

Annual Report 2021/22

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Accessing Cheshire Pension Fund information and services

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Introduction

Welcome to the Annual Report of the Cheshire Pension Fund for the year ending 31 March 2022



This has been another year affected by the Covid-19 pandemic. As a pensions team we have continued to work predominately from home. This has presented some challenges but I am pleased to report that we have continued to deliver our core business and also achieved some important milestones during the year. The pandemic has also provided us with the opportunity to embrace new ways of working for staff members which is providing benefits in terms of work life balance.

We have made significant progress with our pensions improvement programme. This programme seeks to improve both the quality of the data held by the Fund and the level of service we offer to our members. By the end of the financial year over 80% of Fund employers have moved on to our new monthly interfacing system. This allows employers to efficiently submit payroll data to us on a monthly basis. We have also been able to reduce casework backlogs by 40%, as well as increasing the number of Annual Benefit Statements delivered on time.

Work has continued to ensure that we will be ready to put in place the McCloud remedy when details of the proposed approach are confirmed by the Government. The remedy will eliminate historic age discriminatory protections within the Local Government Pension Scheme. In preparation, the Fund has been collecting data from employers so that all cases within the scope of the proposed solution can be processed. In addition, work has continued to develop the Fund's member self-service offering (called 'My Cheshire Pension'). The phased launch across all our membership will begin in early 2023. Please keep an eye out for our communications as we progress this exciting project.

The independent Chairman of the Local Pension Board, along with a member representative and council nominated employer representative, were re-appointed during the year, having completed their term of office. Our Local Pension Board has continued to meet throughout the year, albeit online, providing important assistance and assurance on the operation of the Fund. More information can be found in the Board's Annual Report later in this publication.

As set out in the Fund Accounts on pages 81 to 125, the Fund's investments continued their growth of recent years, increasing in value by over £400m to £7bn by the end of the year. This represented

an investment return for the year of 6.9% compared to the target of 5.8%. Fund investment returns remain ahead of target over three, five and ten years, making a vital contribution to keeping the scheme affordable for our employers.

The Fund has continued to develop its response to the constantly changing Responsible Investment agenda. During the year, the Fund published its second Taskforce on Climate Related Financial Disclosure (TCFD) report. This showed that we are on track to deliver against our ambitious decarbonisation targets and we are committed to delivering net zero emissions across the whole of the Fund's investment portfolio by 2050 at the latest. As a further example of our commitment to tackle climate change, we have committed to invest over £350m in a new Sustainable Equity Fund. This will invest in companies seeking solutions to world's sustainability problems.

Work has continued throughout the year alongside our investment pooling partners in the Central Pool and with LGPS Central Ltd, our jointly owned pooling provider, to transition more assets into the pool. As at the 31 March 2022 LGPS Central Ltd managed £1,348m of the Fund's assets with additional commitments of £671m to follow. These pooled assets, when added to investment assets procured collectively with our partners, total almost 60% of the Fund's total investment assets.

During the year there was one change to the membership of the Pension Fund Committee. After many years of service, Councillor Mike Wharton stepped down and we welcomed Councillor Mark Dennett as his replacement. I'd like to record my thanks to Councillor Wharton for the major contribution he made to the work of the Committee over many years and wish him well in his new role as Leader of Halton Borough Council.

As always, I thank everyone who has worked for, or with the Cheshire Pension Fund over the last twelve months for their support and continued commitment.

Mark Wynn

Chief Operating Officer

Cheshire West and Chester Council

Management and Financial Performance

Scheme Management and Advisors (as at 31 March 2022)

Administering Authority

Cheshire West and Chester Council

The Portal, Wellington Road, Ellesmere Port, CH65 0BA

Cheshire West and Chester Council Officers

Mark Wynn Chief Operating Officer

Steven Wilcock Head of Pension Fund

Vanessa Whiting

Director of Governance and Monitoring Officer

Pension Fund Committee

Councillor Myles Hogg

Cheshire West and Chester Council (Chairman)

Councillor Gareth Gould Cheshire West and Chester Council

Councillor Gina Lewis Cheshire West and Chester Council

Councillor Harry Tonge Cheshire West and Chester Council

Councillor Carol Bulman Cheshire East Council

Councillor Sam Corcoran Cheshire East Council

Councillor Paul Findlow Cheshire East Council

Councillor Amanda Stott Cheshire East Council

Councillor Cathy Mitchell Warrington Borough Council

Councillor Mark Dennett Halton Borough Council (joined May 2021)*

Councillor Mike Wharton Halton Borough Council (left May 2021)*

Paul Matthews Member Representative (GMB)

*In June 2022 Cllr Mark Dennett left the Committee and was replaced by Cllr Mike Wharton

Local Pension Board members

Peter Raynes Chairman (Independent)

Councillor Robert Bisset Employer Representative
(Cheshire West and Chester Council)

Adrienne Laing Employer Representative
(The Challenge Academy Trust)

Geoff Wright Member Representative (UNISON)

Neil Harvey Member Representative (GMB)

Asset Pool Operator

LGPS Central Limited

First Floor, i9, Wolverhampton Interchange, Wolverhampton,
WV1 1LD

Investment Managers

Adams Street Partners UK LLP

4th Floor, 75 Davies Street, London W1K 5JN

Arrowgrass Capital Partners LLP

3rd Floor, 10 Portman Square, Marylebone, London, W1H 6AZ

Baillie Gifford & Co

Calton Square, 1 Greenside Row, Edinburgh, EH1 3AN

Blackstone

The Blackstone Group, 40 Berkeley Square, London, W1J 5AL

BlueBay Asset Management

77 Grosvenor Street, London, W1K 3JR

Darwin Property Investment Management Limited

11 New Street, St Peter Port, Guernsey, GY1 3EG

Janus Henderson Global Investors

201 Bishopsgate, London, EC2M 3AE

Legal & General Investment Management

One Coleman Street, London, EC2R 5AA

Lexington Partners UK LLP

42 Berkeley Square, London, W1J 5AW

M&G Investments

10 Fenchurch Avenue, London, EC3M 5AG

Pantheon Ventures (UK) LLP

10 Finsbury Square, 4th Floor, London, EC2A 1AF

Patrizia UK Ltd

166 Sloane Street, London, SW1X 9QF

Custodian

BNY Mellon Asset Servicing

London Branch, One Canada Square, Canary Wharf, London, E14 5AL

AVC Providers

Scottish Widows (Clerical Medical prior to April 2017)

PO Box 902, 15 Dalkeith Road, Edinburgh, EH16 9AS

Utmost

PO Box 484, Walton Street, Aylesbury, Bucks, HP21 7WW

Standard Life

1 Baileyfield Crescent, Edinburgh, EH15 1ET

Actuary

Hymans Robertson LLP

20 Waterloo Street, Glasgow, G2 6DB

Investment Advisor

Mercer

Belvedere, 12 Booth Street, Manchester, M2 4AW

Legal Advisor

Cheshire West and Chester Council

Director of Governance, The Portal, Wellington Road,
Ellesmere Port, CH65 0BA

Auditors

Grant Thornton

Audit and Assurance, Public Sector, Royal Liver Building,
Liverpool, L3 1PS

Banker

Lloyds Bank plc

Chester Branch, Foregate Street, Chester, CH1 1XP

Scheme Manager

Cheshire West and Chester Council

The Portal, Wellington Road, Ellesmere Port, CH65 0BA

Financial Performance

In the following pages we provide a range of high-level information on the Fund's key financial metrics for the year and commencing with a recap on the results of the last triennial valuation. This is required content as specified by CIPFA (the Chartered Institute of Public Finance and Accounting).

2019 Triennial Valuation

Every three years the Pension Fund is subject to a formal valuation by the Fund Actuary which produces two key outputs.

- Firstly, it quantifies the funding Level i.e. the level to which the Fund's pension liabilities for the accrued benefits of current employees, deferred pensions and pensions in payment are matched by the market value of the Fund's assets. A funding level of less/more than 100% implies that there is a deficit/surplus in the Fund at the valuation date.
- Secondly, it sets the rate at which employers should contribute to the Fund for the following three years.

The formal valuation report by the Fund Actuary, including the minimum contribution rates to be paid by each employer from 1 April 2020 to 31 March 2023 is available on the Fund's website at the following link: **www.cheshirepensionfund.org/members/wp-content/uploads/sites/2/2020/04/200330-CPF-2019-Valuation-Final-Results-Report.pdf**

The table below summarises the funding position of the Cheshire Pension Fund as at 2019 in respect of benefits earned by members up to this date (along with a comparison at the last formal valuation at 31 March 2016).

Summary Valuation Results

	31 March 2019	31 March 2016
Total past service liability (£m)	5,739	4,620
Fund assets (£m)	5,583	4,153
Surplus/(deficit) (£m)	(156)	(467)
Funding level	97%	90%

The main changes highlighted by the 2019 valuation were:

- The reported funding level improved from 90% at 31 March 2016 to 97% at 31 March 2019, and a reduction in the funding deficit from £467m to £156m.
- The improvement in funding position between 2016 and 2019 is mainly due to strong investment performance.
- Liabilities have increased due to a reduction in future expected investment returns and an increase in the assumed rate of future inflation.
- Changes to the longevity assumptions reflecting slowing of the improvement in life expectancy has served to reduce the liabilities.

Fund Account- Comparison of 2021/22 Forecasts to Actual

The table below outlines the Fund's performance for key financial variables against forecast for the 12 months to 31 March 2022.

Fund Account 2021/22	Forecast	Actual	Variance
	£000	£000	£000
Contributions	200,449	193,726	(6,723)
Payments	(196,647)	(200,048)	(3,401)
Admin/Oversight and Governance expenses*	(5,007)	(4,483)	524
Transfers in/(out)	0	(2,721)	(2,721)
Net investment income	34,669	31,873	(2,796)
Investment expenses	(22,850)	(23,102)	(252)
Change in market value	139,157	423,669	284,512
Net increase in the fund	149,771	418,914	269,143

*During the year the Pension Fund Committee endorsed a temporary budget uplift for Administrative and Oversight and Governance expenses of £276k from £4,731k to £5,007k as a result of a new IT contract award and work to move the pensions administration database over to cloud hosting.

Operational Expenses – Comparison of 2021/22 Forecasts to Actual

	Forecast	Actual	Variance
	£000	£000	£000
Administration/Oversight and Governance			
Employees	2,009	1,900	(109)
LGPS Central running costs	1,227	1,036	(191)
Supplies and Services	753	633	(120)
Actuarial Fees	234	207	(27)
Investment Advisor Expenses	154	154	0
IT Costs	438	340	(98)
Printing and Postage	66	66	0
External Audit Fees	51	63	12
Legal Fees	75	84	9
Total	5,007	4,483	(524)
Investment Management			
External Fund Managers	22,737	22,947	210
Custodian	113	155	42
Total	22,850	23,102	252

Administration/Oversight and Governance costs were £0.524m less than forecast primarily due a reduction in year to LGPS Central running costs, delays in regulatory changes and project work as a result of Covid-19 and delays in implementing the move to hosted IT services which is now expected to take place 2022/23.

LGPS Central Set Up Costs

	Cumulative to 31/03/2018
	£000s
Set up Costs:	
Recruitment	27
Procurement	2
Other support costs	284
Staff Costs	142
Other Costs	59
Share purchase costs	1,315
Loans	685
Total set up costs	2,514

LGPS Central Ltd, the pooling delivery company was fully set up by 31 March 2018 and no further set up costs have been incurred from 1 April 2019.

Forecast for 3 Years – 2022/23 to 2024/25

The following tables show the forecasts for the Fund Account and Net Assets Statement for the three years to 31 March 2025 based on the most up to date information.

Note: The budgets have been restated to incorporate increases resulting from changes to the staffing structure, additional costs associated with running the asset pool and costs associated with operational developments within the Fund.

Forecast Fund Account for 3 Years – 2022/23 to 2024/25

	2022/23	2023/24	2024/25
	£000	£000	£000
Contributions	194,500	195,650	196,350
Payments	(214,051)	(224,754)	(235,991)
Admin/Oversight and Governance expenses	(5,217)	(5,305)	(5,158)
Net investment income	33,020	33,806	34,838
Investment expenses	(24,593)	(26,148)	(27,888)
Change in market value	125,130	160,336	169,572
Net increase in the fund	108,788	133,585	131,723

Note: Contributions and payments are based on current expectations; administration and investment management expenses are based on current budgets, and net investment income and change in market value are based on the long-term forecast returns for each asset class held.

The forecasts for total investment assets are based on the actual allocations at 31 March 2022 figures multiplied by the forecast returns for each asset class as provided by the Fund's investment advisor.

Three Year Forecast Management Expenses – 2022/23 to 2024/25

	2022/23	2023/24	2023/24
	Restated	Restated	
	£000	£000	£000
Administration/Oversight and Governance			
Employees	2,080	2,183	2,228
Asset Pool running costs	1,354	1,381	1,409
Supplies and Services	898	929	666
Actuarial Fees (See Note 1)	263	165	182
Investment Advisor Expenses	153	157	162
IT Costs	272	286	300
External Audit Fees	52	55	57
Printing and Postage	75	77	79
Legal Fees	70	72	75
	5,217	5,305	5,158
Investment Management			
External Fund Managers	24,438	25,988	27,723
Custodian	155	160	165
Total	24,593	26,148	27,888

1. Actuarial fees in 2022/23 are higher due to this being a valuation year.

Analysis of Pension Contributions

The table below shows the value of primary pension contributions received on time and late.

	Total	On Time		Late	
	£000	£000	% (by value)	£000	% (by value)
Employee	41,507	41,330	99.57%	177	0.43%
Employer	152,219	151,572		647	
Total	193,726	192,902		824	

The Fund classes contributions income as being received on time when it is received within 22 days (if received electronically), commencing from the end of the month in which the amount is deducted from the earnings. Contributions received over 22 days are classed as late.

No interest charges were applied to employers during the year as a result of late payments.

The Fund continues to monitor the timeliness of contribution receipts from all employers and will charge a mandatory penalty when an employer breaches on three or more occasions over a six-month rolling period. Material (Red) breaches will also be reported to The Pensions Regulator.

In total the Fund recorded 40 late payments of contributions on the Breaches Log in 2021/22. The majority of these relate to employers who have small numbers of staff and so are easily affected by unexpected staff absences. These breaches were all green status and have been quickly rectified by the employer.

Pension Overpayments

The Cheshire Pension Fund pays around 30,000 pensioners every month, with a monthly gross payroll in excess of £13 million. With such a large volume of pensioner payments, it is inevitable that there will be times when a member has been receiving more pension than they are entitled to.

Wherever possible the Fund will recover any overpayment and will only write off an overpayment as a last resort when all other avenues have been exhausted.

Analysis of Pension Overpayments

	2021-22	2020-21	2019-20	2018-19	2017-18	2016-17	Total
	£000	£000	£000	£000	£000	£000	£000
Overpayments Recovered	67	55	132	26	34	49	363
Overpayments written off							
Written off due to death	18	17	6		3	2	46
Annual Pension Payroll	165,183	161,135	155,722	148,638	141,304	136,864	908,846
Write offs as % of payroll	0.010%	0.010%	0.003%	0.00%	0.002%	0.001%	

National Fraud Initiative

The Fund participates in the National Fraud Initiative (NFI), which is an exercise that matches electronic data within and between public and private sector bodies to prevent and detect fraud.

The NFI is biennial with the last initiative being in 2020/21. It identified only twenty-one cases that required investigation. Following initial investigation, twelve cases show an overpayment was made and further action was taken as follows:

- In five cases overpayments were recovered
- The Fund is liaising with the relevant parties to recover the other seven overpayment cases.
- Of the remaining nine cases the fund is liaising with the General Registry Office to obtain death certificates as we haven't been able to obtain these from the local registry office. Potentially these cases may all have overpayments.

Investigation procedures involve writing to members where a mismatch is identified, performing DWP traces on members that cannot be contacted or writing to registrar offices to confirm and obtain a copy of the death certificate. Overpayments recovered or written off as a result of the National Fraud Initiative are included in the pensions overpayments table above.

Administration Report

The team have continued to work from home for the majority of the year in line with national and local pandemic guidance. Some staff members did make an initial return to the office in late 2021 early 2022 but had to revert to working from home due to the omicron variant.

We intend to have some staff working from the office from the Spring/Summer of 2022 and that will allow us to reopen our telephony helpdesk for those members who cannot find the answer to their query on our website.

The Fund is working to the Council's Modern Workforce strategy which means the majority of staff will continue to work from home and will attend the office where necessary to meet business needs which are better achieved in person.

After two years of largely working from home staff members are now used to conducting their business virtually and use Microsoft Teams to hold all meetings, including keeping in touch with colleagues and delivering/receiving training.

Over the past two years improvement to the Fund's website have increased the ways that our members can engage with us digitally and we will continue to develop these options into the future.

We continue to use the services of Civica Mail for off site printing which has reduced the need for staff members to attend the office to print and post documents to members. The Council owned company Qwest Services are also continuing to provide scanning services for post received.

Pensions Programme

Work on the Pensions Programme has continued throughout the year with some notable achievements having been reached.

The programme and project management resources that were put in place last year have helped us to develop clear plans and milestones which in turn have meant that we have been able to make considerable progress in a number of key areas.

For Monthly Interfacing (MI), 80% of employers had moved onto the system by year-end with the remaining 20% due to be moved on to MI early in 2022/23.

The backlog of administration casework has been reduced by circa 40% with a plan to clear a further 13% during 2022/23. The pace of reducing the backlog will accelerate thereafter as more staff will be trained and the Fund will have made significant progress with data cleansing work which will be occupying capacity in 2022/23.

A data improvement plan to tackle areas for improvement relating to data quality has been produced with targets to clear the majority of data issues during 2022/23. This will assist in the preparatory work required to comply with pensions dashboard in 2023/24.

A programme of training has been ongoing throughout the year to multi skill staff members within the operations area to both increase the number of staff available to process different types of casework and to allow the Fund to flex resources in line with demand. Further training will continue into 2022/23.

An outcome from the pensions programme overall will be an improved service for our customers and increased value for money.

Regulatory Changes

McCloud

The McCloud judgement, as it is known, refers to the case in which the Supreme Court found that transitional protections introduced in the firefighters' and judges' pensions schemes in 2015 were age discriminatory to younger workers.

Similar protections were introduced in other public sector schemes, including the LGPS, and the Government confirmed the ruling applies to those schemes as well.

There has been little movement on McCloud in the past year, other than the Public Service Pensions and Judicial Offices Bill 2022 received Royal Assent on 10 March and is now an Act of Parliament. The Act provides the regulatory powers necessary to resolve the discrimination identified in the McCloud case and so LGPS regulations can now be amended. However, the LGPS regulations will not be amended until October 2023.

McCloud has been billed as the biggest challenge to face the LGPS since the scheme was changed to a Career Average Revalued Earnings (CARE) Scheme in 2014.

We still await a further consultation on how the McCloud remedy will be implemented for the LGPS which we expect to receive in the autumn of 2022. The information provided so far suggests that LGPS administrators will need to undertake two calculations for affected members to determine which set of regulations members are better off under. This is likely to require us to revisit a considerable number of benefit calculations dating back to 2014. No benefits in payment will be reduced but some may be increased (with payment back dated) depending on personal circumstances.

In the meantime, we are continuing to focus on preparing for this change in a number of ways:

- All employers have been contacted to supply the necessary part time hour changes and service history information for all members between 1 April 2014 and 31 March 2021. The information for the year 1 April 2021 to 31 March 2022 will be collected through the Monthly Interfacing System.
- Additional resources have been deployed to create capacity to maintain service delivery and address the historic recalculations workload needed for McCloud.
- Working with the pensions administration database provider to maximise the functionality that can be deployed to assist with this major project.

Meeting the McCloud remedy requirements will be managed through the Pension Programme described above, including a detailed plan so this project can be managed effectively alongside other work pressures.

Exit Cap £95k

In the autumn of 2020, HM Treasury introduced the Restriction of Exit Payment Regulations which introduced the public sector exit payment cap. This was an overall limit to the amount that an employer could pay to an employee, or to a pension scheme in respect of that employee, when they left their employment. The cap was set at £95,000.

Following widespread feedback, the Restriction of Exit Payment Regulations were subsequently revoked in early 2021 and a further consultation on the reform of exit payments, originally expected during 2021/22, is now expected during 2022/23.

Data Quality

Enhancing data quality has continued to be a key focus area and progress is closely monitored by the Local Pension Board.

Annual Benefit Statements (ABS)

Building on the progress we made last year further data quality work has been undertaken this year resulting in a further increase in the number of members receiving their Annual Benefit Statement (ABS) on time – i.e by 31 August each year.

In 2021 we issued over 30,500 active members their ABS, representing 91% of eligible members. This compares to 90% in 2020 and 85% in 2019.

Since August 2021, we resolved a considerable number of outstanding data queries with employers and issued a further c1,950 members their ABS.

Most of the members who did not receive an ABS have since been shown to have left the Fund prior to 31 March 2021 and so were not actually eligible to receive an ABS. Employers have been contacted about these members to obtain the necessary leaving information.

In addition to the sending out an ABS to active members, we also issued statements to 95% (87% in 2020) of eligible deferred members by the statutory deadline of 31 August. There were 1,400 deferred members who did not receive their ABS simply because we had not been provided with a current address for those members. During the year we commissioned a new contract for the services of a tracing company who are now locating the remaining members so we can reconnect them with their LGPS Benefits.

The Pensions Regulator (TPR) – Data Scores

We are required to provide data scores to TPR on an annual basis as part of the scheme return. The scores which have been submitted for the past three years are shown in the table below:

	TPR Scheme Return		
	1-Sep-19	25-Sep-20	1-Nov-21
Common Data	98.07%	98.73%	98.95%
Scheme Specific Data	74.18%	74.01%	80.09%

Common data relates to information such as name, address, national insurance number etc. and the Fund is almost at 100% for this information. Deferred members who haven't notified us of a change in their address and we haven't yet traced, largely account for why the data score is not 100%.

The Scheme Specific Data (SSD) Score reflects information specific to a member and needed to process their benefits such as a member's active or deferred status or events that have taken place during membership.

The Fund scores for 2019, 2020 and 2021 are based upon its own 'foundation' approach to the data it should measure. This centred around the service history available for each member and the 'foundation' approach to measuring data was approved by the Local Pension Board. Again, the scores have improved because of the data quality work undertaken over the past twelve months.

Going forward, we will measure data quality scores using reports developed by the Fund's administration database provider reflecting a definition of SSD provided by the LGPS Scheme Advisory Board. The new report includes additional data checks which verify each item of data is present. The changed reporting methodology will make comparisons across past years more difficult but will provide a good baseline for future comparisons.

Technology and Pensions Administration System Development

We use the Universal Pensions Management (UPM) pensions administration software supplied by Civica, utilising benefits calculation, task management, document imaging, document production and workflow functionality.

During the year Civica were re-appointed as the Fund's database provider following a procurement exercise using the National LGPS Framework for pensions administration software. The new contract will run until March 2029.

We are working with Civica to transition to a cloud hosted solution for the database in the summer of 2022 and will also introduce functionality which will provide self-service functionality for our members in early 2023.

Ongoing developments will also seek to maximise the benefits that the administration database can provide in terms of automating processes and increasing engagement channels with stakeholders. This will provide value for money by both speeding up the processing of casework and freeing up capacity within the team to concentrate on more complex casework and administration casework backlogs.

The Pension Fund has a dedicated website www.cheshirepensionfund.org which provides information on all aspects of the LGPS and has dedicated sections for the Fund's customer groups - including active members, deferred members, pensioners, councillor members and employers. It also contains key publications such as policy statements and a back collection of annual reports.

The Fund's approach to communication is set out in the Communications Policy Statement section of this report and provides an overview of how the Fund will communicate with its customers (members and employers) and stakeholders. During the year we appointed a new Communications Manager who is refreshing and strengthening our communication channels. An updated communications strategy will be published during the summer of 2022.

Member Engagement

Each year we would typically run a series of roadshows, held across the Fund's geographic area throughout the year and provide an opportunity for both existing and potential members of the Fund to raise queries and ask questions about their pension on a 'drop in' basis.

Unfortunately, due to the Covid-19 pandemic these face to face roadshows could not take place. However, as part of the new communications strategy the Fund is looking at the service which can be made available for members.

Key Performance Data

The tables below summarise our performance in processing key casework over the year and have been produced in line with CIPFA (Chartered Institute for Public Finance and Accountancy) guidance. The information captures data in two formats:

1. Number of cases completed for each category during the year, including opening and closing balances for that year.
2. Outlining compliance against local key performance indicators and against disclosure regulation requirements.

The Local Pension Board receives quarterly updates on administrative performance, and this will continue.

Table 1: Casework activity in the year

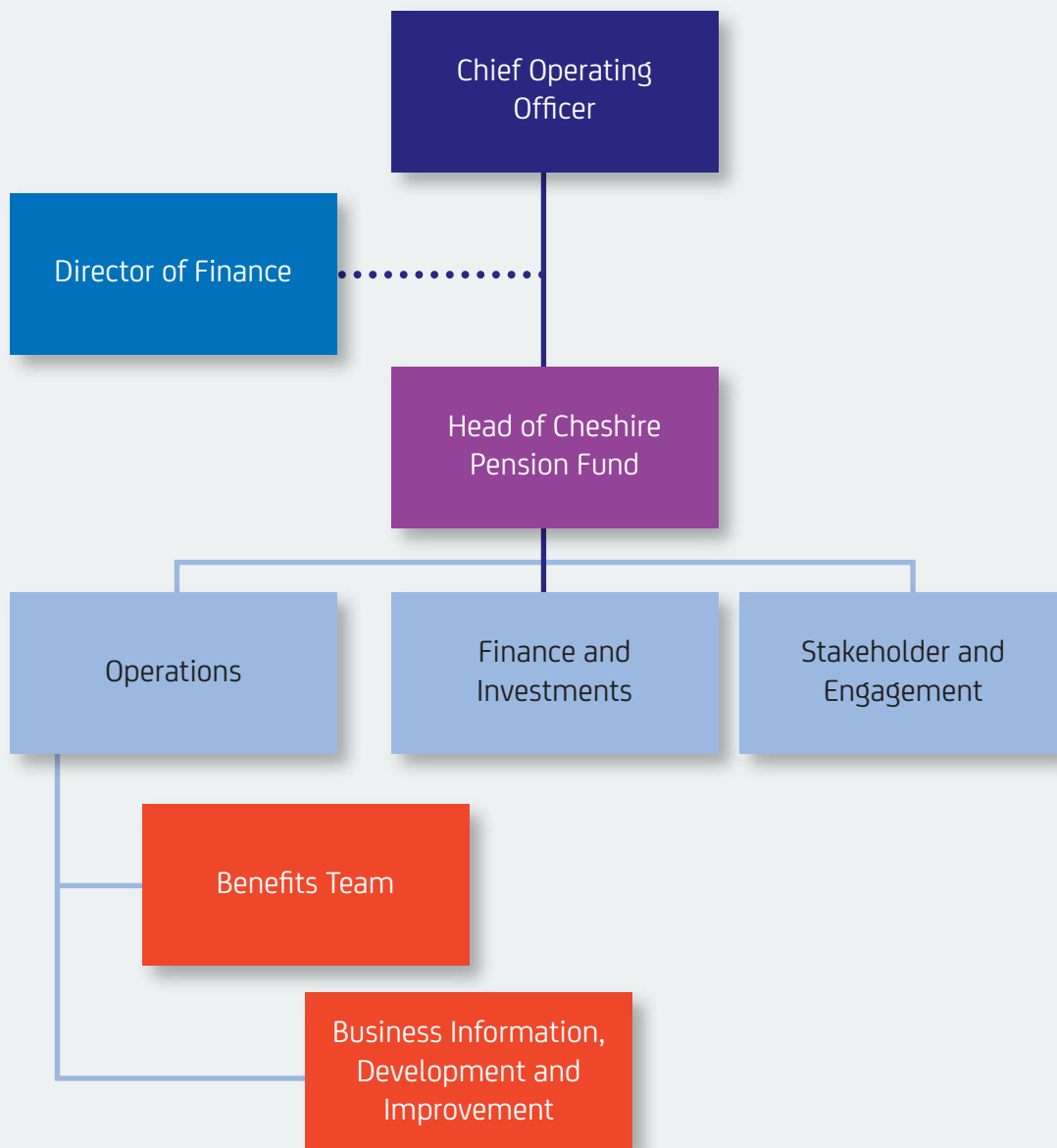
		2021/22			
Casework Type	Completed 2020/21 Cases	Cases Outstanding as start of period	Cases commenced in year	Cases completed in year	Cases outstanding at year end
Deaths	1,524	217	1,396	1,397	216
Retirement Estimates	6,708	1,150	8,062	8,491	721
Retirements	4,092	105	3,572	3,419	258
Deferments	5,647	2,207	4,110	4,114	2,203
Transfers In	926	681	1,174	1,182	673
Transfers Out	1,662	517	2,071	2,025	563
Joiners	1,924	319	1,459	1,610	168
Aggregation	2,945	8,273	3,627	2,417	9,483
Refunds	1,954	446	2,227	2,379	294
Leavers	6,060	2,167	7,864	8,055	1,976
Totals	33,442	16,082	35,562	35,089	16,555

Table 2: KPI Performance in year

	Local KPI Target	Achieved	Cases Completed within KPI	Legal Requirement from notification	Achieved
	No. of Days	%			%
Deaths (Active)	5	92	35	2 Months	97
Deaths (Deferred)	5	99	71	2 Months	99
Deaths (Acknowledgement)	5	95	822	2 Months	98
Deaths (Dependant Benefit)	10	92	722	2 Months	98
Retirements (Active members)	5	87	986	2 Months	100
Retirements (Deferred members)	5	88	986	2 Months	100
Deferment	30	96	3,389	2 Months	98
Transfer In	10	90	251	2 Months	100
Transfer Out	10	89	324	2 Months	100
Refunds	10	80	872	2 Months	97

Pensions Staffing Structure

The Pensions Team reports to the Chief Operating Officer of Cheshire West and Chester Council and is responsible for the day to day management of the Fund, including the administration of scheme membership. A diagram below summarises the team structure:-



The main responsibilities of the three teams are:

- **Operations Team** – which is further split between two teams:
 - **Benefits Team** – responsible for the calculation of retirement benefits, early leavers, deceased members, transfers for divorced members, and transfers in and out of the fund and arranging additional contributions contracts.
 - **Business Information, Development, and Improvement Team** – responsible for maintaining the pension's administration database, research and delivery of the development roadmap and providing support to staff members in the most efficient use of the pensions database. The team are also responsible for the production of reports to satisfy all statutory and operating requirements, and to assist in continually improving the data held by the Fund.
- **Stakeholder and Engagement Team** – responsible for processing scheme admissions and cessations, notifying new employers of their responsibilities to the Cheshire Pension Fund, organising dates for training to new employers and managing the Fund's communication strategy.
- **Finance and Investments Team** – responsible for the management of investments and production of the Statement of Accounts.

Work is continuing to multi skill staff on a wider variety of tasks so that we can achieve a more resilient workforce that can provide value for money and an improved service for our customers. There are 52 (52 in 20/21) full time equivalent (FTE) posts in the Pensions section. We may increase the staffing establishment during the coming year to provide the capacity to support the outcomes required from the pensions programme and to deal with future challenges from changes in regulations and best practice guidance.

Unit Cost Per Member

The table shows the main categories of Fund costs in total each year and by member over the five years since April 2017. Total membership has increased by 11% over the 5 years, total costs have reduced by 10%.

Process	2017/18	2018/19	2019/20	2020/21	2021/22
Total Membership (Number)	96,825	99,848	103,486	105,694	107,882
Investment Management					
Cost (£000)	27,466	24,366	21,978	22,532	23,102
Per Member (£)	284	244	212	213	214
Administration					
Cost (£000)	2,147	2,188	1,981	2,226	2,627
Per Member (£)	22	22	19	21	24
Oversight and Governance					
Cost (£000)	1,213	1,271	2,151	2,030	1,856
Per Member (£)	13	13	21	19	17
Total Costs (£000)	30,826	27,825	26,110	26,788	27,585
Total Cost Per Member (£)	318	279	252	253	255

Membership and Employer Movement and Scheme Complexity

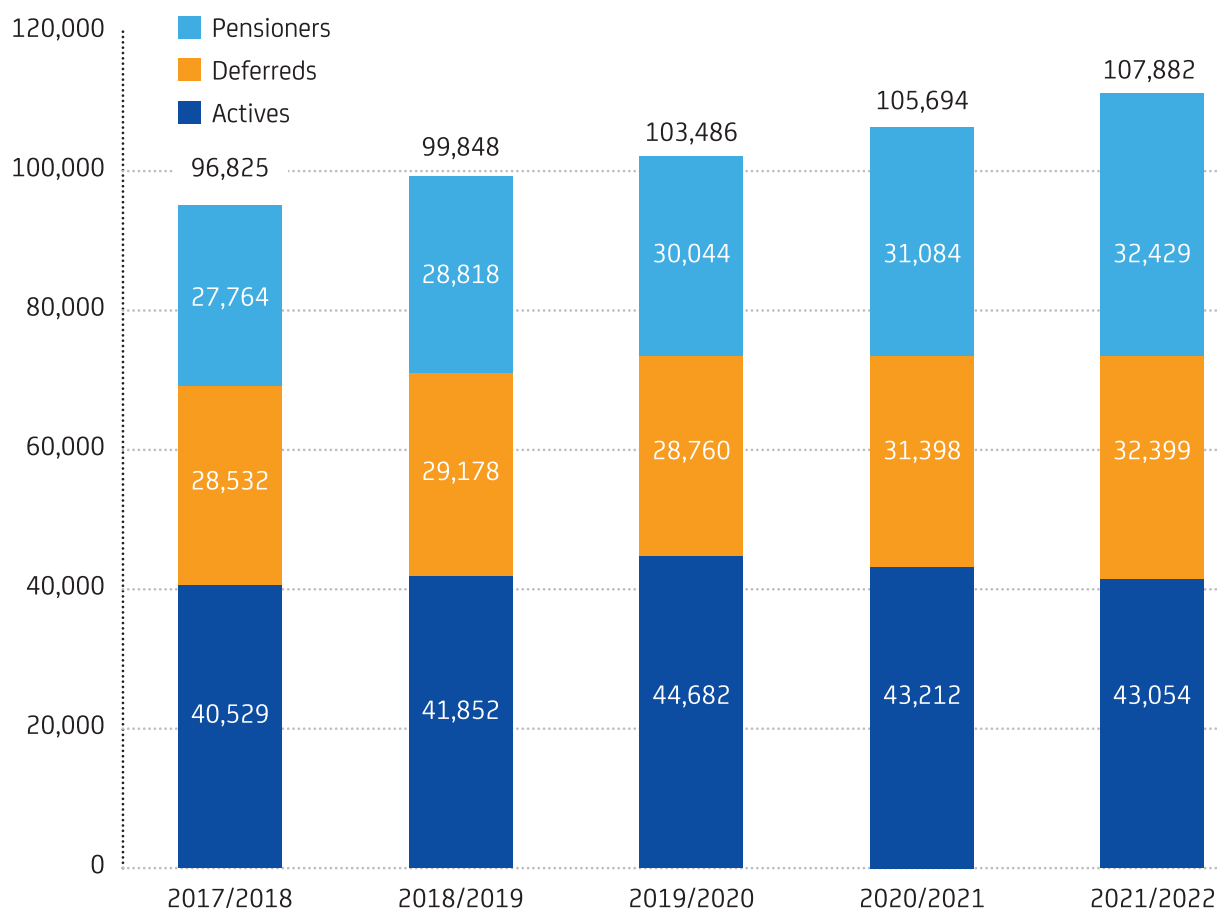
Membership numbers have increased year on year for both deferred and pensioner members. There has been a slight year on year reduction in active membership as the Fund continues to work through casework to combine member records where required.

The table and chart below show the membership movements for the past five years.

Membership	2017/18	2018/19	2019/20	2020/21	2021/22
Active	40,529	41,852	44,682	43,212	43,054
Deferred	28,532	29,178	28,760	31,398	32,399
Pensioners	27,764	28,818	30,044	31,084	32,429
Total Membership	96,825	99,848	103,486	105,694	107,882

Membership and Employer Movement and Scheme Complexity

The Fund continues to experience a year on year increase in the number of members. In addition the number of Employers in the Fund also continues to grow as the tables below illustrate.



The number of Employers participating in the Fund also continues to grow as the table below illustrates.

	2017/18	2018/19	2019/20	2020/21	2021/22
Number of Employers (who paid contributions during the year)	283	290	305	308	321

The increase in membership and number of employers adds to the already challenging workload of the Fund. This is compounded by the increased complexity of the scheme with the introduction of CARE in 2014 which now means that the Fund is effectively managing 3 separate benefit structures as summarised below:

Pre April 2008	April 2008 to March 2014	April 2014 on
Membership based	Membership based	Earnings based
Final Salary link	Final Salary link	Career Average Revalued Earnings
1/80 th accrual	1/60 th accrual	1/49 th accrual
3/80 th Mandatory Lump Sum	Convert pension for lump sum 1:12	Convert pension for lump sum 1:12

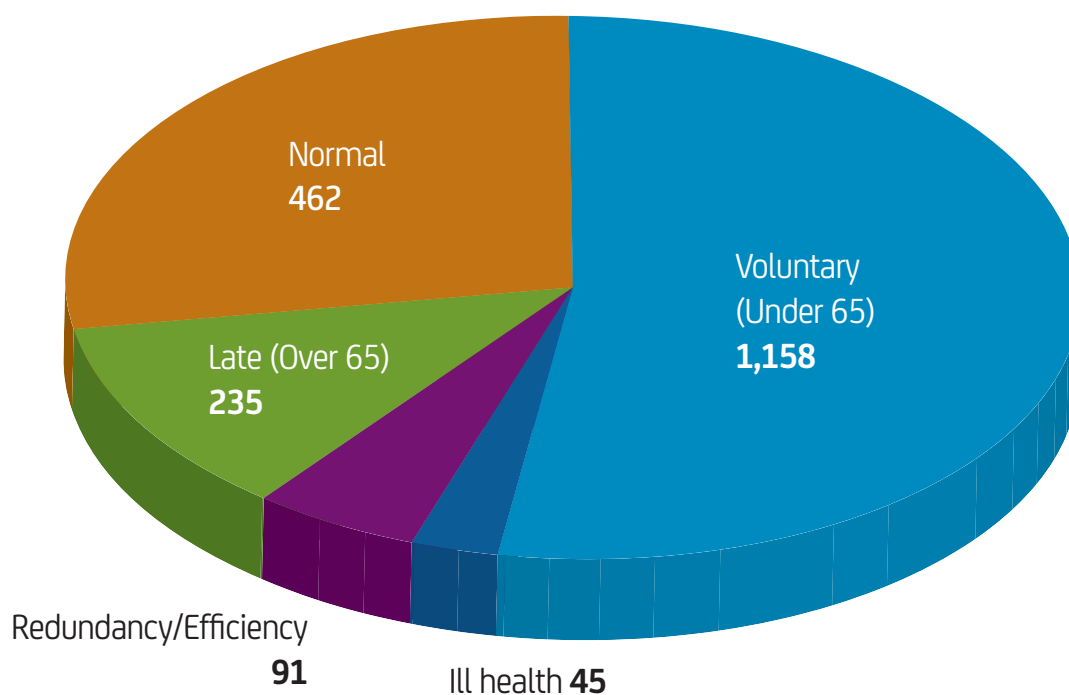
Fund's Membership demographic

The table below summarises the age ranges of the membership at the end of 2021-22 over the three categories of Active, Pensioner and Deferred.

	Active		Pensioner		Deferred	
Age Group	Number	%	Number	%	Number	%
0 -5	0	0.01	8	0.02	0	0.00
6 - 10	0	0.00	22	0.07	0	0
11-15	0	0.00	69	0.21	0	0
16-20	240	0.56	99	0.31	5	0.02
21-25	1,763	4.09	28	0.09	218	0.67
26-30	3,146	7.31	4	0.01	1,078	3.33
31-35	3,870	8.99	4	0.01	2,396	7.40
36-40	4,691	10.90	8	0.02	3,585	11.07
41-45	5,382	12.50	31	0.10	4,283	13.22
46-50	5,971	13.87	77	0.24	5,280	16.30
51-55	5,611	13.03	103	0.32	5,402	16.66
56-60	7,424	17.24	1,808	5.58	7,652	23.61
61-65	3,658	8.49	5,749	17.74	2,171	6.70
66-70	1,009	2.34	7,439	22.93	268	0.83
71-75	238	0.55	6,941	21.39	57	0.18
76-80	25	0.06	4,620	14.25	3	0.01
81-85	16	0.04	2,790	8.60	1	0.00
86-90	9	0.02	1,706	5.26	0	0.00
91-95	1	0.00	714	2.20	0	0.00
96-100	0	0.00	180	0.56	0	0.00
101-105	0	0.00	28	0.09	0	0.00
106-110	0	0.00	1	0.00	0	0.00
Totals	43,054	100	32,429	100	32,399	100

Retirements during 2021/22

There were 1,991 retirements during 2021/22 as summarised in the chart below:



Internal Dispute Resolution Procedure

There are times when Scheme members, employers and the Administering Authority may find themselves in disagreement about a pension issue. The first approach in these situations is for those involved to talk to each other to reach a resolution. However, should this not prove possible, the Fund has established an Internal Disputes Resolution Procedure (IDRP).

The IDRP is a two stage process. When the Fund or an Employer makes a decision about a beneficiary's benefits under the LGPS rules, if for any reason a member, pensioner, deferred pensioner or potential beneficiary is not satisfied about a decision made they can apply to the employer or the Fund to have their complaint reviewed under a stage 1 of the IDRP.

If the beneficiary is dissatisfied with the stage 1 decision they may invoke stage 2 of the IDRP within 6 months of the stage 1 decision.

If after the stage 2 decision the beneficiary is still dissatisfied, they can contact The Pensions Ombudsman (TPO) for help when dealing with a complaint.

Fortunately such instances are few and far between as most issues are settled locally. In the last year there have been nine IDRP cases, two of which have been stage 1 cases which have moved onto stage 2 cases. Of the nine IDRP cases, five were against an employer, none were upheld and two are awaiting an outcome. Four cases were against the Fund, two have been upheld, one was not upheld and one is awaiting an outcome.

Investment Policy and Performance

Investment Management

Management of Cheshire Pension Fund's assets is determined within the context of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 (the "Regulations").

The regulations require the Fund to publish its Investment Strategy Statement which documents the current investment strategy, provides transparency in relation to how the Fund's investments are managed and acts as a high level risk register. This document can be found on the Fund's website and provides further detailed information about how the Fund manages its assets.

In summary, the Fund groups all of its employers into one of four groups: Open, Academies, Closing and Closed. Each employer group can then be allocated to an appropriate investment strategy which gives the constituent employers access to an investments strategy that meets their long-term funding objectives.

The appropriateness of the investment strategy to the needs of each employer group is kept under review and where necessary different strategies will be developed and implemented. This ensures that each of the Fund's 457 scheme employers (321 employers who contributed to the fund in year) has access to an investment strategy that meets their long-term funding requirements.

Each investment strategy has a strategic asset allocation, which targets the required long term rate of return, whilst ensuring that the portfolio maintains an acceptable level of risk and an appropriate level of diversification. The strategic asset allocation is formally reviewed every three years alongside the actuarial valuation. It is considered and endorsed by the Pension Fund Committee after taking advice from the Fund's professional advisers.

In September 2021 the Committee endorsed the following changes within the Open and Academies employer group's strategic asset allocation model:

- To provide a new 7.5% allocation to private debt
- To decrease the allocation to property from 10% to 7.5%
- To decrease the allocation to gilts from 30% to 25%

A further change was then agreed by the Investment Sub-Committee in May 2022 to be applied from 31 March 2022 for the academies employer group only:

- To increase the allocation to infrastructure from 5% to 7.5%
- To increase the allocation to private equity from 5% to 7.5%
- To decrease the allocation to gilts from 25% to 20%

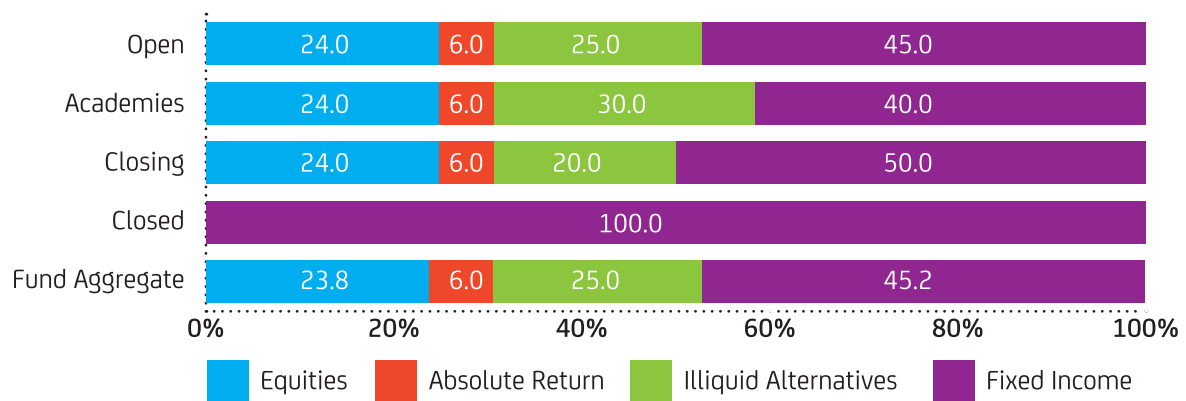
No changes were made to the strategic asset allocation for Closing or Closed Employer groups in the year.

Further details on the Fund's revised investment strategy, responsible investment policy, risk management strategy and governance arrangements are available on the Fund's website.

www.cheshirepensionfund.org

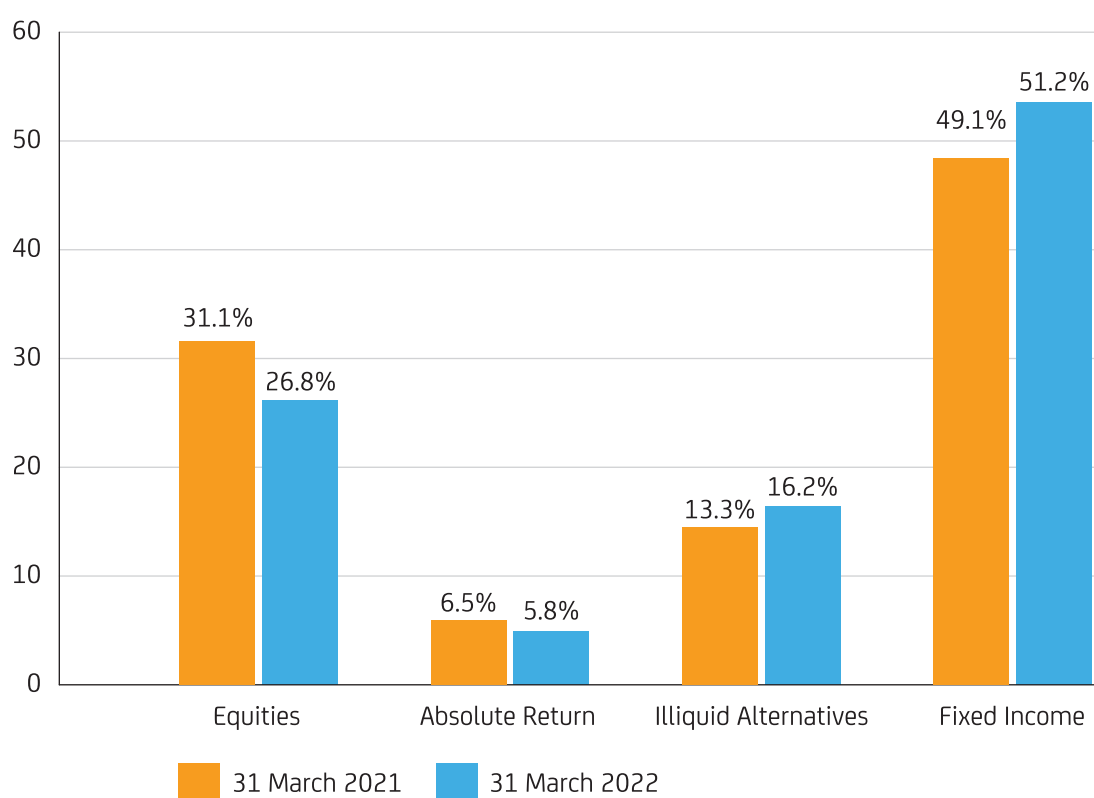
Strategic Asset Allocation

The strategic asset allocation for each investment strategy is shown in the chart below, alongside a weighted aggregated asset allocation at whole fund level. The strategic asset allocations following the changes endorsed by the Committee in September 2021 and May 2022 are shown below:

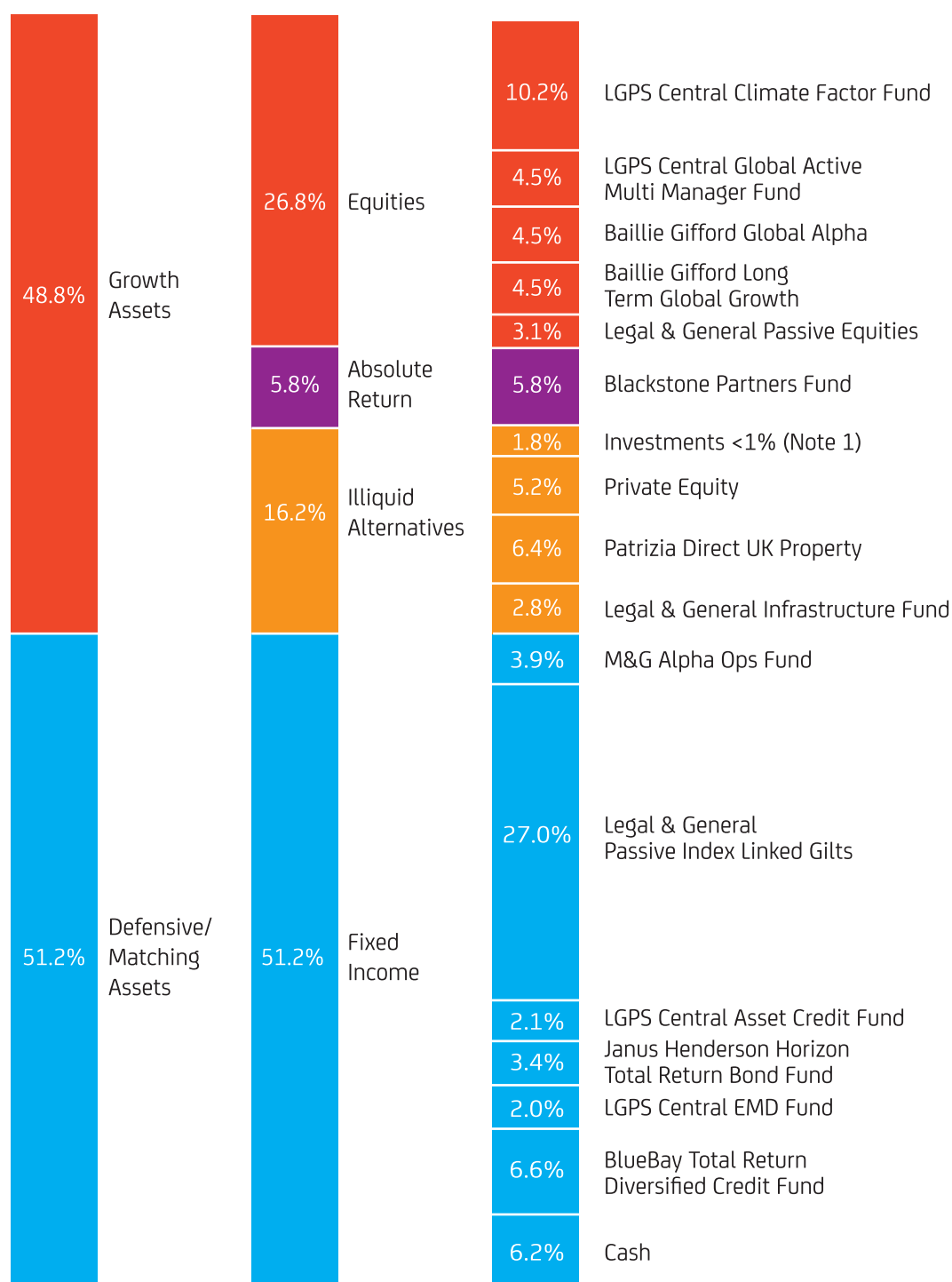


Actual Asset Allocation

The market value of the Fund's investments, cash and other assets, as at 31 March 2022, was £6.959 billion, compared with a value of £6.540 billion as at 31 March 2021. The chart below shows the distribution of assets across the main investment categories. These change year on year as a result of changes to the strategic asset allocation, the performance of the underlying asset classes and managers, and rebalancing across managers and asset classes.



The detailed distribution of assets by category and by manager at 31 March 2022 is set out in the following chart.

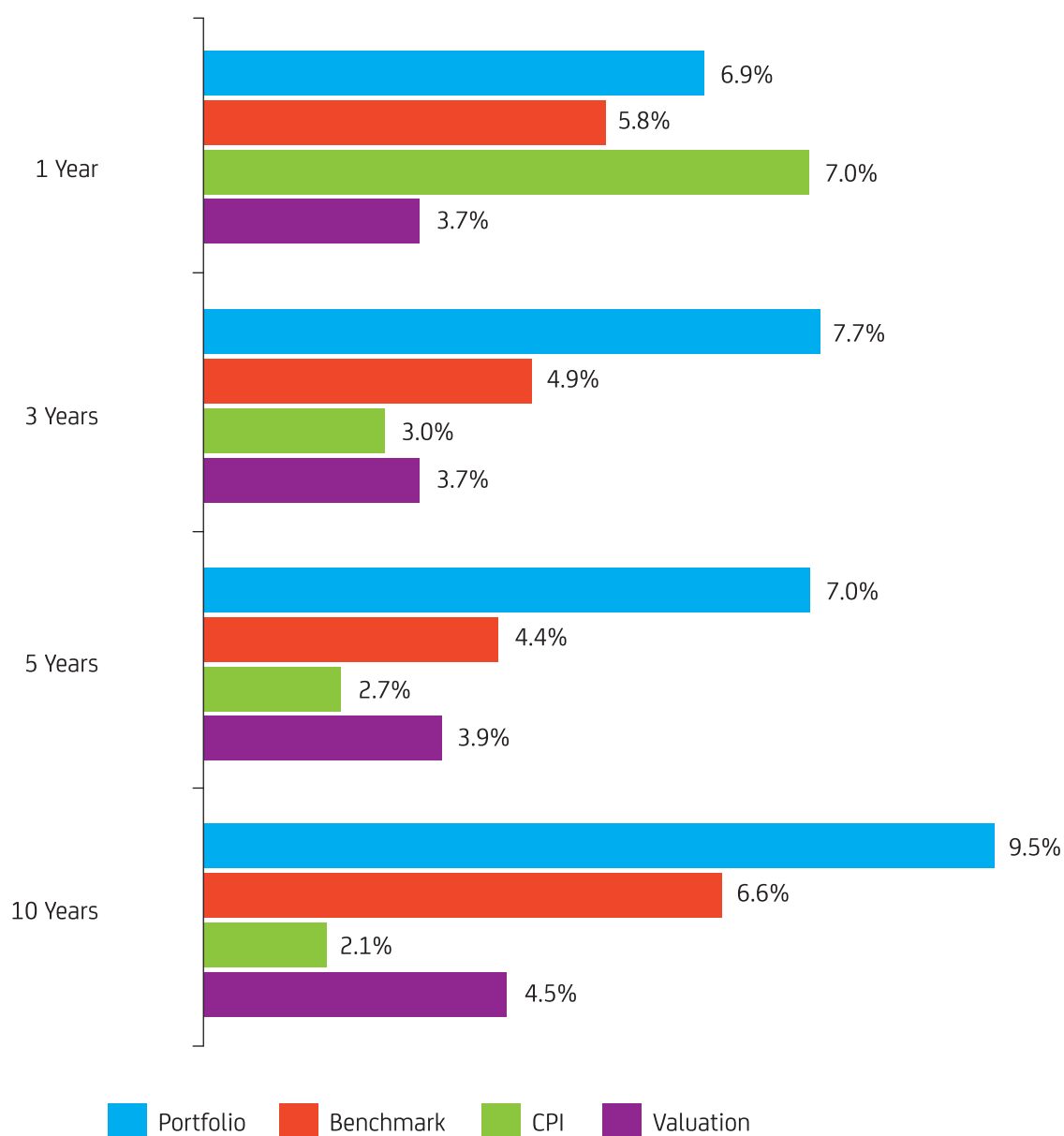


(Note 1) Investments which make up less than 1% of the funds total assets include:

Darwin Leisure Fund	LGPS Central Credit Partnership II
Darwin Property Development Fund	LGPS Central Infrastructure Core Fund
Darwin K Class	LGPS Central Infrastructure Value Add/Opportunistic Fund
Arrowgrass Capital Partners	

Investment Performance

The Fund uses a tailored strategic benchmark that reflects its specific asset allocation. The following chart shows the performance of the Fund relative to its strategic benchmark, inflation (CPI) and the return assumption used by the Actuary as part of the triennial valuation. Returns for periods of greater than 1 year are annualised.



Appointed Investment Managers

The Fund utilises external investment managers to undertake the day to day management of the Fund's assets. Each manager has a specific benchmark and performance target against which their performance is regularly monitored. The aggregation of each underlying manager's performance provides the total fund return as shown above. Rolling 3 year performance for each investment manager is shown in the table below, alongside the relevant benchmark. The right hand axis and green line shows the % of assets held by each manager at 31 March 2022.



Notes: Excludes contributions from Managers who are no longer used or are in the process of disinvesting (at 31 March 2022).

Where a manager/mandate has been in place for less than 3 years, annualised return since inception is used. All returns are annualised.

The following table provides further details in relation to each investment manager.

Manager/Mandate	Description	Benchmark	Performance Target per annum	Inception
Baillie Gifford Long Term Global Growth	Active global equities	FTSE All World Index	b/m +3%	2005
Baillie Gifford Global Alpha	Active global equities	MSCI All Countries World	b/m +2%	2011
LGIM Equities	Passive global equities	RAFI Fundamental Global Carbon Neutral Net Index	Track index	2022
LGPS Central Ltd	Passive global equities	FTSE All World Climate Balanced Comprehensive Factor Index	Track index	2019
LGPS Central Ltd	Active global equities	FTSE ALL World Index	b/m +1.5%	2019
Private Equity - Various	Private Equity fund of fund and direct	LIBID	10%	2003
Janus Henderson	Total return fixed income	SONIA	4%	2012
Bluebay	Multi asset credit	SONIA	5-10%	2015
M&G Alpha	Multi asset credit	SONIA	b/m +3-5%	2018
LGPS Central Ltd	Multi asset credit	3 month SONIA GBP	b/m +4%	2021
LGPS Central Ltd	Emerging Market Debt	JP Morgan EMBI Global Diversified Index	b/m +1%	2021
LGIM Gilts	Passive index linked gilts and fixed gilts	FTSE A Index-Linked > 5 Years	Track index	2013
LGIM - Infrastructure Equity	Passive Infrastructure Equity	FTSE Developed Core Infrastructure Index	Track index	2020
Patrizia	UK direct property	BNY Property Median	Main portfolio 6.5%, Index linked portfolio CPI +1.5%	1988
Blackstone	Fund of hedge fund	CPI	b/m +5%	2016

The above tables provide information on those managers that manage fund assets >2%. The Fund is in the process of divesting from Arrowgrass. The Fund also has small allocations with three Darwin Leisure Investment Funds.

The private equity mandate is managed by Pantheon Ventures, Adams Street Partners and Lexington. The Fund has also committed £82m to four LGPS Central Ltd private equity funds.

Investment Fees

The Fund is committed to transparency in relation to the fees it pays to investment managers. It believes that it is important to assess the value delivered by asset managers by evaluating fees in relation to investment performance. The table below shows the fees paid to managers in each asset class, including those underlying fees that the Fund is not required to report in the Statement of Accounts.

	Management Fees (£000)	Performance and Other Fees (£000)	Underlying fees within Fund of Fund Structures (£000)	Total Fees inc. Underlying (£000)	Estimated 12 Month Performance	Net Impact on Asset Value of Investment Returns, minus all fees (£)
Pooled Investment Vehicles	8,614	17	157	8,788	+6.6%	+276m
Equities	4,514	3,225	-	7,739	+5.0%	-62m
Pooled Property Investments	478	445	-	923	+5.1%	+6m
Private Equity	3,652	762	4,014	8,428	+60.3%	+134m
Direct Property	1,211	-	-	1,211	+20.6%	+57m
Loans	30	-	-	30	0	0
Cash and Other	126	29	-	155	0	0
Total Fund	18,625	4,478	4,171	27,274	+6.9%	+411m

The table below shows the fees paid to managers alongside the combined returns of those managers and the net impact (i.e. taking into account both fees and performance) on the value of Fund assets.

Ongoing management fees

	Asset Pool				Non Asset Pool				Fund Total	
	Direct	Indirect	Total		Direct	Indirect	Total			
	£000s	£000s	£000s	bps	£000s	£000s	£000s	bps	£000s	bps
Management fees:										
Ad valorem	3,661	293	3,954		14,838	3,683	18,521		22,475	
Performance			-		3,392		3,392		3,392	
Transaction costs:			-				-		-	
Commissions			-		158		158		158	
Acquisition/issue costs			-				-		-	
Disposal costs			-				-		-	
Registration/filing fees			-				-		-	
Taxes and stamp duty			-				-		-	
Other							-			
Custody					126		126		126	
Other		195	195		928		928		1,123	
Total	3,661	488	4,149	-	19,442	3,683	23,125		27,274	

Note: bps are basis points with 100 bps = 1%. So, a manager who charged 100 bps in fees would levy a fee equivalent to 1% of assets under management.

In addition to the above ongoing management fees the Fund was also charged £1.036m for its share of the running costs of LGPS Central. These costs were in respect of product development, governance costs and operator costs. These costs have been included within the Fund's Statement of Accounts under the category of oversight and governance costs.

Asset Allocations and Performance

Asset Category	Opening value		Closing value		Performance 1 year		Passive	Local
					Gross	Net	Index	Target
	£000s	%	£000s	%	%	%	%	%
Asset Pool Managed Investments								
Active Listed Equity	334,609	5.1%	312,149	4.5%	12.13%	11.91%	12.80%	14.30%
Multi-asset funds / diversified growth funds 1	144,990	2.2%	136,500	2.0%	-5.95%	-6.14%	-7.76%	-6.76%
Multi-asset funds / diversified growth funds 2	-	0.0%	144,765	2.1%	-3.30%	3.5%	0.40%	4.20%
Passive Fund	610,251	9.3%	701,248	10.1%	14.09%	14.06%	14.63%	14.63%
Infrastructure	-	0.0%	26,264	0.4%	N/A	N/A	N/A	N/A
Private Debt	-	0.0%	6,054	0.1%	N/A	N/A	N/A	N/A
Unlisted Equity Fund	8,978	0.1%	18,787	0.3%	N/A	N/A	N/A	N/A
Other*	2,032	0.0%	2,032	0.0%	N/A	N/A	N/A	N/A
Total	1,100,859	16.7%	1,347,799	19.5%	N/A	N/A	N/A	N/A
Non Asset Pool Managed Investments								
Active Listed Equity:								
Global Fund 1	395,861	6.1%	311,041	4.5%	-6.71%	-7.06%	12.90%	14.90%
Global Fund 2	472,818	7.2%	302,780	4.4%	-13.66%	-14.54%	12.80%	15.80%
Global Fund 3	19	0.0%	14	0.0%	N/A	N/A	N/A	N/A
Passive Listed Equity:								
Passive Fund 1	193,073	3.0%	0	0.0%	-	14.68%	N/A	N/A
Passive Fund 2	167,292	2.6%	196,656	2.8%	-	17.55%	17.53%	17.53%
Passive Fund 3	-	0.0%	221,523	3.2%	N/A	N/A	14.06%	14.06%
Passive Listed Fixed Income 1	1,774,514	27.1%	1,860,668	26.7%	-	4.86%	4.86%	4.86%
Private Debt	1	0.0%	1	0.0%	N/A	N/A	N/A	N/A
Property:								
Direct- Core and Index Linked	401,784	6.1%	445,480	6.4%	20.12%	19.78%	N/A	6.50%
Indirect Property Fund 1	34,259	0.5%	35,400	0.5%	4.70%	3.30%	N/A	8.00%
Indirect Property Fund 2	39,213	0.6%	42,132	0.6%	9.40%	7.40%	N/A	10.00%
Indirect Property Fund 3			10,265	0.1%	3.10%	2.60%		
Unlisted Equity Fund	287,439	4.4%	389,732	5.6%	N/A	N/A	N/A	N/A
Cash	281,941	4.3%	425,634	6.1%	N/A	N/A	N/A	N/A
Multi-asset funds/diversified growth funds:								
Diversified credit Fund	461,527	7.1%	457,493	6.6%	-0.38%	-0.83	N/A	5.00%
Total Return Bond Fund	245,357	3.8%	241,726	3.5%	-	1.83%	N/A	4.00%
Opportunities Fund	267,145	4.1%	269,291	3.9%	-	0.81%	N/A	3.10%
Hedge Funds:								
Multi- Strategy	37,275	0.6%	3,434	0.0%	N/A	N/A	N/A	N/A
Hedge Fund of Funds	379,497	5.8%	397,689	5.7%	N/A	N/A	N/A	12.00%
Total	5,439,015	83.3%	5,610,959	80.5%	N/A	N/A		
Overall Total	6,539,875	100%	6,958,758	100%	N/A	N/A	-	N/A

*Relates to equity share of £1.315m in LGPS Central Ltd and Loan advanced to LGPS Central Ltd of £685k plus £32k interest

In response to the Scheme Advisory Board Transparency Code the Fund has contacted all managers regardless of whether they have signed up to the Code and requested that they complete the Transparency Code template for 2021/22 and future years to allow more transparent reporting. LGPS Central Ltd, in selecting Managers for the pool, also set this as a requirement that Fund Managers they select are signed up to the Transparency Code. The table above includes information from all managers who returned the transparency code template in time for inclusion in the Annual Report.

Costs and savings from asset pooling

As at the end of March 2022, assets valued at £1.348bn had transitioned to the Fund's pooling company, LGPS Central Limited with a further £671m of commitments to be drawn down. In addition, assets with a year-end value of £2.082bn had been jointly procured with partner funds from within the Central pool. Together, these constitute 58.9% by value of the Fund's total investment assets.

The table shows the costs and savings from asset pooling to date:

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
	£000	£000	£000	£000	£000	£000
Set up costs	97	2,417	- 502			
Transition costs			179	243	419	
Fee savings				-195	-306	-252
Net savings realised	97	2,417	- 323	48	113	-252

Fee savings shown are calculated by comparing fee rates charged by legacy managers vs. those charged by LGPS Central in respect of transitioned assets. They do not include additional fee saving reductions from strategic asset allocation changes or general downward pressure on investment manager fees facilitated by asset pooling.

Additional costs relating to pooling Governance, Operator and Product Developments costs are excluded as these are not charged directly to an investment product (these costs totalled £1.036m in 2021-22).

Investment Administration and Custody

Whilst the Fund's appointed investment managers make and implement investment decisions, particularly in respect of the purchase and sale of stock, the practical consequences of their decisions in terms of the Fund's rights to, and benefits of, ownership of investments and cash are handled by custodians who are independent of the investment managers.

The Pension Fund's custodian is Bank of New York Mellon who is responsible for custody and safekeeping of assets within the segregated equity mandates managed by Baillie Gifford. The Fund's custodian is also employed to undertake an independent review and validation of the assets held in unit trusts with other investment managers and their own custodians.

A full list of the custodians used by the Fund and its investment managers is provided below:

Investment Manager / Sub Fund	Asset Class	Custodian
Baillie Gifford	Segregated Equity	Bank of New York Mellon
BlueBay Asset Management	Fixed Income	Brown Brothers Harriman
Janus Henderson	Fixed Income	BNP Paribas
M&G	Fixed Income	State Street
Arrowgrass	Absolute Return	CITCO Fund Services
Blackstone	Absolute Return	CITCO Fund Services
Legal & General	Passive Equity / Gilts	HSBC
LGPS Central	Pooled Equity/Fixed Income	Northern Trust

Statement of Responsible Investment

The Cheshire Pension Fund ("the Fund") is a long-term investor aiming to deliver a sustainable Pension Fund for all stakeholders.

Cheshire West and Chester Council ("the Council") as the Administering Authority of the Fund has a fiduciary duty to act in the best, long-term, interests of the Fund's employers and scheme members. The Fund believes that in order to fulfil this duty, it must have a clear policy on how it invests in a responsible manner.

Responsible Investment is a fundamental part of the Fund's overarching investment strategy as set out in the Investment Strategy Statement. That is, to maximise returns subject to an acceptable level of risk whilst increasing certainty of cost for employers, and minimising the long term cost of the scheme.

The Fund believes that consideration of Environmental, Social and Corporate Governance ("ESG") factors are fundamental to this, particularly where they are likely to impact on the overarching investment objective.

The Fund's approach aims to ensure that consideration of ESG factors is embedded in the investment process, utilising the various tools available to manage ESG risks and to harness opportunities presented by ESG factors.

The Fund reviews and revises its Responsible Investment policy annually and the latest policy was published in April 2022. The current policy was updated to better reflect the Fund's net zero climate change commitment

Climate Change

In recognition of the unique risk posed by climate change the Fund undertakes an annual exercise to identify, evaluate and manage the climate related risk to its investment portfolio.

The results from this annual exercise are published each year in a climate risk report which complies with industry best practice as defined by the Taskforce on Climate Related Financial Disclosures (TCFD). The Fund's second annual TCFD report was published in August 2021 and is available on the Fund's website.

The report assessed the Fund's progress against its three climate change targets as follows:

Target	Status
Carbon footprint to be 50% below the benchmark by the end of 2023	As of 31st December 2020, the carbon footprint of Fund's Total Equities portfolio is 38.57% lower than the FTSE All World. This is an improvement from 31st December 2019, where the Fund was 30.33% less carbon intensive than the FTSE All World. The Fund will implement additional changes to ensure delivery of the 50% below benchmark target.
Carbon footprint reduction of 7.6% each year	The Fund reduced its Total Equities carbon footprint by 25.22% between 31st December 2019 and 31st December 2020.
Invest an increasing proportion of Fund assets in low carbon and sustainable assets	The Fund already invests in equity funds with a low carbon footprint and is exploring options to invest in Sustainable Global Equities. Infrastructure investments with a significant allocation to renewables are now being built up.

In addition, the report also evaluated the risk and return characteristics of the Cheshire Fund's investment portfolio under various climate scenarios including an increase in global temperatures of 2, 3 and 4 degrees centigrade. Under all scenarios the review found there would be a minimal impact on the expected annual investment returns for the Fund projected to 2050. This was due to the Fund's well diversified portfolio and significant allocation to UK Government debt.

The publication of an annual TCFD report is intended to demonstrate the Fund's progress towards delivering against its Climate Change commitments and beliefs as set out in its Climate Strategy Document, also available on the Fund's website:

- (i) The Fund commits to decarbonise its investment portfolio to deliver net zero emissions by 2050 at the latest.
- (ii) Support the Paris Climate Agreement, which seeks to limit increases in global temperatures below 2 degrees centigrade. By extension, the Fund expects all investee companies to align their business activities with the Paris Agreement.
- (iii) The belief that climate change is a long-term material risk and therefore it is correct that the Fund consider it as an integral part of its statutory fiduciary duties.
- (iv) The belief that climate change may impact the Fund through asset pricing, life expectancy, employer covenants, long term inflation and interest rates.

- (v) The belief that the Fund believes that the transition to a low carbon world economy presents both risk and opportunities and therefore, the Fund will consider climate change as a part of all asset allocation, manager selection and individual investment decisions.
- (vi) To support the long-term aim of net zero by 2050 by setting specific shorter-term targets to lower the carbon footprint of its equity portfolio year on year compared to the general market.

The Fund believes that its climate change commitments can be delivered without jeopardising its fiduciary duty to act in the best long-term financial interests of members and employers. However, when considering all investment decisions which are presented to the Committee with a view to reducing the Fund's carbon footprint or closer alignment with net zero, additional analysis will be presented to show, as far as possible, any likely positive or negative impact on investment returns. In this way, the Fund has sought to clearly demonstrate that it is acting in accordance with the requirements of the LGPS Investment Regulations.

The Fund's approach and documentation relating to Climate Change are all available on the Fund's website at:

www.cheshirepensionfund.org/members/about-us/how-we-manage-our-investments/climate-change

Policies Adopted

The Fund adopts a policy of positive engagement with the companies in which it invests in order to promote high standards of corporate governance. It believes that this will help to raise standards across all markets and that this is in the best long term interests of the Fund, its beneficiaries and other stakeholders.

Investment performance is monitored on a quarterly basis and the Fund expects investment managers to engage with companies to address concerns affecting performance.

The Fund believes that the greatest impact on behaviour can be achieved when working together with others. It is a member of the Local Authority Pension Fund Forum (LAPFF) which 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 amongst the companies in which they invest. The Fund actively supports the work of LAPFF and sees this as an important element of its stewardship responsibilities.

The Fund continues to exercise its ownership rights by adopting a policy of actively voting stock it holds. The Fund delegates responsibility for voting to its directly appointed investment managers who are required to vote wherever the Fund has a voting interest. Wherever practicable, votes must be cast in accordance with industry best practice as set out in the Combined Code of Corporate Governance with a clear focus on enhancing long term shareholder value.

In order to ensure that the governance practices employed by the Fund's investment managers are aligned to that of the fund, investment manager's quarterly performance reports are required to include a specific briefing on corporate governance, detailing all votes cast on the Fund's behalf. This is reported to the Investment Sub-Committee on a quarterly basis and any exceptions or examples of non-compliance are addressed directly with the Fund's managers.

The table below summarises the voting activity for the Fund over the 12 months to 31 March 2022:

	UK	Overseas	Total	%
Number of Companies	9	149	158	N/A
Votes Cast in Favour	95	1,422	1,517	94.93
Votes Cast Against	7	62	69	4.32
Votes Abstained / Withheld	0	12	12	0.75
Total number of Resolutions	102	1,496	1,598	100.0

The Fund also invests in a number of funds managed by its pooling fund company, LGPS Central Ltd ('LGPSC'). LGPSC have a 'Responsible Investment and Engagement Framework', available on the company's website at: <https://www.lgpscentral.co.uk/wp-content/uploads/2021/06/LGPSC-RI-E-Framework-2021.pdf> which contains two key objectives:

- 1) To support the company's investment objectives;
- 2) To be an exemplar for Responsible Investment within the financial services industry and raise standards across the market.

Every three months, LGPSC publish a Quarterly and Annual Stewardship Report setting out in full their stewardship, engagement and voting activities. This is also available on the LGPS Central website at: www.lgpscentral.co.uk/responsible-investment

Statement of Compliance with the UK Stewardship Code for Institutional Investors

The Financial Reporting Council has published its new Stewardship Code which took effect from 1 January 2020. The new Code significantly strengthens the existing one and places a new requirement on all signatories to produce an annual report explaining their stewardship activities and outcomes.

The new Code set out a number of principles and the Fund will be submitting a statement of compliance to the Financial Reporting Council at a forthcoming staging date.

Myners' Principles

The Myners' Principles are a set of principles for good investment governance, originally created in 2001 and subsequently updated in 2008. Local government pension funds are required to produce a statement in their annual report regarding compliance with these Principles on a 'comply or explain' basis. The Myners' Principles are:

- Principle 1: Effective Decision-Making
- Principle 2: Clear Objectives
- Principle 3: Risk and Liabilities
- Principle 4: Performance Assessment
- Principle 5: Responsible Ownership
- Principle 6: Transparency and Reporting

The Pension Fund's compliance with the Myners' Principles is shown in the following table:

Principle	Evidence of Compliance
<p>Principle 1 Effective Decision Making:</p> <p>Administering authorities should ensure:</p> <ul style="list-style-type: none"> That decisions are taken by persons or organisations with the skills, knowledge, advice and resources necessary to make them effectively and monitor their implementation; and That those persons or organisations have sufficient expertise to be able to evaluate and challenge the advice they receive, and manage conflicts of interest. 	<p>Compliant</p> <p>Decisions are taken by the Chief Operating Officer advised by the Pension Fund Committee.</p> <p>The Committee has support from Council officers with sufficient experience to assist them. The Committee also seeks advice from professional actuarial and investment advisers to ensure it can be familiar with the issues concerned when making decisions.</p> <p>The Committee is able to make robust challenges to advice and is aware of where potential conflicts of interest may reside within the Committee and in relation to service providers.</p>
<p>Principle 2 Clear objectives:</p> <ul style="list-style-type: none"> An overall investment objective should be set out for the Fund that takes account of the scheme's liabilities, the potential impact on local tax payers, the strength of the covenant for non-local authority employers, and the attitude to risk of both the Administering Authority and scheme employers, and these should be clearly communicated to advisers and investment managers. 	<p>Compliant</p> <p>The Committee has established objectives for the Fund which takes account of the nature of Fund liabilities and the contribution strategy. The objectives are set based on advice from the Fund Actuary and Strategic Investment Advisor, which informs the overall risk budget for the Fund. The overarching objective is reflected in the investment mandates awarded to the asset managers.</p> <p>There is dialogue with admitted bodies within the Fund in relation to the contributions they pay, their capacity to pay these contributions and the level of guarantees they can provide.</p>
<p>Principle 3 Risk and liabilities:</p> <ul style="list-style-type: none"> In setting and reviewing their investment strategy, administering authorities should take account of the form and structure of liabilities. These include the implications for local tax payers, the strength of the covenant for participating employers, the risk of their default and longevity risk. 	<p>Compliant</p> <p>The investment strategy is considered in the light of the nature of the Fund liabilities, the timescale over which benefits will be paid, and financial and demographic factors affecting the liabilities, such as inflation and improving longevity.</p> <p>The Committee and Council officers have discussed the contribution strategy with the Actuary taking account of the strength of covenant of the Council and its long term horizon. Discussions have also taken place with admitted bodies in relation to the affordability of contributions and the strengths of their covenants.</p>

Principle	Evidence of Compliance
<p>Principle 4 Performance assessment:</p> <ul style="list-style-type: none"> • Arrangements should be in place for the formal measurement of performance of the investments, investment managers and advisers. • Administering Authorities should also periodically make a formal assessment of their own effectiveness as a decision-making body and report on this to scheme members. 	<p>Compliant</p> <p>The performance of the Fund and its individual managers are monitored on a regular basis.</p> <p>The quality of advisers is assessed on a qualitative basis and is subject to periodic tender in order to ensure value for money.</p> <p>During 2018-19 Barnett Waddingham were commissioned to undertake an independent review of the Fund's governance arrangements. Their review concluded that the Fund's governance arrangements were working effectively, although a number of relatively minor improvement recommendations were made. All recommendations within the remit of the Fund have now been implemented. Final Government proposals on Good Governance are awaited.</p> <p>In addition, the Fund has completed a self assessment against the CIPFA/SOLACE 'Delivering Good Governance framework 2016' and this is included in the Governance section of this AR.</p>
<p>Principle 5 Responsible Ownership:</p> <p>Administering authorities should</p> <ul style="list-style-type: none"> • Adopt, or ensure their investment managers adopt, the Financial Reporting Council's (FRC) Stewardship Code on the responsibilities of shareholders and agents. • Include a statement of their policy on responsible ownership in the Statement of Investment Principles. • Report periodically to scheme members on the discharge of such responsibilities. 	<p>Compliant</p> <p>The Pension Fund Committee encourages its investment managers to adopt the Financial Reporting Council's (FRC) new Stewardship Code 2020 on the responsibilities of shareholders and agents on the Fund's behalf. Asset managers must comply with the Code and the Fund will monitor manager compliance.</p> <p>The Fund's Investment Strategy Statement includes a statement on the Fund's policy on responsible ownership.</p> <p>The Fund's asset pooling company, LGPS Central has its own Responsible Investment and Engagement policy and is compliant with the FRC Stewardship Code.</p>
<p>Principle 6 Transparency and Reporting:</p> <p>Administering authorities should</p> <ul style="list-style-type: none"> • Act in a transparent manner, communicating with stakeholders on issues relating to their management of investment, its governance and risks, including performance against stated objectives. • Should provide regular communication to scheme members in the form they consider most appropriate. 	<p>Compliant</p> <p>The Pension Fund Committee maintains minutes of meetings which are available on the Fund's website.</p> <p>The Council meet regularly with sponsoring employer bodies and a member representative attends committee meetings.</p> <p>The Investment Strategy Statement is published on the Fund's website and is available to members on request. Other information on the Scheme, including comprehensive quarterly information detailing all the Fund's investment holdings is available to members on the Fund's website.</p>

Investment performance – link to 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 Funding Strategy (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.

The FSS sets out the objectives of the Fund's funding strategy, such as:

- Ensuring 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;
- Ensuring that employer contribution rates are reasonably stable where appropriate;
- Minimising 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
- Reflecting 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
- Using 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 does contribution rate vary for different employers?

- 1 The **funding target** is based on a set of assumptions about the future, (e.g. investment returns, inflation, pensioners' life expectancies). However, 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, in broad terms, the period over which any deficit is to be recovered. A shorter period will lead to higher contributions, and vice versa (all other things being equal). 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 **probability 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, or potentially ceasing from the Fund, then the required probability will be set higher, which in turn will increase the required contributions (and vice versa).

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. This stabilisation mechanism allows short term investment market volatility to be managed without directly impacting 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 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" should be aware of the risks of this approach and should consider making additional payments to the Fund if possible.

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 (e.g. due to outsourcing or redundancies), changes in the nature of the employer (perhaps due to Government restructuring) or changes in the security of an employer.

On the basis of extensive modelling carried out for the 2019 valuation exercise, the stabilised details are as follows:

Type of employer	Stabilisation Mechanism
Tax Raising bodies excluding Cheshire East Council (including Police, Fire and Parish Councils)	+1.0%pa/-1.0%pa
Cheshire East Council	+1.5%pa/-1.5%pa

All other employers were set an appropriate individual employer rate based on their own individual characteristics. This contribution rate may be different to their theoretical contribution rate. Any deviation will be based on their own circumstances and a range of factors including (amongst other things) their perceived security or covenant, any budgetary constraints that they may be bound by, their likely time horizon as an LGPS employer etc.

The minimum contributions to be paid by each employer from 1 April 2020 to 31 March 2023 are shown in the Rates and Adjustment Certificate which is available on the Funds website as an appendix to the 2019 Actuarial Valuation Report.

During the year the Fund welcomed 21 new employers into the scheme, 11 schools converted to academies, 9 admitted bodies and 1 parish council,

The LGPS regulations requires that admitted bodies carry out, to the satisfaction of the Administering Authority an assessment, taking account of actuarial advice, of the level of risk arising on the premature termination of the provision of service or assets by reason of insolvency, winding up or liquidation of the admission body.

Such a risk assessment was carried out for each of the 9 new admitted bodies, admission agreements and pension indemnity bonds are in place or in the process of being put in place for the new bodies. These are to be reviewed on an annual basis.

During the year the Fund had 6 employers who ceased membership of the Cheshire Pension Fund, all of whom were admitted bodies.

Governance

1. Introduction

- 1.1** Public service pension schemes do not have trustees rather they are governed by regulation and statutory guidance. The principal regulations governing the Local Government Pension Scheme (LGPS) are the Pensions Act 2013 and the Local Government Pensions Scheme Regulations 2013.
- 1.2** Cheshire West and Chester Council (the Council) is the designated Administering Authority for the Cheshire Pension Fund. The Council has established effective governance arrangements for the Cheshire Pension Fund (the Fund) and the chart on page 54 summarises the local governance structure.

Governance Compliance Statement

- 1.3** Governance structure, roles and responsibilities, the terms of reference of Committees, Board, Forum and Working Groups along with the Council's approach to training for those in governance roles are set out in the Fund's Governance Compliance Statement included in this Annual Report and available on the Fund website at:
www.cheshirepensionfund.org
- 1.4** The Governance Compliance Statement also sets out the Council's assessment of current practice against the seven principles set out in the CIPFA/SOLACE 'Delivering Good Governance Framework 2016'.

Governance in practice 2021-22

Covid-19 impact on meetings schedule

- 2.1** All scheduled meetings of the Pension Fund Committee, Investment Sub-Committee, Local Pension Board, and joint training events took place as usual during 2021-22 although all were held virtually in light of the restrictions in place due to Covid-19. The Fund plans to hold some in person meetings in 2022-23 given that Covid-19 restrictions have now been lifted in the UK.
- 2.2** In addition, investment pooling governance meetings, including the LGPS Central Joint Committee (agenda available at www.cheshirepensionfund.org), the LGPS Central Shareholder Forum and the Practitioner's Advisory Forum (the officer working group) continued to meet virtually during the year.

Pension Fund Committee

- 2.3** The Pension Fund Committee is made up of ten elected Member representatives from the four local councils who participate in the Cheshire Pension Fund (Cheshire East, Cheshire West and Chester, Halton, and Warrington) and a non-voting scheme member representative.
- 2.4** Members of the Committee as at 31 March 2022 were:



Cllr Myles Hogg (Chair)



Cllr Carol Bulman



Cllr Sam Corcoran



Cllr Paul Findlow



Cllr Gareth Gould



Cllr Gina Lewis



Paul Matthews GMB



Cllr Cathy Mitchell



Cllr Amanda Stott



Cllr Harry Tonge



Cllr Mark Dennett

** Following the May 2021 local council elections, Cllr Wharton stood down as the Pension Fund Committee representative for Halton BC and Cllr Mark Dennett was nominated as the Halton representative going forward.

2.5 The Committee met four times during the year, and Committee members were also invited to three joint training events. Meeting dates and attendance for Committee members are shown below:

	2021					2022	
Committee Member	4 June	16 July Training	10 Sept	19 Nov Training	3 Dec	25 Feb Training	11 Mar
Cllr Hogg (Chair)	✓	✓	✓	✓	✓	✓	✓
Cllr Gould	✓	✓	✓	✓	✓	✗	✓
Cllr Lewis	✓	✓	✓	✓	✗	✓	✓
Cllr Tonge	✓	✓	✓	✓	✓	✓	✓
Cllr Corcoran	✓	✓	✓	✓	✓	✓	✓
Cllr Findlow	✓	✓	✓	✓	✓	✓	✓
Cllr Stott	✓	✓	✓	✓	✗	✓	✓
Cllr Bulman	✓	✓	✓	✓	✓	✓	✓
Cllr Dennett	✓	✓	✓	✗	✓	✗	✗
Cllr Mitchell	✓	✗	✗	✗	✗	✓	✓
Paul Matthews	✗	✗	✗	✗	✗	✗	✗

2.6 At each Pension Fund Committee meeting, the Committee reviewed the minutes and recommendations of the Investment Sub-Committee, Local Pension Board, and the Pensions Consultative Forum.

2.7 The Committee also received regular reports updating on:

- Employer admissions and cessations
- Compliance (including Breaches Log)
- Regulatory developments
- Progress against Business Plan targets
- Investment pooling updates
- Fund Risk Register

2.8 Topical issues in 2021-22 on which Committee made recommendations or received key updates include:

- Updates on the Scheme Advisory Board Good Governance Review
- Draft results from the Government Actuary Department's (GAD) valuation of the Cheshire Pension Fund under Section 13 of the Public Service Pensions Act 2013
- Update on the Fund's Funding Strategy Statement
- Monitoring of delivery against the Fund's carbon reduction targets and review of options to further reduce the Fund's carbon footprint
- Triennial valuation planning and endorsement of assumptions to be used
- Communication Strategy Review updates
- Endorsement of the Fund's updated Pension Administration Strategy following consultation with employers
- Updates on contractual arrangements regarding Investment Consultancy services and the Fund's administration database
- Endorsement of the updated Investment Strategy Statement and Responsible Investing policy
- Investment Pooling – endorsement of proposals for investments (including sustainable equities) in new pooled investment funds launched by LGPS Central Ltd – the jointly owned pooling company

Investment Sub-Committee

2.9 The Investment Sub-Committee strengthens governance and oversight by providing a more in-depth focus on investment strategy and investment performance.

2.10 The Sub-Committee met four times during the year. All members of the Pension Fund Committee are invited to attend the Investment Sub-Committee, but attendance is voluntary. Attendance at Sub-Committee meetings in 2021-22 is shown below:

Name	14 May 2021	27 Aug 2021	12 Nov 2021	11 Feb 2022
Cllr Hogg (Chair)	✓	✓	✗	✓
Cllr Gould	✓	✓	✗	✓
Cllr Lewis	✓	✓	✓	✓
Cllr Tonge	✓	✓	✓	✗
Cllr Corcoran	✓	✗	✓	✗
Cllr Findlow	✓	✗	✓	✓
Cllr Stott	✓	✓	✓	✗
Cllr Bulman	✓	✓	✓	✓
Cllr Dennett	✓	✗	✓	✓
Cllr Mitchell	✗	✗	✗	✗
Paul Matthews	✗	✗	✗	✗

2.11 At each meeting, the Sub-Committee reviewed the performance of the Fund's investment and funding strategy and the performance contribution of each appointed investment manager. Regular reports include:

- Outputs from the Fund's most recent annual review meetings with investment managers
- A summary of Responsible Investment issues, equity voting activity and engagement
- An explanation of Mercer manager risk ratings and important notices regarding any changes at investment managers
- Fund cash flow monitoring

2.12 In 2021-22, the Sub-Committee also received reports and advised on topical matters in relation to:

- Endorsement of top up commitments to the Fund's private equity portfolio and also additional commitments to the Fund's indirect property investments
- Progress updates on the Pension Fund Committee decisions to invest in Multi Asset Credit and Infrastructure funds
- Presentations on Private Debt as an asset class
- Review of the Fund's approach to stock lending
- Review of the balance between the Fund's UK and global investments and review of local investing

Local Pension Board

2.13 The Local Pension Board prepares an Annual Report of its activity each year and this is included on page 47 of this Annual Report.

Pensions Consultative Forum

2.14 The Pensions Consultative Forum provides an opportunity to engage with participating employers and met three times during the year.

2.15 The Chair of the Local Pension Board, Peter Raynes, also chairs the Forum. Attendance at the Pensions Consultative Forum for 2021-22 is shown in the table below:

Name	Jun 2021	Oct 2021	Feb 2022
Peter Raynes (Chair)	✓	✗	✓
Cheshire West and Chester Council	✓	✓	✓
Cheshire Fire and Rescue	✓	✓	✓
Town and Parish Councils	✗	✗	✗
Cheshire East Council	✓	✓	✓
Halton Borough Council	✓	✓	✓
Warrington Borough Council	✓	✓	✓
Housing Trusts / Associations	✓	✓	✓
Universities/FE Colleges	✗	✗	✗
Schools / Academies	✗	✗	✗
Council owned companies	✗	✓	✓
Other employers	✓	✗	✓
Cheshire Association of Local Councils	✗	✓	✓

2.16 In addition to regular updates on scheme developments and administrative performance, the Forum has input into the design and development of changes to benefits administration processes and information flows between employers and the Fund.

2.17 In 2021-22 key areas of discussion were as follows:

- The Pensions Administration Strategy
- The Fund's transformation programme
- Monthly Interfacing updates
- Development and implementation of Member Self-Serve
- Engagement and Communications Strategy

Scheme Advisory Board - Good Governance Review

2.18 The Scheme Advisory Board (SAB) commissioned Hymans Robertson to undertake a Good Governance Review of the LGPS.

2.19 Hymans Robertson presented their initial findings in July 2019 and published their Phase 2 report in November 2019. The Scheme Advisory Board published their final recommendations arising from the review in February 2021 and these are listed below.

Theme	Recommendation	
Statutory Guidance	1.	MHCLG produce statutory guidance to establish new governance requirements for funds to implement the recommendations
Improved accountability	2.	Single named officer responsible for the delivery of all LGPS related activity. To be known as the "LGPS Senior Officer"
Improve transparency and auditability of governance	3.	Requirement to publish an annual governance compliance statement signed by the LGPS Senior officer and where different, co-signed by the S151 officer
Conflicts of Interest	4.	Requirement to publish conflict of interest policy evidencing how conflicts, perceived and actual, are identified, monitored, and managed
	5.	Guidance should refer all involved in managing the LGPS, and, in particular, those on decision making committees, to the guide on statutory and fiduciary duty which will be produced by the SAB
Representation	6.	Requirement to publish a policy on the representation of scheme members and non-administering authority employers on committees, explaining approach to representation and voting rights for each party
Skills and training	7.	Requirement for key individuals within the LGPS, including LGPS officers and pension committee members to have the appropriate level of knowledge and understanding to carry out their duties
	8.	Introduce a requirement for s151 officers to carry out LGPS relevant training as part of their CPD requirements to ensure good levels of knowledge and understanding
	9.	Requirement to publish a policy setting out the approach to the delivery, assessment and recording of training plans to meet governance requirements
	10.	CIPFA and other relevant bodies to produce appropriate guidance and training modules for s151 officers and to consider including LGPS training within their qualification syllabus
Service delivery of LGPS function	11.	Administering Authorities must document and publish key roles and responsibilities setting out how key decisions are reached
	12.	Requirement to publish an administration strategy
	13.	Each administering authority must report the fund's performance against an agreed set of indicators designed to measure standards of service. (Indicators to be established by SAB)
	14.	Each administering authority to ensure their committee is included in business planning process. Both the Committee and LGPS Senior Officer must be satisfied with the resources and budget allocated to deliver the LGPS service
	15.	Each administering authority must give proper consideration to the pay and recruitment policies relevant to the needs of their pension function. Administering authorities should not simply apply general staffing policies, such as recruitment freezes, to their pension function
Independent review	16.	Each administering authority must undergo a biennial Independent Governance Review and, if applicable, produce the required improvement plan to address any issues identified
Peer Review	17.	LGA to consider establishing peer review processes for LGPS Funds

2.20 Further regulation and statutory guidance will be needed to bring many of these recommendations into effect in the LGPS and further guidance from the Government is expected in summer/autumn 2022. In the meantime, the Fund has completed a self-assessment against the proposals and implemented those actions which can be completed ahead of regulatory change.

Committee and Board Training 2021-22

3.1 In line with the agreed Training Plan, three joint training events were held in the year. The table below summarises the topics covered and attendees:-

Date	Training topic	Delivered by	Attendees	Attendees
			Pension Fund Committee	Local Pension Board
16 Jul 2021	Pensions Legislation Hymans – LGPS Online Learning Academy training tool Annual report 2020-21 2022 Valuation Process	Fund Officers Hymans Fund Officers Hymans	Cllr Hogg (Chair) Cllr Gould Cllr Lewis Cllr Tonge Cllr Corcoran Cllr Findlow Cllr Stott Cllr Bulman Cllr Dennett	Peter Raynes
19 Nov 2021	Financial Markets and Product Knowledge 2022 Valuation Assumptions Overview and Council's Funding Strategies Training Plan Update	Fund Officers and Mercer Hymans Fund Officers	Cllr Hogg (Chair) Cllr Gould Cllr Lewis Cllr Tonge Cllr Corcoran Cllr Findlow Cllr Stott Cllr Bulman	Peter Raynes Neil Harvey
25 Feb 2022	2022 Valuation- Assumptions Setting 2022 Valuation Later Stages	Hymans Robertson	Cllr Hogg (Chair) Cllr Lewis Cllr Tonge Cllr Corcoran Cllr Findlow Cllr Stott Cllr Bulman Cllr Mitchell	Peter Raynes Geoff Wright

Cheshire Pension Fund Local Pension Board

Annual Report 2021/22

Introduction

Welcome to the seventh annual report for the Local Pension Board (the Board) for the year ending 31 March 2022.

The Board assists Cheshire West and Chester Council, as Administering Authority, with the efficient governance and administration of the Cheshire Pension Fund, the name of the local government pension scheme in Cheshire.

In accordance with the Board's terms of reference, an annual report is required to provide an overview of the nature and effect of the Board for consideration by the Administering Authority.

The Board have continued to hold meetings virtually and intend to hold the majority of future meetings in the same way, perhaps meeting face to face once a year.

Board members received regulator updates on the Fund's transformation programme, which is designed to make the best use of technology and other resources in order to deliver an effective service to customers and employers.

Further meetings were held with other funds within LGPS Central (the pooling partnership with seven other local government pension funds) to share ideas and best practice.

The Board met seven times in the year and Board members attended three joint training sessions with the Pension Fund Committee to maintain and develop knowledge and understanding.

Two special meetings took place during the year. One meeting was convened to review the Pension Regulators single code of practice and respond to the consultation.

The other was for the Board to undertake a self-assessment of their own performance.

A collaboration between the Cheshire and Shropshire Local Pension Board took place during the year with the aim of sharing best practice.

During the year, the term of office for the chair, one employer representative and one member representative came to an end. The Board sought expressions of interest and Peter Raynes was reappointed as the chair, and Geoff Wright as the member representative for a further three-year term commencing 27 June 2021.

Councillor Robert Bisset was again nominated as the employer representative by Cheshire West and Chester Council, in accordance with the Board's terms of reference. This appointment is for a three-year term commencing 27 June 2021.

The Board places great importance on being open and transparent. A wealth of information relating to the Board, including minutes of meetings, can be found on the Pension Fund website using the link below. There is also a facility for members to contact the Board for any questions/issues relating to the Board's role:

www.cheshirepensionfund.org/members/resources/forms/contact-the-pension-board/

A summary of the work undertaken by the Board in the past year, along with information about the work plan for the year ahead can be found below.

Peter Raynes
Local Pension Board Chair

1. Board Membership

- 1.1 The Board consists of five members, two scheme member and two employer representatives and an Independent Chair. All members are unpaid volunteers.
- 1.2 Terms of office are staggered to ensure business continuity.
- 1.3 Further information, including biographies of each member, is available on the Fund's website.

Role	Name	Organisation	Date Appointed	Term End Date
Employer representative	Adrienne Laing	The Challenge Academy Trust	1/4/20	31/3/23
Employer representative	Cllr Robert Bisset*	Cheshire West and Chester Council	27/6/21	26/6/24
Member presentative	Geoff Wright*	UNISON	27/6/21	26/6/24
Member presentative	Neil Harvey	GMB	27/6/20	26/6/23
Chair	Peter Raynes*	Independent (non-voting)	27/6/21	26/6/24

*Reappointed following requests for Expressions of Interest

2. Review of 2021/22

- 2.1 Below is a summary of key areas of activity for the Board during the year and an outline of the plans for the year ahead.

Joint Chairs Meetings

- 2.2 The Chairs of the Board and the Pension Fund Committee (the Committee) continue to meet on a quarterly basis to discuss common issues.
- 2.3 These meetings provide the Chairs with a regular opportunity to discuss important topics and to ensure that their work compliments and avoids duplication of effort.

Pensions Consultative Forum

- 2.4 The Pensions Consultative Forum (PCF) is made up of representatives from the main employers and employer groups within the Fund. It works with the Fund to ensure an efficient service is delivered for all stakeholders, with particular emphasis on administration and communication.
- 2.5 The Board Chair, Peter Raynes is also Chair of the PCF providing an important link between the Board and the Forum.
- 2.6 The Forum is key to assisting the Fund in developing new ways of working which will improve efficiency for both the Fund and Employers.
- 2.7 Forum members assisted the Fund by sharing information with their employees on a baselining survey on communication with the Fund during the autumn of 2021. The support from the Forum meant that the Fund received just under 1,000 responses. The valuable feedback from the surveys is now being used to inform the new communications strategy which will be published in the summer of 2022.

LGPS Central Board Chairs / Scheme Advisory Board Engagement

- 2.8 As in previous years, the Board Chair has continued to meet with Chairs from the Boards of the LGPS Funds within the Central Pool (these are Derbyshire, Leicestershire, Nottinghamshire, Shropshire, Staffordshire, West Midlands and Worcestershire LGPS Funds). These meetings allow the Boards to discuss important topics and share ideas.
- 2.9 Two virtual meetings took place during the year on 25 October 2021 and 28 March 2022.
- 2.10 The Scheme Advisory Board continues to play an important role in this group. A SAB representative (Bob Holloway) attends the joint meetings and provides regular updates on regulatory and other relevant issues. The updates are helpful as they provide an overview of the upcoming issues that Local Pension Board members need to consider.

Knowledge and Skills

- 2.11 The Committee endorsed the training policy at its meeting on 13 March 2020. The policy was effective from 1 April 2020 and covered the collective training requirements for Committee and Board members.
- 2.12 A joint training plan was developed for the 2021/22 year which was based upon the results of CIPFA knowledge and skills self-assessment questionnaires which had been completed by Committee and Board members.
- 2.13 In addition, members each received a summary of their own results in the form of an individual training plan which they would update with details of other training they attended. This training would be accessed through conferences and seminars, along with details of any online learning, such as the Pensions Regulator's Trustee Toolkit and the Hymans Robertson LGPS Online Learning Academy (LOLA).

2.14 In the autumn the Board and Committee Chairs undertook a review of the collective training which had been delivered to members, the results of the individual training plans and the results from the further self-assessment questionnaire which had been completed by members.

2.15 The training plan for 2022/23 was derived from these results and approved by the Chairs.

Governance Review

2.16 In 2018/19 the Pension Fund commissioned Barnett Waddingham (BW) to conduct a review of the governance arrangements within the Fund, including the role of the Board. The review found that the governance arrangements worked well and there were no material issues to be addressed. The review did, however, make some minor recommendations in relation to the Board, including updating the Terms of Reference to reflect some changes to working practices (e.g. the number of Board meetings held each year had increased).

2.17 Board members agreed to align implementation with the outcomes from the Scheme Advisory Board's Good Governance Review, so that any changes needed flowing from the SAB's recommendations could be incorporated.

2.18 At its meeting on 4 May 2021 the Board identified the specific changes they would like to make to the terms of reference following the BW review.

2.19 The Board also received an update on the outcomes from the SAB Good Governance review, which were published in February 2021, and the recommendations that have been made to the Department for Levelling Up, Housing and Communities (DLUHC).

2.20 Board members reviewed the sixteen recommendations from the outcomes report and were comfortable that the Fund would be able to meet them without the need for material changes.

2.21 Further regulations and guidance are required to bring the recommendations into full effect and are expected sometime during 2022. The proposed changes to the Board's ToR will be made alongside any required changes resulting from the Good Governance review.

Regulatory Changes

2.22 The Board received detailed briefings on regulatory changes during the year.

McCloud Judgement

2.23 The first related to the McCloud judgement which refers to the case in which the Supreme Court found that transitional protections introduced in the firefighters and judges pension schemes in 2015 amounted to age discrimination to younger workers. Similar protections were introduced into other public sector schemes, and the Government confirmed the ruling applies to those schemes as well.

2.24 This regulatory change presents a significant challenge and will require input from all areas of the Fund. The regulations themselves are expected to come into force from October 2023. In the meantime the Fund is working on obtaining necessary information from employers dating back to 2014 when the scheme changed to a career average revalued earnings scheme.

2.25 The Board regularly monitor the Fund's progress in preparing for and meeting the requirements of this regulatory change.

Exit Reform

2.26 Board members also received a briefing on caps on exit payments resulting from redundancy and efficiency.

2.27 The Government initially introduced the Restriction of Exit Payment Regulations in autumn 2020 but they were revoked early in 2021.

2.28 It is expected that a further consultation on proposed exit reforms will be received in 2022/23. Board members will be briefed on the consultation once it is received.

Risk Register

2.29 The Board reviewed and updated the risk register during the year.

2.30 The register contains six risks that relate specifically to the Board itself. The register identifies additional mitigating actions which could be taken in future to further mitigate the risks. The Board will seek to implement these where possible.

2.31 A high level summary of the risks outlined in the Board's register along with their current rating is shown below:

Risk	RAG Status
Conflicts of Interest	Green
Maintaining knowledge and skills	Amber
Changes to Board membership	Amber
Monitoring compliance effectively	Green
Support to the Board	Green
National developments	Green

2.32 At the meeting on 15 September 2021, where Board members undertook a review of their own performance, it was suggested that it would be beneficial for the Board to conduct a detailed review of the Pension Fund's risk register as well.

2.33 The Fund's Risk Register was reviewed at the Board meeting on 5 October 2021 and a recommendation was made to include a specific risk on cyber security. The Pension Fund Committee agreed and added this risk to their register at the meeting on 3 December 2021.

Coronavirus and Changes to Working Practices

- 2.34** At the outset of the pandemic in 2020 pension fund staff switched from being mostly office based to working wholly from home. This position has largely continued over the past two years with a small number of staff members attending the office when required in order to carry out tasks that cannot be completed remotely.
- 2.35** The Board received regular updates on how the Fund was able to maintain service delivery and support staff members and customers through this challenging time.
- 2.36** The switch to home working required some changes to working practices, such as how the Fund deals with post, suspension of the office based pension helpline, setting up a recorded message to explain how customers could reach us via email.
- 2.37** The Board were pleased to find that, similar to the previous year, the Fund had been able to maintain its standards of service to members throughout the year.
- 2.38** The Fund will be implementing new ways of working for all staff in line with the Council's modern workforce strategy. The strategy classifies pension fund staff members as agile workers which means they will continue to work from home but will attend the office, and other collaboration spaces, in line with business need.

The Pensions Regulator – Code of Practice

- 2.39** One of the key tasks for the Board is to monitor the Fund's compliance with the Pensions Regulators (TPR) Code of Practice.
- 2.40** On 17 March 2021 TPR issued a consultation on its Modular / Single Code of Practice. The consultation was on ten of the 15 codes of practice, relating to the public sector, which had been combined into one.
- 2.41** The Board considered the consultation questions and provided responses by the 26 May deadline.
- 2.42** The new code is expected to be published in 2022. At that point the Board will undertake a thorough review of the Fund's compliance with the new code along with any action plan to address any areas where further work may be required.

Data Quality

- 2.43** A key objective of the transformation programme is to improve the quality of data held by the Fund. The Board has continued its oversight of the Fund's important work to improve the quality of data held throughout the year.
- 2.44** A quarterly report is presented to the Board confirming the Fund's TPR common and scheme specific data scores, along with an explanation of any work which is underway to improve those scores.
- 2.45** The Fund has also identified a number of other actions that it can take, as part of the transformation programme, to improve data quality and has been providing updates to the Board on a regular basis.

2.46 This is a significant and resource intensive activity and the data quality work in 2021/22 has included:

- a) **a) Tracing services** – commissioning a third party to locate members that the Fund has lost contact with.
 - b) **Monthly Interfacing** – the project to move from annual to monthly employer submissions of membership and contributions information. This involves a specific data cleanse for each employer and creation of unique identifier numbers so individual contracts of employment can be clearly identified. By the end of 2021/22 80% of employers had moved onto monthly interfacing.
 - c) **Resolving historic data queries** - including liaison with employers to retrieve missing data.
- 2.47** The Board received regular detailed updates on progress for all three areas.
- 2.48** The Board was pleased to note that the Fund issued Annual Benefit Statements to 91% of active members by the 31 August deadline, compared to 90% in 2020 and 85% in 2019. This demonstrates that the Fund's data quality is improving.

Breaches Policy/Log

- 2.49** The Board has a critical role in monitoring breaches and reviews the breaches log on a monthly basis. The Board reviews any new breaches to monitor local actions to redress the breach and to determine if the breach meets the requirement for reporting to TPR.
- 2.50** In addition to reviewing the breaches log, the Board undertakes a quarterly review to identify any trends which require further investigation.
- 2.51** The Breaches policy and Breaches Log are available on the Fund's website.

Member Engagement

- 2.52** The Board has a dedicated facility on the Fund's website to allow members to contact the Board with any questions.
- 2.53** The Board received seven questions, from four members, during the year and provided a response to each. The subjects covered included:
- The Fund's investments and responsible investing, including carbon neutrality / net zero
 - The pooling of assets
 - Local Pension Board membership
 - Cheshire Chat – pensioner newsletter
 - Consultations on the Funding Strategy Statement and Investment Strategy Statement
 - Individual member queries on transfer of pension.

3. Board Attendance at Meetings 2021-22

- 3.1** The terms of reference for the Board state that there should be a minimum of two meetings per year, however, the Board has chosen to meet a minimum of four times per year. There were 7 meetings held during 2021/22.
- 3.2** The table below summarises the meetings which have taken place including attendance by members of the Board. (A tick denotes the Board member was present):

Members	19 Apr 2021	3 May 2021	1 Jun 2021	20 Jul 2021	15 Sep 2021	5 Oct 2021	10 Mar 2022	%
Peter Raynes	✓	✓	✓	✓	✓	✓	✓	100
Cllr Robert Bisset	✓	✓		✓	✓		✓	71
Adrienne Laing	✓	✓	✓	✓		✓	✓	86
Geoff Wright	✓	✓	✓	✓	✓	✓	✓	100
Neil Harvey	✓	✓	✓	✓	✓	✓	✓	100

- 3.3** A special meeting was convened on 19 April 2021 so that Board members could review the consultation on the Pension regulator's Single Code of Practice and respond to the questions in that consultation.
- 3.4** John Hall, Local Pension Board Chair for Shropshire Pension Fund attended the meeting on 4 May 2021. John attended the meeting in an observer capacity to share knowledge and best practice between the two funds.
- 3.5** Peter Raynes attended the Shropshire Local Pension Board meeting on 23 July as an observer. A comparison of the Terms of Reference for the Board's has also been completed.
- 3.6** The meeting on the 1 June was dedicated to the review of the Fund's draft Statement of Accounts and Annual Report for 2020/21 so that the Board could ensure these had been produced in accordance with statutory requirements and best practice. This is an important part of the Fund's governance process for the production of the Statement of Accounts and Annual Report.
- 3.7** The Board's review provided assurance to the Committee that they could recommend the draft accounts to be presented to the Council's Audit and Governance Committee.
- 3.8** A further special meeting took place on 15 September 2021 where the Board undertook a self-assessment of its own performance as a means of identifying how it could add more value to the Cheshire Pension Fund via improving outcomes.

Skills and Development Activities

- 3.9** The Board and Committee have attended several joint training sessions during the year which, as well as developing Board members' knowledge, have helped the Board to gain assurance that the Committee decision making processes are robust and properly informed, and are in accordance with regulations and best practice.

- 3.10** A summary of the training provided for the Board, including attendance, during 2021/22 is shown below.

Date	Topic	Delivered by	Board Attendees
16 Jul 2021	Pensions Legislation	Officers	Peter Raynes
	Online Learning Academy	Hymans Robertson	
	Cheshire Pension Fund Annual Report 2020/21 – key facts and figures	Officers	
	Valuation Process	Hymans Robertson	
19 Nov 2021	Financial Markets and Product Knowledge	Officers	Peter Raynes Neil Harvey
	Committee/Board Joint Training Policy and Plan Update	Officers / Mercer	
	Valuation – Assumptions and Funding Strategies	Hymans Robertson	
25 Feb 2022	Valuation – Setting Assumptions	Hymans Robertson	Peter Raynes Geoff Wright
	Valuation – Employer Considerations and Section 13	Hymans Robertson	

External training events

3.11 Board members attended a number of external conferences and seminars in order to maintain knowledge and keep up to date with current issues facing the LGPS. These events have taken place virtually this year due to the pandemic.

These were:

Event Date	Organised by	Topic
18-19 May 2021	PLSA	Local Authority Conference
23 June 2021	CIPFA / Barnett Waddingham	LPB Annual Seminar
13 October 2021	LGPS Central Ltd	Responsible Investing Summit
20-21 January 2021	LGA	LGPS Governance Conference

Budget

3.12 The Board agreed a budget of £5,000 for 2021/22 to assist with its operation. This included costs for training, external advice, expenses and travel costs.

3.13 The Board incurred costs of £950 which was spent on attending conferences and seminars, reflecting the reduced number of in person events in the year. Budgeted provisions for external advice were not required in 2021/22.

4. 2022/23 Work Plan

- 4.1** The Board will undertake a review of compliance with the Pensions Regulator's new single code of practice, which is expected to be published in 2022.
- 4.2** Changes to regulations and statutory guidance resulting from the SAB Good Governance review are expected in 2022. Once published the Board will review the requirements to ensure that the Fund is compliant and monitor progress on any actions that the Fund may need to take are implemented as soon as possible. This will include the introduction of a Fund specific cyber security policy.
- 4.3** The Board will ensure that the Fund adheres to any regulatory changes which may come into effect during the year, including clear and timely communication of those changes with members and employers.
- 4.4** The Board will monitor progress in delivering the Fund's transformational pensions programme, including the ongoing work to improve data quality ahead of the introduction of the pension dashboard in 2023.
- 4.5** The Board will keep a close eye on any changing guidance from TPR and SAB and ensure the Fund implements any recommendations as prescribed.
- 4.6** The Board will continue with its compliance role in ensuring Fund policies and publications are produced and updated in line with statutory requirements and best practice guidance.
- 4.7** The Board will undertake the annual review of its own policies, such as the Terms of Reference, to ensure that they remain fit for purpose.
- 4.8** The Board's activity will support the Administering Authority and Pension Fund Committee in making decisions safe in the knowledge that the fund is compliant with statutory and best practice and that any areas for development will be highlighted to them by the Board.
- 4.9** Board members will attend external conferences and seminars in order to maintain knowledge and also to keep up to date with current issues facing the LGPS.

5. Further information

- 5.1** If you would like to further information regarding the Cheshire Pension Fund Local Pension Board or have any questions please visit our website:

www.cheshirepensionfund.org/members/about-us/how-we-manage-the-fund/governance-structure

Governance Compliance Statement

March 2022

1. Introduction

- 1.1** Public service pension schemes do not have trustees rather they are governed by regulation and statutory guidance. The principal regulations governing the Local Government Pension Scheme (LGPS) are the Public Service Pensions Act 2013 and the Local Government Pensions Scheme Regulations 2013.
- 1.2** The Public Service Pensions Act 2013 states that overall responsibility for a scheme rests with the Scheme Manager. The Local Government Pension Scheme Regulations provide that the responsibilities of Scheme Manager are fulfilled by the designated local Administering Authority for each local LGPS fund.
- 1.3** Cheshire West and Chester Council (the Council) is the designated Administering Authority for the Cheshire Pension Fund.
- 1.4** LGPS regulations require an Administering Authority to prepare, maintain, publish, and keep under review a written statement setting out:
 - whether it delegates its functions, or part of its functions under these Regulations to a committee, a sub-committee, or an officer of the authority.
 - If it does delegate,
 - the terms, structure, and operational procedures of the delegation,
 - the frequency of any committee or sub-committee meetings
 - whether such a committee or sub-committee includes representatives of Scheme employers or members, and if so, whether those representatives have voting rights.
 - the extent to which a delegation, or the absence of a delegation, complies with guidance given by the Secretary of State and, to the extent that it does not so comply, the reasons for not complying; and
 - details of the terms, structure, and operational procedures of the Local Pension Board.
- 1.5** The Council has produced this Governance Compliance Statement to set out the local governance arrangements in place for the Cheshire Pension Fund to ensure compliance with regulations and ensure effective management of the Fund's affairs.
- 1.6** The Council is committed to the core principles of governance set out in the CIPFA (the Chartered Institute of Public Finance and Accountancy) and SOLACE (the Society of Local Authority Chief Executives) 'Delivering Good Governance in Local Government (2016)' framework. Compliance with these principles is shown in Appendix 1 of this statement.

2. Statement of the Chief Operating Officer

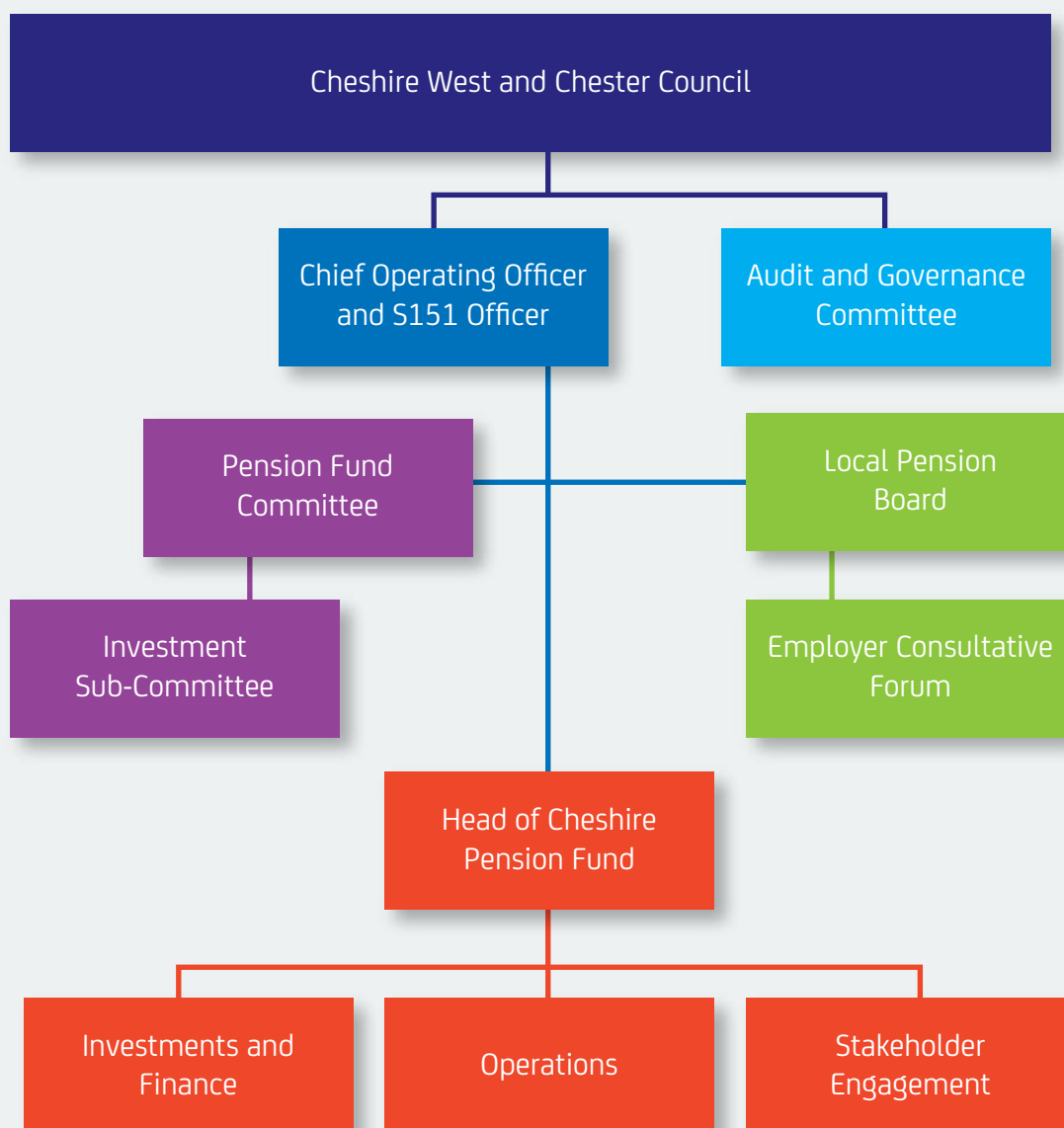
- 2.1** I confirm, as the officer responsible for the Cheshire Pension Fund, that this Governance Compliance Statement reflects the Administering Authority's governance arrangements for the Fund.
- 2.2** I also confirm that the training policies and strategies are implemented, such that the officers and members charged with the financial management and decision-making of the pension scheme collectively possessed the requisite knowledge and skills necessary to discharge those duties and make the decisions required during the reporting period.

Mark Wynn

Chief Operating Officer and S151 Officer
Cheshire West & Chester Council

3. Local Governance Structure

3.1 The chart below summarises the local governance structure the Council has established for the Cheshire Pension Fund.



Chief Operating Officer and S151 Officer

3.2 The Council has delegated responsibility for the management and administration of the Cheshire Pension Fund to the Chief Operating Officer, who is also the Council's Section 151 officer.

Pension Fund Committee and Investment Sub-Committee

3.3 The Chief Operating Officer has established an advisory panel, known as the Pension Fund Committee and advises the Chief Operating Officer on all matters relating to the Fund as required.

3.4 The Pension Fund Committee has formed an Investment Sub-Committee to provide greater focus and oversight on the delivery of the strategic investment outcomes set out in the Investment Strategy Statement. The Investment Sub-Committee is not decision making but may make recommendations to the Pension Fund Committee.

3.5 The Pension Fund Committee may also receive recommendations from the Pensions Consultative Forum and Local Pension Board to enable it to advise the Chief Operating Officer on effective discharge of the Council's Administering Authority responsibilities.

3.6 The Pension Fund Committee and the Investment Sub-Committee both meet quarterly and may call additional meetings if required. All members of the Pension Fund Committee are invited to and can attend meetings of the Investment Sub-Committee.

3.7 The Pension Fund Committee has eleven members as summarised below.

	Representation	Voting rights
Cheshire West and Chester Council	Four Councillors	Yes
Cheshire East Council	Four Councillors	Yes
Halton Borough Council	One Councillor	Yes
Warrington Borough Council	One Councillor	Yes
Employee representative	Union Representative	No

3.8 Pension Fund Committee agendas and papers are published on the Cheshire Pension Fund website and are available via the following link

<https://www.cheshirepensionfund.org/members/about-us/how-we-manage-the-fund/governance-structure/pfc/>

Pensions Service

3.9 The Chief Operating Officer and Pension Fund Committee are supported by the Pensions Service, the officer team lead by the Head of Cheshire Pension Fund.

3.10 The Pensions Service has day to day responsibility for the management and operation of the Cheshire Pension Fund's affairs, including benefits administration, investments and accounting and stakeholder engagement.

Audit and Governance Committee

3.11 The Council reviews the discharge of its responsibilities for the Fund through the Council's Audit and Governance Committee.

3.12 Pension Fund Committee minutes are reported to the Council's Audit & Governance Committee who discharge Council oversight of the Fund.

3.13 Audit & Governance agenda and papers are publicly available via the Council's website at:

www.cheshirewestandchester.gov.uk/home.aspx

Local Pension Board

3.14 The Local Pension Board is a statutory body and its role, as defined by the Public Service Pensions Act 2013, is to assist the Council in ensuring effective governance and administration of the Fund and compliance with all relevant legislation and guidance, and the requirements of the Pensions Regulator.

3.15 The Board has a membership of five, an independent, non-voting Chair, along with two employer and two scheme member representatives. The Board meets quarterly, and Board minutes are published on the Pension Fund website.

3.16 Scheme members or members of the public may submit questions to the Local Pension Board via the website.

3.17 The Board produces its own Annual Report which is published within the Cheshire Pension Fund Annual report.

Pension Consultative Forum

3.18 The Council has established a Pensions Consultative Forum made up of representatives from participating employers. The Forum typically meets up to four times per year and provides important engagement with and feedback from employers on the operation of the Fund and development of administrative policy.

Terms of Reference

3.19 The terms of reference of the Pension Fund Committee, Investment Sub-Committee, Local Pensions Board and Pension Consultative Forum are attached at Appendix B to this Governance Compliance Statement.

External Advisers

3.20 Recognising the complexity of pension investment, funding, and administration the Council has retained independent external investment consulting and actuarial advice to support the Chief Operating Officer, the Pension Fund Committee, and the Local Pension Board.

3.21 The Council's appointed Actuary, Hymans Robertson, and Strategic Investment Advisor, Mercer, are invited to all Pension Fund Committee meetings and other meetings with Fund officers.

3.22 Specialist external legal advice is retained as required.

Other Council input

3.23 Other Council officers, including the Director of Governance (and Monitoring Officer) and the Council's Legal Services also advise the Chief Operating Officer.

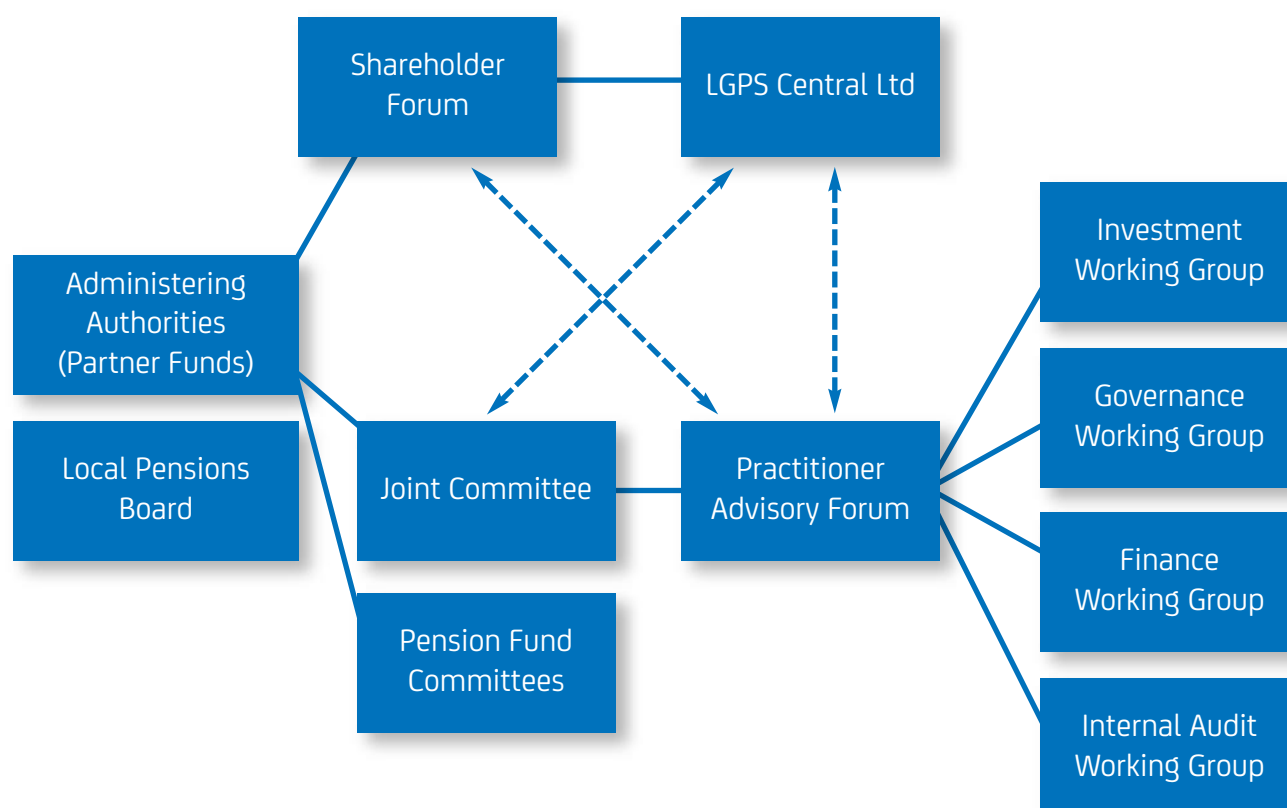
4. Investment Pooling Governance

Background

- 4.1** In April 2018, the Council was a co-founder of the LGPS Central Pool in response to the LGPS (Management and Investment of Funds) Regulations 2016 and associated statutory guidance which require all Administering Authorities to commit to a suitable pool and to “set out their approach to pooling investments, including the use of collective investment vehicles and shared services”.
- 4.2** The LGPS Central pool is a partnership of eight Administering Authorities, Cheshire, Derbyshire, Leicestershire, Nottinghamshire, Shropshire, Staffordshire, West Midlands, and Worcestershire Pension Funds (known as the Partner Funds) to enter into collective arrangements for the investment of their LGPS fund assets.
- 4.3** The Partner Funds have established LGPS Central Ltd (the Company), an arms-length investment company that manages the partner funds’ pooled investments. The Company is regulated by the Financial Conduct Authority and is controlled within the meaning of the Public Contract Regulations 2015.
- 4.4** The Partner Funds and the Company work together to develop pooled investment approaches which meet LGPS pooling requirements, Partner Funds’ strategic investment aims and deliver the benefits of pooling.
- 4.5** Cheshire Pension Fund assets will transfer to the Company’s management on a phased basis. Prior to transition, assets remain managed under legacy arrangements with appointed external managers. The Pension Fund Committee, advised by the Investment Sub-Committee, oversees the investment performance of the Company and legacy external managers.

Investment Pooling Governance Structure

- 4.6** The investment pooling governance structure is shown in the diagram below. There are separate governance arrangements reflecting Partner Funds’ roles as both shareholder and customer of the Company.



Shareholder role

- 4.7 Partner funds are joint and equal shareholders in the Company. They have entered into a Shareholder Agreement that governs how Partner Funds manage their collective relationship with, and ownership of, the Company.
- 4.8 The Shareholder Agreement also sets out areas of Company decision making which require shareholder approval, known as Reserved Matters. The Shareholder Agreement specifies which Reserved Matters require unanimous partner fund approval and which may be decided by a majority of shareholders (and a majority is specified as six out of eight shareholders).
- 4.9 A Shareholder Forum, comprising the nominated shareholder representatives from the eight Partner Funds meets twice yearly, usually in advance of Company meetings.
- 4.10 The Council has separated its shareholder and client representatives reflecting the different roles and responsibilities each undertake.
- 4.11 The Council's Shareholder Representative is the Cabinet Member for Finance who has discretion to exercise shareholder voting rights at Company meetings, with advice from the Chief Operating Officer as required.

Client Role

- 4.12 A Joint Committee oversees client matters, including pooling progress, delivery of pooling benefits and scrutiny of the investment performance of the Company's pooled investment funds.
- 4.13 The Joint Committee is made up of nominated representatives from the Partner Funds, usually elected members, plus a scheme member representative nominated by the trade unions.
- 4.14 Joint Committee is a public meeting. It meets twice yearly and its agenda and papers are available on the Cheshire Pension Fund website via: www.cheshirepensionfund.org/members/about-us/how-we-manage-the-fund/governance-structure/pfc
- 4.15 The Joint Committee is not a decision-making body but can make recommendations to the individual Partner Funds.
- 4.16 The Council's representative on the Joint Committee is the Chair of the Pension Fund Committee.

Practitioner Advisory Forum

- 4.17 The Practitioners Advisory Forum is an officer working group made up of senior pension officers of the eight Partner Funds. It oversees the delivery of investment pooling and the transition of Partner Fund assets and supports the Shareholder Forum and Joint Committee.

5. Governance – review of effectiveness

- 5.1 The Council commissions independent review of the effectiveness of Fund governance arrangements.
- 5.2 The last independent review was undertaken in 2018-19 by Barnett Waddingham whose overall conclusion was that the governance and decision-making arrangements in place, were 'effective, and considered to be among the most well informed'. Several helpful recommendations were made, but no fundamental changes were proposed.
- 5.3 A further independent review will be commissioned once the recommendations from the SAB Good Governance review have been brought into effect by DLUHC.
- 5.4 Administering Authorities are required to assess current practice against statutory guidance and the latest assessment is attached at Appendix 1.
- 5.5 The Council also assesses its arrangements against the seven principles set out in the CIPFA/SOLACE 'Delivering Good Governance Framework 2016'. The latest assessment is included in Appendix 2 to this statement.

6. Knowledge and Skills

- 6.1 The Council recognises the need for Fund Officers as well as Pension Fund Committee and Local Pension Board members to have an appropriate level of skill to undertake their roles effectively.
- 6.2 To this end the Council's objectives are to ensure that:
- Those charged with financial management and decision-making regarding the Fund are fully equipped with the knowledge and skills required to discharge the duties and responsibilities allocated to them.
 - Those responsible for the day-to-day administration and running of the Fund are appropriately equipped with the knowledge and skills required to discharge their duties and responsibilities in relation to the Fund.
 - Those responsible for providing governance and assurance of the Fund have sufficient expertise to be able to evaluate and challenge the advice they receive, to ensure their decisions are robust and soundly based, and to manage any potential conflicts of interest.

- 6.3** To help meet these objectives, the Council has adopted the CIPFA Knowledge and Skills Framework, and The Pensions Regulator's Code of Practice as the basis for assessing training and development requirements and for on-going delivery planning. These have informed the development and publication of the Fund's Training Policy, which details the training strategy for members of the Pension Fund Committee, the Local Pension Board, and Senior Officers involved in the management of the Fund.
- 6.4** The Training Policy is reviewed annually and is supported by regular re-assessment of individual knowledge and skills. These inform annual Training Plans which are based on the following key elements: -

	Training plan	How delivered
Individual Training Needs	A training needs analysis, based on the CIPFA Knowledge and Skills Framework, will be developed for each member and officer. Training plans will be developed based on the priorities identified.	<ul style="list-style-type: none"> • The Pensions Regulator – Trustee Toolkit (online learning) • External courses e.g. LGA Fundamentals training (for new members). • In-house training led by officers, external advisors, or third-party experts.
Corporate Training	Appropriate training will be provided at critical times to support specific decisions that the Committee need to make (i.e. valuation training, specific investment training).	<ul style="list-style-type: none"> • In-house training days provided by officers and/or external providers • Training as part of meetings • External training events • Attendance at seminars / conferences
Continued Awareness	Members and Officers will be required to maintain a general level of awareness of topical issues facing the wider pensions industry.	<ul style="list-style-type: none"> • Industry publications • Member Briefing packs • National press releases • Attendance at conferences and seminars

- 6.5** Newly appointed members of the Pension Fund Committee received induction training to provide a clear understanding of the Fund's governance, policies, and performance frameworks.
- 6.6** The Council's Chief Operating Officer (and S151 officer) is responsible for ensuring that the policy in respect of training and education is implemented.

7. Contacts and Further Information

Pension Fund website

Contains information about the Fund and includes all published documents and contact forms

www.cheshirepensionfund.org

You can also e-mail us at

pensions@cheshirewestandchester.gov.uk

Alternatively, write to us at:

Cheshire Pension Fund,
Cheshire West and Chester Council,
The Portal, Wellington Road
Ellesmere Port, CH65 0BA

Pensions Management team contact details

Head of Pension Fund

Steven Wilcock

steven.wilcock@cheshirewestandchester.gov.uk

Stakeholder Relations Manager

Nick Jones

nick.jones@cheshirewestandchester.gov.uk

Operations Manager

Heidi Catherall

heidi.catherall@cheshirewestandchester.gov.uk

Cheshire West and Chester Council website

Contains information about the Council's constitution, scheme of delegation, committee terms of reference and agenda papers and minutes, including those of the Audit & Governance Committee

www.chesterwestandchester.gov.uk

LGPS Regulatory Compliance Assessment

LGPS Regulations require pension funds to issue a statement confirming the extent to which their governance arrangements comply with guidance issued by the Secretary of State. The statement below confirms the mechanisms in place in relation to the Cheshire Pension Fund to satisfy each requirement.

Principle	Compliance	Evidence of Compliance
Delegation		
The Management of the administration of benefits and strategic management of the Fund assets clearly rests with the main committee established by the appointing Council.	Partial	<ul style="list-style-type: none"> The Council has delegated responsibility for the Cheshire Pension Fund to the Chief Operating Officer who is also Section 151 Officer. The Chief Operating Officer is advised by the Pension Fund Committee which in turn has established an Investment Sub-Committee. The Chief Operating Officer is supported by the Pensions Service lead by the Head of Cheshire Pension Fund. These arrangements reflect the position following several local government reorganisations in Cheshire and ensure that Administering Authority and Non-Administering Authority Council representatives have equal status and voting rights on the Pension Fund committee. Independent review has assessed these local arrangements as sound and effective.
Where a secondary Committee or Board has been established, the structure ensures effective communication across both levels.	Compliant	<ul style="list-style-type: none"> Investment Sub-Committee, reporting to the Pension Fund Committee has been established to provide greater focus and oversight on delivery of the investment outcomes set out in the Investment Strategy Statement.
Representation		
<p>All key stakeholders are afforded the opportunity to be represented within the governance structure. These include:</p> <ul style="list-style-type: none"> Scheme employers (including non-local government employers e.g. admitted bodies) Scheme members (including deferred and pensioner scheme members) Independent professional observers, and Expert advisors (on an ad hoc basis) 	Partial	<ul style="list-style-type: none"> All participating employers and scheme members are represented on either one or more of the Pension Fund Committee, the Local Pension Board, or Pensions Consultative Forum as summarised below. Local Councils are represented on the Pension Fund Committee (the advisory panel to the Chief Operating Officer) and Pensions Consultative Forum. Non-local government employers are represented on the Pensions Consultative Forum. Nominated Trade Union representatives represent scheme members on the Pension Fund Committee, Local Pension Board, and Pension Consultative Forum. There is no formal representation for independent professional observers, but current governance arrangements have been independently assessed as effective. Expert actuarial and investment advisors regularly attend meetings of the Pension Fund Committee and Investment Sub-Committee. Other advisors attend on specific issues as and when required.

Principle	Compliance	Evidence of Compliance
Voting		
The policy on voting rights is clear and transparent.	Compliant	<ul style="list-style-type: none"> Voting rights are clearly set out in the terms of reference for each of the governance bodies.
Training / Facility time / Expenses		
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 re-imbursement of expenses in respect of members involved in the decision-making process.	Compliant	<ul style="list-style-type: none"> There is a clear published policy on training for both Committee and Board members, facility time and reimbursement of expenses in respect of those involved in the decision-making process.
Where such a policy exists, it applies equally to all members of the main and sub committees and Board.	Compliant	<ul style="list-style-type: none"> The policy applies equally to all members of Pension Fund Committee, Investment Sub-Committee and Local Pensions Board.
Meetings (Frequency / Quorum)		
Meetings are held regularly	Compliant	<ul style="list-style-type: none"> The Pension Fund Committee meets quarterly with additional meetings when required. Investment Sub-Committee meetings are quarterly and are synchronised with the Pension Fund Committee. The Consultative Forum will also meet up to a maximum of four times per year. The Local Pension Board meets four times per year. Minutes are reviewed by the Pension Fund Committee and vice versa.

Principle	Compliance	Evidence of Compliance
Access		
Subject to any rules in the council's constitution, all members of main and secondary committees, Boards, or forums have equal access to committee papers, documents, and advice that is considered at meetings of the main committee.	Compliant	<ul style="list-style-type: none"> • All members of Pension Fund Committee and Investment Sub-Committee have equal access to meeting papers, documents, and advice. • Pension Fund Committee papers and minutes are published on the Fund's website. • Local Pension Board papers and minutes are equally available to all Board members.
Scope		
Administering Authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.	Compliant	<ul style="list-style-type: none"> • The Council has included benefits administration, investments, and wider governance issues under the remit of the Pension Fund Committee. All aspects of fund management and performance are reported to pension Fund Committee.
Publicity		
The Administering Authority has published details of their governance arrangements in such a way, that those stakeholders with an interest in the way the scheme is governed can express an interest to be part of those arrangements.	Compliant	<ul style="list-style-type: none"> • The Council publishes its policy and other documents of interest, including the Annual Report on the Fund's website. • Information on consultations about changes to policy or strategy are advertised via the website.

CIPFA/SOLACE Compliance Assessment

Supporting principles	How we demonstrate in practice
Principle 1 : Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law	
<ul style="list-style-type: none"> • Behaving with integrity • Demonstrating strong commitment to ethical values • Respecting the rule of law 	<ul style="list-style-type: none"> • Codes of Conduct – establish clear standards of behaviour for Pension Fund Committee members and Fund officers. • Declarations of interest – standing item on all committee agenda, with all disclosures recorded. • Conflicts of Interest Policy – ensures impartiality of Local Pension Board members. • THRIVE values – (Teamwork, Honesty, Respect, Innovation, Value for Money, Empowerment) underpin staff performance management framework. • Breaches log – breach reporting and monitoring in place with regular quarterly updates to Local Pensions Board and Pension Fund Committee. • Independent Dispute Resolution Process (IDRP) in place, ensures all complaints are dealt with impartially. • Investment Strategy Statement (ISS) and Responsible Investment Policy (RI) set out Fund's approach to investment stewardship including how environmental, social and governance factors are taken into account in investment decision making and ongoing monitoring.
Principle 2 : Ensuring openness and comprehensive stakeholder engagement	
<ul style="list-style-type: none"> • Openness • Engaging comprehensively with institutional stakeholders • Engaging with individual citizens and service users effectively 	<ul style="list-style-type: none"> • Communication & Engagement Strategy identifies key stakeholders, priority themes for engagement and communication media. • Website – all key policy documents, committee agenda papers and investment holding details published on Fund website. 24 hour on-line access to key membership information and forms. • Pension Consultative Forum – regular engagement with representatives from main employer groups to consult on Fund developments and gather feedback. • Employer meetings – at least one meeting per year held to update employers on Fund performance. • Customer Relationship Management approach under development to improve Fund/employer interface. • Benefits roadshows and 'drop-in' sessions for scheme members held annually. • Staff Bulletin and team away-days to keep staff up to date and informed of key issues/developments and to provide an opportunity for feedback. • Customer Service training programme for all staff to support high standards of customer care.

Supporting principles	How we demonstrate in practice
Principle 3: Delivering outcomes in terms of sustainable economic, social and environmental benefits	
<ul style="list-style-type: none"> Defining outcomes Defining sustainable economic, social and environmental benefits 	<ul style="list-style-type: none"> Pension Fund Business plan (approved annually) sets out long, medium and short term aims, objectives and target outcomes. Staff are set clear performance objectives and delivery targets (linked to the Pension Fund Business plan) against which they are appraised. Specific investment performance targets and benchmarks set for all investment portfolios, aligned to the Fund's long term funding strategy. ISS and RI policy set out the Fund's approach to long term, sustainable investment.
Principle 4: Determining the interventions necessary to optimise the achievement of intended outcomes	
<ul style="list-style-type: none"> Determining interventions Planning interventions Optimising achievement of intended outcomes 	<ul style="list-style-type: none"> Investment Risk/Performance trigger monitoring in place to prompt review of investment mandates and overall asset allocation when agreed thresholds are hit. On-going review of employer covenants, indemnity bonds, guarantees etc to ensure exposure to employer default is managed proactively. Business Continuity Plan in place and subject to regular review. Fund Risk Register updated quarterly, and control actions reviewed to mitigate potential threats to delivery of business plan objectives. Pensions Programme – major transformational change programme underway to modernise and improve service operating model in response to changing demands and expectations. Administration database development roadmap in place to ensure that the benefits of new technology are harnessed effectively in the delivery of planned outcomes. Regular monitoring of funding levels to assess appropriateness of existing strategic asset allocations.
Principle 5: Developing the Fund's capacity including the capability of its leadership and individuals within it	
<ul style="list-style-type: none"> Developing the Fund's capacity Developing the capability of the Fund's leadership and individuals within it 	<ul style="list-style-type: none"> CIPFA Knowledge & Skills Framework used to systematically identify training and development needs for Pension Fund Committee and Local Pension Board members and senior officers. Targetted induction training for new Pension Fund Committee and Local Pension Board Members. Skills audit undertaken across the team to identify individual training and development needs for all staff and as a basis for personal development plans. Career Grades introduced into the team structure, linked to professional training programme and the National Apprenticeship Scheme as a means of opening up structured learning opportunities and career 'pathways'. Co-ordinated programme of Management & Leadership training being rolled out to all junior and middle managers. Regular formal and informal collaboration and experience sharing with other LGPS Funds, to maximise capacity and resources.

Supporting principles	How we demonstrate in practice
Principle 6 :Managing risk and performance through robust internal control and strong public financial management	
<ul style="list-style-type: none"> • Managing risk • Managing performance • Robust internal control • Managing data • Strong public financial management 	<ul style="list-style-type: none"> • Fund Risk Register in place and reviewed quarterly. • Quarterly reporting to Local Pension Board, Investment Sub-Committee and Pension Fund Committee on investment and budgetary performance, operational KPIs and progress against business plan delivery targets. • Staff have regular one to one supervisory meetings and formal six-monthly performance reviews • Independent internal and external audit review of internal control processes • Data quality management plan under development • Positive internal audit review/feedback on GDPR implementation
Principle 7: Implementing good practices in transparency, reporting and audit to deliver effective accountability	
<ul style="list-style-type: none"> • Implementing good practice in transparency • Implementing good practice in reporting • Assurance and effective accountability 	<ul style="list-style-type: none"> • Fund website provides open, public access to all key policy documents, committee agenda papers/minutes, investment holdings. • Comprehensive Performance Management Framework developed to provide consistent reporting against key financial, non-financial and operational targets. • Plain English standards adopted for all Fund correspondence/communications • Annual Report reviewed and updated in the light of 2019 CIPFA Guidance • Full compliance with Freedom of Information disclosure requirements. • Independent review of Fund Governance arrangements to provide assurance regarding compliance and effectiveness. • Involvement at national level in development of guidance on Administrative Performance reporting.

Pension Fund Committee

Terms of Reference

- 1 The Pension Fund Committee's key responsibilities are to advise the s151 Officer on the management of the Cheshire Pension Fund, including the management of the administration of the benefits and strategic management of Fund assets, taking advice from an actuarial and strategic investment advisor.

The Committee principally fulfil this responsibility by:

- Meeting quarterly, or otherwise as necessary, to effectively monitor the management and administration of the Fund.
- Monitoring investment policy and overall investment performance.
- Selection, appointment, and dismissal of an investment pooling operator to manage the assets of the Fund.
- Determining what the Administering Authority requires the pool to provide to enable it to execute its local investment strategy effectively.
- Receiving and considering reports and recommendations from the Joint Committee, Shareholders Forum and Practitioners Advisory Forum, established to oversee the pool, and ensuring the Fund's investor rights and views are represented effectively.
- Identifying and managing risks associated with asset pooling.
- Ensuring that appropriate measures are in place to monitor and report on the ongoing costs of investment pooling.
- Ensuring the responsible investment, corporate governance and voting policies of the Fund are delivered effectively.
- Reviewing the Funds governance arrangements and the effective use of its advisors to ensure good decision-making.
- Overseeing the Pensions Consultative Forum (PCF) arrangement and compliance with best practice.
- Receiving recommendation from the (PCF) on ways to improve the administration and communication between the scheme, its employers and members.
- Reviewing and advising on the development of an Investment Strategy Statement, Funding Strategy Statement, Communication Policy, Administration Policy, Governance Compliance Statement and publishing a Pension Fund Annual Report.

- 2 On an interim basis, in respect of non-pooled, legacy assets; the Pension Fund Committee is also responsible for:-

- Overseeing the appointment and termination of investment managers
- Reviewing the performance benchmarks and targets for investment managers

- 3 The Committee receive recommendations from the Investment Sub-Committee, the Local Pension Board, and Pensions Consultative Forum (PCF) to enable it to discharge its responsibilities effectively.

Committee Membership and Representation

	Representation	Voting Rights
Cheshire West and Chester Council	Four Councillors	Yes
Cheshire East Council	Four Councillors	Yes
Halton Borough Council	One Councillor	Yes
Warrington Borough Council	One Councillor	Yes
Employee representative	Union Representative	No

- 4 Cheshire West and Chester Council as the Administering Authority ensure that the correct political balance is maintained where applicable.
- 5 Decisions are usually made by consensus, should a vote be required then decisions are made by a clear majority and the Chair of the Committee has a casting vote should there be a tie in the voting.

Investment Sub-Committee

- 1 The Sub-Committee is open to all members of the Full Committee and ensures that the Pension Fund Committee limited governance time is utilised in the most efficient manner, with this Sub-Committee focussing on more complex investment issues.
- 2 The Sub-Committee fulfils this responsibility by:-
 - On a quarterly basis, reviewing the performance of the Pension Fund and the pool operator against the objectives, benchmarks and targets set.
 - After taking appropriate advice, identifying, and implementing any tactical asset switches (within ranges prescribed by the Pension Fund Committee).
 - Receiving reports from the Fund's investment managers and other service providers on issues that may affect the Fund's investment strategy and objectives and considering if, and to what extent, any recommendations to the Pension Fund Committee may be necessary to ensure the efficient and effective performance of the Pension Fund.
 - Receiving reports on Responsible Investment issues impacting the Fund's investment portfolio.
- 3 On an interim basis, in respect of non-pooled, legacy assets the Investment Sub-Committee is also responsible for:
 - On a quarterly basis, reviewing the performance of Fund managers against the objectives, benchmarks and targets set
 - Receiving and considering any investment manager or service provider issues escalated to the Sub-Committee by key officers

Sub-Committee Membership and Representation

	Representation	Voting Rights
Cheshire West and Chester Council	Four Councillors	Yes
Cheshire East Council	Four Councillors	Yes
Halton Borough Council	One Councillor	Yes
Warrington Borough Council	One Councillor	Yes

- 4 Cheshire West and Chester Council as Administering Authority ensure that the correct political balance is maintained.
- 5 The Investment Sub-Committee are not a decision-making body but may make recommendations to the main Pension Fund Committee.

Local Pension Board

- 1 The role of an LGPS Board is defined by Public Service Pensions legislation and LGPS Regulations.
- 2 The Board's aim is to assist the Administering Authority to ensure the effective and efficient governance and administration of the LGPS, including:
 - Securing compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS;
 - Securing compliance with requirements imposed in relation to the LGPS by the Pensions Regulator;
 - Such other matters as the LGPS regulations may specify.
- 3 The Board will ensure it effectively and efficiently complies with the Guidance issued by the LGPS Scheme Advisory Board and may determine the areas it wishes to consider including:
 - Meeting for a minimum of two occasions during a twelve-month period
 - Reviewing regular compliance monitoring reports which shall include reports to, and recommendations of, the Committee and delegated decisions made under the Regulations
 - Monitoring complaints and performance on the administration and governance of the scheme.
 - Reviewing the implementation of revised policies and procedures following changes to the scheme.
 - Reviewing the arrangements for the development of Board members and those elected members and officers with delegated responsibilities for the management and administration of the scheme.
 - Reviewing the exercise of employer and Administering Authority discretions.
 - Reviewing the outcome of internal and external audit reports, review the draft accounts and the scheme Annual Report.
 - Any other area within the core function (i.e. assisting the Administering Authority) the Board deems appropriate.

Membership and Representation

	Representation	Voting Rights
Independent Chair	One	No
Employer Representative	Two	Yes
Scheme member representative	Two	Yes

Pension Consultative Forum

- 1 The Council is keen for all employers to participate in the efficient and effective administration of the Fund and achieves this through the Pension Consultative Forum, which consists of employer representatives from Local Authorities, Council Owned Companies, Cheshire Police, Fire and Rescue Authorities, Parish and Town Councils, Housing Associations, Admitted Bodies, Academies, Colleges and the Trades Unions.
- 2 The Forum allows these stakeholders to bring their own perspective to the management of the Fund. The Forum's key responsibilities are set out below.
- 3 The Forum determine the frequency of meetings, subject to a minimum of four meeting per year, or otherwise as necessary to:
 - Consult on and review performance against the Fund's administration strategy to ensure it clearly outlines all responsibilities of both the Fund and employers including any applicable charges/penalties for non-compliance.
 - Consult on and review performance against the Fund's communication policy and suggest improvements for the efficient and effective flow of information between the Fund and employers.
 - Make and implement recommendations on the administration strategy and communication policy of the Fund.
 - Assist the Fund and employers to comply with all requirements of the Pensions Regulator's Code of Practice No 14 Governance and Administration in Public Sector Pension Schemes, in particular reporting breaches of the law and record keeping.

Membership and Representation

Membership	Representation
Chair	One
Cheshire West and Chester Council	Two
Cheshire East Council	Two
Warrington Borough Council	One
Halton Borough Council	One
Cheshire Police, Cheshire Fire and Rescue	One
Academies, Colleges, Admitted Bodies, and the Housing Trusts	One rep per body

LGPS Central Joint Committee

- 1 The Joint Committee is a public forum for the Councils within the LGPS Central Pool (the Pool) to provide oversight of the delivery of the objectives of the Pool, the delivery of client service, the delivery against the LGPS Central business case and to deal with common investor issues.
- 2 The Joint Committee shall provide assistance, guidance, and recommendations to the individual Councils in connection with the functions set out below taking into consideration the conflicting demands and interests of the participants within the Pool. The Joint Committee does not have delegated authority to make binding decisions on behalf of the participating Councils.

Membership

- 3 The Joint Committee shall consist of one elected member from each Council.
- 4 Each council may nominate one or more elected member (s) to attend any meeting of the Joint Committee or its sub-committees in place of an appointed member from a Council, subject to prior notification being given to the Clerk to the Joint Committee or his or her nominee.
- 5 Each council may remove its appointed members or substitute members and appoint different members and substitutes by giving written notice to the Clerk to the Joint Committee or his or her nominee.
- 6 Each appointed member or substitute shall be entitled to remain on the Joint Committee for so long as the Council appointing them so wishes, but shall cease to be a member or substitute if he or she ceases to be a member of the appointing Council or if that Council removes the appointed member.
- 7 Any vacancies will be filled as soon as reasonably practicable by the Council from which such vacancy arises by giving written notice to the Clerk to the Joint Committee or his or her nominee.
- 8 Each member of the Joint Committee shall comply with any relevant codes of conduct of their Council when acting as a member of the Joint Committee.
- 9 A Trade Union representative shall be appointed as a non-voting member of the Joint Committee to represent the scheme members across the Councils' pension funds.

Role and function

- 10** To provide oversight of the objectives of the Pool as listed below:
- to meet the investment objectives of the participating LGPS funds;
 - to establish a collaborative platform through which the Councils can aggregate their pension assets with a view to providing scale economies and improved investment efficiency;
 - to develop internal investment management capabilities for the collective benefit of the Councils in order to provide wider investment choice and market competition;
 - to create capacity to invest in asset classes which individual funds may find difficult to access;
 - to stimulate innovation, and provide an opportunity for funds to engage with the investment industry in finding new and creative approaches to the funding challenges faced by the LGPS (and the wider pensions sector);
 - to act as a responsible, long term investor, using its influence to promote the highest standards of corporate stewardship;
 - to create a regional centre of excellence for investment management, able (in the long term) to offer services to other pension funds, charities and endowments; and
 - Following transitioning arrangements, to invest each Shareholder's pension assets including any assets administered for and on behalf of other parties either through the collective investment vehicle(s) operated by LGPS Central Ltd, as the primary and exclusive collective investment vehicle(s) for all eligible pension assets, or by appointing LGPS Central Ltd to manage any non-eligible pension assets outside of such vehicle(s).
- 11** To provide oversight of the delivery of client service.
- 12** To provide oversight of delivery against the LGPS Central business case.
- 13** To deal with common investor issues, with a particular focus on Responsible Investment.

Practitioners' Advisory Forum

- 14** The Practitioners' Advisory Forum (PAF) shall provide a central resource for advice, assistance, guidance, and support for the Joint Committee and shall support the functions of the Joint Committee. PAF shall provide technical support at meetings of the Joint Committee and shall act as a conduit for the Joint Committee to communicate back to the respective Councils and/or direct to LGPS Central Ltd as appropriate.

Meetings

- 15** The Clerk to the Joint Committee will be the Head of Paid Service or nominee of Cheshire West and Chester Council who will work within a budget set by the Councils.
- 16** The Joint Committee will meet twice a year in June and December either remotely or in person, with the location to be rotated around the Shareholding Councils.
- 17** The Clerk to the Joint Committee or his or her nominee will give notice to the public of the time and place of the meeting in accordance with Part VA of the Local Government Act 1972. At least five clear working days before a meeting, the clerk to the Joint Committee or his or her nominee will send a summons signed by the Clerk to the Joint Committee or his or her nominee electronically to every Member. The summons will give the date, time and place of each meeting and specify the business to be transacted and will be accompanied by such reports as are available.
- 18** Each Council within the LGPS Central Pool will publish a link on its own website to the relevant page on Cheshire West and Chester Council's website providing access to the Joint Committee's agendas and minutes.

¹ Meetings of councils and their committees are expected to be open to the public, except in the circumstances set out in Part VA of the Local Government Act 1972.

- 19** The Chair and Vice Chair of the Joint Committee will be elected by the Joint Committee from amongst its members and shall hold those offices until the first meeting after 1st May in the following year. Both the initial and subsequent Chairs and Vice Chairs may be re-appointed to serve a further term or terms.
- 20** If there is a quorum of members present but neither the Chair nor the Vice Chair is present at the meeting of the Joint Committee, the other members of the Joint Committee shall elect one of the members of the Joint Committee as Chair of the Joint Committee for that meeting only.
- 21** The quorum of a meeting will be at least five members who are entitled to attend and vote.
- 22** Each elected member shall have one vote on any recommendations. Any matter will be decided by a simple majority of those members of the Councils represented in the room at the time the question was put. In the case of an equality of votes the Chair shall have a second or casting vote but before exercising this, the Chair shall consider whether it is appropriate to defer the matter to the next meeting of the Joint Committee. The Chair shall take account of the governing principles to the LGPS Central pooling agreement when exercising the casting vote.
- 23** The member appointed as a substitute shall have the same voting rights as the member for whom he or she is substituting and who does not attend. Where the appointed member attends the substitute member shall not have any right to vote after the conclusion of the item of business being discussed when the appointed member arrives but may remain at the meeting as an observer.
- 24** The Chair will take the vote by show of hands, or if there is no dissent, by the affirmation of the meeting.
- 25** The Clerk to the Joint Committee or his or her nominee shall arrange for written minutes to be taken at each meeting of the Joint Committee and shall send them to the members of the Joint Committee for on-line approval within three weeks of the meeting. At the next meeting of the Joint Committee, the Chair shall move that the minutes of the previous meeting be ratified as a correct record. If this is agreed, the Chair of the Joint Committee shall sign the minutes.
- 26** Any elected member of the Councils who is not a member of the Joint Committee may speak at a meeting of the Joint Committee if the Chair of the Joint Committee invites him or her to do so but an elected member of the Councils who is not a member of the Joint Committee shall not be entitled to vote at a meeting of the Joint Committee.
- 27** Meetings of the Joint Committee shall be open for members of the public to attend unless the Joint Committee determines that it is necessary to exclude members of the public in accordance with Part VA of the Local Government Act 1972 or the Joint Committee determines that it is necessary to take action because of a disturbance. Copies of the agenda for meetings of the Joint Committee and any reports for its meetings shall be open to inspection by members of the public at the offices of all of the Councils unless the Clerk to the Joint Committee determines that any report relates to items in which his or her opinion are likely not to be open to the public.
- 28** In accordance with Part VA of the Local Government Act 1972, the Joint Committee shall exclude the public from its meetings whenever it is likely, in view of the nature of the business to be discussed or the nature of the proceedings that, if members of the public were present, confidential information would be disclosed to them in breach of the obligation of confidence.
- 29** If any member of the public interrupts proceedings, the Chair will warn the person concerned. If they continue to interrupt, the Chair will arrange for their removal from the meeting room and will suspend the meeting until the member of the public has left or been removed.
- 30** If there is a general disturbance in any part of the meeting room open to the public, the Chair may call for that part to be cleared.
- 31** Each Council will undertake the overview and scrutiny function on its own behalf in accordance with their constitutions.
- 32** Items for inclusion in the meetings:
- Update on delivery against the objectives of the Pool
 - Investment Performance & Cost Reporting
 - Benchmark Reporting
 - Service Level Agreement Reporting
 - Update on delivery against the LGPS Central Business Case
 - MHCLG & SAB Reporting
 - Responsible Investment
 - Investment Outlook
 - Training/LGPS Central Events Programme
 - Other Relevant Common Investor Issues
- Terms of Reference Review**
- 33** These terms of reference will be reviewed annually.

LGPS Central Shareholders' Forum

Terms of Reference

- 1 The primary role of the Shareholders' Forum is to oversee the operation and performance of LGPS Central Ltd (the Company) and to represent the ownership rights and interests of the Shareholding Councils (the Councils) within the LGPS Central Pool (the Pool). The Shareholders' Forum is independent of the Company and its meetings are distinct from Company meetings, however members of the Shareholders' Forum will also represent the Councils at Company meetings.
- 2 The Councils are individual investors in the Company and each Council will have in place local arrangements to enable its Shareholder representative to vote at Company meetings. The Shareholders' Agreement ensures that the Councils act in a unified way, having agreed to a common set of principles and collective Shareholder discussions will take place in the Shareholders' Forum.
- 3 Decisive Shareholder influence over the Company, which is required to ensure that the Company's compliance with Public Contract Regulations (known as Teckal compliance), is demonstrated via the reserved matters which are contained in the Shareholders' Agreement.

Membership

- 4 Membership of the Shareholders' Forum will consist of one representative from each Council, to be determined locally by the individual Council. Representatives are likely to be elected members.
- 5 Each Council may nominate one or more representative (s) to attend any meeting of the Shareholders' Forum in place of an appointed representative from a Council.
- 6 Directors or representatives of the Company may be invited to attend Shareholder Forum meetings, in particular to present on any reserved matters, which require authorisation, by the Shareholders.

Role and function

- 7 To debate, discuss and seek to agree common responses to Company matters requiring authorization by the Shareholders. Matters requiring authorisation include:
 - a Strategic Plan for each Financial Year
 - an Annual Budget including:
 - an estimate of the working capital requirements of LGPS Central Ltd incorporated within a cash flow forecast.
 - a projected profit and loss account.
 - an operating budget (including estimated capital expenditure requirements and balance sheet forecast).

- a summary of business objectives; and
 - A financial report, which includes an analysis of the results of LGPS Central Ltd and the established collective vehicles for the previous Financial Year, compared with the Strategic Plan for that Financial Year, identifying variations in revenues, costs and other material matters.
 - Reserved Matters; and
 - Changes to the governance arrangements of the Company
- 8 To procure the Board to formally review and report (the Structural Review) on the corporate structure of LGPS Central and any of its Group Companies and the operation of their respective boards of directors and board committees every six months from the date of the original Shareholders' Agreement (11th August 2017) until the third anniversary of the Agreement and, thereafter, on each anniversary of the Agreement.
 - 9 To consider the resulting Structural Review and any recommendations regarding more efficient governance, any reductions of costs and/or improvements of performance and seek to agree a common response to the recommendations requiring authorisation.
 - 10 To procure from LGPS Central Ltd and consider such financial information as is necessary to keep each Shareholder informed about how the business of LGPS Central Ltd is performing.

This information will include:

- quarterly management accounts and reports on operational effectiveness.
 - unaudited Annual Accounts.
 - audited Annual Accounts; a medium-term Strategic Plan; and
 - A report on the company's progress against objectives/milestones set out in the Strategic Plan.
- 11 To procure from LGPS Central Ltd and consider other information relating to the operations and management of LGPS Central Ltd, having regard to the Shared Objectives of the LGPS Central Pool and the duties and responsibilities of the Shareholders. Such information is likely to include:
 - staffing structures.
 - changes in key personnel.
 - internal controls.
 - compliance and regulatory matters.
 - customer feedback and complaints; and
 - Staff surveys.

Practitioners' Advisory Forum

1. Purpose

- 1.1** Practitioners Advisory Forum (PAF) is the collective group of senior officers from each Partner Fund, who, through their own authority's scheme of delegation, have responsibility for the management and administration (including investment matters) of their respective LGPS Funds.
- 1.2** As persons charged with the responsibility for their LGPS Funds, in the context of LGPS Investment Pooling, they have three areas of responsibility:
- a)** Statutory responsibility to ensure the legal obligations imposed on LGPS Funds are met, this includes the obligation to pool investments
 - b)** Owner of the investment pooling company created to deliver investment pooling and meet its Fund's obligation to pool investments
 - c)** Client / Customer of the investment pooling company contracted to deliver and manage the pooled investment products
- 1.3** In the context of its three areas of responsibility, PAF as individual officers and a collective group of senior officers have responsibility to provide support and advice to their individual representatives who sit on the LGPS Central Joint Committee and their Shareholder representatives.
- 1.4** PAF's overriding objective is to guide, support and prioritise the focussed delivery of investment pooling in response to the individual authority's needs and interests ensuring each achieves the statutory requirement to deliver investment pooling as part of its investment strategy.
- 1.5** In delivering this objective, PAF will seek to manage conflicts, which have the potential to impact the overriding aim. Conflicts may arise either between the participating Authorities or between the Authorities (collectively) and LGPSC Ltd (the Company), recognising that speaking with "one voice" will reduce the duplication of costs and resources and maximise the benefits of scale.
- 1.6** PAF work will be supported by the Partner Fund Support Office (PFSO), appointed collectively by the Authorities and which is directly accountable to PAF. The role and purpose of the PFSO is to facilitate the work of PAF through secretariat roles and to lead engagement.

- 1.7** PAF supports Partner Funds in their roles as Shareholders owning the Company and as Commissioners of investment pooling services through LGPS Central Ltd, the pool operator which performs a range of functions. PAF supports shareholders in consideration of reserved matters and Company resolutions as presented.

2. Roles and Functions

Role as Shareholder

- 2.1** To oversee, challenge and ensure the Company's goals, ambitions and overall performance achieve the objectives set out in its annual business plan (including the budget), ensuring such business plan is fit for purpose in the context of its customers, their needs and ambitions, including the creation and delivery of products which meet those needs.

Role as Client/Customer

- 2.2** To receive investment services (under agreement) and to manage the performance of that agreement under normal contract management processes.

2.3 PAF's key responsibilities for each are summarised below:

Shareholder Roles and Responsibilities	Client Roles and Responsibilities
Supporting shareholders with decisions required under the Shareholder Agreement, at both a collective and local Fund level, with provision of information to support decision making	Commissioners of investment pooling services
Advising Shareholders' Forum meetings and briefings	Supporting and advising Joint Committee
Shareholder KPI development and delivery	Client KPI development and Risk management
Company commercial sustainability	Product development - Evaluation and approval of pooled product business cases
Company risks from a shareholder perspective	Monitoring investment performance
Resourcing to advise on Strategic Business Plan and budget setting and ensuring sufficient to meet regulatory requirements and client needs	Compliance assurance - to include AAF
Client satisfaction	Consideration of individual Funds' Responsible Investment and Climate Strategies to deliver common goals and objectives
Transition management approach facilitating optimal outcomes with LGPSC Ltd	
Assessment of investment costs and savings – Pool level and individual authority	
Internal audit assurance	

2.4 PAF provides a central resource for advice, assistance, guidance and support for the Joint Committee and the Shareholders' Forum and for the Authorities working collaboratively with the Company to deliver investment pooling.

2.5 PAF will act as a conduit for communication back to the respective Authorities and/or direct to the Company (LGPSC Ltd.) as appropriate on progressing investment pooling.

3. Membership and Chair of PAF

- 3.1 Each of the eight Partner Funds will be represented on PAF by their designated senior Officer(s) in accordance with that individual authority's scheme of delegation. Each Authority may send up to 2 representatives to ensure consistent representation. Additional Partner Fund officers may be invited to attend in support of matters under consideration at meetings.
- 3.2 When it is not possible for a representative to attend PAF, an email detailing their views on Agenda items they wish to be raised in the meeting should be sent to the PFSO and the Chair of the meeting in advance of the meeting. These views shall be presented by the Chair of the respective PAF meeting.
- 3.3 PAF may, from time to time invite officers from any Partner Fund to provide specific advice or expertise as required (e.g. Legal or Financial). Such invited officers do not have any decision-making responsibility, unless delegated to do so by the relevant Authority.
- 3.4 The Company will be invited to attend PAF meetings for relevant business items.
- 3.5 The Chair of PAF will be chosen from one of the Partner Fund Officers of PAF, with the position of Chair rotating on a 6-monthly basis between Partner Funds unless agreed otherwise by the constituent Authorities.
- 3.6 The Vice Chair of PAF will be the Officer expected to succeed the Chair on the rotational basis from the Partner Funds.
- 3.7 PAF will meet monthly, unless otherwise agreed. One PAF meeting each quarter will include a focus on the Shareholder Role described above, notwithstanding more frequent discussion in the normal course of PAF's workplan. The "hat" of responsibility will be clearly outlined in the meeting agenda to provide clarity on which role senior officers are taking in the consideration of matters to be determined or actioned.

4. Meetings

- 4.1 Meetings will be held either in person at one of the eight Administering Authority offices (as agreed) or virtually, with any cost of holding the meetings shared amongst the Partner Funds.
- 4.2 The agenda for each PAF meeting is co-ordinated by the PFSO and agreed with the Chair.
- 4.3 Agendas shall be issued, along with relevant papers, four working days before the meeting.

5. Working Groups

- 5.1 PAF may set up working groups and task and finish groups on either an interim or permanent basis according to requirements.
- 5.2 Working Groups shall report back into PAF following meetings of the working group and recommendations for taking actions forwards. PAF may delegate actions and some elements of decision making to be taken forward by individual working groups.

6. Partner Fund Support Office

- 6.1 The Partner Fund Support Office (PFSO) will provide services to PAF to facilitate progressing investment pooling, this can include project management and finance support as well as administration and secretariat support.

This includes (but is not limited to):

- a) Coordinating dates, agendas and papers and attendance at meetings of PAF in liaison with Partner Funds and LGPSC Ltd.
- b) Coordinating dates, agendas, and papers, and attendance at meetings of the Shareholders' Forum.
- c) Assist with coordinating the Joint Committee meetings, agendas, and papers in conjunction with the Clerk to the Committee and in liaison with Partner Funds and LGPSC Ltd and PAF with LGPSC Ltd. and the clerk of the Joint Committee.
- d) Liaising between the Partner Funds, and on their collective behalf, with LGPS Central Ltd and other agencies when authorised to do so by the Partner Funds.

7. Terms of Reference Review

- 7.1 These Terms of Reference will be reviewed annually.

Risk Management

Each year the Fund produces a Business Plan setting out the high-level objectives for the next four years. In addition, the Fund produces a plan for the actions to be achieved in each individual year of the Business Plan.

The associated risks are captured within the Fund's risk register. Risks are categorised against the Fund's long-term strategic objectives in respect of: -

- **Governance**
- **Administration and Communication**
- **Funding**
- **Investments**

Risks are managed through a series of mitigations designed to reduce their likelihood and/or impact. Risk ratings are colour coded and risks are assigned a red, amber or green status according to the degree of assessed risk.

The Pension Fund Committee is responsible for approving the Business Plan, including risk register. The Committee regularly reviews the risk register to ensure that key risks are identified, evaluated and controlled to a suitable level. The Committee will also ensure that any planned mitigating actions are put into place.

Investment Risk

The Investment Sub-Committee regularly reviews investment risk and manager performance at its quarterly meetings and is assisted by the Fund's Investment Advisors Mercer Ltd.

LGPS Central Pool

There is a separate risk register relating to investment pooling which the Practitioner Advisory Forum, the main Partner Fund working group, maintains. The LGPS Central Joint Committee oversees the pool risk register to ensure risks are logged and mitigating actions put in place.

LGPS Central Ltd, the pooling delivery company, maintains its own risk register, which is overseen by the company board.

Systems of Internal Control

The Fund's Statement of Accounts and Annual Report are subject to external audit by Grant Thornton, who provide a separate opinion for both the accounts and the annual report. Grant Thornton also conduct interim audits throughout the year to test the design and effectiveness of the Fund's internal controls.

In addition to external audit, the Fund receives regular reviews from the Council's internal audit department who test the internal control systems and processes employed. Internal Audit obtain assurance on the internal control environment through a series of audits of key areas. The outputs from these audits are presented to the Local Pension Board.

During 2021/22 internal audit reviewed the process in place for the transfer of members benefits. The outcome from the audit is due in early 2022/23.

The following table summarises the highest scoring risks identified in setting the 2022/23 business plan, after considering mitigating actions and controls. These will be subject to ongoing monitoring throughout the year.

Business Plan Risks 2022-23

Objective	Risk	Planned action	Risk Status
Governance	Key person risk at Officer, Committee and Local Pension Board, leading to inappropriate, skills and knowledge, governance and management / administration of the Fund should key person(s) depart	<ul style="list-style-type: none"> Seek opportunities to widen the knowledge and skills base of all Committee and Board Members, as well as officers Production of a comprehensive suite of procedure notes for officers 	Amber
Governance	Failure to comply with the various statutory and regulatory requirements leading to potential non-compliance, reputational risk and penalties.	<ul style="list-style-type: none"> Respond to consultations on regulatory changes as they arise Continue engagement with practitioner groups Continue attendance at national conferences and seminars Review and/or develop policies in line with changing guidance e.g. cyber security, TCFD 	Amber
Governance	Cyber and information security risk (CISR) is the risk of loss (financial/non-financial) arising from digital events caused by external or internal actors or third parties, leading to service disruption, additional costs, potential fines and reputational damage	<ul style="list-style-type: none"> The Fund will develop its own cyber security policy to ensure the risk is managed in conjunction with ICT and will commission independent advice to help develop the policy The cyber security policy will be aligned with the Business Continuity Plan Ensuring there are clear roles and responsibilities between the ICT, the Fund and the administration database provider The administration database is being moved from an on-premise solution to a cloud hosted solution which will provide greater data security with regular technology upgrades, along with a robust business continuity and disaster recovery procedure Staff members to complete all mandatory training on cyber security risks 	Amber
Investment	Failure to effectively manage financially related investment risk from Environmental, Social and Governance factors, leading to the adoption of an investment approach which fails to place sufficient emphasis on the importance of strong financial returns to meet pension obligations	<ul style="list-style-type: none"> Develop a pro-active and outward looking approach to engaging with decision makers on ESG issues Continue to work with Partner Funds and LGPS Central to embed Responsible Investment in investment products Ongoing challenge to legacy managers to improve RI metrics Improved reporting and communication with Fund members on the Fund's positive ESG investments 	Amber
Investment	Failure to effectively manage the client and shareholder relationship with LGPS Central leading to slow transition of Fund assets, below target investment performance and planned savings and benefits set out in pooling business case not being realised.	<ul style="list-style-type: none"> More regular informal meetings of Shareholders Forum. Quarterly company performance reports shared with shareholders Earlier and clearer formal engagement with shareholders on company resolutions prior to Annual General Meeting Shareholder engagement in process to appoint new company directors Fundamental 3 year review of all existing investment products planned 	Amber
Funding	Significant financial and reputational loss to the Fund due to employer default.		Amber

Objective	Risk	Planned action	Risk Status
Administration and Communication	Failure to achieve the quality of data required by the Fund, and clear backlogs of casework, leading to inability to meet key regulatory changes, poor customer service, errors in calculating benefits, delays in processing casework and failure to meet statutory disclosures resulting in regulatory penalties.	<ul style="list-style-type: none"> The Fund has developed a Data Improvement Plan which will vastly improve the position over the next 12 months The Fund will be switching to a TPR common and scheme specific measuring report which is embedded within the administration database allowing us to identify and rectify all data anomalies in accordance with the 22 data fields identified by SAB Preparation for the Pensions Dashboard will further improve the quality of data held by the Fund and allow members to view their own record online from 2024 	Amber
Administration and Communication	Failure to implement technological developments to the administration database leading to an inability to free up capacity for the team and to remove processes which do not add value.	<ul style="list-style-type: none"> The Fund will continually seek opportunities to develop the system so as to take advantage of technological advancements which can benefit the Fund The recent re-tender of the administration database and move to cloud hosting will enable implementation of a number of new system modules supporting business process improvements and an improved customer experience 	Amber
Administration and Communication	Failure to resource or deliver revised communication and engagement strategy for Pensions Programme and enhanced Business as Usual communication/engagement.	<ul style="list-style-type: none"> Comms strategy to be signed off Qtr 1 2022/23 Operational/Resource plan to be signed off Qtr 1 2022/23 Additional resources requested to support roll out of Member Self-Serve 	Amber
Administration and Communication	Failure of employers to deliver their roles and responsibilities. Leading to poor customer service, not meeting expectations of the Pensions Administration Strategy or failure to meet statutory requirements and possible reporting of breaches to the Pension Regulator	<ul style="list-style-type: none"> New Employer Engagement plan to be developed by Comms Manager Compliance and reporting framework against Administration Strategy is being developed Regular cycle of employer comms to be implemented by Comms Manager 	Amber
All	Failure to meet the objectives of the pensions programme due to insufficient capacity of staff and competing priorities	<ul style="list-style-type: none"> Ongoing progress with the pensions programme on achieving the objectives will lead to increased capacity for staff once key milestones achieved (backlogs reduced/cleared, staff multi skilled, employers submitting data via MI and data quality improved) System developments will lead to reduced manual work required for some processes and will free up capacity for the team 	Amber

Funding and Investments

In addition to the service risks identified above, the Fund is exposed to a range of specific investment and funding risks. These are explained in detail, along with the risk management measures the Fund has put in place, in Note 19 of the Statement of Accounts.

In April 2020 the Fund elevated and prioritised the management of Climate Change Related investment risk in its revised Investment Strategy Statement and Responsible Investment policy.

In December 2020 the Fund published a Climate Change strategy, which consolidated all the Fund's climate change related beliefs, policies and targets into one document. This explained that the Fund formally acknowledges that there is a risk from holding investment assets with a high carbon footprint and/or a high level of exposure to fossil fuel assets.

These assets pose a particular risk in that markets may re-price fossil fuel and high carbon emitting assets in response to growing public concerns over climate change and the response of policy makers to this concern. Therefore, the Fund has adopted a precautionary approach to climate change investment risk and will pro-actively manage the risk by:

- Every year an independent assessment of publicly listed investment assets will be commissioned to determine the Fund's overall carbon footprint and assess potential climate change impacts and opportunities. To minimise its investment risk, the Fund has set a target of reducing the carbon footprint of its listed equity portfolio year on year and to reduce it to a level that is 50% lower than that of the general market.
- Each year the fund will publish a Climate Risk Report, which will fully comply with the requirements of the Task Force on Climate-related Financial Disclosures (TCFD). This report will report on the Fund's carbon footprint and assess the likely impact of different climate scenarios on expected investment returns.

- The Climate Risk report will include a climate change stewardship plan which will set goals of engagement with companies, fund managers and policy makers and influencers. The Fund believes that all companies should fully adhere to the requirements of the Paris Agreement on climate change and will actively engage with companies, ideally in partnership with like-minded investors, to ensure companies align their business plans with the 1.5C target.

The Fund believes the above mitigating actions have reduced the Fund's level of climate change related investment risk to within an acceptable tolerance level and therefore the risk is not included in the table on page 76.

The Fund obtains independent assurance about the internal control frameworks of its investment managers and custodian by obtaining copies of their audit reports, as set out in the table below:

Fund Manager	Type of Report	Assurance Obtained	Reporting Accountant
Legal & General	ISAE 3402	Reasonable assurance	KPMG LLP
Baillie Gifford & Co	ISAE 3402	Reasonable assurance	PricewaterhouseCoopers LLP
Patrizia	ISAE 3402	Reasonable assurance	BDO LLP
Bluebay	ISAE 3402	Reasonable assurance	PricewaterhouseCoopers LLP
Janus Henderson	ISAE 3402	Reasonable assurance	PricewaterhouseCoopers LLP
Blackstone	SOC 1	Reasonable assurance	Deloitte and Touche LLP
M&G Investments	SOC 1	Reasonable assurance	Ernst & Young LLP
Pantheon Ventures	ISAE 3402	Reasonable assurance	KPMG LLP
Adams Street Partners	SOC 1	Reasonable assurance	KPMG LLP
Darwin	ISAE 3402	Reasonable assurance	Ernst & Young LLP
Arrowgrass	ISAE 3402	Reasonable assurance	PricewaterhouseCoopers LLP
Bank of New York Mellon	SOC 1	Reasonable assurance	KPMG LLP
Lexington Capital Partners	SOC 1	Reasonable assurance	Ernst & Young LLP
LGPS Central Ltd	ISAE 3000	Reasonable assurance	Deloitte LLP

Employer Fund Level Monitoring and Investment Strategies

The Fund has recognised that over time, the characteristics and funding objectives of its participating employers have become increasingly diverse. Therefore, it has divided employers into four separate groups and operated a distinct investment strategy for each group. This approach was taken to recognise the different characteristics, cash flows, maturity of liabilities and funding levels of different employers.

In April 2020, following a review of the current groupings of employers, the Fund re-organised the employers into the following groups:

- **Open Employers**
- **Academies**
- **Exiting/Closed Employers**
- **Exited Employers**

The funding levels of each employer group and the appropriateness of their investment strategy are regularly monitored, and changes to investment strategies implemented when it is considered appropriate to do so.

Statement of Accounts for the year ended 31 March 2022

Cheshire Pension Fund - Fund Account for the year ended 31 March 2022			
	Notes	2021-22	2020-21
		£000	£000
Contributions and Benefits			
Contributions Receivable			
From Employers		152,219	160,387
From Employees		41,507	39,862
Total Contributions Receivable	6/6a	193,726	200,249
Transfers in from Other Schemes	7	12,877	12,244
Benefits Payable			
Pensions		-165,183	-161,135
Lump Sums		-30,891	-24,692
Death Benefits		-3,974	-5,092
Total Benefits Payable	8	-200,048	-190,919
Payments to and on account of Leavers			
Refund of Contributions		-562	-466
Transfers to Other Schemes		-15,036	-14,075
	9	-15,598	-14,541
Net Additions / (withdrawals) from dealing with members		-9,043	7,033
Management Expenses	10/10a	-27,585	-26,788
Returns on Investments			
Investment Income	11	31,873	30,128
Taxes on Income	12	-172	-115
Profits and losses on disposal of investments and changes in the market value of investments	13f	423,669	1,024,651
Net Returns On Investments		455,370	1,054,664
Net Increase/ (Decrease) in the Fund During the Year		418,742	1,034,909
Opening Net Assets of the Scheme		6,549,238	5,514,329
Closing Net Assets of the Scheme		6,967,980	6,549,238

Cheshire Pension Fund - Net Assets Statement as at 31 March 2022

	Notes	2021-22	2020-21
		£000	£000
Investment Assets	13/f, 17/18/19	6,958,758	6,539,874
Long Term Debtors	22	578	617
Current Assets	23	20,990	20,492
Current Liabilities	24	-12,346	-11,745
Total Net Assets		6,967,980	6,549,238

Note 1 – Description of the Fund

The Cheshire Pension Fund (the Fund) is part of the Local Government Pension Scheme (LGPS) and is administered by Cheshire West and Chester Council (the Council). The Council is the reporting entity for this pension fund.

The following description is a summary only. For more detail, reference should be made to the Cheshire Pension Fund Annual Report and the underlying statutory powers underpinning the scheme.

The scheme is governed by the Public Service Pensions Act 2013 and 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

The LGPS is a statutory, defined benefit, funded pension scheme. The Fund is administered by the Council to provide pensions and other benefits for pensionable employees of Cheshire West and Chester, Cheshire East, Halton and Warrington Borough Councils and a range of other scheduled and admitted bodies within the County of Cheshire area. The Fund excludes provision for teachers, fire fighters and police officers as they come within other national pension schemes. A full list of the employers contributing into the Fund is shown at the end of the Fund's Statement of Accounts.

Responsibility for managing the Fund lies with the full Council of Cheshire West and Chester Council. The Council has delegated responsibility for the Fund's affairs to the Chief Operating Officer, who is also the Section 151 Officer. The Chief Operating Officer is advised, by the Pension Fund Committee with external advice from Mercer the Fund's appointed investment consultant and Hymans Robertson the appointed actuary. The Council's Audit and Governance Committee oversees the Council's arrangements for the Fund.

The Local Pension Board was established with effect from the 1 April 2015 in accordance with the Public Service Pensions Act 2013. The role of the Board, as defined in regulations, is to assist the Administering Authority to ensure the effective and efficient governance and administration of the Fund. The Board is comprised of two Employer Representatives (including one Cheshire West and Chester nominated Councillor), two Scheme Member representatives, and one independent chair (non-voting).

The Cheshire Pension Fund operates four investment strategies each with different allocations to growth assets and diversifying and matching assets reflecting the differing pension liabilities and funding positions of employers. At 1 April 2021 the four strategies were as follows:

	Growth	Diversifying and Matching
Open Employers	50%	50%
Academies	50%	50%
Exiting / Closed Employers	50%	50%
Exited Employers	0%	100%

To manage the Fund's assets in accordance with its investment strategy, the Council had twelve appointed external investment managers as at 31 March 2022 who each have specific responsibility for part of the Fund's investment portfolio in addition to the LGPS Central asset pool.

As part of investment pooling, the Fund is continuing to transfer assets to LGPS Central Ltd, its jointly owned pooling delivery company. As at the 31 March 2022 LGPS Central Ltd managed £1,348m of the Fund's assets with additional private market commitments of £671m to be drawn down.

The Council uses the services of Bank of New York Mellon Asset Servicing to independently monitor the performance of the investment strategy as a whole and the contributions of individual managers. Performance is monitored against the Fund's tailored asset allocation benchmark rather than to a peer group benchmark.

Bank of New York Mellon Asset Servicing reported that for the year ending 31 March 2022 the Fund achieved a return from its investments of 6.9% (18.2% in 2020-21) compared with the Fund's tailored benchmark return of 5.8% (10.0% in 2020-21). For the three years ending 31 March 2022 the Fund achieved an annualised return of 7.7% per annum against the Fund's benchmark return of 4.9% per annum.

Membership

In accordance with the Government's Automatic Enrolment Legislation, eligible employees are automatically enrolled into the LGPS from their first day of employment. However membership of the LGPS is voluntary and after auto enrolment employees are able to choose whether to remain in the scheme, opt out of the scheme, re-join at a later date or to make their own personal arrangements outside of the scheme.

Organisations participating in the Fund include:

- Scheduled bodies (scheme employers), 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 organisation. Admitted bodies include voluntary, charitable and similar bodies or private contractors undertaking public sector authority functions following outsourcing.

In the year to 31 March 2022 a total of 321 employer organisations including the Administering Authority itself, contributed into the Fund.

Cheshire Pension Fund	31-Mar-22	31-Mar-21
Number of employers making contributions into the fund	321	308
Number of employees in the scheme		
Cheshire West and Chester Council	7,704	8,032
Other employers	32,962	33,035
Total	40,666	41,067
Number of pensioners		
Cheshire West and Chester Council	3,393	3,077
Other employers	29,036	28,007
Total	32,429	31,084
Number of Deferred pensioners		
Cheshire West and Chester Council	5,251	4,968
Other employers	27,148	26,430
Total	32,399	31,398
Undecided Leavers	2,388	2,145
Total Membership	107,882	105,694

Funding

Benefits are funded by contributions and investment earnings.

Contributions are made by active members of the Fund in accordance with the LGPS Regulations 2013 and range from 5.5% to 12.5% of pensionable pay for the financial year ending 31 March 2022.

In addition to employee contributions, employers pay contributions into the Fund which are set through triennial actuarial valuations. The last such valuation was at 31 March 2019 which set employer contribution rates for the 3 year period commencing 1 April 2020 and ending 31 March 2023, details of employer rates can be found in the Fund valuation report available on the Fund's website.

Benefits

From 1 April 2014, the LGPS became a career average revalued earnings (CARE) scheme, whereby members accrue benefits based on their pensionable pay each year at an accrual rate of 1/49th. The accrued pension is inflated annually in line with the Consumer Prices Index.

There are a range of other benefits provided under the scheme including early retirement, disability pensions and death benefits. For details, please refer to the scheme handbook which is available from the Fund or visit the website: www.cheshirepensionfund.org

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

	Service pre 1 April 2008	Service post 31 March 2008 to 31 March 2014
Pension	Each year worked is worth 1/80 x final pensionable salary.	Each year worked is worth 1/60 x final pensionable salary.
Lump sum	Automatic lump sum of 3 x pension. 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

Note 2 – Basis of Preparation

The Statement of Accounts summarises the Fund's transactions for the 2021-22 financial year and its position as at year ending 31 March 2022. The accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2021-22 which is based upon International Financial Reporting Standards (IFRS), as amended for the UK public sector. The accounts have been prepared on a going concern basis.

The Code requires the disclosure of any accounting standards issued but not yet adopted. IFRS 16, introduced on 1 January 2019, is due to be adopted by the Code for accounting periods commencing on or after 1 April 2024. This new accounting standard largely removes the distinction between operating and finance leases. However, the implementation of IFRS 16 is not expected to have a material impact on the Fund because it does not hold any assets as a lessee.

The accounts summarise the transactions of the Fund and report on the net assets available to pay pension benefits. The accounts do not take account of obligations to pay pensions and benefits which fall due after the end of the financial year. The actuarial present value of promised retirement benefits, valued on an International Accounting Standard (IAS) 19 basis, is appended to the statement of accounts. Further information is included within Note 21 of these accounts.

The accounts contain one restatement; to restate Note 10b External Audit Costs to reflect the final fee proposed for the 2020/21 audit of the statement of the accounts.

Note 3 – Summary of significant accounting policies

Fund Account – revenue recognition

a) Contribution income

Normal (primary) contributions, both from the members and from the employers, are accounted for on an accruals basis at the percentage rate of pensionable pay set in regulations or recommended by the Fund actuary in the payroll period to which they relate.

Employer deficit (secondary) funding contributions are accounted for on the due dates on which they are payable under the schedule of contributions set by the scheme actuary or on receipt if earlier than the due date.

Employers' augmentation contributions and pensions strain contributions are accounted for in the period in which the liability arises. Any amount due in year but unpaid will be classed as a current financial asset. Amounts not due until future years are classed as long-term assets.

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 during the financial year and are calculated in accordance with the Local Government Pension Scheme regulations (see notes 7 and 9).

Individual transfers in/out are accounted for when they are received/paid, which is normally when the member liability is accepted or discharged.

Transfers in from members wishing to use the proceeds of their additional voluntary contributions (see below) to purchase scheme benefits are accounted for on a receipts basis and are included in Transfers In (see Note 7).

Bulk (group) transfers are accounted for on a cash basis once terms have been agreed and payment made to/from the respective fund.

c) Investment 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.

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.

Distributions from pooled funds are recognised within investment income 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. Any other income from pooled investments is automatically reinvested within the fund and reflected in the unit price and resultant market value of these investments.

Property related income consists primarily of rental income. Rental income from operating leases on properties owned by the Fund is recognised on a straight-line basis over the term of the lease. Any lease incentives granted are recognised as an integral part of the total rental income, over the term of the lease. Contingent rents based on the future amount of a factor that changes other than with the passage of time, such as turnover rents, are only recognised when contractually due.

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.

Foreign income has been translated into sterling at the date of the transaction. Income from overseas investments is recorded net of any withholding tax where this cannot be recovered.

Fund account – expense items

d) Benefits payable

Pensions and lump-sum benefits payable include all amounts known to be due as at the end of the financial year. Any amounts due but unpaid are disclosed in the net assets statement as current liabilities.

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 Code does not require any breakdown of pension fund administration expenses. However, in the interest of greater transparency the pension fund management expenses are accounted for in accordance with the CIPFA guidance Accounting for Local Government Pension Scheme Management Expenses (2016).

Investment Management Expenses

All investment management expenses are accounted for on an accruals basis.

Fees of the external investment managers and custodian are contractually 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 or reduce as the value of these investments change.

In addition the Fund has negotiated with the following managers that an element of their fee be performance related:

- Baillie Gifford
- Pantheon
- Darwin Property Investment

Performance related fees amounted to £3.4m in 2021-22 (£4.4m in 2020-21) for managers who outperformed their target.

Where an investment manager's fee invoice has not been received by the balance sheet date, an estimate based upon the market value of their mandate as at the end of the year is used for inclusion in the fund account. The total of fees based on estimates in 2021-22 was £6m relating to fees due for the quarter ending 31 March 2022 (2020-21: £5m).

Administration expenses

All administration expenses are accounted for on an accruals basis. All staff costs of the pension's administration team are charged directly to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund.

Oversight and governance costs

All oversight and governance expenses are accounted for on an accruals basis. All staff costs associated with 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.

Net Assets Statement

g) Financial assets

Cheshire West and Chester Council jointly owns an asset pooling company, LGPS Central Ltd, along with seven other Partner Funds. The Council's shareholding in the asset pool company is valued at £1.315m which is the transaction price i.e. cost of the investment. LGPS Central Ltd began to trade on 3 April 2018 and consequently there are only limited trading results available. As a wholly owned

company of the Partner Funds its shares are not traded. The Fund's view is that the market value of this investment at 31 March 2022 cannot be reasonably assessed and that cost is therefore an appropriate estimate of fair value.

All other investment assets with the exception of the loan to LGPS Central Ltd are included in the financial statements on a fair value basis at the reporting date. Financial 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 assets 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 asset are recognised by the Fund.

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 18). For the purposes of disclosing levels of fair value hierarchy, the fund has adopted the classification guidelines recommended in the Practical Guidance on Investments Disclosures (PRAG/Investment Association 2016).

h) Stock Lending (Securities Lending)

In accordance with the LGPS (Management and Investment of Funds) Regulations 2016, the Fund allows its stock to be lent provided that the total value of the securities loaned out does not exceed 25% of the total Fund value. The Fund has entered into a stock lending programme managed by its custodian the Bank of New York Mellon.

In accordance with the securities lending agreement the collateral parameters are restricted to non-cash collateral securities, This being Fixed Income securities issued or guaranteed by a set of 21 OECD countries which have to have a minimum rating of AA by S&P or Aa2 by Moody's rating agency as well as Supranational securities rated AAA/ Aaa from six issuers.

The market value of the securities at year end is taken from prices from a number of reputable vendors in accordance with the Bank of New York Mellon pricing policy.

In addition, LGPS Central Ltd operate a stock lending programme in respect of their pooled equity funds such as the Global Active Equity Fund, in which the Cheshire Pension Fund invests.

i) Freehold and leasehold properties

The Scheme's freehold and leasehold investment properties were valued by an external valuer, Savills. The valuations were in accordance with the requirements of the RICS Valuation-Professional Standards. The valuation of each property was on the basis of Fair Value, subject to the following assumptions:

- (i) For investment property: that the property would be sold subject to any existing leases.
- (ii) For property held for development: that the property would be sold with vacant possession in its existing condition.

The valuer's opinion of Fair Value was primarily derived using comparable recent market transactions on arm's length terms.

j) Derivatives

The Fund may use derivative financial instruments, predominantly to manage its exposure to specific risks arising from its investment activities. As shown in Note 13f the Fund has not used any derivatives in either 2020-21 or 2021-22.

k) Cash and cash equivalents

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

l) Loans and receivables

Financial assets classed as amortised cost are carried in the net asset statement at amortised cost i.e. the outstanding principal receivable as at the year end date, plus accrued interest.

m) Financial liabilities

The Fund recognises financial liabilities at fair value as at the reporting date, excluding creditors which are measured at amortised cost. A financial liability is recognised in the net assets statement on the date the Fund becomes party to the liability. From this date, any gains or losses arising from changes in the fair value of the liability are recognised by the Fund.

n) 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 IAS19 Employee Benefits and relevant actuarial standards.

As permitted under the Code, the Fund has opted not to disclose the actuarial present value of promised retirements in the net assets statement, instead providing the information by reference to an accompanying actuarial report. A copy of the full actuarial calculation is appended to the Statement of Accounts.

o) Additional voluntary contributions

The Fund provides an Additional Voluntary Contributions (AVC) scheme for its members, the assets of which are invested separately from those of the pension fund.

From the 1 April 2019 Standard Life were appointed as the sole AVC provider for the Fund. Prior to 1 April 2019 the AVC providers to the members of the Fund were Scottish Widows, Standard Life and Utmost who took over Equitable Life on 1 January 2020.

Individual member's AVC contributions are paid directly to the AVC provider by their respective employers and are specifically for providing additional benefits for individual members. AVC contributors receive 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 section 4 (1) (b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 (SI 2009/3093) but are disclosed as a note only (Note 25).

p) Contingent assets and contingent liabilities

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.

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 the future events.

Contingent assets and liabilities are not recognised in the net assets statement but are disclosed by way of narrative in the notes.

Note 4 – Critical judgements and key sources of estimation uncertainty

In the application of the Fund's accounting policies, which are described in Note 3, those charged with governance of the Fund are required to make judgements, estimates and assumptions about the values of assets and liabilities which are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised if the revision affects only that period, or in the period of the revision and future periods if the revision affects both current and future periods.

Note 4.1 – Critical Judgements in applying accounting policies

There were no material critical judgements in 2021-22.

Note 4.2 – Assumptions made about the future and other major sources of estimation uncertainty

The Statement of Accounts contains some estimated figures that are based on assumptions made by the Council about the future or that are otherwise uncertain. Estimates are made taking into account historical experience, current trends and other relevant factors, however, because balances cannot be determined with certainty, actual results could be materially different from the assumptions and estimates.

The items in the net assets statement at 31 March 2022 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
Pension fund liability	The pension fund liability is calculated every three years by the Fund's actuary, Hymans Robertson, with annual updates in the intervening years. The methodology used is in line with accepted guidelines and in accordance with financial standards. Assumptions underpinning the valuations are agreed with the actuary and are disclosed in the actuarial calculation which is included within the Annual Report. This estimate is subject to significant variances based on changes to the underlying assumptions.	<p>The effects on the net pension liability of changes in individual assumptions can be measured. For instance,</p> <ul style="list-style-type: none">• A 0.5% increase in the discount rate assumption would reduce the value of the liabilities by approximately £855m.• A 0.5% increase in pensions increase rate would increase the value of the liabilities by approximately £765m.• A 0.5% increase in the salaries increase rate would increase the value of the liabilities by approximately £85m

The items in the net assets statement at 31 March 2022 include the following items of estimation uncertainty which are significant but not material to the accounts.

Item	Uncertainties	Effect if actual results differ from assumptions
Private equity	It is important to recognise the highly subjective nature of determining the fair value of private equity investments. They are inherently based on forward looking estimates and judgements involving many factors. Private equity investments are valued at fair value in accordance with International Private Equity and British Venture Capital Association guidelines. These investments are not publicly listed and as such there is a degree of estimation involved in the valuation.	The total private equity investments in the financial statements are £409m (£296m 2020-21). There is a risk that this investment may be under or overstated in the accounts. A potential under or over statement of the value of these investments of 10% would equate to £40.9 m increase or decrease to the market value of these investments.
Absolute Return funds	Absolute Return funds are valued at the sum of the fair values provided by the administrators of the underlying funds plus adjustments that the funds' directors or independent administrators judge necessary. These investments are not publicly listed and as such there is a degree of estimation involved in the valuation.	The total value of absolute return funds in the financial statements is £398m (£417m in 2020-21). There is a risk that this investment may be under or overstated in the accounts. A potential under or over statement of the value of these investments of 10% would equate to £39.8m increase or decrease to the market value of these investments.
Property valuations	The Scheme's freehold and leasehold investment properties are valued by an external valuer, Savills, who operate entirely independently from the Fund's appointed property manager Patrizia. The valuations are made in accordance with the requirements of the RICS Valuation-Professional Standards. The valuer's opinion of Fair Value is primarily derived using comparable recent market transactions and therefore involves a degree of judgement and estimation.	The total value of direct property investments in the financial statements is £441m (£392m in 2020-21). There is a risk that this investment may be under or overstated in the accounts. A potential under or over statement of the value of these investments of 10% would equate to £44.1m increase or decrease to the market value of these investments.

See Note 18 for a full list of possible market movements.

Note 5 – Events after the Balance Sheet date

These are events, both favourable and unfavourable, that occur between the end of the reporting period and the date when the financial statements are authorised for issue. Two types of events can be identified:

- Those that provide evidence of conditions that existed at the end of the reporting period (adjusting events after the reporting period), and
- Those that are indicative of conditions that arose after the reporting period (non-adjusting events after the reporting period).

Non adjusting events after the reporting period

In May 2022 the Fund invested £360m in the LGPS Central Sustainable Equity Fund, this was funded by fully redeeming the Baillie Gifford Global Alpha Fund mandate and the remaining £60m was funded by a partial redemption from the LGPS Central Global Active Equity Fund. This event had no impact on the 31 March 2022 investment valuations.

In the period following the 31 March 2022 the global financial markets have experienced a high amount of volatility, as a result of this the value of the Funds investment assets have decreased in the short term period to 30 September 2022. The Fund has a well diversified portfolio and many of its investments are held for the medium to long term. At present the Fund does not think this short term volatility means that the Fund needs to change its Investment Strategy Statement but will continue to monitor its investment performance and take action where necessary.

Note 6 Contributions Receivable

	2021-22	2020-21
	£000	£000
Employees Normal Contributions	41,507	39,862
Employers Normal Contributions	133,488	129,010
Employers Deficit Funding	16,018	28,634
Employers Cost of Early Retirements (pension strain)	2,713	2,743
Total Employers Contributions	152,219	160,387
Total Employees and Employers Contributions	193,726	200,249

The employers deficit funding decrease is due to Halton Borough Council and Warrington Borough Council paying their year deficit contributions in one lump sum in 2020-21 rather than over the three-year post valuation period. Cheshire East Council and Cheshire West and Chester Council are paying their deficit over the three year period.

The cost of early retirements represents the contributions from Employers to meet the capitalised costs of discretionary early retirements. The Fund recharges Employers for such costs and the income received is made up of both one-off lump sum payments and instalments.

The accounts recognise the full cost due from employers for early retirement contributions based on the date the scheme member left the scheme regardless of whether scheme employers have the option of paying over more than one year.

Note 6a – Analysis of Contributions Receivable

	2021-22		2020-21	
	Employers	Employees	Employers	Employees
	£000	£000	£000	£000
Scheme Employers	107,333	29,312	114,865	28,033
Cheshire West and Chester Council	29,312	8,065	29,443	7,782
Community Admission Bodies	13,102	3,455	13,116	3,345
Transferee Admission Bodies	2,472	675	2,963	702
Total	152,219	41,507	160,387	39,862

Note 7 – Transfers in from other Pension Funds

	2021-22	2020-21
	£000	£000
Transfers from other Local Authorities	10,100	10,251
Transfers from other pension funds	2,777	1,993
Total	12,877	12,244

Note 8 – Benefits payable

	2021-22	2020-21
	£000	£000
Scheme Employers	125,485	119,852
Cheshire West and Chester Council	53,213	51,725
Community Admission Bodies	16,417	14,440
Transferee Admission Bodies	4,933	4,902
Total	200,048	190,919

Note 9 – Payment to and on account of leavers

	2021-22	2020-21
	£000	£000
Individual transfers out	15,036	14,075
Refunds to Members leaving service	562	466
Total	15,598	14,541

The transfer out figure will vary year on year depending on the number of people that move to employers outside of the Fund and the value of the pension accrued for these individuals.

The refunds to members leaving service relates to members who opted out of the scheme within two years of joining.

Note 10 – Management Expenses

	2021-22	2020-21
	£000	£000
Investment management expenses	23,102	22,532
Administration costs	2,627	2,226
Oversight and governance costs	1,856	2,030
Total	27,585	26,788

No costs have been included for carried interest. Included within the investment management expenses and oversight and governance costs are fees paid to LGPS Central Ltd, further details of these fees paid and the amounts are included in Note 26- Related Party Transactions.

In addition to these costs, indirect costs are incurred through the bid-offer spread on investment sales and purchases. These are reflected in the cost of investment acquisitions and in the proceeds of sales from investments (see Note 13f).

Note 10a – Investment Management Expenses

2021-22	Total	Management Fees	Performance related fees	Transaction Costs
	£000	£000	£000	£000
Equities	7,738	4,524	3,057	157
Pooled Investments	8,631	8,631	0	0
Pooled Property	923	608	315	0
Private Equity	4,414	4,393	21	0
Private Debt	30	30	0	0
Property	1,211	1,211	0	0
	22,947	19,397	3,393	157
Custody fees	155			
Total	23,102			

2020-21	Total	Management Fees	Performance related fees	Transaction Costs
	£000	£000	£000	£000
Equities	7,247	3,864	3,383	0
Pooled Investments	8,116	7,933	183	0
Pooled Property	697	444	253	0
Private Equity	5,205	4,673	532	0
Property	1,122	1,122	0	0
Total	22,387	18,036	4,351	0
Custody fees	145			0
Total	22,532			

Note 10b – External Audit Costs

	2021-22	2020-21 Restated
	£000	£000
Payable in respect of external audit	47	42
Payable in respect of other services	11	7
Total	58	49

Fees in respect of other services relates to work completed in respect of the IAS19 process which is an audit related non-audit service.

Note 11 – Investment Income

	2021-22	2020-21
	£000	£000
Net Rents from Properties	19,936	17,495
Income from Fixed Interest Securities	5,830	6,882
Dividends from Equities	4,599	3,597
Other	801	129
Interest from Cash Deposits	301	444
Income from Pooled Property	268	1,508
Stock Lending	138	73
Total	31,873	30,128

No investment income has been recognised for Private Equity investments. Calls and distributions in relation to these investments are accounted for within the private equity sales and purchases figures in Note 13f.

Note 12 – Taxes on income

	2021-22	2020-21
	£000	£000
Withholding tax - Equities	172	115
Total	172	115

The Fund is exempt from UK income tax on interest and from capital gains tax on the profits resulting from the sale of investments.

The Fund is exempt from United States withholding tax on dividends and can recover all or part of the withholding tax deducted in some other countries. The amount of withholding tax deducted from overseas dividends which the Fund is unable to reclaim in 2021-22 amounts to £172k and is shown as a tax charge, compared to £115k in 2020-21.

As Cheshire West and Chester Council is the administering authority for the Fund, VAT input tax is recoverable on all Fund activities including expenditure on investment and property expenses.

Note 13 – Investments

	2021-22	2020-21
Investment Assets		
	£000	£000
Equities	607,359	855,025
Pooled Investments		
UK Government Index Linked Gilts	1,860,668	1,774,514
Fixed Income - Multi Strategy	1,248,434	1,117,406
UK Equity Listed	1,431,577	1,305,226
Infrastructure	26,263	0
Hedge Funds	397,689	416,772
	4,964,631	4,613,918
Other Investments		
Pooled Property Investments	90,152	81,378
Directly Managed Property	441,300	391,850
Private Equity	408,520	296,417
Private Debt	6,054	0
	946,026	769,645
Cash Deposits	436,921	297,131
Loans	686	686
Other Investment Balances:		
Outstanding dividends entitlements and withholding tax claims	3,135	3,469
Total	6,958,758	6,539,874

During the year the Fund invested £10m in the Darwin K Class Fund, increasing the Fund's investments within Pooled Property.

The Fund redeemed £204m from Baillie Gifford (included in the equities) and £68m from the LGPS Central Global Active Equity Fund (included in the Pooled Investments - UK Listed equity) in the year. The increased cash balances from these redemptions are held in the Fund's money market accounts pending investment into the Fund's new commitments to Private Debt and Infrastructure as part of its investment strategy detailed below.

In line with the Fund's investment strategy and the government initiative for asset pooling the Fund also made the following investments with LGPS Central:

- Investment of £150m into the LGPS Central Multi Asset Credit Fund- funded from existing cash balances

- Commitment of £170m to the LGPS Central Credit Partnership II Fund which is a Private Debt Lower Return Fund
- Commitment of £340m to the LGPS Central Credit Partnership III Fund which is a Private Debt Stable Return Fund
- Commitment of £130m to LGPS Central Infrastructure Funds split £10m to the Value Add/Opportunistic sleeve, £80m to the Core/Core Plus sleeve and £40m to the Single Asset sleeve.

Calls and distributions to the LGPS Central Private Debt and Infrastructure Funds are included in Note 26 Related Parties.

Note 13a – Fixed Income Multi Strategy

The Fund has invested in five pooled fixed income investment vehicles managed separately by Janus Henderson Investors, BlueBay, M&G and LGPS Central. The market value of investments with each manager as at the 31 March 2022 was:

- £242m in Janus Henderson Investors (2020-21: £245m),
- £457m (2020-21: £462m) in BlueBay,
- £268m in M&G Alpha Opportunities Fund (2020-21: £265m).
- £137m in LGPS Central Emerging Market Debt Fund (2020-21: £145m)
- £145m in LGPS Central Multi Asset Credit Fund (2020-21 £Nil)

The underlying assets of these pooled vehicles are invested by the managers in diversified portfolios of a wide range of fixed income assets including Government Bonds (UK and Overseas), Corporate Bonds, High Yield Bonds, Emerging Market Bonds, Asset and Mortgage Backed Securities, Secured Loans and currency. Within these mandates, each manager may use derivative instruments to manage their exposure to specific risks arising from its investment activities.

Note 13b – Absolute Return Funds

	Strategy	2021-22	2020-21
		£000	£000
Blackstone	Hedge Fund of Funds	397,689	379,498
Arrowgrass Capital Partners	Multi Strategy Hedge Fund	0	37,275
Total		397,689	416,773

At the end of March 2022 the balance held by Arrowgrass as shown in Note 17 related to cash balances which will be paid to the Fund post year end following the finalisation of the wind down of the hedge fund.

Note 13c – Private Equity

	Number of Funds	2021-22	2020-21
		£000	£000
Pantheon Ventures	13	218,542	157,013
Adam Street Partners	19	170,943	129,782
LGPS Central Ltd	3	18,787	8,978
Lexington	1	248	644
Total	36	408,520	296,417

Note 13d – Loans

The Fund has a £685k loan advanced to LGPS Central Ltd in January 2018. The interest accrued on the loan for the year is £32k. The loan is held at amortised cost in the statement of accounts at a value of £717k at 31 March 2022 (31 March 2021: £717k).

Note 13e – Cash

	2021-22	2020-21
	£000	£000
Cash Instruments	402,103	273,144
Cash Deposits	34,818	23,987
Total	436,921	297,131

Note 13f – Reconciliation of movements in Investments

	Fair Value at 31 March 2021	Purchases at cost and derivative payments	Sales proceeds and derivative receipts	Change in Fair value	Fair Value at 31 March 2022
	£000	£000	£000	£000	£000
Equities	855,025	120,175	-311,462	-56,379	607,359
Pooled Investments	4,613,918	404,958	-331,705	277,460	4,964,631
Pooled Property Investments	81,378	10,000	-7,510	6,284	90,152
Directly Managed Property	391,850	3,104	-11,940	58,286	441,300
Private Equity	296,417	55,282	-80,360	137,181	408,520
Private Debt	0	6,118	-30	-34	6,054
Loans	686	0	0	0	686
	6,239,274	599,637	-743,007	422,798	6,518,702
Derivatives	0	0	0	0	0
Cash and Cash Equivalents	297,131	138,919	0	871	436,921
	6,536,405	738,556	-743,007	423,669	6,955,623
Outstanding dividend entitlements, accrued interest and recoverable withholding tax	3,469	0	0	0	3,135
Net Investments	6,539,874	738,556	-743,007	423,669	6,958,758

	Fair Value at 31 March 2020	Purchases at cost and derivative payments	Sales proceeds and derivative receipts	Change in Fair value	Fair Value at 31 March 2021
	£000	£000	£000	£000	£000
Equities	587,450	189,495	-340,065	418,145	855,025
Pooled Investments	3,793,579	769,556	-493,198	543,981	4,613,918
Pooled Property Investments	78,916	0	-708	3,170	81,378
Directly Managed Property	397,950	1,335	0	-7,435	391,850
Private Equity	225,375	48,503	-41,367	63,906	296,417
Loans	686			0	686
	5,083,956	1,008,889	-875,338	1,021,767	6,239,274
Derivatives	0	2	0	-2	0
Cash and Cash Equivalents	413,485	0	-119,240	2,886	297,131
	5,497,441	1,008,891	-994,578	1,024,651	6,536,405
Outstanding dividend entitlements, accrued interest and recoverable withholding tax	4,282				3,469
Net Investments	5,501,723	1,008,891	-994,578	1,024,651	6,539,874

Note 14 – Stock Lending

In accordance with the LGPS (Management and Investment of Funds) Regulations 2016, the Fund allows its stock to be lent, provided that the total value of the securities loaned out does not exceed 25% of the total Fund value.

The Fund has entered into a stock lending programme managed by its custodian the Bank of New York Mellon and only accepts government and quasi government bonds as collateral against loaned stock to safeguard the Fund's assets.

During the year ended 31 March 2022 the Fund earned £138k (2020-21: £73k) of income from its stock lending activities.

At the balance sheet date, the value of aggregate stock on loan was £12.1m (2020-21: £34m) and the value of collateral held was £13.2m (2020-21: £35.9m).

Note 15 Property Holdings

The Fund's investment in property comprises investments in pooled property funds and a number of directly owned properties which are leased commercially to various tenants. Details of income from these directly owned properties are below:

Note 15a – Property Income

	2021-22	2020-21
	£000	£000
Rental Income	21,883	19,931
Direct Operating Expenses	-1,947	-2,436
Balance at the end of the year	19,936	17,495

Note 15b – Fair Value of Investment Properties

	2021-22	2020-21
	£000	£000
Balance at the start of the year	391,850	397,950
Purchases	0	0
Disposals	-9,565	0
Capital Expenditure	3,104	1,334
Net gain/loss on fair value	55,911	-7,434
Balance at the end of the year	441,300	391,850

During the year the Fund did not purchase any investment properties. Disposals are made up of three disposals in the year.

Investment properties were independently valued by Savills as at 31 March 2022. At the year-end there were no restrictions on the Fund's ability to realise investment property or the remittance of proceeds of disposals.

Contractual obligations for development, repairs and maintenance amounted to £4m (2020-21: £1.5m).

Note 16 – Operating Leases

The Fund's property portfolio comprises a variety of units which are leased to organisations with the objective of generating an appropriate investment return.

These leases are all categorised as operating leases due to the relatively short length of the agreements i.e. relative to the overall life of the asset and proportion of the assets overall value. The leases do not meet the assessment criteria for finance leases, and the risks and rewards of ownership of the leased assets are retained by the Fund (and reflected in the Net Assets Statement).

The properties comprise a mix of office, retail and industrial buildings. These leases vary in length from short term to over 25 years.

The future minimum lease payments receivable under non-cancellable leases in future years are:

Age profile of lease income	2021-22	2020-21
	£000	£000
No later than one year	21,465	19,974
Between one and five years	82,549	74,612
Later than five years	118,867	123,245
Total	222,881	217,831

The above disclosure for 2021-22 has been reduced by a credit loss allowance of 5% for income due within one year and 3% for the second year onwards reflecting the Fund's expected loss from late or non-recovery of rents from tenants.

With regards to the properties owned and leased by the Fund, all are leased to tenants under contracts that have been assessed as operating leases and which may include periodic rent reviews etc. The minimum lease payments receivable do not include rents that are contingent on events taking place after the lease entered into, such as adjustments following rent reviews.

Note 17 – Investment by Fund Manager

	2021-22	2021-22	2020-21	2020-21
	£000	%	£000	%
Investments managed by LGPS Central Limited Asset Pool:				
All World Equity Climate Multi Factor Fund	701,248	10.1	610,251	9.3
Global Equity Active Multi Manager Fund				
- Schroders	118,866	1.7	127,486	2.0
- Union	104,695	1.5	111,759	1.7
- Harris	88,588	1.3	95,364	1.5
Multi Asset Credit Fund	144,765	2.1	0	0.0
Emerging Market Debt Fund	136,500	2.0	144,990	2.2
Infrastructure Core / Core Plus Fund	24,784	0.4	0	0.0
Infrastructure Value Add / Opportunistic	1,480	0.0	0	0.0
Private Equity Funds	18,787	0.3	8,978	0.1
Credit Partnership II (Private Debt) Fund	6,054	0.1	0	0.0
LGPS Central Ltd Asset Pool	2,032	0.0	2,032	0.0
Total	1,347,799	19.5	1,100,860	16.8
Investments managed outside of LGPS Central Limited Asset Pool:				
Legal & General	2,278,847	32.7	2,134,880	32.6
Baillie Gifford & Co	613,821	8.8	868,679	13.3
Bluebay	457,493	6.6	461,527	7.1
Patrizia	445,480	6.4	401,784	6.1
Blackstone	397,689	5.7	379,497	5.8
Deutsche Bank (Money Market)	339,742	4.9	203,555	3.1
M&G Investments	269,291	3.9	267,146	4.1
Janus Henderson	241,726	3.5	245,356	3.8
Pantheon Ventures	218,542	3.1	157,013	2.4
Adams Street Partners	170,943	2.5	129,782	2.0
Darwin	87,797	1.3	73,472	1.1
Fidelity (Money Market)	49,500	0.7	49,666	0.8
Bank of New York Mellon	36,393	0.4	28,719	0.4
Arrowgrass Capital Partners	3,434	0.0	37,275	0.6
Lexington Capital Partners	248	0.0	644	0.0
GMO	13	0.0	19	0.0
Total	5,610,959	80.5	5,439,014	83.2
Total	6,958,758	100.0	6,539,874	100.0

Key movements in assets during the year are detailed in Note 13.

Note 17a – Concentration of Investments

The CIPFA Code of Practice requires disclosure where there is a concentration of investment which exceeds 5% of the total value of the net assets of the scheme. Four investments fall into this category as follows:

Security Description	Market Value 31 Mar 2022	Total Fund	Market Value 31 Mar 2021	Total Fund
	£000	%	£000	%
Legal & General - Over 5 Yr Index Linked Gilts	1,860,668	26.74%	1,774,514	27.13%
LGPS Central Limited - All World Equity Climate Multi Factor Fund	701,248	10.08%	610,251	9.33%
Bluebay - Total Return Diversified Fund	457,493	6.57%	461,527	7.06%
Blackstone Partners - Class A1 Initial Series	397,689	5.71%	379,497	5.80%
LGPS Central Limited - Global Active Equity Multi Manager Fund	312,149	4.49%	334,609	5.12%

Note 18 – Fair Value – Basis of Valuation

The basis of the valuation of each class of investment asset is set out below. There have been no changes in the valuation techniques used during the year. All assets have been valued using fair value techniques which represent the highest and best price available at the reporting date.

Description of Assets	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
Quoted Bonds	Level 1	Fixed interest securities are valued at market value based on current yields	Not required	Not required
Unquoted Bonds	Level 2	Average of broker prices	Evaluated price feeds	Not required
Pooled investments property funds	Level 3	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
Pooled investments - absolute return funds	Level 3	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

Description of Assets	Valuation Hierarchy	Basis of Valuation	Observable and unobservable inputs	Key sensitivities affecting the valuations provided
Pooled investments - absolute return funds	Level 3	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	Valuations could be affected by material events occurring between the date of the financial statements provided and the pension fund's own reporting date, by changes to expected cashflows, and by any differences between audited and unaudited accounts
Freehold and leasehold properties	Level 3	Valued at fair value at the year-end using the investment method of valuation by Savills in accordance with the RICS valuation professional standards	Existing lease terms and rentals. Independent market research. Nature of tenancies. Covenant strength for existing tenants. Assumed vacancy levels. Estimated rental growth. Discount rate	Significant changes in rental growth, vacancy levels or the discount rate could affect valuations as could more general changes to market prices
Unquoted equity	Level 3	Comparable valuation of similar companies in accordance with Private Equity and Venture Capital Valuation Guidelines (2012)	EBITDA multiple. Revenue multiple. Discount for lack of marketability. Control premium	Valuations could be affected by material events occurring between the date of the financial statements provided and the pension fund's own reporting date, by changes to expected cashflows, and by any differences between audited and unaudited accounts
Private Debt	Level 3	Valued at fair value in accordance with International Valuation Standards and investment managers valuation policy	Comparable valuation of similar assets EBITDA multiple. Revenue multiple. Discounted cash flows. Enterprise value estimation	Valuations could be affected by material events occurring between the date of the financial statements provided and the Pension Fund's own reporting date, by changes to expected cash flows, and by any differences between audited and unaudited accounts
Infrastructure	Level 3	At the price or net asset value advised by the manager using the latest financial information available from the respective manager, adjusted for drawdowns and distributions to the final date of the accounting period, if the latest financial information is not produced at that date.	EBITDA multiple. Revenue multiple. Discount for lack of marketability. Discounted cash flows	Valuations could be impacted by material events occurring between the date of the financial statements provided and the year end, by changes to expected cash flows, and any differences between the audited and unaudited accounts

Sensitivity of Assets Valued at Level 3

The values reported in the Level 3 (see explanation of Level 3 below) valuations represent the most accurate estimation of the portfolio value as at 31 March 2022. Any subjectivity related to the investment value is incorporated into the valuation.

Note 18a – Fair Value Hierarchy

The valuation of investment assets and liabilities has 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. Fair value measurement defines an active market as a market in which transactions for the financial instrument occur with sufficient frequency and volume to provide pricing information on an ongoing basis, as well as the reporting date. Products classified as level 1 comprise listed equities, exchange traded futures, options and an element of absolute return funds.

Level 2

Assets and liabilities at level 2 are those whose values are based on quoted market prices that are not as active as level 1 markets, or based on models whose inputs are observable either directly or indirectly for substantially the full term of the asset or liability. Products classified as level 2 comprise bonds and loans, less liquid and restricted equity securities and absolute return funds.

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.

Such instruments would primarily include private equity, absolute return funds, pooled property, private debt and unlisted infrastructure investments which are valued using various valuation techniques that require significant judgement in determining appropriate assumptions.

Valuations for private equity, private debt and infrastructure are usually undertaken annually at the end of December. Estimated market values or cash flow adjustments are used to roll forward the valuations to 31 March as appropriate.

The values of the investment in absolute return funds are based on the net asset value provided by the fund manager. Assurances over the valuation are gained from the independent external audit of the individual funds.

The following table provides an analysis of the assets and liabilities of the Fund grouped into levels 1 to 3, based on the level at which the fair value is observable. The table does not reconcile back to the net assets figure as it excludes items which are valued at amortised cost (i.e. loans and receivables).

Note 18a – Assets carried at fair value

Assets carried at Fair Value:

	Quoted Market Price	Using observable inputs	With significant unobservable inputs	
Values at 31 March 2022	Level 1	Level 2	Level 3	Total
	£000	£000	£000	£000
Financial assets at fair value through profit and loss				
Equities	606,044	0	0	606,044
Pooled investments	457	4,083,185	881,446	4,964,631
Pooled Property	0	2,355	87,797	90,152
Private Equity	0	0	408,520	408,520
Private Debt	0	0	6,054	6,054
Loans	0	685	1	686
Cash	436,921	0	0	436,921
Accrued Investment Income	3,135	0	0	3,135
	1,046,100	4,086,225	1,383,818	6,516,143
Non-financial assets at fair value through profit and loss				
Property			441,300	441,300
Total	1,046,100	4,086,225	1,825,118	6,516,143

The following assets have been carried at cost:

	Quoted Market Price	Using observable inputs	With significant unobservable inputs	
Values at 31 March 2022	Level 1	Level 2	Level 3	Total
	£000	£000	£000	£000
Investments in LGPS Central Ltd	0	0	1,315	1,315
Investments held at cost	0	0	1,315	1,315

Assets carried at Fair Value:

	Quoted Market Price	Using observable inputs	With significant unobservable inputs	
Values at 31 March 2021	Level 1	Level 2	Level 3	Total
	£000	£000	£000	£000
Financial assets at fair value through profit and loss				
Equities	853,710	0	0	853,710
Pooled investments	0	3,735,617	878,301	4,613,918
Pooled Property	0	7,907	73,471	81,378
Private Equity	0	0	296,417	296,417
Loans		685	1	686
Cash	297,131		0	297,131
Accrued Investment Income	3,469	0	0	3,469
	1,154,310	3,744,209	1,248,190	6,146,709
Non-financial assets at fair value through profit and loss				
Property	0	0	391,850	391,850
Total	1,154,310	3,744,209	1,640,040	6,538,559

The following assets have been carried at cost:

	Quoted Market Price	Using observable inputs	With significant unobservable inputs	
Values at 31 March 2021	Level 1	Level 2	Level 3	Total
	£000	£000	£000	£000
Investments in LGPS Central Ltd	0	0	1,315	1,315
Investments held at cost	0	0	1,315	1,315

Note 18b – Transfers between levels 1 and 2

No assets were transferred between level 1 and 2 during the year.

Note 18c – Reconciliation of fair value measurements within level 3

	Market Value 1 April 2021	Transfers into Level 3	Transfers out of Level 3	Purchases at cost and derivative payments	Sales	Unrealised Gains /(Losses)	Realised Gains /(Losses)	Market Value 31 March 2022
	£000	£000	£000	£000	£000	£000	£000	£000
Absolute return funds	416,773				- 37,220	14,605	3,532	397,690
Direct Property	391,850			3,104	- 9,565	55,911		441,300
Private equity	296,417			55,283	-80,361	112,830	24,315	408,520
Pooled Property	73,471			10,000	-922	4,324	922	87,795
Fixed income	461,528			1,647	-2,187	-5,681	2,187	457,494
Secured Loans	1							1
Infrastructure	-			26,413	-177	-149	177	26,264
Private Debt	-			6,119	-30	-65	30	6,054
	1,640,040	-	-	102,566	-130,462	181,775	31,199	1,825,118

Note 18d – Classification of financial instruments

Accounting policies describe how different asset classes of financial instruments are measured, and how income and expenses, including fair value gains and losses, are recognised.

The following table analyses the market value of financial assets and liabilities (excluding cash) by category and net assets statement heading. No financial instruments were reclassified during the accounting period.

	Fair value through profit and loss	Financial assets at amortised cost	Financial liabilities at amortised cost	Fair value through profit and loss	Financial assets at amortised cost	Financial liabilities at amortised cost
	31 March 2022			31 March 2021		
	£000	£000	£000	£000	£000	£000
Financial Assets						
Pooled Investments	4,964,631			4,613,918		
Equities	607,359			855,025		
Pooled Property	90,152			81,378		
Private Equity and Joint Venture	408,520			296,417		
Private Debt	6,054					
Loans	1	717		1	717	
Cash		435,316			295,263	
Other Investment balances		2,883			3,256	
Debtors		19,164			21,109	
	6,076,717	458,080	0	5,846,739	320,345	0
Financial Liabilities						
Creditors			-10,046			-10,031
TOTAL	6,076,717	458,080	-10,046	5,846,739	320,345	-10,031

Note 18e – Net Gains and Losses on Financial Instruments

	2021-22	2020-21
	£000	£000
Financial Assets		
Fair value through profit and loss	364,513	1,029,202
Amortised cost- unrealised gains	871	2,886
Financial Liabilities		
Fair value through profit and loss	0	0
Amortised cost- unrealised losses	0	0
Total	365,384	1,032,088

Cheshire West and Chester as administering authority has not entered into any financial guarantees that are required to be accounted for as financial instruments.

Note 19 – Nature and extent of risks arising from financial instruments

Risk and risk management

The Fund's primary long term risk is that the Fund's assets will fall short of its liabilities (i.e. 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 whole fund portfolio. The Fund achieves this through asset diversification to reduce risk 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 that there is sufficient liquidity to meet forecast cash flows. The Council manages these investment risks as part of its overall Pension Fund risk management programme.

Risk management policies were established to identify and analyse the risks faced by the Council's pension operations. Policies are reviewed regularly to reflect changes in activity and in market changes.

a) Market risk

Market risk is the risk of 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 price and yield movements and the asset mix.

The objective of the Fund's risk management strategy is to identify, manage and control market risk exposure within acceptable parameters, whilst optimising the return on risk.

In general, excessive volatility in market risk is managed through the diversification of the portfolio in terms of geographical and industry sectors and individual securities. To mitigate market risk, the Council and its investment advisers undertake appropriate monitoring of market conditions and benchmark analysis.

Equity futures contracts and exchange traded option contracts on individual securities may also be used to manage market risk on equity investments. It is possible for over-the-counter equity derivative contracts to be used in exceptional circumstances to manage specific aspects of market risk.

Other price risk

Other 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 were 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. Except for shares sold short, the maximum risk resulting from financial instruments is determined by the fair value of the financial instruments. Possible losses from shares sold short are unlimited.

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's investment strategy.

Other price risk - sensitivity analysis

In consultation with the Fund's investment advisers and, following analysis of historical data and expected investment return movement during the financial year, the Council has determined that the following movements in market price risk are reasonably possible for the 2021-22 reporting period:

Asset Type	Potential market movements
	% (+ / -)
Private Equity	24.9
Global Equities - Emerging	25.3
Global Equities - Developed	17.8
UK Equities	15.9
Property Unit Trusts	14.7
High Yield	11.1
Absolute Return Funds	7.0
Corporate Bonds	6.7
Government Bonds	9.8
Cash	0.0

The potential price changes disclosed above are broadly consistent with a one-standard deviation movement in the value of the assets. The sensitivities are consistent with the assumptions contained in the investment adviser's most recent review. This analysis assumes that all other variables, in particular foreign currency exchange rates and interest rates, remain the same.

Had the market price of the Fund's investments increased/decreased in line with the above, the change in the net assets available to pay benefits in the market price would have been as follows:

Asset Type	Value at 31 March 2022	Percentage Change	Change in Value on increase	Change in Value on decrease
	£000	%	£000	£000
Government Bonds	2,143,413	9.8	210,054	-210,054
Global Equities - Developed	1,789,243	17.8	318,485	-318,485
Corporate Bonds	622,256	6.7	41,691	-41,691
High Yield	457,494	11.1	50,782	-50,782
Cash	443,253	0.0	0	0
Private Equity	414,573	24.9	103,229	-103,229
Absolute Return Funds	397,689	7.0	27,838	-27,838
Global Equities - Emerging	180,186	25.3	45,587	-45,587
UK Equities	60,255	15.9	9,581	-9,581
Investment Income Due	2,883	0.0	0	0
Property Unit Trusts	2,356	14.7	346	-346
Equities - LGPS Central Ltd	1,315	0.0	0	0
Loans - LGPS Central Ltd	717	0.0	0	0
Total assets available to pay benefits	6,515,633		807,593	-807,593

The above table excludes direct property due to the illiquidity of this asset type.

Interest rate risk

The Fund invests in a number of interest bearing instruments such as Government bonds, corporate bonds and secured loans for the primary purpose of obtaining a return on those investments. These investments were subject to interest rate risks, which represent the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

The Fund's interest rate risk is routinely monitored by the Council and its investment advisers in accordance with the Fund's risk management strategy, including monitoring the exposure to interest rates and assessment of actual interest rates against the relevant benchmarks.

The Fund's assets which have direct exposure to interest rate movements as at 31 March 2022 and 31 March 2021 are set out below. These disclosures present interest rate risk based on the underlying financial asset at fair value:

Asset Type	2021-22	2020-21
	£000	£000
Corporate and Government Bonds	3,109,102	2,746,929
Cash	389,127	253,220
Cash and cash equivalents	47,794	43,912
Total	3,546,023	3,044,061

Interest rate risk sensitivity analysis

The Fund recognises that interest rates can vary and can affect both income to the Fund and the carrying value of fund assets, both of which affect the value of the net assets available to pay benefits. A 100 basis points (BPS) movement in interest rates is consistent with the level of sensitivity applied as part of the Fund's risk management strategy. The Fund's investment advisor has advised that long term average rates are expected to move less than 100 basis points from one year to the next and experience suggests that such movements are likely.

The £3,109m fair value of the bond mandates managed by M&G Alpha Opportunities Fund, Janus Henderson Investors, BlueBay, Legal and General and the Emerging Market Debt Fund and Multi Asset Credit Fund managed by LGPS Central are particularly sensitive to movements in interest rates. This sensitivity is measured by their duration of 3.19, 3.25, 3.15, 22.97, 6.38 and 3.81 years respectively.

A 100BPS increase in the prevailing level of interest rates would decrease the aggregate fair value of these mandates by £472.6m (£461.3m in 2020-21). Likewise a 100BPS decrease in the level of interest would be expected to increase the fair value of these mandates by a similar amount.

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 +/- 100 BPS change in interest rates.

Asset Type	Duration	Carrying amount at 31 March 2022	Effect of Asset Values	
		£000	+100 BPS	-100 BPS
Cash and Cash Equivalents		47,794		
Cash Balances		389,127		
Fixed Income - M&G	3.19	267,950	-8,548	8,548
Fixed Income - Janus Henderson	3.25	241,726	-8,033	8,033
Fixed Income - BlueBay	3.15	457,493	-14,411	14,411
Fixed Income - Legal and General	22.97	1,860,668	-427,395	427,395
Fixed Income - LGPSC EMD Fund	6.38	136,500	-8,709	8,709
Fixed Income - LGPSC MAC Fund	3.81	144,765	-5,516	5,516
Total change in assets available		3,546,023	-472,612	472,612

Asset Type	Duration	Carrying amount at 31 March 2021	Effect of Asset Values	
			+100 BPS	-100 BPS
		£000		
Cash and Cash Equivalents		43,912		
Cash Balances		253,220		
Fixed Income - M&G	3.2	265,530	-8,497	8,497
Fixed Income - Janus Henderson	5.58	245,357	-13,691	13,691
Fixed Income - BlueBay	3.26	461,527	-15,046	15,046
Fixed Income - Legal and General	23.9	1,774,514	-424,109	424,109
Total change in assets available		3,044,060	-461,343	461,343

The tables below illustrate the impact of a change in the interest rate of 1%.

Income Source	Duration	Interest receivable 2021/22	Effect of Asset Values	
			+100 BPS	-100 BPS
		£000		
Cash deposit / cash and cash equivalents	0.25	301	-1	1
Fixed Income Securities		5,830		
Total change in assets available		6,131	-1	-1

Income Source	Duration	Interest receivable 2020/21	Effect of Asset Values	
			+100 BPS	-100 BPS
		£000		
Cash deposit / cash and cash equivalents	0.25	444	-1	1
Fixed Income Securities		6,882		
Total change in assets available		7,326	-1	1

This analysis demonstrates that a 1% increase in interest rates will not affect the interest received on fixed interest assets but could reduce their fair value and vice versa. Changes in interest rates do not impact on the value of cash/cash equivalent balances. Changes to both the fair value of assets and the income received from investments impact on the net assets available to pay benefits.

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 the functional currency of the fund (GBP). The Fund holds both monetary and non-monetary assets denominated in currencies other than GBP.

The Fund's liabilities are denominated in GBP but as part of its investment strategy the Fund invests in assets denominated in foreign currencies, which exposes the Fund to the risk of movement in exchange rates. The Fund's investment managers may, at their own discretion, hedge part or all of the foreign exchange risk inherent in their portfolio.

The Fund's currency rate risk is routinely monitored by the Fund and its investment advisers in accordance with the Fund's risk management strategy, including monitoring the range of exposure to currency fluctuations.

The following tables summarise the Fund's net currency exposure, after hedging, as at 31 March 2022 and 31 March 2021:

Currency Exposure - Asset Type	Gross Exposure	Hedging Exposure	Net Exposure
2021-22	£000	£000	£000
Overseas Listed Equities	596,957		596,957
Overseas Unquoted Securities	389,733		389,733
Overseas Unit Trusts	2,531		2,531
Total	989,221	0	989,221

Currency Exposure - Asset Type	Gross Exposure Restated	Hedging Exposure	Net Exposure Restated
2020-21	£000	£000	£000
Overseas Listed Equities	838,934		838,934
Overseas Unquoted Securities	287,439		287,439
Overseas Unit Trusts	8,082		8,082
Total	1,134,455	0	1,134,455

Currency risk - sensitivity analysis

Following analysis of historical data in consultation with the Fund investment advisers, the Fund considers the likely volatility associated with foreign exchange rate movements to be 13% (as measured by one standard deviation).

A 13% fluctuation in the currency risk is considered reasonable based on the Fund adviser's analysis of long-term historical movements in the month-end exchange rates over a rolling 36-month period. This analysis assumes that all other variables, in particular interest rates, remain constant.

A 13% strengthening/weakening of the GBP against the various currencies in which the Fund holds investments would increase/decrease the net assets available to pay benefits as follows.

Net Currency Exposure - Asset Type	Asset Values	Change to net Assets available to pay benefits	
	2021-22	+13%	-13%
	£000	£000	£000
Overseas Listed Equities:	596,957	77,604	-77,604
Of which from United States Dollar	422,057	54,867	-54,867
Of which from Japanese Yen	15,264	1,984	-1,984
Of which from Hong Kong Dollar	49,410	6,423	-6,423
Of which from Swedish Krona	5,477	712	-712
Of which from Swiss Franc	3,229	420	-420
Of which from Danish Krone	2,079	270	-270
Of which from South African Rand	2,136	278	-278
Of which from other currencies	97,305	12,650	-12,650
Overseas Unquoted Securities:	389,733	50,666	-50,666
Of which from United States Dollar	377,821	49,117	-49,117
Of which from Euro	11,912	1,549	-1,549
Absolute Return Funds Overseas:			
Of which from United States Dollar	0	0	0
Overseas Unit Trusts:			
Of which from Euro	2,531	329	-329
Total	989,221	128,599	-128,599

Net Currency Exposure - Asset Type	Asset Values	Change to net Assets available to pay benefits	
	2020-21	+13%	-13%
	£000	£000	£000
Overseas Listed Equities:	838,935	109,062	-109,062
Of which from United States Dollar	590,267	76,735	- 76,735
Of which from Japanese Yen	26,236	3,411	-3,411
Of which from Hong Kong Dollar	75,604	9,829	-9,829
Of which from Swedish Krona	7,042	915	-915
Of which from Swiss Franc	2,660	346	-346
Of which from Danish Krone	2,033	264	-264
Of which from South African Rand	13,614	1,770	-1,770
Of which from other currencies	121,479	15,792	-15,792
Overseas Unquoted Securities:	287,438	37,367	-37,367
Of which from United States Dollar	274,713	35,713	-35,713
Of which from Euro	12,725	1,654	-1,654
Absolute Return Funds Overseas:			
Of which from United States Dollar	0	0	0
Overseas Unit Trusts:			
Of which from Euro	8,082	1,051	-1,051
Total	1,134,455	147,480	-147,480

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 risk in their pricing and consequently the risk of loss is implicitly provided for in the market value of the Fund's financial assets and liabilities.

In essence the Fund's investment portfolio is exposed to some form of credit risk, with the exception of the derivatives positions where the risk equates to the net market value of a positive derivative position. However the selection of high quality counterparties, brokers and financial institutions minimises credit risk that may occur through the failure to settle a transaction in a timely manner.

The primary credit risk to the Fund is through its fixed interest instruments managed by Janus Henderson Investors, BlueBay, M & G Alpha Opportunities Fund and LGPS Central. However, the majority of the Fund's fixed income assets are investment grade quality (above BBB rated) sovereign or corporate bonds rated.

Multi Asset

The Fund's aggregate exposure to credit risk through these six mandates as measured by the credit rating of external agencies is summarised in the table below:

S&P Quality Rating	Fair Value 2021-22	% of Fair Value of Fixed Income Assets	S&P Quality Rating	Fair Value 2020-21	% of Fair Value of Fixed Income Assets
	£000	£000		£000	£000
AAA	65,087	2.0	AAA	36,460	1.0
AA	1,891,595	61.0	AA	1,795,323	65.0
A	59,763	2.0	A	36,960	1.0
BBB+	267,950	9.0	BBB+	0	0.0
BBB	150,579	5.0	BBB	388,142	14.0
Below BBB	547,306	17.0	Below BBB	400,997	15.0
Cash	97,241	3.0	Cash	72,608	3.0
NR	29,581	1.0	NR	16,439	1.0
Total	3,109,102	100.0	Total	2,746,929	100.0

Deposits were not made with banks and financial institutions unless they were rated independently and met the Fund's credit criteria. The Fund also set limits as to the maximum percentage of the deposits placed with any one class of financial institution. In addition, the Fund invests an agreed percentage of its assets in the money markets to provide diversification. Money market funds chosen all have AA ratings from a leading ratings agency.

The Fund believes it has managed its exposure to credit risk and has had no experience of default or uncollectable deposits to date. The Fund's cash holding under its treasury management arrangements as at 31 March 2022 was £389.1m (31 March 2021 £253.2m) and was held in the Deutsche Bank and Fidelity money market accounts. The remainder of the cash was held by the Fund's custodian, Bank of New York Mellon with a small amount of cash in transit which was held by the Fund's property investment manager.

2021-22 Counterparty	Moodys Rating	£000	% of cash balances
Bank of New York Mellon (Money Market Cash / Cash Accounts)	P-1	46,189	10.6
Fidelity Worldwide Investment (Money Market)	Aaa-mf	49,500	11.3
Deutsche Bank Advisors (Money Market)	A2	339,627	77.7
Cash in Transit	NR	1,605	0.4
Total		436,921	100.0

2020-21 Counterparty	Moodys Rating	£000	% of cash balances
Bank of New York Mellon (Money Market Cash / Cash Accounts)	P-1	42,044	14.2
Fidelity Worldwide Investment (Money Market)	Aaa-mf	49,666	16.7
Deutsche Bank Advisors (Money Market)	A2	203,554	68.5
Cash in Transit	NR	1,868	0.6
Total		297,132	100.0

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 Fund therefore takes steps to ensure that the Fund has adequate cash resources to meet its commitments.

The Fund has immediate access to its Pension Fund cash holdings.

The Fund defines liquid assets as assets that can be converted to cash within three months, subject to normal market conditions. Illiquid assets can include assets where:

- a) there are no highly liquid active markets, such as investment properties and private equity or,
- b) individual fund structures, where the Fund's investment is locked in for a specific period or where the investment manager may have the ability to 'gate' or limit investors withdrawal from the fund.

As at 31 March 2022 the value of illiquid assets was £392m, which represented 5.64% of the total fund assets (31 March 2021 £296m which represented 4.52% of the total fund assets).

In terms of liquidity risk, the Fund had £436.9m (2020-21 £297.1m) of cash balances as at 31 March 2022 and net current assets of £8.7m (£8.8m in 2020-21). The Fund's net cash flow, before taking account of investments and excluding management expenses, as at 31 March 2022 was -£9.0m (+£7.0m in 2020-21). Income from investments supports the cash flow for the year to ensure there is no significant risk that the Fund will be unable to meet its current commitments.

All current liabilities are due to be paid in less than one year.

Other risks

Financial mismatch	<ol style="list-style-type: none">1. The risk that Fund assets fail to grow in line with the developing cost of meeting Fund liabilities.2. The risk that unexpected inflation increases the pension and benefit payments and the Fund assets do not grow fast enough to meet the increased cost.
Changing demographics	The risk that longevity improves and other demographic factors change increasing the cost of Fund benefits.
Systemic risk	The possibility of an interlinked and simultaneous failure of several asset classes and/or investment managers, possibly compounded by financial 'contagion', resulting in an increase in the cost of meeting Fund liabilities.

The Council measures and manages financial mismatch in two ways. As indicated above, it has set a strategic asset allocation benchmark for the Fund. It assesses risk relative to that benchmark by monitoring the Fund's asset allocation and investment returns relative to the benchmark. It also assesses risk relative to liabilities by monitoring the delivery of benchmark returns relative to liabilities.

The Fund prepares regular cash flow forecasts to understand and manage the timing of cash flows. The appropriate strategic level of cash balances to be held is a central consideration in preparing the Fund's annual investment strategy.

The Council keeps under review mortality and other demographic assumptions which could influence the cost of the benefits. These assumptions were considered formally at the triennial valuation.

The Council seeks to mitigate systemic risk through a diversified portfolio but it is not possible to make specific provision for all possible eventualities that may arise under this heading.

Stock Lending

The Fund has entered into a stock lending programme managed by its custodian the Bank of New York Mellon and only accepts government and quasi government bonds as collateral against loaned stock to safeguard the Fund's assets. The credit rating of the collateral accepted is summarised below.

	Fair Value of collateral 31 March 2022	% of Fair Value of collateral 31 March 2022	Fair Value of collateral 31 March 2021	% of Fair Value of collateral 31 March 2021
Moody's rating	£000	%	£000	%
Aaa	8,224	62.2	16,990	47.3
Aa1	599	4.5	160	0.5
Aa2	4,410	33.3	18,741	52.2
Grand Total	13,233	100	35,891	100
Value of Stock on Loan	12,114		34,009	

During the year ended 31 March 2022 the Fund earned £138k (2020-21: £73k) of income from its stock lending activities. At the balance sheet date the value of aggregate stock on loan was £12.1m (2020-21: £34m) and the value of collateral held was £13.2m (2020-21: £35.9m).

Note 20 – Funding Arrangements

In line with the LGPS 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 last such valuation took place as at 31 March 2019. The next valuation is at 31 March 2022.

The key elements of the funding policy are:

- To ensure long-term solvency of the Fund
- To 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;
- To reflect the different characteristics of employers in determining contributions rates;
- To have 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 risk to other employers including tax raising employers from an employer defaulting on its pension obligations.

The aim is to achieve 100% solvency over each employer's payment period and to provide stability in employer contribution rates by spreading any increases in rates over a period of time. Solvency is achieved when the funds held, plus future expected investment returns and future contributions are sufficient to meet expected future pension benefits payable.

At the 2019 valuation, the fund was assessed as 97% funded (90% at the March 2016 valuation). This corresponded to a deficit of £156m (2016 valuation: £467m) at that time.

Each employer had contribution requirements set at the valuation, with the aim of achieving full funding within a time horizon and probability measure as per the Funding Strategy Statement. Individual employer's 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 the Funding Strategy Statement.

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

The principal assumptions were:

Financial assumptions	Real
Discount rate	3.20%
Salary increase assumption	3.00%
Benefit Increase assumption (CPI)	2.30%

Longevity assumptions Assumed life expectancy at age 65	Current Pensioners	
	Male	Female
Current Pensioners	21.2 Years	23.6 Years
Future Pensioners*	21.9 Years	25 Years

*Aged 45 at the valuation date

Note 21 – Actuarial value of promised retirement benefits

CIPFA's Code of Practice on Local Authority Accounting 2021-22 requires administering authorities of LGPS funds that prepare pension fund accounts to disclose what IAS26 Accounting and Reporting by Retirement Benefit Plans refers to as the actuarial present value of promised retirement benefits. There are three options for disclosure.

The Fund has opted not to disclose the actuarial present value of promised retirements in the net assets statement, instead providing the information by reference to an accompanying actuarial report. A copy of the full actuarial calculation is appended to the Statement of Accounts.

Note 22 – Long Term Assets

	2021-22	2020-21
	£000	£000
Long Term Debtors:		
Reimbursement of lifetime tax allowances	578	617
Total	578	617

Note 23 – Current Assets

	2021-22	2020-21
	£000	£000
Current Debtors and cash:		
Contributions due - Employers	13,048	15,343
Contributions Due - Employees	3,439	3,332
Sundry Debtors	4,374	3,735
Provision for Doubtful Debt	-2,275	-2,009
Cash balances	2,404	91
Total	20,990	20,492

Note 24 – Current Liabilities

	2021-22	2020-21
	£000	£000
Sundry Creditors	5,926	6,826
Benefits Payable	4,120	3,205
Receipts in Advance	2,300	1,714
Total	12,346	11,745

Note 25 – Additional Voluntary Contributions (AVCs)

From the 1 April 2019 Standard Life were appointed as the sole AVC provider for the Fund. Prior to 1 April 2019 the AVC providers to the members of the Fund were Scottish Widows, Standard Life and Utmost who took over Equitable Life on 1 January 2020.

The AVCs are invested separately from the Fund's main assets and used to acquire additional pension benefits and therefore are not included in the Fund's accounts in accordance with regulation 4 (1) (a) of the LGPS (Management and Investment of Funds) Regulations 2016. Members participating in these AVC arrangements each receive an annual statement confirming the amounts held in their account and the movements during the year.

A summary of the information provided by Scottish Widows, Standard Life and Utmost for the year to 31 March 2022 is shown below, along with a prior year comparator.

	Scottish Widows	Standard Life	Utmost	Total
	£000	£000	£000	£000
Contributions received in year 2022	135	585	1	721
Contributions received in year 2021	204	442	1	647
Fair value at 31 Mar 2022	2,318	4,210	451	6,979
Fair value at 31 Mar 2021	2,645	3,730	492	6,867

Note 26 – Related Party Transactions

Cheshire West and Chester Council

The Fund is administered by Cheshire West and Chester Council. During the reporting period, the Council incurred costs of £4.097m (2020-21: £4.26m) in relation to the administration and management of the fund and was reimbursed by the fund for these expenses. The Fund repays cash due to the Council for such transactions plus any interest charges on a monthly basis.

In 2021-22 the Fund paid £992 (2020-21: £805) to the Council for interest accrued on these balances.

The Council is one of the largest participating employers and contributed £29.7m into the Fund in 2021-22 (2020-21: £35.1m). At the year end, a balance of £2.692m (2020-21: £2.767m) was due to the Fund from the Council, primarily relating to contributions which were paid in April but became due in March. A balance of £141.3k was owed to the Council (2020-21: £258.6k was owed to the Pension Fund) for recharges from the Council in relation to the administration and management of the Fund.

The Fund has not made any employer related investment at any time during the period.

Pension Fund Committee and Local Pensions Board

Specific declarations have been received from Pension Fund Committee and Local Pension Board Members regarding membership of and transactions with any parties related to the Pension Fund.

A number of Members act as Councillors or Board Members of particular employers who maintain a conventional employer relationship with the Fund. Employer representatives for the Local Pension Board also act as Trustees for employers of the Fund.

The value of transactions with each of these related parties, namely routine monthly payments to the Fund of employer's and employee's contributions is determined by the Local Government Pension Scheme Regulations, and as such no related party transactions have been declared.

A register of outside bodies that Members are appointed to, along with a register of interests is available on the Internet for Cheshire West and Chester, Cheshire East, Warrington and Halton Councils.

Details of the membership of the Local Pension Board are available on the Fund's website.

Investment Pooling

LGPS Central Ltd has been established to manage investment assets on behalf of eight Local Government Pension Scheme (LGPS) administering authorities across the Midlands including Cheshire. It is jointly owned in equal shares by the eight administering authorities participating in the Pool.

In 2017-18 the fund invested £1.315m in share capital and granted a loan of £685k to LGPS Central Ltd. In 2021-22 interest of £32k (2020-21: £32k) accrued on the loan balance to give a balance at the end of the year of £0.717m (2020-21: £0.717m), the share capital was valued at cost at the end of the year at £1.315m. Investments managed by LGPS Central Ltd as at 31 March 2022 are disclosed in Note 17 to the accounts.

During the year the Fund incurred charges for the running costs of LGPS Central Ltd totalling £1.095m (2020-21: £1.164m) and joint pool governance costs of £13k (2020-21: £18k).

The Fund increased its commitment to the LGPS Central Private Equity Funds in 2021-22 by £60m to give a total commitment of £82m, during the year the Fund paid £6.8m calls to these funds and received £1.9m in distributions. (£4.2m calls were made and £0.295m distributions were received in 2020-21).

During 2021-22 the Fund Committed £170m to the LGPS Central Credit Partnership II Fund which is a Private Debt Lower Return Fund and £340m to the LGPS Central Credit Partnership III Fund which is a Private Debt Stable Return Fund. During the year the Fund made calls of £6m to the Credit Partnership II Fund, no calls were made to the Credit Partnership III Fund and no distributions were received from either fund in the year.

The Fund also made a commitment of £130m to LGPS Central Infrastructure Funds in 2021-22 split £10m to the Value Add/Opportunistic sleeve, £80m to the Core/Core Plus sleeve and £40m to the Single Asset sleeve. During the year the Fund made calls to these funds totalling £26.4m, no distributions were received in the year.

The market values at the end of the year of all investments with LGPS Central are shown in Note 17.

Investment management fees of £3.7m (2020-21: £2.4m) were incurred on the Fund's investments managed by LGPS Central Ltd.

Governance

Responsibility for managing the Fund lies with the full Council of Cheshire West and Chester Council. The Council has delegated responsibility to the Chief Operating Officer who is also the s151 officer. The Chief Operating Officer is advised, by the Pension Fund Committee and external advice from Mercer the appointed investment consultant. The Fund also receives actuarial advice from Hymans Robertson. The Council's Audit and Governance Committee has oversight of the Council's governance arrangements for the Fund.

The Local Pension Board was established with effect from the 1 April 2015. The role of the Board, as defined in regulations, is to assist the Administering Authority to ensure the effective and efficient governance and administration of the LGPS.

From January 2004 elected members who were offered membership of the Scheme under their respective Council's scheme of allowances were eligible to join the Scheme. From the introduction of the new scheme in 2014 Councillors in England could only continue to accrue rights until the end of the term of office which they were serving on 1 April 2014. As a consequence all councillors ceased membership of the scheme from 12 May 2015 including those members of the Pension Fund Committee who had been active members of the Scheme.

There are three members of the Committee who are in receipt of pension benefits from the Fund (Councillor M. Hogg, Councillor P. Findlow and Paul Matthews). In addition, Committee member Councillor Corcoran has a deferred pension, Councillor Dennett was an active member of the Fund as at 31 March 2022

There are three members of the Local Pension Board who were active members of the Fund as at 31 March 2022; G. Wright, N. Harvey and A. Laing. P. Raynes also has a deferred pension with the Fund.

Each member of the Committee and Board is required to declare their interests at each meeting and sign an annual declaration form which is published on the fund's website.

As the Fund forms part of the LGPS it does not have trustees. The members of the Committee do not receive any fees in relation to their specific responsibilities as members of the Committee, although they may be reimbursed for any out of pocket expenses incurred whilst discharging their Committee role.

Similarly the members of the Board do not receive any fees in relation to their specific responsibilities as members of the Board, although they may be reimbursed for any out of pocket expenses incurred whilst discharging their role.

Further information on Fund governance can be found in the Fund's Governance Compliance Statement available on the Fund's website at www.cheshirepensionfund.org.

Key Management Personnel

The key management personnel of the Fund are the Chief Operating Officer and the Head of Pension Fund. During the year the Head of Pension Fund retired and is therefore excluded from the long term/post-retirement benefits disclosure as at 31 March 2022. A recruitment exercise took place post year end for this position and the new Head of Pension Fund will be included in this disclosure for the year ended 31 March 2023.

The combined financial value of their relationship with the fund (in accordance with IAS24 Related Party Disclosures) is set out below:

	31-Mar-22	31-Mar-21
	£000	£000
Short term benefits	87	110
Long term/post-retirement benefits	183	1,251
Total	270	1,361

The long term/post-retirement benefits are calculated on an IAS19 basis and will be affected by the assumptions used for the calculation which can vary from year to year.

Note 27 – Contingent Liabilities and Contractual Commitments

The Fund has contractual commitments to the value of £824m (2020-21 £733m) in private equity funds.

During 2021-22 the Fund made new commitments to private equity funds of £60m. A commitment of £50m was into LGPS Centrals PE Primary Partnership 2021 LP and £10m into LGPS Centrals PE Co-Investments Partnership 2021 LP.

As at 31 March 2022 the Fund had actually invested £587.6m (2020-21 £544.5m). As the Pantheon and Adam Street Partner funds are denominated in US Dollars and Euros the commitment in Sterling is subject to changes due to currency fluctuations.

During 2021-22 the Fund committed £170m to the LGPS Central Credit Partnership II Fund which is a Private Debt Lower Return Fund and £340m to the LGPS Central Credit Partnership III Fund which is a Private Debt Stable Return Fund. During the year the Fund made calls of £6m to the Credit Partnership II Fund, no calls were made to the Credit Partnership III Fund and no distributions were received from either fund in the year.

The Fund also made a commitment of £130m to LGPS Central Infrastructure Funds in 2021-22 split £10m to the Value Add/Opportunistic sleeve, £80m to the Core/Core Plus sleeve and £40m to the Single Asset sleeve. During the year the Fund made calls to these funds totalling £26.4m, no distributions were received in the year.

There are 16 admitted bodies in the Cheshire Pension Fund who hold insurance bonds to guard against the possibility of being unable to meet their pension obligations, along with an additional 12 employers with Parent Company Guarantees or Deeds of Guarantee in place.

The bonds or guarantees are drawn in favour of the Council as administering authority for the Fund and payment will only be triggered in the event of employer default.

Note 28 – Impairment of Financial Assets

During 2021-22 the Fund has recognised expected credit losses of £2.3m (2020-21: £2m) for possible and actual non-recovery of rental income on its investment properties.

Note 29 – Investment Strategy Statement

The Investment Strategy Statement (ISS) sets out the current investment strategy of the Fund, provides transparency in relation to how the Fund's investments are managed, acts as a high level risk register, and has been designed to be informative for all stakeholders.

The ISS also includes the Fund's Responsible Investment Policy which sets out the Fund's approach to the governance and stewardship of its investment assets. A full copy of the ISS can be obtained is available on the Fund's website at: www.cheshirepensionfund.org

Note 30 – Funding Strategy Statement

Under the LGPS Regulations 2013 (as amended) administering authorities are required to prepare a Funding Strategy Statement (FSS).

Fund members' accrued benefits are guaranteed by statute. Members' contributions are fixed in the Regulations at a level which covers only part of the cost of accruing benefits. Employers pay the balance of the cost of delivering the benefits to members (net of returns from the Fund's investments). The FSS focuses on the pace at which these liabilities are funded and, insofar as is practical, the measures to ensure that employers pay for their own liabilities.

The Funding Strategy Statement is available on the Fund's website at: www.cheshirepensionfund.org

Pension Fund Accounts Reporting Requirement

Introduction

CIPFA's Code of Practice on Local Authority Accounting 2021/22 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 Cheshire 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 2022	31 March 2021
Active members (£m)	4,054	4,049
Deferred members (£m)	1,671	1,802
Pensioners (£m)	2,616	2,818
Total (£m)	8,341	8,669

The promised retirement benefits at 31 March 2022 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.

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 2022 and 31 March 2021. I estimate that the impact of the change in financial assumptions to 31 March 2022 is to decrease the actuarial present value by £674m. I estimate that the impact of the change in demographic assumptions is to decrease the actuarial present value by £51m.

Financial assumptions

Year ended (%p.a.)	31 March 2022	31 March 2021
Pension Increase Rate	3.20%	2.85%
Salary Increase Rate	3.90%	3.55%
Discount Rate	2.70%	2.00%

Demographic assumptions

The longevity assumptions have changed since the previous IAS26 disclosure for the Fund.

Life expectancy is based on the Fund's VitaCurves with improvements in line with the CMI 2021 model, with a 0% weighting of 2021 (and 2020) data, standard smoothing (Sk7), initial adjustment of 0.25% and a long term rate of improvement of 1.5% p.a.. Based on these assumptions, the average future life expectancies at age 65 are summarised below:

	Males	Females
Current pensioners	21.2 years	23.8 years
Future pensioners (assumed to be aged 45 at the latest formal valuation)	22.1 years	25.5 years

All other demographic assumptions are unchanged from last year and as per the latest funding valuation of the Fund.

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 obligations are set out below:

Change in assumption at 31 March 2022	Approximate % increase to promised retirement benefits	Approximate monetary amount (£m)
0.1% p.a. decrease in the Discount Rate	2%	171
1 year increase in member life expectancy	4%	334
0.1% p.a. increase in the Salary Increase Rate	0%	17
0.1% p.a. increase in the Pension Increase Rate (CPI)	2%	153

Professional notes

This paper accompanies my covering report titled 'Actuarial Valuation as at 31 March 2022 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 by:-



Peter MacRae

For and on behalf of Hymans Robertson LLP
13 May 2022

Cheshire Pension Fund (“the Fund”)

Actuarial Statement for 2021/22

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), dated 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’/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 (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.

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 70% 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 £5,583 million, were sufficient to meet 97% 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 £156 million.

Each employer had contribution requirements set at the valuation, with the aim of achieving their funding target within a time horizon and liability measure as per the FSS. 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.

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 (% p.a.)	31 March 2019
Discount rate	3.2%
Salary increase assumption	3.0%
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	21.2 years	23.6 years
Future Pensioners*	21.9 years	25.0 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 severely disrupted by COVID 19 in March 2020, but over most of 2020/21 and 2021/22 they recovered strongly. However, due to the war in Ukraine, March 2022 markets were particularly volatile, which affects values as at the accounting date. All other things being equal, the funding level of the Fund as at 31 March 2022 is likely to be better than that reported at the previous formal valuation as at 31 March 2019.

It is important to note that the formal triennial funding valuation exercise is as at 31 March 2022 and this may show a different picture when the finalised position is disclosed in next year's annual report. In particular, changes in Fund membership, changes in anticipated real investment returns, and changes in demographic assumptions will affect the valuation results. The Funding Strategy Statement will also be reviewed as part of the triennial funding valuation exercise.

Peter MacRae

For and on behalf of Hymans Robertson LLP
13 May 2022

List of employers contributing into the Fund in 2021-22

Employer Name	Strategy	Employers	Employees	Total
Scheme Employer				
Acresfield Primary School	ACADS	-71,855.43	-15,775.49	-87,630.92
Acton CE Primary Academy	ACADS	-31,853.47	-9,987.94	-41,841.41
Adelaide School	ACADS	-122,860.46	-37,461.97	-160,322.43
Adlington Primary Academy	ACADS	-13,410.32	-3,422.21	-16,832.53
Alderley Edge Parish Council	OPEN	-11,833.39	-3,147.06	-14,980.45
Alderman Bolton Community Primary School	ACADS	-67,403.23	-19,790.81	-87,194.04
All Hallows Catholic College	ACADS	-154,284.80	-51,632.66	-205,917.46
Alsager Highfield Comm Primary School	ACADS	-41,428.93	-15,663.50	-57,092.43
Alsager School	ACADS	-266,137.16	-78,462.86	-344,600.02
Alsager Town Council	OPEN	-47,952.88	-14,251.02	-62,203.90
Appleton Parish Council	OPEN	-15,559.10	-4,133.83	-19,692.93
Ash Grove Academy	ACADS	-124,308.97	-41,445.16	-165,754.13
Astbury St Mary's CoE Primary School	ACADS	-31,910.13	-8,833.07	-40,743.20
Audlem St James CE Primary*	ACADS	-9,600.81	-3,044.06	-12,644.87
Axis School	ACADS	-39,659.91	-13,805.73	-53,465.64
Barnton Parish Council	OPEN	-8,891.58	-2,557.27	-11,448.85
Barnton Primary School	ACADS	-108,570.72	-32,686.71	-141,257.43
Beamont Primary School	ACADS	-80,943.25	-22,112.40	-103,055.65
Beaumont Collegiate Academy	ACADS	-192,077.76	-52,380.76	-244,458.52
Belgrave Academy*	ACADS	-14,379.33	-4,261.11	-18,640.44
Bexton Primary School	ACADS	-138,850.55	-33,427.28	-172,277.83
Birchwood High School	ACADS	-191,962.44	-53,055.69	-245,018.13
Birchwood Town Council	OPEN	-33,911.41	-9,562.13	-43,473.54
Bishops Blue Coat CofE High School	ACADS	-224,476.07	-74,043.85	-298,519.92
Black Firs Primary School	ACADS	-80,882.30	-24,455.38	-105,337.68
Bollington Town Council	OPEN	-17,376.84	-4,784.90	-22,161.74

Employer Name	Strategy	Employers	Employees	Total
Bosley St Marys CE Primary School*	ACADS	-15,880.14	-2,343.11	-18,223.25
Boughton Heath Academy	ACADS	-44,173.73	-11,260.88	-55,434.61
Brereton CoE Primary School	ACADS	-46,644.33	-13,487.26	-60,131.59
Brereton Parish Council	OPEN	-1,521.96	-370.39	-1,892.35
Bridgewater High School	ACADS	-355,542.00	-92,224.96	-447,766.96
Bridgewater Park Primary School	ACADS	-29,344.29	-8,921.20	-38,265.49
Brine Leas School	ACADS	-259,207.73	-77,829.68	-337,037.41
Brio Leisure (CWaC CIC)	OPEN	-943,949.66	-284,281.38	-1,228,231.04
Broken Cross Primary Academy	ACADS	-66,629.52	-17,325.46	-83,954.98
Brookfields School	ACADS	-145,970.66	-42,925.40	-188,896.06
Broomfields Junior School	ACADS	-57,088.51	-13,722.83	-70,811.34
Bruche Primary School	ACADS	-48,388.31	-13,323.35	-61,711.66
Bunbury Aldersey CofE Primary School	ACADS	-31,882.91	-9,646.91	-41,529.82
Burtonwood Comm Primary School	ACADS	-40,375.82	-10,581.01	-50,956.83
Calveley Primary Academy	ACADS	-15,067.07	-4,699.96	-19,767.03
Cavendish High Academy	ACADS	-137,795.43	-41,202.87	-178,998.30
Chapelford Village Primary School	ACADS	-85,895.36	-23,502.42	-109,397.78
Chelford Parish Council*	OPEN	-4,691.20	-1,141.63	-5,832.83
Cheshire College South & West	OPEN	-1,651,391.62	-416,461.33	-2,067,852.95
Cheshire East Council	OPEN	-32,594,429.56	-7,093,173.23	-39,687,602.79
Cheshire Fire Authority	OPEN	-726,288.78	-248,687.27	-974,976.05
Cheshire West & Chester Council	OPEN	-29,312,086.64	-8,064,824.58	-37,376,911.22
Childer Thornton Primary School	ACADS	-53,348.09	-15,281.79	-68,629.88
Christleton High School	ACADS	-234,835.34	-74,547.55	-309,382.89
Cloughwood School	ACADS	-93,805.38	-32,482.83	-126,288.21
Clutton CoE Primary School	ACADS	-28,417.87	-7,331.23	-35,749.10
Comberbach Primary School	ACADS	-30,656.64	-8,967.06	-39,623.70

Employer Name	Strategy	Employers	Employees	Total
Congleton High School	ACADS	-233,122.76	-73,643.79	-306,766.55
Congleton Town Council	OPEN	-136,119.93	-42,097.06	-178,216.99
Cornerstone Academy*	ACADS	-19,486.71	-3,337.41	-22,824.12
County High School Leftwich	ACADS	-151,515.94	-44,917.39	-196,433.33
Cranberry Academy	ACADS	-46,865.96	-13,819.66	-60,685.62
Crewe Engineering UTC	ACADS	-35,603.53	-10,484.11	-46,087.64
Crewe Town Council	OPEN	-56,501.90	-15,002.93	-71,504.83
Croft Primary School	ACADS	-78,901.15	-19,281.78	-98,182.93
Cuddington Parish Council*	OPEN	-4,590.12	-1,320.18	-5,910.30
Cuddington Primary School	ACADS	-75,064.04	-15,020.55	-90,084.59
Daresbury Primary School	ACADS	-30,498.32	-8,283.42	-38,781.74
Daven Primary School	ACADS	-55,007.86	-12,624.66	-67,632.52
Delamere and Oakmere Parish Council	OPEN	-1,388.40	-337.92	-1,726.32
Delamere Primary School	ACADS	-33,306.15	-8,737.13	-42,043.28
Disley Parish Council	OPEN	-17,087.36	-4,495.29	-21,582.65
Disley Primary School	ACADS	-59,799.29	-11,991.16	-71,790.45
Ditton Primary School	ACADS	-111,373.03	-27,514.11	-138,887.14
Eaton PS	ACADS	-29,937.50	-6,532.52	-36,470.02
Eaton Bank School	ACADS	-158,753.45	-43,224.94	-201,978.39
Egerton Primary School	ACADS	-56,592.81	-12,612.34	-69,205.15
Evelyn Street Primary School	ACADS	-159,542.80	-48,306.84	-207,849.64
Excalibur Primary School	ACADS	-68,005.68	-17,509.05	-85,514.73
Frodsham Town Council	OPEN	-12,188.51	-3,492.68	-15,681.19
Gawsworth Primary School	ACADS	-39,382.78	-10,056.94	-49,439.72
Glazebury Primary School	ACADS	-28,256.95	-8,180.13	-36,437.08
Gorse Covert Primary School	ACADS	-41,693.38	-9,875.85	-51,569.23
Gorseybank Primary School	ACADS	-36,885.53	-7,134.02	-44,019.55
Grange Community & Primary School	ACADS	-49,712.13	-14,482.66	-64,194.79

Employer Name	Strategy	Employers	Employees	Total
Grappenhall and Thelwell Parish Council	OPEN	-235,517.29	-5,068.80	-240,586.09
Great Sankey High School	ACADS	-377,813.15	-109,380.22	-487,193.37
Great Sankey Primary School	ACADS	-54,668.38	-14,813.09	-69,481.47
Grosvenor Park CoE Academy	ACADS	-32,064.16	-8,797.26	-40,861.42
Halton Borough Council	OPEN	-13,436,156.92	-4,191,972.00	-17,628,128.92
Handforth Grange Community Primary School	ACADS	-66,839.34	-18,178.99	-85,018.33
Handforth Parish Council	OPEN	-6,428.78	-1,854.00	-8,282.78
Hartford Parish Council	OPEN	-6,803.59	-1,956.74	-8,760.33
Haslington Primary*	ACADS	-90,533.89	-15,159.56	-105,693.45
Highfields Community Primary School	ACADS	-66,747.36	-14,983.20	-81,730.56
Hollinhey School	ACADS	-47,818.51	-13,353.57	-61,172.08
Hollins Green St Helens CoE Primary School	ACADS	-25,041.73	-6,832.40	-31,874.13
Holmes Chapel Comprehensive School	ACADS	-275,090.23	-85,437.55	-360,527.78
Holmes Chapel Parish Council	OPEN	-9,840.75	-2,704.60	-12,545.35
Holmes Chapel Primary School	ACADS	-89,089.97	-24,889.83	-113,979.80
Hungerford Primary	ACADS	-114,207.87	-31,806.01	-146,013.88
Ivy Bank Primary School	ACADS	-140,440.43	-38,243.04	-178,683.47
Kelsall Primary School	ACADS	-66,964.01	-20,213.35	-87,177.36
Kings Leadership Academy	ACADS	-185,546.06	-64,475.96	-250,022.02
Kingsmead Parish Council	OPEN	-1,699.79	-443.59	-2,143.38
Knutsford Academy	ACADS	-234,037.49	-56,150.75	-290,188.24
Knutsford Town Council	OPEN	-41,588.69	-11,502.77	-53,091.46
Lacey Green Primary Academy	ACADS	-70,675.45	-22,018.62	-92,694.07
Leftwich Primary*	ACADS	-47,877.58	-14,092.00	-61,969.58
Leighton Academy	ACADS	-121,900.40	-34,802.77	-156,703.17
Little Bollington PS	ACADS	-27,135.42	-7,420.25	-34,555.67
Leighton Academy	ACADS	-121,900.40	-34,802.77	-156,703.17
Little Bollington PS	ACADS	-27,135.42	-7,420.25	-34,555.67

Employer Name	Strategy	Employers	Employees	Total
Little Leigh Primary	ACADS	-36,681.78	-8,027.47	-44,709.25
Little Sutton CoE Primary School	ACADS	-21,945.81	-5,836.90	-27,782.71
Lostock Hall Primary	ACADS	-38,560.06	-9,849.43	-48,409.49
Lymm High School	ACADS	-412,980.53	-120,230.13	-533,210.66
Lymm Parish Council	OPEN	-14,754.88	-3,988.53	-18,743.41
Macclesfield Academy	ACADS	-156,437.09	-28,783.15	-185,220.24
Macclesfield College	OPEN	-581,202.26	-158,426.06	-739,628.32
Macclesfield Town Council	OPEN	-33,440.46	-10,334.49	-43,774.95
Manor Park Primary School	ACADS	-64,287.77	-14,914.74	-79,202.51
Marlborough Primary School	ACADS	-99,689.79	-26,209.97	-125,899.76
Marlfields Primary Academy	ACADS	-53,611.22	-14,489.71	-68,100.93
Meadowside Comm Primary School	ACADS	-124,865.36	-33,013.95	-157,879.31
Mersey Gateway Crossing Board	OPEN	-55,647.00	-14,559.72	-70,206.72
Middlewich High School*	ACADS	-90,963.29	-17,237.95	-108,201.24
Middlewich Town Council	OPEN	-40,146.08	-11,312.07	-51,458.15
Mill View Primary School	ACADS	-48,095.95	-13,325.19	-61,421.14
Monks Coppenhall Academy	ACADS	-166,119.64	-42,156.61	-208,276.25
Mossley CE Primary School	ACADS	-106,955.33	-27,198.84	-134,154.17
Mottram St Andrew Primary Academy	ACADS	-39,506.43	-12,430.93	-51,937.36
Nantwich Primary Academy	ACADS	-37,490.64	-11,129.37	-48,620.01
Nantwich Town Council	OPEN	-103,076.70	-31,211.29	-134,287.99
Neston High School	ACADS	-318,147.38	-88,544.49	-406,691.87
Neston Town Council	OPEN	-23,423.29	-7,102.67	-30,525.96
Nether Alderley Parish Council	OPEN	-2,745.77	-716.43	-3,462.20
Nether Alderley Primary School	ACADS	-19,787.96	-5,016.38	-24,804.34
New Horizons School	ACADS	-42,965.06	-13,099.87	-56,064.93
Northwich Town Council	OPEN	-72,392.51	-19,228.21	-91,620.72

Employer Name	Strategy	Employers	Employees	Total
NW Fire Control Limited	OPEN	-520,445.85	-148,916.36	-669,362.21
Oak View Primary Academy	ACADS	-117,735.71	-31,700.17	-149,435.88
Oakwood Avenue Primary School	ACADS	-267,464.26	-68,053.55	-335,517.81
Odd Rode Parish Council	OPEN	-7,149.22	-2,176.56	-9,325.78
Offley Primary Academy	ACADS	-69,218.17	-20,641.76	-89,859.93
Ormiston Bolingbroke Academy	ACADS	-213,892.65	-69,839.16	-283,731.81
Ormiston Chadwick Academy	ACADS	-157,602.86	-46,780.33	-204,383.19
Oughtrington Primary*	ACADS	-97,943.12	-23,974.38	-121,917.50
Over Hall Community School	ACADS	-67,905.28	-19,434.52	-87,339.80
Padgate Academy	ACADS	-101,605.98	-30,698.08	-132,304.06
Palacefields Academy	ACADS	-43,199.92	-11,294.09	-54,494.01
Park Road Primary School	ACADS	-36,880.34	-9,951.26	-46,831.60
Parklands Community Primary School	ACADS	-67,150.41	-19,080.87	-86,231.28
Parkroyal Community School	ACADS	-109,481.67	-31,612.11	-141,093.78
Pear Tree School	ACADS	-67,213.56	-15,735.20	-82,948.76
Penketh High School	ACADS	-187,856.76	-51,030.37	-238,887.13
Penketh Parish Council	OPEN	-11,394.85	-2,972.21	-14,367.06
Penketh Primary School	ACADS	-47,855.92	-12,396.92	-60,252.84
Penketh South Primary School	ACADS	-48,092.48	-13,768.64	-61,861.12
Peover Superior Primary School	ACADS	-22,828.58	-6,113.14	-28,941.72
Pikemere School	ACADS	-83,073.12	-22,461.47	-105,534.59
Police & Crime Commissioner	OPEN	-9,908,496.91	-3,193,494.56	-13,101,991.47
Poulton with Fearnhead Parish Council	OPEN	-9,663.71	-2,480.05	-12,143.76
Poynton High School	ACADS	-237,161.04	-71,698.96	-308,860.00
Poynton with Worth Parish Council	OPEN	-60,830.91	-17,109.01	-77,939.92
Priestley 6th Form College	ACADS	-320,173.13	-96,240.11	-416,413.24
Puss Bank School	ACADS	-92,127.98	-30,046.81	-122,174.79

Employer Name	Strategy	Employers	Employees	Total
Queens Park High School	ACADS	-131,639.02	-39,756.71	-171,395.73
Ravensbank Primary*	ACADS	-84,125.46	-21,295.93	-105,421.39
Reaseheath College	OPEN	-1,898,643.18	-492,177.09	-2,390,820.27
Riverside College	OPEN	-981,201.97	-246,465.85	-1,227,667.82
Rudheath Primary School	ACADS	-71,554.96	-20,583.93	-92,138.89
Rudheath Senior Academy	ACADS	-141,713.26	-25,170.26	-166,883.52
Sandbach High School & 6th Form	ACADS	-149,098.01	-46,314.46	-195,412.47
Sandbach Primary Academy School	ACADS	-41,987.93	-11,581.95	-53,569.88
Sandbach School	ACADS	-256,189.35	-78,230.71	-334,420.06
Sandbach Town Council	OPEN	-44,805.99	-13,751.69	-58,557.68
Sandiway Primary School	ACADS	-69,057.11	-13,727.70	-82,784.81
Sandymoor School	ACADS	-129,413.31	-38,864.74	-168,278.05
Shavington Academy	ACADS	-147,186.34	-38,370.49	-185,556.83
Shavington Primary School	ACADS	-125,656.76	-39,293.16	-164,949.92
Simms Cross Primary School	ACADS	-74,073.12	-19,318.88	-93,392.00
Sir John Deanes College	ACADS	-274,636.94	-94,345.52	-368,982.46
Sir Thomas Boteler High School	ACADS	-155,880.78	-44,168.97	-200,049.75
Sir William Stanier Community School	ACADS	-187,037.10	-43,971.68	-231,008.78
Smallwood CofE Primary Academy	ACADS	-36,539.59	-9,462.20	-46,001.79
St Albans Catholic Primary School	ACADS	-56,973.63	-12,666.98	-69,640.61
St Augustines Catholic Primary School	ACADS	-24,311.00	-5,634.46	-29,945.46
St Bernards RC Primary School	ACADS	-62,595.64	-16,703.95	-79,299.59
St Chad's COE & Catholic High*	ACADS	-8,858.22	-2,288.09	-11,146.31
St Johns Wood Community School	ACADS	-58,685.31	-16,732.69	-75,418.00
St Martins Academy	ACADS	-27,060.87	-8,472.62	-35,533.49
St Marys Catholic Primary School	ACADS	-53,977.45	-14,767.84	-68,745.29
St Mic with St Thomas Primary School	ACADS	-43,381.52	-10,149.81	-53,531.33

Employer Name	Strategy	Employers	Employees	Total
St Michaels Community Academy	ACADS	-91,876.79	-28,186.44	-120,063.23
St Oswalds Worleston Primary School	ACADS	-32,391.70	-9,529.38	-41,921.08
St Pauls Catholic Primary School	ACADS	-34,051.87	-8,742.85	-42,794.72
St Thomas More Catholic High School	ACADS	-85,821.12	-24,207.29	-110,028.41
Stapeley Broad Lane	ACADS	-48,482.93	-13,461.73	-61,944.66
Statham Primary*	ACADS	-39,851.31	-9,965.45	-49,816.76
Stockton Heath Parish Council	OPEN	-8,273.14	-2,094.77	-10,367.91
Tarporley High School & 6th Form College	ACADS	-157,481.51	-45,028.84	-202,510.35
Tarvin Primary School	ACADS	-64,510.71	-14,789.68	-79,300.39
The Berkeley Academy	ACADS	-92,561.34	-26,781.98	-119,343.32
The Catholic High - Chester	ACADS	-167,342.86	-47,464.33	-214,807.19
The Ellesmere Port C of E College	ACADS	-125,305.62	-41,159.30	-166,464.92
The Fallibroome Academy	ACADS	-391,729.00	-115,335.66	-507,064.66
The Fermain Academy	ACADS	-51,393.46	-18,718.57	-70,112.03
The Grange School	ACADS	-215,207.23	-64,223.61	-279,430.84
The Heath Academy	ACADS	-258,563.43	-87,878.88	-346,442.31
The Hermitage Trust	ACADS	-48,024.21	-12,384.42	-60,408.63
The Oaks Academy	ACADS	-113,190.75	-30,088.09	-143,278.84
The Quinta Primary School	ACADS	-104,136.67	-27,984.49	-132,121.16
The Russett School	ACADS	-157,038.53	-43,393.97	-200,432.50
Thelwell Primary*	ACADS	-40,044.25	-9,818.78	-49,863.03
Transport Services Solutions Limited	OPEN	-186,729.44	-66,029.36	-252,758.80
Tytherington School	ACADS	-278,967.83	-69,346.58	-348,314.41
Underwood West Academy	ACADS	-255,603.09	-39,971.19	-295,574.28
University Technical College (UTC) Warrington	ACADS	-37,264.94	-12,143.98	-49,408.92
Upton Heath CoE Primary School	ACADS	-92,518.53	-26,424.38	-118,942.91
Upton Priory School	ACADS	-102,637.80	-26,660.84	-129,298.64

Employer Name	Strategy	Employers	Employees	Total
Utkinton St Pauls CE PS	ACADS	-15,198.18	-4,008.36	-19,206.54
Victoria Road Primary School	ACADS	-47,001.00	-13,513.37	-60,514.37
Vivo Care Choices Ltd	OPEN	-1,807,252.72	-510,941.01	-2,318,193.73
Wade Deacon High School	ACADS	-346,063.56	-119,718.35	-465,781.91
Warmingham CofE Primary School	ACADS	-13,489.86	-3,543.32	-17,033.18
Warrington & Vale Royal College	OPEN	-791,504.79	-215,763.23	-1,007,268.02
Warrington Borough Council	OPEN	-16,552,749.68	-5,205,786.74	-21,758,536.42
Warrington Transport	OPEN	-15,875.43	-3,925.56	-19,800.99
Weaverham Primary Academy	ACADS	-28,566.41	-7,405.36	-35,971.77
Westbrook Old Hall School	ACADS	-56,449.99	-14,684.50	-71,134.49
Weston Village Primary School	ACADS	-58,265.66	-15,952.53	-74,218.19
Wheelock Primary School	ACADS	-59,504.35	-16,533.59	-76,037.94
Whirley Primary School	ACADS	-48,973.89	-12,808.29	-61,782.18
Widnes Academy	ACADS	-42,548.29	-12,912.07	-55,460.36
Willaston Primary Academy	ACADS	-62,431.48	-17,519.92	-79,951.40
Wilmslow Academy	ACADS	-83,274.70	-19,674.61	-102,949.31
Wilmslow Town Council	OPEN	-17,231.19	-5,825.64	-23,056.83
Winsford Academy	ACADS	-251,839.86	-69,772.05	-321,611.91
Winsford Town Council	OPEN	-40,477.00	-10,696.04	-51,173.04
Winwick Parish Council	OPEN	-1,928.40	-469.32	-2,397.72
Wistaston Academy	ACADS	-90,008.34	-28,722.58	-118,730.92
Wistaston Church Lane Academy	ACADS	-77,282.90	-21,789.25	-99,072.15
Wistaston Parish Council	OPEN	-316.10	-81.12	-397.22
Wolverham Primary and Nursery School	ACADS	-123,306.52	-36,598.95	-159,905.47
Woolston Comm Primary School	ACADS	-79,026.16	-18,960.06	-97,986.22
Worth Primary School	ACADS	-32,428.89	-8,730.64	-41,159.53
Wybunbury Delves Primary School	ACADS	-74,517.60	-25,750.84	-100,268.44
Scheme Employer Total		-132,112,562.26	-36,161,845.56	-168,274,407.82

Scheme Employer	Strategy	Employers	Employees	Total
Other Admitted Bodies				
Active Cheshire	OPEN	-9,249.88	-2,705.04	-11,954.92
Adoption Matters	OPEN	-616,859.93	-177,727.43	-794,587.36
ANSA Enviromental Services	OPEN	-1,994,835.30	-661,797.67	-2,656,632.97
Aramark - St Thomas Moore	OPEN	-1,492.54	-281.13	-1,773.67
Aspens Svcs Ltd - BrLeas	OPEN	-4,098.75	-627.67	-4,726.42
Avenue Services (NW) Ltd	OPEN	-21,029.86	-5,947.10	-26,976.96
Belong Limited	CLOSING	-543,390.45	-3,345.30	-546,735.75
Bridgewater High School Trading	OPEN	-641.28	-135.64	-776.92
Bulloughs - Lymm	OPEN		-744.40	-744.40
Bulloughs Collegiate	OPEN		-661.44	-661.44
Canal & River Trust	CLOSING		-490.26	-490.26
Care Quality Commission	CLOSING	-128,217.08	-2,901.12	-131,118.20
Catalyst Choices	OPEN	-14,897.72	-166,496.60	-181,394.32
Catering Academy - COE Academy	OPEN		-1,556.50	-1,556.50
Catering Academy - Warrington	OPEN		-449.78	-449.78
Caterlink (Ruskin)	OPEN	-4,227.00	-666.13	-4,893.13
Caterlink (Sandbach)	OPEN	-27,986.50	-4,515.17	-32,501.67
CG Cleaning - Great Sankey	OPEN	-1,197.05	-362.95	-1,560.00
Chartwell - Elworth	OPEN	-2,986.13	-436.35	-3,422.48
Cheshire Community Action	CLOSING	-39,300.86	-2,380.68	-41,681.54
Cheshire Peaks and Plains Housing Trust	OPEN	-400,274.28	-99,030.90	-499,305.18
Cheshire West Recycle Ltd	OPEN	-245,895.03	-35,569.97	-281,465.00
Churchill Services Ltd	OPEN	-4,644.01	-717.50	-5,361.51

Scheme Employer	Strategy	Employers	Employees	Total
Compass (Chartwells Ltd) - Middlewich High School*	OPEN	-671.19		-671.19
Compass (Chartwells Ltd) - St Barts Multi Academy Trust*	OPEN	-23,307.74	-5,989.11	-29,296.85
Crossroads Together*	OPEN	-7,187.87	-1,966.81	-9,154.68
Culture Warrington	OPEN	-9,311.50	-37,097.92	-46,409.42
CWP NHS Trust	OPEN	-69,468.34	-21,567.64	-91,035.98
Dataspire	OPEN		-310.04	-310.04
David Lewis Centre	CLOSING	-597,620.16	-550.08	-598,170.24
Deafness Support Network	CLOSING	-136,874.50	-5,786.06	-142,660.56
Edsential	OPEN	-1,093,265.63	-318,525.20	-1,411,790.83
ENGIE	OPEN	-8,208.26	-1,573.89	-9,782.15
Everybody Sport + Recreation	OPEN	-807,481.43	-196,174.70	-1,003,656.13
ForHousing	OPEN	-177,153.83	-72,740.99	-249,894.82
Hall Cleaning Services	OPEN	-5,409.94	-830.06	-6,240.00
Halton Housing Trust	OPEN	-1,636,167.25	-540,631.50	-2,176,798.75
Hochtief	OPEN	-1,624.62	-448.96	-2,073.58
HQ Theatres Limited	OPEN		-2,875.83	-2,875.83
Hutchison Catering*	OPEN	-20,491.86	-5,242.12	-25,733.98
Innovate Ltd Tytherington	OPEN		-501.84	-501.84
ISS Facility Services Ltd	OPEN		-1,484.40	-1,484.40
Kings School Chester	CLOSING	-26,185.14	-4,811.36	-30,996.50
Livewire	OPEN	-23,900.15	-251,164.18	-275,064.33
Market Asset Management*	OPEN	-7,266.28	-2,046.29	-9,312.57
Mellors - St Basils	OPEN	-3,714.62	-954.67	-4,669.29
Mellors - St Michael & St Thomas*	OPEN	-9,411.33	-2,418.80	-11,830.13
Mellors Learning for Life*	OPEN	-45,408.58	-12,302.83	-57,711.41

Scheme Employer	Strategy	Employers	Employees	Total
Mellors Frank Field Trust*	OPEN	-6,283.47	-1,469.04	-7,752.51
Midshire Catering Ltd	OPEN	-3,011.22	-494.40	-3,505.62
Midshire Catering Services Ltd - Hartford High School	OPEN	-12,194.68	-3,287.76	-15,482.44
Midshire Signature Serv- Tarvin and Eaton*	OPEN	-5,053.71	-1,292.82	-6,346.53
Nirvana Managed Services - Dee Banks School*	OPEN	-4,140.17	-850.03	-4,990.20
Norton Priory Museum Trust	OPEN	-39,718.12	-11,624.51	-51,342.63
Orbitas Bereavement Service	OPEN	-158,150.65	-52,359.52	-210,510.17
Orian Solutions Ltd*	OPEN	-886.42	-226.77	-1,113.19
Plus Dane (Cheshire) Housing Association	OPEN	-669,137.02	-100,033.84	-769,170.86
QWest Services Ltd	OPEN	-161,631.55	-39,838.23	-201,469.78
Reed Wellbeing Limited	OPEN	-3,416.48	-980.86	-4,397.34
Ringway Infrastructure	OPEN		-43,249.46	-43,249.46
Ringway Jacobs	OPEN	-163,537.16	-56,150.31	-219,687.47
RM Estates Ltd	OPEN	-7,758.36	-2,355.96	-10,114.32
Sanctuary Housing Association	CLOSING	-941,056.32	-190,618.03	-1,131,674.35
SMC Premier Cleaning Ltd	OPEN	-40.21	-10.60	-50.81
Starcare	OPEN	-16,563.16	-4,764.75	-21,327.91
Tarmac Trading Limited	OPEN	-44,316.09	-8,745.77	-53,061.86
The Guinness Partnership	OPEN	-368,955.56	-84,741.13	-453,696.69
Torus 62	OPEN	-1,456,927.65	-302,953.86	-1,759,881.51
Torus 62 (LMH)	OPEN		-4,488.67	-4,488.67
Torus 62 Foundation	OPEN	-93,752.28	-19,605.88	-113,358.16
University Of Chester	OPEN	-4,630,473.10	-1,241,055.12	-5,871,528.22
Verve People	OPEN	-17,278.26	-3,016.84	-20,295.10
Warrington Housing Association	OPEN	-247,309.23	-69,956.60	-317,265.83
Warrington Voluntary Action	CLOSING	-15,000.40	-2,911.80	-17,912.20
Weaver Vale Housing Trust	OPEN	-2,458,930.87	-433,945.46	-2,892,876.33
West Cheshire Facilities Management	OPEN	-3,304.96	-580.76	-3,885.72
Westminster Drug Project	OPEN	-5,574.12	-1776.12	-7,350.24
Your Housing Group	OPEN		-3,911.76	-3,911.76
Youth Federation	CLOSING	-6,999.96		-6,999.96
Other Admitted Bodies Total		-20,312,755.05	-5,344,838.67	-25,657,593.72
Exit payments		206,000.00		206,000.00
Total Contributions 2021-2022		-152,219,317.31	-41,506,684.23	-193,726,001.54

Scheme Advisory Board Disclosures

Summary Information

The following information is provided to assist in the production of the scheme annual report compiled by the LGPS Scheme Advisory Board.

The table below provides a summary of the number of employers in the Fund analysed by scheduled bodies and admitted bodies which are actively contributing (made contributions into the Fund in 2021-22) and ceased contributing (made no contributions into the Fund in 2021-22).

2021-22	Actively Contributing	Ceased Contributing	Total
Scheduled Body	244	41	285
Admitted Body	77	95	172
Totals	321	136	457

The table below provides an analysis of Fund assets as at 31 March 2022

	UK	Non-UK	Global	Total
	£000	£000	£000	£000
Equities	13,405		1,607,351	1,620,756
Bonds	378,226		2,736,340	3,114,566
Property (direct holdings)	441,300			441,300
Alternatives	360,495	632,376	352,344	1,345,215
Cash	390,732		46,189	436,921
Total	1,584,158	632,376	4,742,224	6,958,758

The table below provides an analysis of investment income accrued as at 31 March 2022

	UK	Non-UK	Global	Total
	£000	£000	£000	£000
Equities			4,921	4,921
Alternatives	5,968	268		6,236
Property (direct holdings)	20,411			20,411
Cash	271		33	304
Total	26,650	268	4,954	31,872

Funding Strategy Statement

1. Introduction

1.1. What is this document?

This is the Funding Strategy Statement (FSS) of the Cheshire Pension Fund ("the Fund"), which is administered by Cheshire West and Chester 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 and investment adviser. It is effective from 13 March 2020. The date of any subsequent amendments and the current version in force are in the footer of each page.

1.2 What is the Cheshire 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.

Cheshire West and Chester Council as the Administering Authority runs the Cheshire Pension Fund to make sure the Fund:

- 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 pensions and benefits due to the members and to their dependents 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. 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 dependents.

The FSS focuses on how employer pension liabilities are measured, the pace at which these liabilities are funded, and how employers or groups of employers (known as pools) pay for their own liabilities.

This statement out how the Administering Authority has balanced the conflicting aims of:

- affordability of employer contributions,
- transparency of processes,
- stability of employers' contributions over time, and
- prudence in the funding basis

There are also regulatory requirements for an FSS, as given in Appendix A. The FSS forms part of a governance framework which includes:

- the LGPS Regulations.
- the Rates and Adjustments Certificate issued by the Fund's appointed actuary Hymans Robertson (confirming employer contribution rates from 1 April 2020) which can be found in an appendix to the formal valuation report.
- the Fund's policy on admission or cessation of employers 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) Funding strategy and links to investment strategy

1.4 How does the Fund and this FSS affect me?

This depends who you are:

- **a member of the Fund**, i.e. a current or former employee, or a dependent: 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 Councillor 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 Taxpayer**: your council seeks to strike the balance above, and to minimise cross- subsidies between different generations of taxpayers.

1.5 What does the FSS 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' and dependents' benefits as they fall due for payment.
- to ensure that employer contribution rates are reasonably stable and affordable 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 Taxpayer 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 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. the detailed explanatory notes to accompany Table 3.3
- G. a glossary explaining the technical terms occasionally used in this FSS

If you have any other queries please email:
pensions@cheshirewestandchester.gov.uk

2. Basic funding issues

2.1 How does the actuary calculate the required contribution rate?

In essence this is a three-step process:

- Step 1:** Set the funding target for that employer, i.e. the estimated amount of assets it should hold 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.
- Step 2:** 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;
- Step 3:** 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 How is each employer's contribution rate presented?

This is described in more detail in Appendix D. Employer contributions are normally made up of two elements:

- The "Primary Rate": the estimated cost of benefits being built up each year, less members' own contributions and including an allowance for administration expenses. This is expressed as a percentage of members' pensionable pay; plus
- The "Secondary Rate": an adjustment, if needed, to fund the cost of benefits already accrued before the valuation date. The Secondary Rate may be expressed as a percentage of pay and/or a monetary amount in each year.

The Primary and Secondary 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 the minimum payable, with employers able to pay contributions at a higher rate. Account of any higher rate will be reflected as a credit by the Actuary when next calculating the employer's contributions.

2.3 What different types of employers 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.

Whilst local authorities are still the largest participating employers, the LGPS also includes employers providing services in place of, or alongside, local authority services: academy schools, contractors, housing associations, charities, etc. There are currently more employers in the Fund than ever before, a significant part of this being due to the establishment of new academies.

In essence, participation in the LGPS is open to public sector employers providing some form of service to the local community.

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 for their employees who are not eligible to join another public sector scheme (such as the Teachers Scheme). These employers are called Scheduled Bodies because they are specified in a schedule to the LGPS Regulations.
- It is possible for Local Education Authority schools to convert to academy status, and for other forms of school (such as Free Schools) to be established. **Academies (or Multi Academy Trusts)**, become separate 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..
- Designating employers** - employers such as Town and Parish councils can participate in the LGPS by passing a resolution that they wish to join. The Administering Authority cannot refuse them entry where the resolution is passed. These employers "designate" which of their employees are eligible to join the scheme.
- Admission Bodies:** Other employers who can participate in the Fund via what's called an Admission Agreement in which the employer nominates the employees who it wants to have access to the LGPS. The Administering Authority sets out its criteria for participation by these employers in the Fund's Admissions Policy and can refuse entry if these requirements are not met. There are two types of admission bodies
 - Employers who have a "community of interest" with another Scheduled Body in the Fund, often called – **community admission bodies** ("CAB"). CABs will include housing associations and charities
 - Employers providing a service under contract with a Scheduled Body, often called **transferee admission bodies** ("TAB")

2.4 How does the contribution rate vary for different employers?

All three steps in Section 2.2 are considered when setting contributions (more details are given in Section 3 and Appendix D).

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.

The **time horizon** is the period given to reach the funding target. 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

The **likelihood of success** 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 3.5.

Any costs of non-ill-health early retirements must be paid by the employer, see 3.6. Costs of illhealth early retirements are covered in 3.7 and 3.8.

2.5 How is an employer's funding level calculated?

An employer's "funding level" is defined as the ratio of:

- the market value of the employer's share of assets at the date of the valuation (see Appendix D, section D5, for further details of how this is calculated), to
- the value placed by the actuary on the pension liabilities built up to date for the employer's employees and ex-employees. The Fund actuary agrees with the Administering Authority the assumptions to be used in calculating this value.

If the ratio of assets to liabilities 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 surplus is the difference between the asset value and the liabilities value.

It is important to note that the deficit/surplus and funding level are only measurements at a particular point in time, on a particular set of assumptions about the future. For most employers the key issue is how likely it is that their contributions will be sufficient to pay for their members' benefits.

2.6 How does the Fund recognise that employer contribution rates can affect council and employer budgets, and council tax?

The Administering Authority and the Fund actuary are acutely aware that, all other things being equal, higher contributions paid to the Fund may mean less cash available for the employer to spend on the provision of services.

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;
- 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 dependents), 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. For example, if stability of rates means that solvency isn't achieved within the current generation (which the Fund views as around 20 years), then it may not be possible to keep rates stable.
- The Fund wishes to avoid the situation where an employer's contributions fall so far behind that any 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 other employers' services may in turn suffer as a result.

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 rate changes 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.

The Administering Authority will make a risk assessment of that employer using a knowledge base which is regularly monitored and kept up to date. This assessment will include such information as the type of employer, its membership profile and funding position, financial standing, any guarantors or security provision, material changes anticipated, etc.

For instance, where the Administering Authority has 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. 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 the employer will be able to meet its funding commitments or withstand a significant change in its funding 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 the McCloud court case and its potential impact on the LGPS benefit structure?

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 for Housing, Communities and Local Government (MHCLG) has not provided details of any changes to LGPS benefits because of the case.

However, it is expected that benefit 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 on the treatment of the McCloud case in valuations in the event there was no finalised outcome 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 SAB's note, has considered how to allow for the "McCloud" risk in the setting of employer contribution rates and has taken the following approach:

- increase the prudence in the funding strategy via a higher likelihood of meeting funding target for the Councils who make up the majority of the Fund, and
- make no allowance for the smaller employers until the

As the majority of employers in the Fund are long term participants, the Fund will have time to make future adjustments as detail on the McCloud remedy emerges. The Fund should reserve the right to adjust employer contribution rates between formal valuations if deemed appropriate and necessary once the remedy to McCloud is known.

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.

At the time of writing, whilst the outcome of the consultation is unknown, MHCLG has confirmed that the next valuation will be carried out in three years in March 2022. The Fund has 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 ability to meet benefit payments when they fall due.

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 of success is required to reach that funding target? This will always be less than 100% as pension funding is uncertain. Higher likelihood "hurdles" 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 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 success 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 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 (section 3.3) is a summary of how the main funding policies differ for different types of employer. More detailed notes where necessary are shown in Appendix F.

Section 3.4 onwards deals with various other funding issues which apply to all employers.

Type of employer	Scheduled Bodies			Community Admission Bodies and Designating Employers		Transferee Admission Bodies*
Sub-type	Local Authorities, Police, Fire, Parish and Town Councils	Further Education Establishments	Academies	Open to new entrants	Closed to new entrants	(all)
Funding Target Basis used	Ongoing participation basis, assumes long-term Fund participation (see Appendix E)			Ongoing, but may move to “gilts basis” - see Note (a)		Contractor exit basis, assumes fixed contract term
Primary rate approach	(see Appendix D – D.2)					
Stabilised contribution rate?	Yes - see Note (b)	No	No	No	No	No
Maximum time horizon – Note (c)	20 years	15 years	20 years	15 years	15 years	Outstanding contract term
Secondary rate – Note (d)	Monetary amount for 4 main Councils, % of payroll for	Monetary amount	% of payroll	Monetary amount	Monetary amount	Monetary amount
Treatment of surplus	Covered by stabilisation arrangement	Preferred approach: contributions kept at primary rate. However, reductions may be permitted by the Administering Authority on a case by case basis	Preferred approach: contributions kept at primary rate. However, reductions may be permitted by the Administering Authority on a case by case	Preferred approach: contributions kept at primary rate. However, reductions may be permitted by the Admin. Authority on a case-by-case basis		Reduce contributions by spreading the surplus over the remaining contract term
Likelihood of Success of achieving target – Note (e)	66%	75% but may reduce in return for added security see note 3.6	66%	75% but may reduce in return for added security see note 3.6	75% but may reduce in return for added security see note 3.6	66%
Phasing of contribution changes	Covered by stabilization arrangement	May be permitted by the Administering Authority on a case by case basis	May be permitted by the Administering Authority on a case by case basis	May be permitted by the Administering Authority on a case by case basis	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
New employer	n/a	n/a	Note (g)	Note (h)	Notes (h) & (i)	
Cessation of participation: cessation debt/surplus 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. Exit debt/credit (if any) calculated on the contractor exit basis unless the admission agreement is terminated early by the contractor in which case the gilts exit basis would apply. Letting employer will be liable for future deficits and contributions arising. See Note (j) for further details.	

*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 awarding authority with no crystallisation of any deficit or surplus. Further detail on fixed contribution rate agreements is set out in note (i).'

3.4 Pooled contributions

Each employer will generally only pay for its own employees and ex-employees (and their dependents) not for those of other employers in the Fund. However, from time to time the Administering Authority may set up pools for employers with similar characteristics. This will always be in line with its broader funding strategy.

The intention of such employer pools 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.

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.

The main purpose of pooling is to produce more stable employer contribution levels in the longer term whilst, recognising that ultimately there will be some level of cross-subsidy of pension cost amongst pooled employers Community Admission Bodies and Transferee Admission Bodies are not permitted to participate in a pool.

With the advice of the Actuary the Administering Authority has allowed Parish and Town Councils to pool for the purposes of setting contributions. The underlying funding position of each Parish and Town Council continues to be tracked.

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.

Those employers which have been pooled are identified in the Rates and Adjustments Certificate.

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 may include setting a lower likelihood of success of achieving the funding target, a reduced rate of contributions or an extended time horizon.

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

Employers are required to pay additional contributions ('pension strain') wherever an employee retires before attaining the age at which they can take their benefits without incurring a reduction. The actuary's funding basis makes no allowance for early retirement except on grounds of ill-health.

Strain costs must be paid in full in the year in which the strain is incurred. The Administering Authority at its sole discretion may allow the strain payment to be spread over a period not to exceed 3 years.

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 met by each employer, although individual employers may elect to take external insurance (see 3.8 below).

The Actuary makes provision, known as an 'ill health allowance' into the employer's contribution rate set at each actuarial valuation.

The Administering Authority is notified of the cash value of this "ill-health allowance" from the actuary for the period covered by the actuarial valuation. Where an employer does not take out ill-health insurance, they may be invoiced for any cumulative ill-health retirement costs over their allowance.

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 the total cost of is unchanged, and
- there is no need for monitoring of allowances.

The employer must keep the Administering Authority notified of any changes in the insurance policy's coverage or premium terms or inform the Administering Authority if the policy is ceased.

3.9 Employers with no remaining active (employee) 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 indirectly 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 dependent 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 benefit of other Fund employers.

At its sole discretion, the Fund may allow an employer to spread the deficit payment or may permit an employer with no remaining active members and a cessation deficit to continue contributing to the Fund (see Appendix I)

3.10 Policies on bulk transfers

This section covers bulk transfer payments into, out of and within the Fund.

A bulk transfer is a special arrangement whereby transfer terms apply to members transferring their pension benefits in bulk to a new employer's scheme and receive benefits of equivalent value.

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 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 after each actuarial valuation and is kept under review annually between actuarial valuations to ensure that it remains appropriate to the Fund's liability profile.

Currently there are four investment strategies in the Fund, with a range of allocation to growth assets. More detail of these strategies is set out in the Investment Strategy Statement.

Employers are allocated by the Administering Authority and the Fund's Strategic Investment Advisor to the investment strategy which is most appropriate given the employer's funding objective and current funding position.

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 strategy is consistent with the current investment strategy of the Fund. The actuary's assumption for future investment returns (described further in Appendix E) are based on the current benchmark investment strategies of the Fund. The future investment return assumptions underlying each of the Fund's three funding bases included a margin for prudence, and are there 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 period between 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 (where appropriate) 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, monthly. It reports this to the regular Pension Fund Committee meetings, and to employers from time to time.

The estimated funding level of any employer in the Fund can be provided by the Administering Authority within 5 business days of request.

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 MHCLG on each of the LGPS Funds in England & Wales. This report will cover whether, for each Fund, employer contributions rates 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 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 must have regard to any guidance published by Chartered Institute of Public Finance and Accountancy (CIPFA) (most recently in 2016) and to its Statement of Investment Principles / 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 also covered in more detail by the most recent CIPFA (Chartered Institute of Public Finance & Accountancy) 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 initial consultation process for this FSS was as follows:

- a) A draft version of the FSS was issued to all participating employers on 20 December 2019 for comment.
- b) Comments were requested by 24 January 2020
- c) Following the end of the consultation period the FSS was updated where required, approved by the Pension Fund Committee, and then published, on 13 March 2020

A3. How is the FSS published?

The FSS is made available through the following routes:

- Published on the website, at www.cheshirepensionfund.org
- A copy sent by e-mail to each participating employer in the Fund.
- A copy sent to the Pension Fund Committee and Local Pension Board.
- A full copy included in the annual report and accounts of the Fund.
- Copies sent to investment managers and independent advisers.
- Copies made available on request.

A4. How often is the FSS reviewed?

The FSS is reviewed in detail at least at every formal valuation (if not more frequently). 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 between formal valuations. 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 Pension Fund 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 web at www.cheshirepensionfund.org

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, 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
- 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

Financial Risk	Summary of Control Mechanisms
Fund assets fail to deliver returns in line with the anticipated returns underpinning contribution rates and the valuation of liabilities over the long- term.	Only anticipate long-term returns on a relatively prudent basis to reduce risk of under-performing. Assets invested on the basis of specialist advice, in a suitably diversified manner across asset classes, geographies, managers, etc. Analyse progress at formal valuations for all employers. Inter-valuation roll-forward of liabilities between valuations at whole Fund level.
Inappropriate long-term investment strategy.	Overall investment strategy options considered as an integral part of the funding strategy. Used asset liability modelling to measure 4key out-comes. Chosen option considered to provide the best balance. Operation of multiple investment strategies to meet needs of a diverse employer group.
Fall in risk-free returns on Government bonds, leading to rise in value placed on liabilities.	Stabilisation modelling at whole Fund level allows for the probability of this within a longer-term context. Inter-valuation monitoring, as above. Some investment in bonds helps to mitigate this risk.
Active investment manager underperformance relative to benchmark.	Quarterly investment monitoring analyses market performance and active managers relative to their index benchmark.

Financial Risk	Summary of Control Mechanisms
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>
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 payment (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>
Asset underperformance as a result of climate change	The Fund has a Responsible Investment policy which sets out its approach to environmental, social and governance risks.

C3. Demographic risks

Demographic 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, consider seeking monetary amounts rather than % of pay and consider alternative investment strategies.
Deteriorating patterns of early retirements	<p>Employers are charged the extra cost of non-illhealth 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 maybe 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) to 3.3) and may require a move in deficit contributions from a percentage of payroll to fixed monetary amounts.</p>

C4. Regulatory risks

Regulatory 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

Governance Risk	Summary of Control Mechanisms
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>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>
Actuarial or investment advice is not sought, or is not heeded, or proves to be insufficient in some way	<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>
Administering Authority failing to commission the Fund Actuary to carry out a termination valuation for a departing Admission Body.	<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>
An employer ceasing to exist with insufficient funding or adequacy of a bond.	<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>

Governance Risk	Summary of Control Mechanisms
	<p>Requiring new Community Admission Bodies to have a 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 participate resulting in an exit credit being payable</p>	<p>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.</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 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 section 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 section 3.3 and 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 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 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 rate calculated?

The Fund aims for each 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 contributions are calculated such that the proportion of outcomes meeting the employer's funding target (by 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 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, cash flows 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 cash flow 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.

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 dependents' benefits.

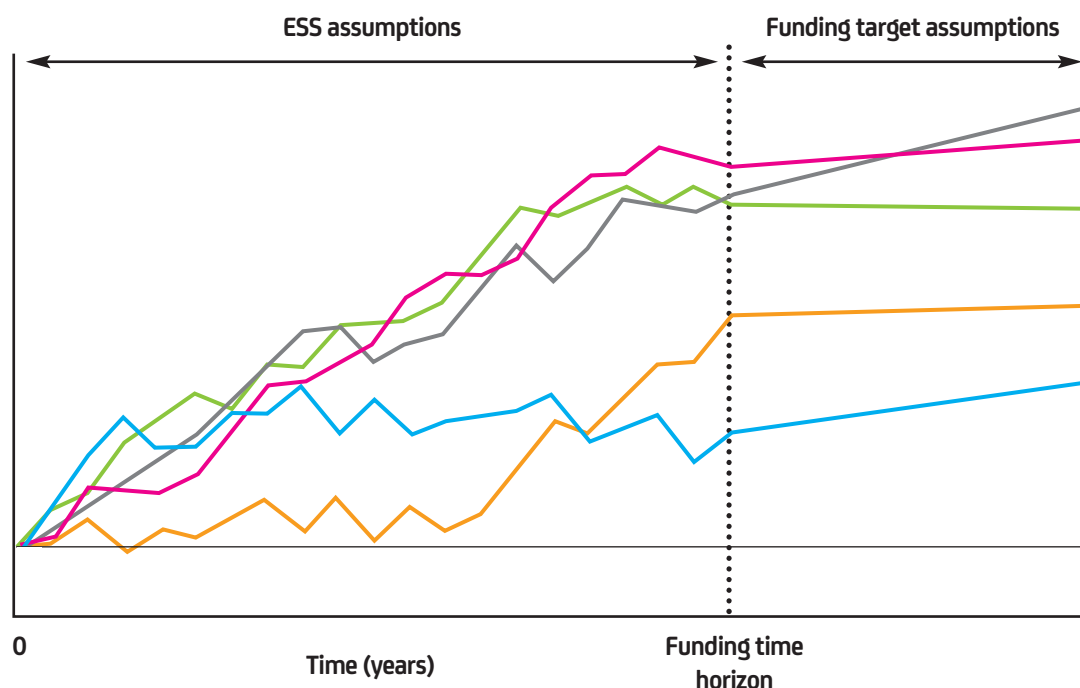
Changes in assumptions will affect the funding target and required contribution rate. However, different assumptions will not of course affect the actual benefits payable by the Fund in future.

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 cash flows 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"). These assumptions vary in two ways: between each of the 5,000 scenarios and between each year. Some assumptions might be high in the first few years but then reduce later (e.g. the blue line in the illustration overleaf) or vice versa (e.g. the yellow line).
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. These assumptions vary between each of the 5,000 scenarios but are fixed from year to year, e.g. one scenario might assume a fixed level of inflation of 5% per year (e.g. the grey or blue lines) whereas another might assume a fixed inflation level of near zero (e.g. the yellow line).

The difference between the two assumptions is represented graphically in the following diagram, where each line represents one of the 5,000 scenarios. Up to the end of the time horizon, the assumptions vary between scenarios and from year to year (these are the ESS assumptions). Beyond this point they vary between scenarios but are fixed from year to year (these are the funding target assumptions). The diagram is illustrative so the height of the vertical lines above the axis does not represent any variable, but it could be thought of as the cumulative total investment return or inflation, for example.



Details on the ESS assumptions and funding target assumptions are included (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.

Economic Scenario Service (ESS)											
		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	-0.4%	-2.3%	-2.9%	-4.1%	-4.1%	-3.5%	-2.7%	1.9%	-2.5%	0.8%
	50th	0.7%	0.5%	0.3%	4.0%	4.1%	2.4%	0.8%	3.3%	-1.7%	2.1%
	84th	2.0%	3.3%	3.4%	12.7%	12.5%	8.8%	4.0%	4.9%	-0.8%	3.6%
10 years	16th	-0.2%	-1.8%	-1.3%	-1.5%	-1.4%	-1.5%	-0.9%	1.9%	-2.0%	1.2%
	50th	1.3%	0.0%	0.2%	4.6%	4.7%	3.1%	0.8%	3.3%	-0.8%	2.8%
	84th	2.9%	1.9%	1.7%	10.9%	10.8%	7.8%	2.5%	4.9%	0.4%	4.8%
20 years	16th	0.7%	-1.1%	0.1%	1.2%	1.3%	0.6%	0.7%	2.0%	-0.7%	2.2%
	50th	2.4%	0.3%	1.0%	5.7%	5.8%	4.3%	1.9%	3.2%	0.8%	4.0%
	84th	4.5%	2.0%	2.0%	10.3%	10.4%	8.1%	3.0%	4.7%	2.2%	6.3%
1-yr volatility (Dispersion)		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 Career Average Revalued Earnings (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	Gilts 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 1.6% 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 significant used in both the projection of the assets, benefits, and cash flows 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. 2.7% in 2019/20 and 2% p.a. until 31 March 2023, followed by
2. pay increases in line with retail prices index (RPI) inflation thereafter.

This gives a single assumption of RPI less 0.3% p.a., a change from the previous valuation where a blended assumption (constructed in a similar way) of RPI less 0.7% p.a. was used.

The change has led to an 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% p.a. lower than RPI.

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 (except for the differences in funding basis mentioned in section E3), 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 – Notes to Table 3.3

Note (a) (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 longterm gilt yields and extending the allowance for future improvements in longevity) 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 with the objective of reducing, but not entirely eliminating, the possibility of a final deficit payment being required from the employer when a cessation valuation is carried out.

If an employer's contributions are set to target a higher funding target, the Administering Authority may move the employer's assets to a lower risk investment strategy.

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.

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 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" should be aware of the risks of this approach and should consider making additional payments to the Fund if possible.

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 (e.g. due to outsourcing or redundancies), changes in the nature of the employer (perhaps due to Government restructuring) or changes in the security of an employer.

On the basis of extensive modelling carried out for the 2019 valuation (see Section 4), the contribution rates payable by stabilised employers are subject to maximum annual changes (in either direction) of 1 or 1.5% of pay depending on their circumstances.

All percentage of pay figures are based on the employer's actual payroll and contributions in payment as at 31 March 2019.

The stabilisation criteria and limits apply for the period 1st April 2020 to 31 March 2023 and will be reviewed at the next formal valuation.

The review will consider the employer's membership profiles, actual payroll and contributions in payment at the time of the review and any issues surrounding employer security, and other relevant factors. Any material changes to any of the above may result in a revision to the stabilisation criteria and limits

The Administering authority reserves the right to review the stabilisation criteria and limits at any point before 31 March 2022 if there are material events for example (but not limited to) significant reductions in active membership or changes in the nature of the employer (perhaps due to Government restructuring or policy changes).

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 valuations but would reserve the right to propose alternative time horizons, for example where there were no new entrants. This expectation does not apply to contractors.

A maximum time horizon of 20 years is reserved only for employers with tax raising powers or an explicit guarantee from a central government department e.g. DFE guarantee for academies.

For other employers who remain open to active membership the maximum time horizon is 15 years. The maximum time horizon for all contractors is the outstanding contract term.

For employers who are closed to new entrants or with no (or very few) active members at this valuation, the deficit should be recovered by a fixed monetary amount over a period to be agreed with the body or its successor, not to exceed 15 years. Note this period is likely to reduce at each subsequent valuation.

Note (d) (Secondary rate)

In general, the Secondary contribution rate for each employer covering the period until the next valuation will be set as a monetary amount as the default.

Note (e) (Likelihood of success of achieving funding target)

Each employer has its own funding target, 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 2 in 3 or 66% minimum likelihood is required for employers with tax raising powers or an explicit guarantee from a central government department e.g. DFE guarantee for academies
- a 3 in 4 or 75% minimum likelihood is generally required if the employer does not have taxraising powers or an explicit guarantee from a central government department e.g. DFE guarantee for academies
- a 2 in 3 or 66% minimum likelihood may be applied for employers who can evidence a tax raising body as a guarantor or other sufficient security backing its funding position.

The Fund reserves the right to change or set alternative minimum probabilities if the circumstances of the employer change, for example (but not limited to) the Fund believes the employer poses a greater risk of being unable to meet its long term funding commitment than other employers 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:

- a) The 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 those of the other academies in the MAT. The underlying funding position of each academy within the MAT will continue to be tracked.
- b) The 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 exemployees of the school who have deferred or pensioner status.
- c) The 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, subject to a maximum initial academy funding level of 100%. The asset allocation will be based on market conditions and the academy's active Fund membership on the day prior to conversion.
- d) The academy's initial contribution rate for the first year ending 31 March from the conversion date will be as per the ceding council's rate. Following the actuarial assessment of the new academy's assets and liabilities, a new, standalone contribution rate will be set which will be payable from 1st April after the conversion date until the next formal valuation. This contribution rate will be assessed using the funding target, time horizon and likelihood of success set out in section 3.3 above;
- e) As an alternative to (d), a new academy joining a MAT in which all academies pay the same rate, may pay the MAT rate from the date of joining the MAT. This may not apply if the new academy would significantly alter the membership profile or funding position of the MAT.

- f) Ultimately, all academies remain responsible for their own allocated assets and liabilities.
- g) 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.

The Fund's policies on academies are subject to change in the light of any amendments to MHCLG and/or DfE guidance or any changes to Government policy, for example if the current provision of a DfE guarantee that the Department will meet any outstanding LGPS liabilities on Academy Trust closure is removed, reduced or becomes insufficient to meet potential risks to the Fund. Any changes will be notified to academies and will be reflected in a subsequent version of this FSS. In particular, policies (c) and (d) above will be reconsidered at each valuation.

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 (TABs): For all TABs, the security must be to the satisfaction of the Administering Authority as well as the letting employer and will be monitored and reassessed on an annual basis by the Administering Authority.

However, it is the responsibility of the letting employer to ensure that the level of security provided remains adequate, as the letting employer is the guarantor of last resort should the TAB default. See also Note (i) below.

Community Admission Bodies (CABs): 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 or provide a form of security as above. The sponsoring Scheduled Body may also require the CAB to provide some form of security, such as a bond.

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).

i) Pooling

Under this option the contractor is pooled with the letting employer. In this case, the contractor pays 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, and 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 requires that a new TAB will participate in the Fund via a fixed contribution rate arrangement with the letting employer. The certified employer contribution rate will be set equal to the fixed contribution rate agreed between the letting authority and the contractor. The fixed rate that will be paid is at the discretion of the letting authority and contractor subject to a minimum rate equal to the letting authority’s primary rate when assessed on a probability of achieving funding target of 75% (the funding target and time horizon remain unchanged). Upon cessation the contractor’s assets and liabilities will transfer back to the awarding authority with no crystallisation of any deficit or surplus.

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. At its sole discretion, the Administering Authority may allow an employer to spread the deficit payment or may permit an employer with no remaining active members and a cessation deficit to continue contributing to the Fund (see Appendix I).

Where there is a surplus, an exit credit may be paid to the Admission Body in line with the Administering Authority's exit credit policy. (see Appendix H).

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 actuary may make an adjustment to the ceasing liability value depending on the employer's circumstances.

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, both of 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 exit credit 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:

- 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 "gilt 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 a significant cessation payment being required.
- 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;

- 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. This will be considered on a case by case basis subject to approval by the guarantor and 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. In certain conditions, at its sole discretion the Administering Authority may allow an employer to spread the deficit payment or may permit an employer with no remaining active members and a cessation deficit to continue contributing to the Fund (see Appendix I).

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 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.

Exit Credits

If an employer becomes an exiting employer under Regulation 64 of the 2013 LGPS Regulations (as amended), it may be entitled to receive an exit credit.

The administering authority may determine, at its absolute discretion, the amount of any exit credit payment due (which may be zero), having regard to any relevant considerations.

The relevant considerations that the administering authority must consider are:

- The extent to which the employer's assets are in excess of its liabilities
- The proportion of the excess of assets which has arisen because of the value of employer's contributions
- Any representations made by the exiting employer and its letting authority/guarantor
- Any other relevant factors.

The Administering Authority's exit credit policy is published at Appendix H of this FSS.

Appendix G – Glossary

Term	Meaning
Active Member	A current employee paying into the Fund
Administering Authority	The council with statutory responsibility for running the Fund
Admission Bodies	Employers where there is an Admission Agreement setting out the employer's obligations and which employees are nominated to participate in the Fund. 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 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 can 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 .
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.
Gilt	A UK Government bond, i.e. a promise by the Government to pay interest and capital as per the terms of that 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 "indexlinked" 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 are also used 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.

Term	Meaning
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.
Major Employing Bodies	Tax raising and precepting bodies such as Councils, Police and Fire Authorities and Town & Parish Council.
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), deferred (ex- employees who have not yet retired) and pensioners (ex-employees who have now retired, and dependents of deceased ex-employees).
Primary 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, i.e. 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 employers 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).

Term	Meaning
Secondary rate	The difference between the employer's actual and Primary 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. This is normally carried out in full every three years (although this may change in future) but can be approximately updated at other times. The assets value is based on market values at the valuation date, and the liabilities value and contribution rates are based on long term bond market yields at that date also.

Appendix H – Exit Credit Policy

Introduction

The Local Government Pension Scheme (Amendment) Regulations 2020 came into force on 20 March 2020 and are effective from 14 May 2018.

If an employer becomes an exiting employer on or after 14 May 2018 under Regulation 64 of the 2013 Local Government Pension Scheme (LGPS) Regulations (as amended) it may be entitled to receive an exit credit.

In accordance with Regulation 64(2ZAB) of the LGPS Regulations 2013, the Administering Authority will determine the amount of any exit credit (which may be zero) by taking into account the factors set out in Regulation 64(2ZC):

- a. the extent to which there is an excess of assets in the fund relating to that employer over the liabilities specified in paragraph (2)(a).
- b. the proportion of this excess of assets which has arisen because of the value of the employer's contributions.
- c. any representations to the administering authority made by the exiting employer and, where that employer participates in the scheme by virtue of an admission agreement, any body listed in paragraphs (8)(a) to (d)(iii) of Part 3 to Schedule 2 to these Regulations; and
- d. any other relevant factors

Cheshire Pension Fund Policy

In determining whether an exit credit may be payable, Cheshire West and Chester Council as Administering Authority for the Cheshire Pension Fund will apply the following principles.

1. If an employer becomes an exiting employer on or after 14 May 2018 under Regulation 64 of the 2013 Local Government Pension Scheme (LGPS) Regulations (as amended) it may be entitled to receive an exit credit.
2. In order to protect other employers, liabilities to determine the amount of any exit credit will be calculated on a "gilts exit basis"
3. Employers within a funding pool (e.g. the Town and Parish Councils pool or a multiacademy trust with more than one school in the Fund) will not normally receive exit credits upon leaving the Fund provided the remaining participants of the pool take responsibility for the residual assets and liabilities after the employer has exited.
4. An exit credit will not normally be payable to any employer who participates in the Fund via the mandated pass through approach as set out in the Funding Strategy Statement.
5. If an employer becomes an exiting employer under Regulation 64 of the 2013 LGPS Regulations (as amended) and an exit payment is payable to the Fund over such period of time as the administering authority considers reasonable, no exit credit will be payable at any future date in relation to that specific agreement as a participating employer.
6. The Administering Authority may calculate an exit credit payment which reflects any contractual pension risk sharing provisions between the exiting employer and the letting authority and/or other relevant scheme employer. This information, which will include which party is responsible for which funding risk, must be presented in writing to the Administering Authority and in clear terms. The document must be agreed by the exiting employer and the letting authority and/or other relevant scheme employer and presented to the Administering Authority no later than one month after the exiting employer ceases participation in the Fund. Where a variation to the original letting contract is required to facilitate any agreement containing the required information, this will be agreed between the exiting employer and the letting authority and/or other relevant scheme employer.
7. Where a guarantor arrangement is in place, but no formal pension risk-sharing arrangement exists, the Administering Authority may consider any representations as to how the approach to setting contribution rates, payable by the exiting employer during its participation in the Fund, reflects which party is responsible for funding risks. This may inform the determination of the value of any exit credit payment.

9. If there is any dispute from either party with regards interpretation of contractual, risk sharing or guarantor agreements as outlined above, the Administering Authority will withhold payment of any exit credit until such disputes are resolved by the letting authority and/or other relevant scheme employer and the exiting employer.
10. The Administering Authority will advise the exiting employer as well as the letting authority and/or other relevant scheme employers of its exit credit determination under Regulation 64.
11. The Administering Authority will take into account whether any contributions due or monies owed to the Fund remain unpaid by the exiting employer at the cessation date. If contributions or monies are due to the Fund, the Administering Authority will notify these to the exiting employer and will deduct these from any exit credit payment.
12. The Administering Authority's final decision will be made by the Pension Fund Manager in the first instance, in conjunction with advice from the Fund's Actuary, and/or legal advisors and Chief Operating Officer where necessary, in consideration of the points held within this policy. Where any dispute remains unresolved, the parties will use the internal dispute resolution procedure specified in MHCLG guidance and Regulations.
13. The Administering Authority accepts that there may be some situations that are bespoke in nature and do not fall into any of the categories set out above. In these situations, the decision of the Administering Authority is final in interpreting how any arrangement applies to the value of an exit credit payment.
14. The Administering Authority will advise the exiting employer of the exit credit amount due to be repaid and seek to make the payment within six months of the exit date. In order to meet the six-month timeframe, the Fund requires prompt notification of an employer's exit and for all data and relevant information to be provided as requested. The Administering Authority is unable to make any exit credit determination or payment until it has received all data and information required and if the delay caused by the Fund requiring data means the 6 month date is passed, the parties will work constructively to enable the Administering Authority to reach its decision as soon as possible thereafter.

Appendix I – Policies in relation to Employer Flexibilities

Regulation 64A	Revision of rates and adjustments certificate	Revisions to scheme employer contributions between valuations
Regulation 64B	Revision of actuarial certificates	Spreading of exit payments
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 1.6% 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

1. Policy regarding revisions to scheme employer contributions between valuations

Background

- 1.1 A review of employer contributions under the Regulation 64A of 2020 Amendment No. 2 Regulations may be triggered if the employer or the Administering Authority believes that there is a reasonable likelihood that there has been either:
 - a) a change in liabilities arising or likely to arise, or
 - b) a change in the employer's ability to meet their obligations
- 1.2 In all cases the justification for a review should be that the change that has occurred is likely to have a material impact (up or down) on the employer contributions required in order to achieve or maintain full funding.
- 1.3 Employers can request a review, or the Administering Authority can require a review.
- 1.4 A review will not be carried out solely as a result of changes in wider economic or demographic conditions as these are addressed at the triennial valuation. For the avoidance of doubt, where it seems likely that an employer may exit before the next Fund triennial valuation then Administering Authorities can use their existing powers under Regulation 64(4) to carry out a valuation and allow for market conditions).
- 1.5 Where the Administering Authority requires a contributions review, it will consult with the affected employer prior to undertaking the review including setting out the reasons for the review.

Reasons for Review 1:

A change in liabilities arising or likely to arise

- 1.6 The grounds for a review are material changes to the employer's liabilities.
- 1.7 Examples of drivers of material changes to liabilities may include are not limited to significant changes to the employer's membership such as:
 - a) Restructuring of an employer
 - b) A significant outsourcing or transfer of staff to another employer (not necessarily within the Fund)
 - c) A bulk transfer into or out of the employer
 - d) Other significant changes to the membership for example due to redundancies, significant salary awards, ill health retirements or large number of withdrawals
 - e) Two or more employers merging including insourcing, merger and transferring of services
 - f) The separation of an employer into two or more individual employers
- 1.8 For the avoidance of doubt, this will not include changes in asset values, market volatility or changes in actuarial assumptions.
- 1.9 For a review to be undertaken, the following criteria must be met:
 - a) The change must have a significant or material impact on the liabilities and hence the contributions required to meet the funding objective
 - b) there is a material increase/decrease in risk to the Fund and other employers in the Fund
 - c) the review is taking place more than 12 months before a new Rates and Adjustment certificate will come into force anyway following the next full valuation exercise under Regulation 62.

1.10 As mentioned above, employers who close to new entrants and therefore will ultimately become exiting employers may have their contributions reviewed under Regulation 64(4) even if none of the above changes apply.

Reason for Review 2:

A change in the employer's ability to meet their LGPS pension obligations

1.11 Either the employer can request or the Administering Authority at its discretion can review contribution rates where there is a reasonable likelihood that there has been a material change in the employer's ability to meet their LGPS pension obligations.

1.12 This can include but is not limited to the following scenarios:

- a) Provision of, increase of, removal of, or impairment of any security, bond, guarantee or other form of indemnity by an employer against their obligations in the Fund. For the avoidance of doubt, this includes provision of security to any other pension arrangement or creditor which may impair the security provided to the Fund.
- b) Material change in an employer's immediate financial strength or longer-term financial outlook (evidence should be available to justify this), including where an employer ceases to operate or becomes insolvent.
- c) Where an employer exhibits behaviour that suggests a change in their ability and/or willingness to pay contributions to the Fund.
- d) In some instances, a change in the liabilities will also result in a change in an employer's ability to meet its obligations.
- e) In some instances, a change in employer legal status or constitution (to include matters which might change qualification or status as a Scheme employer under the LGPS Regulations) may result in a change in an employer's ability to meet these obligations.

1.13 There may be instances of the above occurrences which do not trigger a review of employer contribution rates. For example, if

- a) the cost of the review outweighs the benefit to the employer, the Fund, and other employers in the Fund.
- b) there is a negligible increase/decrease in risk to the Fund and other employers in the Fund.
- c) the review is taking place more than 12 months before a new Rates and Adjustment certificate will come into force anyway following the next full valuation exercise under Regulation 62.

1.14 Additional information will be sought from the employer in order to determine whether a contribution review is necessary in such circumstances. This may include annual accounts, budgets, forecasts and any specific details of restructure plans. As part of this, the Administering Authority will take advice from the Fund Actuary, covenant, legal and any other specialist adviser.

1.15 In this instance, any review of the contribution rate would include consideration of the updated funding position and would usually allow for changes in asset values when considering if the employer can meet its obligations.

1.16 This could then lead to the following actions:

- a) The contributions changing or staying the same depending on the conclusion, and/or;
- b) Provision of, or amendment to level of security, bond, guarantee or some other form of indemnity by an employer against their obligations in the Fund.
- c) As well as reviewing the employer's contributions the Fund may also review other parts of the employers funding strategy for example whether the employer's investment strategy remains appropriate.

General points

- 1.17 In most cases, given that the review will only be happening due to material changes in membership, the employer and Administering Authority should work together to prepare a fully updated data set for the actuary to use in their calculations.
- 1.18 In some cases, the starting point could be the membership data provided for the most recent triennial valuation, for example if the review was happening during or shortly after the valuation.
- 1.19 The FSS and assumptions within the FSS in force at the point of review will be used to form the basis of the review. However, if the review date is after the triennial valuation date, but prior to the finalisation of the Rates and Adjustments (R and A) Certificate and the FSS, the Fund will use the assumptions consistent with the triennial valuation that is underway.
- 1.20 Requests for review from employers will normally be limited to one per employer over a rolling twelve-month period
- 1.21 If the employer requests the review, the employer will be required to meet any professional and administration costs associated with the review.
- 1.22 The employer (or the Administering Authority) will be required to outline the rationale and case for the review through a suitable exchange of information prior to performing the review.
- 1.23 The scope of the review will be provided to the employer for their agreement to the associated charges and the output that will be provided. At this point a timescale for delivery will be outlined.
- 1.24 As well as using updated membership data reflecting the change which triggered the review, the Fund may also review other parts of the employer's funding strategy, for example whether the employer's investment strategy remains appropriate, funding target, the likelihood of success and the time horizon parameters in line with the Funding Strategy Statement.
- 1.25 Ultimately, the final decision whether to amend employer contributions rests with the Administering Authority after, if necessary, taking advice from their Actuary.
- 1.26 Employers should be aware that some requests may require input from the Pension Fund Committee and this should be factored into any planning timescales.
- 1.27 Any change to an employer's contributions will be implemented at a date agreed between the employer and the Administering Authority. The Schedule to the Rates and Adjustment Certificate at the last triennial valuation will be updated for any contribution changes.

2. Policy in relation to the flexibility for exit debt payments and deferred debt agreements (DDA)

- 2.1 Once an employer triggers an exit payment it would be calculated on the funding basis as described in the Funding Strategy Statement in force at the time.
- 2.2 The default position is for exit payments to be paid immediately in full, unless there is a risk sharing arrangement or pass through arrangement in place with a guaranteeing Scheme employer in the Fund, whereby the exiting employer is not responsible for any exit payment.
- 2.3 At the discretion of the administering authority, and subject to the policy described in this document, a ceasing employer could instead
- a) Crystallise the exit debt on the cessation date but pay it in instalments over an agreed period like a fixed interest loan ("exit spreading arrangement")
 - b) Remain in the fund as an employer with no active members, and pay secondary contributions which are revised at each formal valuation ("deferred debt arrangement")
- 2.4 Where an employer is considering exiting the LGPS or will be exiting as a result of another trigger event, it is highly encouraged that the employer engages with the Administering Authority in advance of leaving the Fund to understand the options that may be open to them on exit.
- Exit Spreading Arrangement**
- 2.5 An Exit Spreading Arrangement may be appropriate for an employer which has no active members, no intention of returning to active employer status in the future and wishes to crystallise any debt to the fund.
- 2.6 Any employer wishing to use this option will have to set out clear and evidenced reasons for needing to spread the exit payment as opposed to paying it in a single lump sum.
- 2.7 Employers will need to demonstrate that they are financially sustainable over the term of the Exit Spreading Arrangement.
- 2.8 Allowing the exit payments to be spread over an extended period increases the risk faced by remaining employers. To manage any additional risks the Administering Authority will need to have enough information to be able to make a judgement on the covenant strength of the relevant employer.
- 2.9 This could include, but is not limited to, information on business structure and ownership, credit rating, annual accounts, budgets, forecasts, sources of income, access to government support, and details of security that could be provided to the fund.
- 2.10 The decision to enter an Exit Spreading Arrangement is ultimately the Administration Authority's and will be evidence based and after taking advice from the Actuary, covenant and legal advisor (where necessary).
- 2.11 The Administering Authority will monitor the covenant strength over the spreading period and may consider amending or terminating the agreement if there are material changes to covenant strength.
- 2.12 The Administering Authority's default approach will be:
- a) That exit payments are to be paid immediately in full unless a suitable Exit Spreading Arrangement is in place by the time the cessation is triggered.
 - b) Employers must as far as they are able, submit a request for an Exit Spreading Arrangement at least 3 months prior to them becoming an exiting employer.
 - c) To consider spreading of exit payments only where payment of the debt in a single immediate lump sum could be shown to be materially detrimental to the employer's normal operations.
 - d) For the employer to offer an acceptable level of security (such as charge over assets, bond indemnity, escrow or guarantee) to underwrite the exit payment.
 - e) The exit payment will be calculated on an actuarial basis that is consistent with the administering authority's funding strategy statement in force at the time.
 - f) Interest will be charged on the exit payment spread
 - g) The spreading period will be no longer than 5 years from the date of the last active member leaving.
 - h) The Administering Authority may also review other parts of the employers funding strategy for example whether the employer's investment strategy remains appropriate.

- i) All reasonable costs must be met by the employer e.g. actuarial, covenant advisory, legal and other advice.
- j) The arrangement will be formalised in a legally binding written agreement*.

2.13 *The legally binding agreement will document:

- a) The spreading period for the Exit Spreading Arrangement.
- b) The initial and annual payments due and how these will change over the period.
- c) The interest rates applicable and the costs associated with the payment plan.
- d) The level of security required to support the payment plan and the form of that security e.g. bond, escrow account etc.
- e) The responsibilities of the employer during the exit spreading period, including the provision of updated information and events which would trigger a review of the situation.
- f) Under what circumstances the payment plan may be reviewed or immediate payment requested (e.g. where there has been a significant change in covenant or circumstances).

2.14 At its sole discretion, the Administering Authority may deviate from this default approach in exceptional circumstances.

Deferred Debt Agreement

- 2.15 An employer may participate in the Fund with no contributing members and utilise a “Deferred Debt Agreement” (DDA) at the sole discretion of the Administering Authority. This would be at the request of the employer in writing to the Administering Authority.
- 2.16 A DDA will allow employers to continue to participate in the Fund when they no longer have any active members, in return for an on-going commitment to meet their existing responsibilities as employers in the LGPS.
- 2.17 Essentially this allows the employer to continue to carry the funding risk for their past service liabilities and to pay secondary contributions to fund any deficit, calculated on the appropriate basis as set out in the Funding Strategy Statement. The employer will continue to be responsible for funding their liabilities for as long as the DDA is in force.

2.18 Employers with DDA have not exited the Fund and will continue to participate in the Local Government Pension scheme as a ‘deferred’ employer for the duration of the DDA.

2.19 For example, the employer will:

- a) Continue to benefit from better than expected investment returns, which would act to reduce their debt.
- b) Continue to be exposed to the risk of poor investment returns or increasing liabilities, which would act to increase their debt.
- c) Continue to be exposed to the risk of a failure of other employers, with the associated increase in liabilities.
- d) Continue to exercise some degree of control over their liabilities, for example by being involved in ill-health cases from deferred members.

2.20 If it is in the best interest of the Administering and/or the employer to use this option, they will have to set out clear and evidenced reasons for entering a DDA.

2.21 Allowing the employer to enter a DDA may increase the risk faced by remaining employers. To manage the additional risks the Administering Authority will need to have enough information to be able to make a judgement on the covenant strength of the relevant employer.

2.22 This could include but is not limited to information on business structure and ownership, credit rating, annual accounts, budgets, forecasts, sources of income, access to government support, numbers of LGPS eligible staff and details of security that could be provided to the fund.

2.23 The decision to enter a DDA is ultimately the Administration Authority’s and will be evidence based and after taking advice from the Actuary, covenant and legal advisor (where necessary).

2.24 The Administering Authority will monitor the covenant strength over the period of the DDA and may consider amending or terminating the agreement if there are material changes to covenant strength.

2.25 The Administering Authority's default approach will be:

- a) That exit payments are to be paid immediately in full unless a suitable Deferred Debt Arrangement is in place by the time the cessation is triggered.
- b) Employers must submit a request to enter a DDA at least 3 months prior to them becoming an exiting employer.
- c) To permit a DDA only where payment of the debt in a single immediate lump sum could be shown to be detrimental to the employer's normal operations.
- d) For the employer to provide an acceptable level of security (such as charge over assets, bond indemnity, escrow or guarantee).
- e) The contribution rates set out in the DDA will be calculated on an actuarial basis that is consistent with the funding strategy statement.
- f) The initial period of the DDA will be consistent with and no longer than the time horizons set out for employers in the FSS.
- g) The DDA will be for a fixed period i.e. it will have a fixed end date and the funding time horizon will reduce at each valuation.
- h) The Administering Authority may also review other parts of the employers funding strategy for example whether the employer's investment strategy remains appropriate, funding target, the likelihood of success and the time horizon parameters in line with the Funding Strategy Statement.
- i) All reasonable costs must be met by the employer e.g. actuarial, covenant advisory, legal and other advice.
- j) The DDA arrangement will be formalised in a legally binding written agreement*.

2.26 * The legally binding agreement will document:

- a) The period for the DDA.
- b) The initial contribution rates.
- c) How and when contribution rates will be reviewed over the term of the DDA (default is assumed to be every triennial valuation).
- d) The level of security required to support the DDA and the form of that security e.g. bond, charge over assets, escrow account etc.
- e) The responsibilities of the employer while they remain in the Fund including the provision of updated information and events which would trigger a review of the situation.
- f) What conditions would trigger the implementation of a revised DDA and subsequent revision to the secondary contributions (e.g. provision of security).
- g) Under what circumstances the parties may be able to vary the arrangement (including moving to an exit spreading arrangement) or immediate payment is required.
- h) How the deferred employer will fund any associated costs of the DDA or administration expenses of continuing as an employer in the LGPS.

Cheshire Pension Fund Investment Strategy Statement 2022

1. Introduction

- 1.1 This is the Investment Strategy Statement (the “Statement” or “ISS”) of Cheshire Pension Fund (the “Fund”) as required by regulation 7 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 (the “Regulations”).
- 1.2 Cheshire West and Chester Council is the administering authority of the Cheshire Pension Fund.
- 1.3 The regulations require administering authorities to formulate and to publish a statement of its investment strategy, in accordance with guidance issued from time to time by the Secretary of State.
- 1.4 The ISS is an important governance tool for the Fund. The document sets out the current investment strategy of the Fund, provides transparency in relation to how the Fund's investments are managed, acts as a high-level risk register, and has been designed to be informative for all stakeholders.
- 1.5 In preparing this Statement, the Fund has consulted with such persons as it considers appropriate and the document will be updated based on any factors that the Fund considers material to its liabilities, finances or attitude to risk.
- 1.6 The current regulations require this statement to be reviewed at least triennially but the Fund intends to carry out an annual review and update as appropriate.
- 1.7 Any feedback or comments on this document should be addressed to the Pension Fund Manager and emailed to: pensions@cheshirewestandchester.gov.uk
- 2.3 The investment objective is therefore to maximise returns subject to an acceptable level of risk whilst increasing certainty of cost for employers and minimising the long- term cost of the scheme. Having a thorough understanding of the risks facing the Fund is crucial and these are covered later in this statement.
- 2.4 The Fund's investment approach which helps to inform the investment strategy is as follows:
- Funding, investment strategy and contribution rates are linked.
 - The strategic asset allocation is the key factor in determining the risk and return profile of the Fund's investments.
 - Investing over the long term provides opportunities to improve returns.
 - Diversification across asset classes can help to mitigate against adverse market conditions and assist the Fund to produce a smoother return profile due to returns coming from a range of different sources.
 - Managing risk is a multi-dimensional and complex task but the overriding principle is to avoid taking more risk than is necessary to achieve the Fund's objectives.
 - Environmental, Social and Governance are important factors for the selection and sustainability of investment returns over the long term.
 - Value for money from investments is important, not just absolute costs. Asset pooling will help reduce costs whilst providing more choice of investments and will therefore improve Fund returns.
 - High conviction active management adds value to returns over the long term.

2. Investment Objectives and approach

- 2.1 The primary objective of the Fund is to provide pension and lump sum benefits for members on their retirement and / or benefits on death before or after retirement for their dependents, in accordance with LGPS Regulations.
- 2.2 The Funding Strategy and Investment Strategy are intrinsically linked and together aim to deliver stable and affordable contribution rates for employers.

2.5 A successful investment strategy, delivering strong investment returns over the long term while managing short-term volatility is essential for the ongoing stable operation of the Cheshire Pension Fund. Benefits are fixed and must be paid through a combination of employer contributions, employee contributions and investment returns. Employee contributions are fixed by law, so if investment returns are below expectations, the only source of income to fill the gap is employer contributions, invariably from public sector organisations that are operating under tight financial constraints.

3. Investment Strategy and the Process for Ensuring Suitability of Investments

3.1 Translating the Fund's investment and funding objectives into a single suitable investment strategy is challenging. The key objectives often conflict. For example, minimising the long-term cost of the scheme is best achieved by investing in higher returning assets e.g. equities. However, equity values are also very volatile (i.e. can go up and down frequently), which conflicts with the objective to have stable contribution rates. Achieving greater stability of contributions may therefore be better achieved by a lower allocation to equities but the resulting contributions may be higher in the longer term.

3.2 Additionally, the number of employers in the Fund has increased significantly in recent years meaning that there are groups of employers with different underlying characteristics and with different long-term funding objectives. For example, for employers approaching the point where they will leave the Fund, the most important objective may be to protect their funding position by minimising volatility in asset values and this may be delivered by an investment strategy with a lower allocation to equities.

3.3 In order that the Fund delivers on its key objectives (ensuring that it takes the appropriate level of investment risk, giving each employer the best opportunity possible to achieve its long-term funding objective whilst keeping contributions affordable), the Fund has over the past six years divided employers into four separate groups and operated a distinct investment strategy for each group. This approach was taken to recognise the different characteristics, cash flows, maturity of liabilities and funding levels of different employers.

3.4 Following a review of the current groupings of employers, the Fund has re-organised the employers into the following groups:

- Open Employers
- Academies
- Exiting/Closed Employers
- Exited Employers

3.5 Each grouping will have its own investment strategy with its own strategic asset allocation benchmark. The strategic benchmark is consistent with the Fund's views on the appropriate balance between generating required long-term returns, whilst taking account of market volatility, risk and the nature of the Fund's liabilities.

3.6 The strategic asset allocation at 1 April 2021 for each of the four groups is shown in table 1.

Table 1 – Strategic Asset Allocation

		Investment Strategy (%)			
Asset Class	Investment Objective	Open employers	Academies	Exiting/ Closed Employers	Exited Employers
Growth		55	55	50	-
Equity	Exposure to global equity markets	24	24	24	-
	Outperform global equity markets				
	Contains allocation to active strategies with meaningful outperformance targets				
Absolute Return	Provide significant real returns (currently CPI + 5%)	6	6	6	-
	Lower volatility than equities				
	Low correlation to equities (beta)				
	Preserve capital at times of stress				
Illiquid Alternatives	Long term returns in excess of public equity markets	25	25	20	-
	Access to assets that provide link to inflation				
	To provide a source of regular cash flow				
	Includes new allocation to Infrastructure				
Diversifying & Matching		45	45	50	-
Diversifying Fixed Income	Diversified exposure to global fixed income	20	20	20	-
	Focus on return generation				
	Flexible duration				
Low Risk Fixed Income	Provides diversification and inflation protection	25	25	30	100

The Fund allows asset allocations to fluctuate around the target allocations subject to the tolerances set out in table 2.

- 3.7 At present, the Fund believes that the funding objectives of all open employers, academies and exiting/closed employers can be met by the same investment strategy as set out above. However, this will be reviewed annually, and it is possible that different investment strategies may be implemented when it is considered appropriate to do so.
- 3.8 Between 2014 and 2021, the Fund operated a dynamic Risk Management strategy for the major employers in the Fund. This gave the Fund the opportunity to adjust the strategic asset allocation in the event that a group of employers are ahead or behind their funding plan. This mechanism was used by the Fund to ensure that each group of employers continued to take the appropriate level of investment risk, giving each the best opportunity possible to achieve its long-term funding objective whilst increasing certainty of cost. The Fund now considers this Risk Management strategy to have delivered its objectives and therefore the automatic de-risking and / or re-risking steps linked to changes in funding levels has ceased. All employers formerly governed by the Risk Management strategy have now been allocated to the 'Open Fund' or 'Academies' investment strategies as set out in Table 1 (left).
- 3.9 The performance of each investment strategy will however, continue to be regularly monitored and changes proposed as and when the Fund and its advisors believe changes will improve the chances of employers meeting their funding objectives.
- 3.10 The Fund is required to monitor its investment strategy relative to the agreed asset allocation benchmark in order to ensure that it remains consistent with the overall objective. The Fund also monitors compliance with this statement and the progress of groups of employers towards their long-term funding objective at least quarterly.

Table 2 – Tolerance Ranges

Asset Class	Open Employers and Academies	Exiting / Closed Employers
Equities	+/-5%	+/-2.5%
Absolute Return	+/-2.5% (rebalancing dependent on magnitude, cost and liquidity)	+/-2.5% (rebalancing dependent on magnitude, cost and liquidity)
Illiquid Alternatives	+/-2.5% (rebalancing dependent on magnitude, cost and liquidity)	+/-2.5% (rebalancing dependent on magnitude, cost and liquidity)
Diversifying Fixed Income	+/-2.5%	+/-2.5%
Low Risk Fixed Income	+/-2.5%	+/-2.5%

- 3.11 The above tolerance ranges may be relaxed from time to time to allow the Fund to efficiently manage the transition of investment assets to LGPS Central.
- 3.12 The maximum percentage of assets to be held in each asset class is set out in table 3.

Table 3 – Maximum Allocations

Asset Class	Open, Academies and Exiting/Closed
Equities	29.0%
Absolute Return	8.5%
Illiquid Alternatives	22.5%
Diversifying Fixed Income	22.5%
Low Risk Fixed Income	32.5%

- 3.13 A fundamental review of the strategic asset allocation is undertaken every three years following the actuarial valuation to provide assurance that the investment strategy is aligned to the long-term funding plan.
- This review utilises both qualitative and quantitative analysis, and covers:
- The required level of return that will mean the Fund can meet its future benefit obligations as they fall due
 - The level of risk that the Fund can tolerate in absolute terms, and in relation to its funding level and deficit / surplus
 - An analysis of the order of magnitude of the various risks facing the Fund is established in order that a priority order for mitigation can be determined
 - The desire for diversification across asset class, region, sector, and type of security
 - The level of cash flow and liquidity required by the Fund.

4. Risk measurement and management

- 4.1 The Fund assesses risks both qualitatively and quantitatively, with the starting point being the investment strategy review, which is undertaken as a minimum every three years. The Fund's approach to risk is informed by the Pension Fund Committee, its professional advisors and officers of the Fund.
- 4.2 The key risks that the Fund is exposed to can be grouped under the following headings:
- a) Investment
 - b) Funding
 - c) Operational
 - d) Governance
- 4.3 These risks are identified, measured, monitored and managed on an active basis with the Pension Fund Manager being responsible for the oversight of this process.
- 4.4 These risks are summarised as follows:

A. INVESTMENT RISK

- 4.5 There is a risk of funding levels deteriorating because of a fall in asset values or an unexpected increase in inflation increasing the value of future pensions and benefit payments. For open employers the funding level itself is not an immediate concern as the deficit or surplus will never be crystallised. However, a sustained weakening of the funding position and/or deterioration in the outlook for future returns may eventually feed through into higher employer contribution requirements.

- 4.6 To give an illustration of the potential scale of these risks, Table 4 below shows how a range of events could impact the funding position of the Fund:

Table 4 – Sensitivity Analysis

Event	Event movement (a)	Possible Impact on Deficit (b)
Fall in equity markets	25% fall in equities	c.£430m
Fall in property markets	20% fall in property values	c.£120m
Rise in Inflation	0.75% increase in long-term inflation expectations	c.£660m
Fall in interest rates	1% fall in interest rates	c.£740m
Active Manager underperformance	3% underperformance from all active managers	c.£80m

- (a) One off impact of market changes, broadly equating to a 5% chance of occurring in a one-year period
- (b) Figures estimated based on current strategic allocation and total Fund asset value as at 30 September 2019. Assumes index-linked gilts and liabilities are equally sensitive to changes in interest rates and inflation and makes no allowance for sensitivity of other assets, e.g. diversified fixed income, property or infrastructure. Figures assume no “rebound” or “unwinding” of the event movement, which may or may not subsequently occur.

Interest Rates

- 4.7 Long-term interest rates provide an indicator of future investment returns. Therefore, if interest rates fall, this can indicate that future investment returns are expected to be lower. Lower investment returns would lead to the investment strategy underperforming the funding target. To mitigate this risk, the Fund already has a significant allocation to fixed income assets, such as index-linked gilts and corporate bonds, which increase in value with falling interest rates. This higher asset value helps to protect against a possible reduction in future investment returns on the other assets in the portfolio. The Fund will review this allocation periodically in response to changing market conditions.

Equities

- 4.8 The Fund holds equities in order to provide the necessary returns to ensure that the Fund remains viable. The Fund believes that the extra returns that are expected to be generated by equities over the long term compensates for the volatility involved in equity investing. The investment strategy is diversified which helps to mitigate equity risk by investing significantly in bonds and alternatives.

Alternatives

- 4.9 The risks associated with investing in alternative asset classes including absolute return, property, infrastructure and private equity are relevant considerations when assessing the overall level of risk within the investment strategy. The Fund believes that over the long term, alternative asset classes will provide a level of return that compensates for the inherent risk. The additional level of diversification provided by these assets helps to reduce the Fund's reliance on equity returns. At the aggregate Fund level, investing in alternative asset classes reduces the overall level of risk.

Active Manager Risk

- 4.10 The Fund undertakes extensive due diligence on its appointed investment managers and formally monitors their performance and operation on a quarterly basis. This process is overseen by the Investment Sub-Committee and is advised by Officers and the Fund's advisors.

Liquidity risk:

- 4.11 The Fund invests in both liquid and illiquid assets meaning that not all assets can be realised at short notice. Given the long-term investment horizon, the Fund accepts some liquidity risk given the potential for higher returns. The Fund monitors its liquidity position carefully to ensure that it is not a forced seller of long-term assets in order to make day to day payments of benefits. Around 80% of Fund assets are expected to be highly liquid. Investment in cash flow generative assets is undertaken to assist the Fund's cash flow needs.

Exchange rate risk:

- 4.12 The Fund as a long-term investor can tolerate some short-term currency fluctuations, however this is managed carefully by its investment managers who are monitored against Sterling benchmarks and therefore use hedging techniques to contain this risk. The Fund does not at present directly hedge against the risk of foreign currency fluctuations but has the capacity and processes in place to do so if necessary.

B. FUNDING RISK

- 4.13 The Fund's investment strategy is a fundamental part of ensuring that affordable contributions can be set in the long term. Employer contribution strategies are aligned with the investment strategy. There are, however, a number of factors that could lead to a disconnect between the investment and contribution strategies.

These risks are set out below:

Inflation

- 4.14 Future benefit payments to be made by the Fund are linked to inflation. Therefore, increases in the rate of inflation will increase the value of payments to pensioners. The Fund invests in assets such as index-linked gilts and property with inflation linked income streams to manage and mitigate this risk.

Demographic risks

- 4.15 The Fund is subject to a range of demographic risks. A more mature membership base would mean that there were a greater number of pensioner members receiving benefits than active members paying contributions. The projected maturity of the membership base is factored into the investment strategy in order to ensure that as the membership base matures, the fund is invested in the appropriate level of income generating investments or investments that are realisable at short notice and at low cost.

Climate Change Risk

- 4.16 In its revised Responsible Investment policy, the Fund acknowledges that there may be a significant risk from climate change which could impact on the ability of the Fund to meet its long-term liabilities. It has therefore resolved to adopt an evidence based precautionary approach to climate change to monitor and actively manage any identified risks. Further information is included in the Fund's Responsible Investment policy which is attached in Appendix B.

C. OPERATIONAL RISK

- 4.17 Operational risks arise through the implementation of the Fund's investment strategy.

These risks are set out below:

Transition risk

- 4.18 The Fund may incur unexpected costs in relation to the transition of assets between managers and / or asset classes. When carrying out significant transitions, the Fund takes professional advice and considers the appointment of specialist transition managers in order to mitigate this risk when it is cost effective to do so.

Custody risk

- 4.19 The Fund must ensure that it retains the economic rights to all Fund assets, when held in custody or when being traded. It does this through the use of a global custodian for custody of assets, the use of formal contractual arrangements for all investments and maintaining independent investment accounting records.

Credit default risk

- 4.20 A counterparty related to a Fund investment could fail to meet its contractual obligations. The Fund monitors this through robust internal compliance arrangements where applicable, contractual requirement for investment managers to manage counterparty risk on the Fund's behalf and robust due diligence prior to making any investment.

D. GOVERNANCE RISK

- 4.21 Good governance is an essential part of the Fund's investment strategy and the Fund therefore identifies poor governance as a potential risk that can have a detrimental effect on the successful operation of the Fund. The Fund ensures that its decision-making process is robust and transparent, and this is documented in the Governance Compliance Statement which is published on the Fund's website.

Environmental, Social and Governance risks

- 4.22 The Fund's investment strategy contains its own policy on Responsible Investment. Non-compliance with this policy would expose the Fund to financial and reputational risk. The Fund believes that effective management of financially material Responsible Investment risks should support the Fund's requirement to protect returns over the long term. The Fund will seek to further integrate Responsible Investment factors into the investment process across all relevant asset classes. Further information on the Fund's approach to managing this risk is provided within the Responsible Investment Policy which is published on the Fund's website and as at Appendix B.

5. Securities Lending

- 5.1 Securities lending is undertaken in respect of the Fund's directly owned quoted equities holdings through an arrangement with the Fund's Custodian, BNY Mellon. The Fund receives a fee whenever it loans stock out via this arrangement and the income is used to help the Fund meet its liability payments. The Fund's securities lending programme was reviewed by the Investment Sub-Committee in 2018 and again in 2021; they examined the potential risks and concluded that sufficient safeguards were in place and that that the programme should continue.

6. Approach to asset pooling

- 6.1 LGPS Central Ltd (“LGPS Central”) has been set up as an arms-length company, accredited by the Financial Conduct Authority, to manage the pooled investment assets of eight LGPS funds across the centre of England.
- 6.2 The Cheshire Pension Fund is one of the eight partner funds, all of whom hold equal shares in the company. The other partner LGPS pension funds are: Derbyshire, Leicestershire, Nottinghamshire, Staffordshire, Shropshire, West Midlands and Worcestershire.
- 6.3 LGPS Central started trading on 3 April 2018 and partner funds have started to migrate assets over to the company as and when appropriate investment products become available. As at the end of December 2021 the Cheshire Pension Fund has migrated 30% of its total investment assets to LGPS Central and this percentage will increase as LGPS Central launch more investment products across different asset classes. In respect of migrated investment assets, LGPS Central will assume responsibility for the day to day monitoring of investment performance and the appointment and dismissal of external investment managers.
- 6.4 The Fund is committed to making a success of LGPS asset pooling in the belief that the Fund will benefit from lower investments costs achieved via economies of scale and greater bargaining power driven through the aggregation of assets. In addition, the Fund will have greater access to a broader range of investable asset classes, including new and innovative products and services. LGPS Central and the partner funds have put in place a robust governance framework to ensure the company operates effectively and delivers timely and transparent reporting to shareholders and client funds.
- 6.5 The Fund will retain full responsibility and control over its strategic investment allocation policy. Subject to satisfactory due diligence and value for money considerations being satisfied, the Fund intends to eventually invest all its assets with LGPS Central but will maintain some cash balances locally. However, some existing assets held are illiquid and difficult to transfer (e.g. private equity limited partnership holdings and property assets) and these will be evaluated carefully to assess whether best value for money is delivered by the transfer of the assets to LGPS Central or continuing to be held directly by the Fund.

7. Responsible Investment (RI)

- 7.1 The Cheshire Pension Fund is a long-term investor aiming to deliver a sustainable Pension Fund for all stakeholders.

- 7.2 Cheshire West and Chester Council, as the administering authority of the Fund, has a fiduciary duty to act in the best, long-term, interests of the Fund’s employers and members. The Fund believes that in order to fulfil this duty, it must have a clear policy on how it invests in a responsible manner.
- 7.3 Responsible Investment is a fundamental part of the Fund’s overarching investment strategy as set out in this Investment Strategy Statement – that is to maximise returns subject to an acceptable level of risk whilst increasing certainty of cost for employers and minimising the long-term cost of the scheme. The Fund believes that consideration of Environmental, Social and Corporate Governance (“ESG”) factors are fundamental to this, particularly where they are likely to impact on the overarching investment objective.
- 7.4 The Fund’s approach aims to ensure that consideration of ESG factors is embedded in the investment process, utilising the various tools available to manage ESG risks and to harness opportunities presented by ESG factors.
- 7.5 The Fund’s core principles of responsible investment are:
1. We will apply **long-term thinking** to deliver **long-term sustainable returns**.
 2. We will seek **sustainable returns** from **well-governed assets**.
 3. We will use an **evidence-based** long term investment appraisal to inform **decision-making** in the implementation of RI principles and consider the costs of RI decisions consistent with our fiduciary duties.
- 7.6 The way in which the Fund ensures that these core principles are met, and how it monitors its own performance is provided within the Responsible Investment Policy presented in Appendix B.

8. Myners Principles

- 8.1 Although not specifically referenced in the Regulations, the Fund continues to assess its own compliance with the Myners Principles of Good Investment Governance. A statement that sets out an assessment of compliance is presented in Appendix A.

9. Advice taken

- 9.1 In creating this statement, the Fund has taken advice from its Officers and external advisors.
- 9.2 In relation to each of the constituent parts, such as the asset allocation and risk mitigation, the Fund has taken advice from its Investment Consultant, Mercer, and the Scheme Actuary, Hymans Robertson. In providing investment advice, Mercer is regulated by the Financial Conduct Authority.

Appendix A

Compliance with Myners Principles of Good Investment Governance

Principle	Evidence of Compliance
Principle 1 Effective Decision Making:	Compliant
<p>Administering authorities should ensure:</p> <ul style="list-style-type: none"> - That decisions are taken by persons or organisations with the skills, knowledge, advice and resources necessary to make them effectively and monitor their implementation; and - That those persons or organisations have sufficient expertise to be able to evaluate and challenge the advice they receive, and manage conflicts of interest. 	<ul style="list-style-type: none"> - Decisions are taken by the Section 151 Officer of the Administering Authority, advised by the Pension Fund Committee. - The Section 151 Officer and the Committee has support from Council officers with sufficient experience to assist them. - The Fund is also advised by professional actuarial and investment advisers. - The Committee makes robust challenges to advice and is aware of where potential conflicts of interest may reside within the Committee and in relation to service providers.
Principle 2 Clear objectives:	Compliant
<p>An overall investment objective should be set out for the fund that takes account of the scheme's liabilities, the potential impact on local tax payers, the strength of the covenant for non-local authority employers, and the attitude to risk of both the administering authority and scheme employers, and these should be clearly communicated to advisers and investment managers.</p>	<ul style="list-style-type: none"> - The Fund has established investment objectives, which take account of the nature of Fund liabilities and the contribution strategy. The objectives are set based on advice from the Fund Actuary and Strategic Investment Advisor, which informs the overall risk budget for the Fund. The overarching objective is reflected in the investment mandates awarded to the asset managers. - There is dialogue with admitted bodies within the Fund in relation to the contributions they pay, their capacity to pay these contributions and the level of guarantees they can provide.
Principle 3 Risk and liabilities:	Compliant
<ul style="list-style-type: none"> - In setting and reviewing their investment strategy, administering authorities should take account of the form and structure of liabilities. - These include the implications for local tax payers, the strength of the covenant for participating employers, the risk of their default and longevity risk. 	<ul style="list-style-type: none"> - The investment strategy is considered in the light of the nature of the Fund liabilities, the timescale over which benefits will be paid, and financial and demographic factors affecting the liabilities, such as inflation and improving longevity - The Pension Fund Committee and Council officers challenged the contribution strategy with the Actuary, in order that it takes into account of risk factors for the Fund including strength of covenant. Discussions have also taken place with admitted bodies in relation to the affordability of contributions and the strengths of their covenants.

Principle	Evidence of Compliance
Principle 4 Performance assessment:	Partially compliant
<ul style="list-style-type: none"> - Arrangements should be in place for the formal measurement of performance of the investments, investment managers and advisers. - Administering authorities should also periodically make a formal assessment of their own effectiveness as a decision-making body and report on this to scheme members. 	<ul style="list-style-type: none"> - The performance of the Fund and its individual managers are monitored on a regular basis. - The quality of advisers is assessed on a qualitative basis and is subject to periodic retender in order to ensure value for money. - The Pension Fund Committee does not yet have a formal process in place to measure its own effectiveness.
Principle 5 Responsible Ownership:	Compliant
<p>Administering authorities should:</p> <ul style="list-style-type: none"> - adopt, or ensure their investment managers adopt, the Financial Reporting Council's (FRC) Stewardship Code on the responsibilities of shareholders and agents. - include a statement of their policy on responsible ownership in the Statement of Investment Principles. - report periodically to scheme members on the discharge of such responsibilities. 	<ul style="list-style-type: none"> - The Pension Fund Committee encourages its investment managers to adopt the Financial Reporting Council's (FRC) Stewardship Code on the responsibilities of shareholders and agents on the Fund's behalf and all relevant managers comply. - This Investment Strategy Statement includes a statement on the Fund's policy on responsible ownership. - The Fund will publish an annual summary of voting and engagement activity.
Principle 6 Transparency and Reporting:	Compliant
<p>Administering authorities should:</p> <ul style="list-style-type: none"> • act in a transparent manner, communicating with stakeholders on issues relating to their management of investment, its governance and risks, including performance against stated objectives • should provide regular communication to scheme members in the form they consider most appropriate. 	<ul style="list-style-type: none"> - The Fund maintains minutes of all Pension Fund Committee meetings and documents all key decisions through the EDN and ODN process. Minutes are available on the Fund website. - The Council holds a formal annual meeting for employers and meets periodically with sponsoring employer bodies. - A member representative attends Committee meetings. - The Investment Strategy Statement is published on the Fund's website and is available to members on request. - Other information on the Scheme is available to members on the Fund's website.

Glossary of Terms

Term	Definition
Absolute return	A fund that aims to achieve a positive return irrespective of movements in the equity and bond markets.
Alternatives	Typically seen as an “unconventional” asset class – i.e. an asset class, other than traditional asset classes such as public equities, bonds, property and cash.
Bonds / Fixed Income	A debt investment in which an investor loans money to an entity (corporate or governmental) that borrows the funds for a defined period of time at a fixed interest rate. Seen as a good “matching” asset for a pension scheme.
De-risking	Moving from growth to matching assets to reduce risk.
Diversifying fixed income	A bond like investment that is return seeking and provides a different source of return other than equities.
Equities	A share in a company. Seen as a “risky” or “growth” asset from a pension scheme perspective.
ESG	Environmental, social and corporate governance factors which could impact company performance and therefore investment returns. Examples include (but are not limited to) climate change, workforce issues, remuneration, independence of the board and auditors, board composition and diversity.
Funding basis	The assumptions used by the Scheme Actuary to place a value on the Fund’s liabilities (the value of the benefits to be paid out of the Fund).
Funding level	The difference in the value of the Fund’s assets and liabilities. Assesses the financial health of the Fund.
Hedging	Currency hedging is an approach that is intended to manage the degree of risk that may be present when engaging in some type of foreign investment strategy. Essentially, the structure of a currency hedging process would attempt to compensate for any shifts in the relative value of the currency types utilized in the investment scheme or the transaction.
High Conviction	High conviction is a style of active management often associated with active equity investment funds. Such managers seek to deploy a high conviction approach over time with the aim of outperforming the benchmark or passive fund equivalent for their target sector.
Illiquid alternatives	An alternative asset which is not easily traded (i.e. cannot be converted into cash quickly or without an impact to the price received).
Liquid asset	An asset which is easily traded (i.e. can be converted into cash quickly and with minimal impact to the price received).

Cheshire Pension Fund Responsible Investment Policy 2022

1. Introduction

- 1.1 The Cheshire Pension Fund (“the Fund”) is the name of the Local Government Pension Scheme (LGPS) in Cheshire.
- 1.2 Cheshire West and Chester Council (“the Council”) as the administering authority of the Fund, has a fiduciary duty to act in the best, long-term, interests of the Fund’s scheme members and participating employers.
- 1.3 The Fund’s primary investment objective to meet its fiduciary duty is to maximise returns subject to an acceptable level of risk whilst increasing certainty of cost for employers given the long term nature of the scheme.
- 1.4 The Fund believes that in order to fulfil this duty, it must have a clear policy on how it invests in a responsible manner. Consideration of Environmental, Social and Governance (“ESG”) issues are fundamental to responsible investment, particularly where they are likely to impact on the primary investment objective.
- 1.5 This Responsible Investment (RI) policy sets out the Fund’s approach to embedding consideration of ESG issues in the investment process, utilising the various tools available to manage ESG risks and harness opportunities presented by ESG factors.

2. What is our policy on Responsible Investment?

- 2.1 The Fund’s core principles guiding our approach to Responsible Investment are:
 - We will apply **long-term thinking** to deliver **long-term sustainable returns**.
 - We will seek **sustainable returns** from **well-governed assets**.
 - We will use an **evidence-based** long-term investment appraisal to inform **decision-making** in the implementation of Responsible Investment principles and consider the costs of Responsible Investment decisions consistent with our fiduciary duties.
- 2.2 The Fund will invest in sustainable assets to deliver long term financial returns to enable pension promises to be paid now and into the future. This approach places the full consideration of financially material ESG factors at the heart of the Fund’s investment decision making and monitoring process. This approach is distinct from the commonly used definition of ‘ethical’ investing: an approach in which the values or moral beliefs of an organisation or its key decision makers takes primacy over its investment considerations. Such an approach is often typified by an exclusions policy whereby certain sectors or groups of companies are excluded at the initial stage of the investment analysis process.

3. What actions will the Fund take to meet these principles?

Core Principle	Associated Actions
We will apply long-term thinking to deliver long-term sustainable returns	<ul style="list-style-type: none"> - Investment objectives are clearly set out in the published Investment Strategy Statement. - Set longer-term performance objectives for investment managers. - Seek to ensure that long term interests are aligned with that of its investment managers on all issues including on ESG considerations. - Policies relating to ESG will be considered as part of the Fund's long term investment planning process, following a thorough and robust investment appraisal.
We will seek sustainable returns from well-governed assets	<ul style="list-style-type: none"> - Apply a robust approach to stewardship, linked to the Fund's approach that engagement can positively and effectively influence behaviours. - Engage with companies when engagement to improve ESG outcomes and add value to the Fund. - Comply with the UK Stewardship Code and work within the spirit of the United Nation backed Principles of Responsible Investment ("PRI"). - Hold investment managers to account to ensure compliance with this policy. - Collective engagement through membership of the Local Authority Pension Fund Forum (LAPFF), the LGPS Central pool and other opportunities that arise from time to time. - Exercise voting rights in all markets where practicable.
We will use an evidence-based long-term investment appraisal to inform decision-making in the implementation of RI principles and consider the costs of RI decisions consistent with our fiduciary duties.	<ul style="list-style-type: none"> - Consider the potential financial impact of ESG related issues (such as climate change or executive remuneration) on an ongoing basis. - Consider the potential financial impact of investment opportunities that arise from ESG related factors (e.g. investment in renewable energies or housing infrastructure). - Monitor the carbon footprint of its publicly listed investment assets and actively manage any potential financial risks that this identifies through a Climate Change Stewardship Plan. - Consider investment opportunities that have positive impacts and recognises that the changing external environment presents new opportunities i.e. renewable energy, green technology and social impact investments.

4. How will we monitor performance on Responsible Investment?

4.1 The Fund will be **transparent** and **accountable** in terms of its performance on Responsible Investment.

4.2 To achieve this the Fund will:-

- publish the Investment Strategy Statement on the Fund's website in line with the scheme regulations
- explain decisions relating to the setting of the investment policy
- publish the Responsible Investment Policy on its website, review the policy on an ongoing basis and formally consult on the policy at least every three years
- closely monitor its appointed investment managers whom the Fund rely on to partly implement its Responsible Investment Policy

- publish a Climate Change Report showing the carbon footprint of the Fund's publicly listed investment assets and how the Fund will manage any related risks
- undertake an annual review of corporate governance, voting and engagement activity undertaken by the Fund and its underlying managers
- publish an annual summary of voting and engagement activity
- ensure that its decision makers are properly trained and kept abreast of ESG issues
- include ESG as standing item on the Investment Sub Committee (or equivalent) agendas with a view to reporting on manager performance in relation to ESG investing, and noting any hot topics / issues arising
- undertake a fundamental review of any specific ESG issues that are considered by the Investment Sub Committee to be of potentially material financial impact
- consider and respond to feedback from stakeholders in relation to issues of concern.

5. Responsible Investment and LGPS Central pool

- 5.1 The Fund has joined with seven other LGPS Funds (Derbyshire, Staffordshire, Shropshire, Leicestershire, Nottinghamshire, West Midlands and Worcestershire) to create the LGPS Central pool. This is one of eight pools across the LGPS.
- 5.2 The pool was set up to deliver the Government's requirement for all administering authorities in England and Wales to join together and pool the way they managed their investment assets to drive economies of scale and increase opportunities in asset classes which partner funds may not have had the capacity to invest in individually.
- 5.3 In April 2018, the partner funds created a jointly owned company called LGPS Central Ltd, a Financial Conduct Authority accredited investment company, to manage their pooled investment assets, collectively valued at some £40bn.
- 5.4 It will take a number of years to transition assets securely and economically from current management arrangements across to LGPS Central Ltd.
- 5.5 LGPS Central Ltd has now launched a number of investment products and the Fund will continue to work with LGPS Central Ltd and partner funds to help shape further investment products that meet the requirements of the Fund's Investment Strategy Statement.
- 5.6 All partner funds retain ownership and control of their Investment Strategy and asset allocation decisions. Day to day investment decisions such as to engage or dismiss investment managers, and monitoring of investment performance passes to LGPS Central as assets transfer.
- 5.7 To date the Cheshire Pension Fund has transitioned over £2billion of assets across to LGPS Central (approx. 30% of the Cheshire Fund's total assets) and this figure will increase as LGPS Central launch new investment products.
- 5.8 It is expected that the Fund's ability invest in a responsible way will be enhanced through LGPS Central due to the inherent benefits of scale, collectivism and innovation that will result from the project.

6. Engagement versus Exclusion

- 6.1 The Fund believes that its influence as a shareholder is most effective by engaging with companies, in order to influence behaviour and enhance shareholder value.
- 6.2 Consequently, the Fund does not implement a divestment approach that excludes certain types of investments, companies or sectors except where barred by UK law.

- 6.3 The Fund actively engages with companies in which it is invested through LGPS Central Ltd, its investment managers and through membership of the Local Authority Pension Fund Forum (LAPFF).
- 6.4 Ultimately the Fund retains the right to divest from certain companies or sectors in the event that all other approaches are unsuccessful, and it is determined that the investment is no longer aligned with the interests of the Fund or that the issue poses a material financial risk.
- 6.5 Specifically, in respect of climate change, the Fund does not adopt an approach to divest from companies or sectors on a mechanistic basis. For example, calls to divest from fossil fuel companies by default take insufficient account of the relatively high carbon footprint of many companies outside of the energy sector. In addition, there is strong evidence that some companies within this sector are transitioning quickly and effectively to a net zero carbon emissions position and/or are engaging positively with the requirements of the Paris Climate Change agreement. The Fund therefore believes that it is not sensible to divest from such companies when pursuing a holistic and evidence based approach to managing and monitoring climate change risk.

7. Responsible Investment Engagement Themes

- 7.1 Working in partnership with LGPS Central the Fund has adopted the following key engagements themes for particular focus during the year:

- 7.1.1 Climate Change
- 7.1.2 Plastic Pollution
- 7.1.3 Human Rights risks
- 7.1.4 Responsible Tax Behaviour

- 7.2 LGPS Central Ltd has appointed a specialist engagement provider, Hermes EOS. Every quarter LGPS Central Ltd reports on their activities and progress in a Quarterly Stewardship report, which is publicly available at:

LGPSC-Stewardship-Update-Q2-2021-22-2.pdf
(lgpscentral.co.uk)

- 7.3 In addition to the focus on the four themes outlined above, LGPS Central Ltd have a wealth of active engagement activity on numerous other themes including executive remuneration, board composition, diversity and workforce rights.

8. Exercise of Voting Rights

- 8.1 The Fund exercises its ownership rights by actively voting stock it holds.
- 8.2 The Fund delegates responsibility for voting to LGPS Central Ltd or the Fund's directly appointed investment managers who are required to vote wherever the Fund has a voting interest.
- 8.3 For Fund assets managed by LGPS Central Ltd, wherever practicable, votes must be cast in accordance with LGPS Central's Voting Principles (available on LGPS Central's website) at: **LGPSC-Voting-Principles_2021.pdf** (lgpscentral.co.uk)
- 8.4 For Fund assets managed by appointed external investment managers, votes must be cast in line with industry best practice as set out in the Combined Code of Corporate Governance with a clear focus on enhancing long term shareholder value.
- 8.5 Investment managers' quarterly performance reports are required to include a specific briefing on corporate governance, detailing all votes cast on the fund's behalf. The Investment Sub Committee receives these reports on a quarterly basis and any exceptions or examples of non-compliance are addressed directly with the Fund's managers.
- 8.6 The Fund is committed to becoming accepted as a signatory to the recently relaunched and revised UK Stewardship Code and will submit an annual stewardship report for assessment by the Financial Reporting Council by the required deadline.

9. Climate Change

- 9.1 The Fund recognises that, in addition to the wider impacts of climate change, owning investment assets with a significant exposure to fossil fuels, poses a particular potential investment risk in that markets may re-price fossil fuel assets in response to growing public concerns over climate change and the response of policy makers to this concern.
- 9.2 It is impossible to predict the timing or quantum of any market re-pricing. Given this, the Fund believes it is sensible to adopt a precautionary approach to climate change related investment risk and this approach was articulated in the Fund's Climate Change Strategy document which was published in December 2020. In the document the Fund commits itself to:
 - i) Support the Paris Climate Agreement, which seeks to limit increases in global temperatures below 2 degrees centigrade. By extension, the Fund expects all investee companies to align their business activities with the Paris Agreement.

- ii) The belief that climate change is a long-term material risk and therefore it is correct that the Fund consider it as an integral part of its statutory fiduciary duties.
 - iii) The belief that climate change may impact the Fund through asset pricing, life expectancy, employer covenants, long term inflation and interest rates.
 - iv) The belief that the Fund believes that the transition to a low carbon world economy presents both risk and opportunities and therefore, the Fund will consider climate change as a part of all asset allocation, manager selection and individual investment decisions.
 - v) Decarbonise its investment portfolio to deliver net zero emissions by 2050 at the latest.
 - vi) To support the long-term aim of net zero by 2050 by setting specific shorter-term targets to lower the carbon footprint of its equity portfolio year on year compared to the general market.
- 9.3 Further details of the Fund's approach to climate change are included in the Fund's Climate Change Strategy document which is available at: **www.cheshirepensionfund.org/members/wp-content/uploads/sites/2/2020/12/Climate-Change-Strategy-December-2020.pdf** and is attached to this Responsible Investment policy as an Annex.
- 9.4 The shorter-term decarbonisation targets that the Fund has set are:
- i) A commitment to reduce the carbon footprint of the Fund's equity portfolio by 7.6% per year.
 - ii) A commitment to reduce the carbon footprint of the Fund's equity portfolio to a level 50% below that of the general equity market by the end of 2023.
 - iii) The Fund will seek to invest an increasing proportion of total Fund assets in low carbon and sustainable assets.
- 9.5 The Fund believes that the above targets can be delivered without jeopardising its fiduciary duty to act in the best long-term financial interests of members and employers.

Climate Change Strategy

Introduction

This Climate Change Strategy sets out the Cheshire Pension Fund’s approach to managing the risks and opportunities to its investment portfolio from climate change.

The publication of a separate Climate Change Strategy reflects the Fund’s view that there is a significant material risk from climate change to the value of the Fund’s investment assets and this risk needs to be actively monitored and managed.

Climate Change Risk

Climate action failure is the stand-out, long-term risk the world faces in likelihood and impact according to the 2020 Global Risks Report from the World Economic Forum. If ‘business as usual’ continues, the world could heat up by about 5 degrees by 2100 which would cause profound societal damages and significant human harm. According to the Intergovernmental Panel on Climate Change (IPCC), greenhouse gas (GHG) emissions need to fall by 45% vs 2010 levels by 2030 in order to avoid the worst effects of climate change.

As a long-term asset owner, the Fund would like to see stable, well-functioning and sustainable markets which will foster long-term value creation and sustainable returns. Climate change cuts across industries, markets and economies and is a risk that cannot be fully diversified. How companies manage climate-related transition and physical risks and opportunities is highly likely to affect long-term profits and company returns. The Fund will endeavour to take a holistic approach to managing climate change risk and to act in a manner that will enable the broader transition towards a low-carbon economy through a combination of portfolio construction, engagement and policy advocacy.

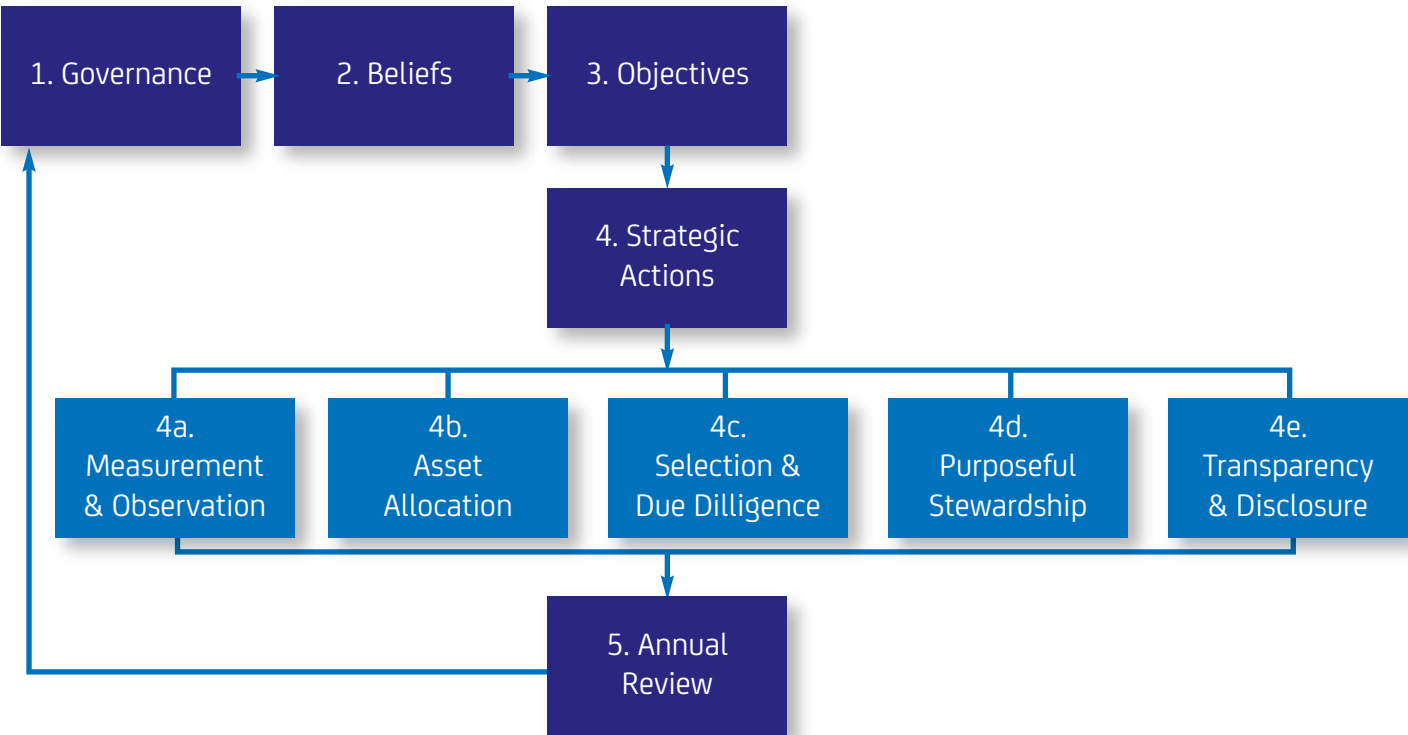
Governance of Climate Change Risk

The Pension Fund Committee is responsible for endorsing the Fund’s policies and procedures including the Fund’s Climate Change Strategy. Responsibility for the implementation of the Strategy is held by the Head of the Cheshire Pension Fund and the Finance and Investments Manager. The Pension Fund Committee will review the strategy on a bi-annual basis and agenda time will be scheduled twice a year for discussion of progress on the strategy.

The Fund is committed to providing decision-makers with appropriate training, including specialised training on climate change. The Investment Sub- Committee includes responsible investment (including climate change) as a standing item on the Investment Sub-Committee agendas, and investment managers’ quarterly performance reports are required to include a specific briefing on responsible investment (including climate change as relevant).

As a primarily externally managed Fund, the implementation of much of the management of climate-related risk is delegated onwards to portfolio managers, with oversight from Fund officers. Where appropriate, the Fund’s asset pooling company, LGPS Central Ltd, assists in assessing and managing climate- related risks.

Figure 2: Depiction of the Climate Change Strategy (Below)



Evidence-based beliefs related to climate change

The Fund believes that:

- i) Climate change is a financially material risk for the Fund. It has the potential to impact our beneficiaries, employers and all our holdings across asset classes. Due consideration of climate risk falls within the scope of the Fund's fiduciary duty.
- ii) There is overwhelming evidence that climate change is impacting the environment. This will have long-term consequences for our financial system. The Fund holds that the economic damages of climate change will outweigh the costs of precautionary mitigation.
- iii) As a result of human activities, the world is warming at an unsustainable rate. Already the world is approximately 1°C warmer than pre-industrial levels. Unabated, such change would be devastating for our way of life.
- iv) Climate change has the potential to impact the funding level of the Fund through impacts on employer covenant, asset pricing, and longer-term inflation, interest rates and life expectancy.
- v) The Fund strongly supports the Paris Agreement on climate change.
- vi) The Fund believes that a transition to a low-carbon economy is essential. This requires greenhouse gas emissions to decline to net-zero well before the end of this century. This will happen not only by focussing on the suppliers of energy but also, the demand for energy must undergo a major transformation.
- vii) The Fund believes all companies should align their business activities with the Paris Agreement on climate change. It is possible for a high-emitting company to undergo this transformation and thrive in the transition to a low-carbon future.
- viii) Investors have an important role to play in the transition to a low-carbon economy. The Fund believes the global economy will be less likely to realise a Paris-aligned energy transition were investors to cease influencing company behaviours.
- ix) A global co-ordinated response is needed to limit the rise in temperatures. No individual investor is influential enough to act alone. Governments, policymakers, consumers, companies and investors all have a role to play. Acting in collaboration will increase the likelihood of an orderly transition to a low-carbon economy.
- x) Climate-aware decisions can only be made with accurate, relevant, complete, and comparable data.

Objectives

Identify, understand and assess risks and opportunities

The Fund aims to utilise the best available information and tools to identify, understand and assess climate change risks and opportunities across regions and sectors that are material to our Fund. This includes both relevant climate-related transition and physical risks and opportunities likely to impact on the Fund's Investment Strategy and Funding Strategy.

Integration

The Fund intends to ensure that its investment portfolio; Funding Strategy and Employer Covenant Framework are resilient to climate change impacts.

To achieve climate change resilience, the Fund will ensure that material short, medium and long-term climate change considerations play an integral part in the stewardship of our investment portfolio. This includes climate change integration in the selection and due diligence, and continuous monitoring of assets.

The Fund will seek to influence investee companies and fund managers through routine engagement and voting on climate change issues.

Climate solutions and decarbonisation

The Fund aims to promote the transition to a low carbon economy through identifying and investing in sustainable and low carbon products across all asset classes. The Fund will also aim to benefit from the opportunities posed by the transition to a low carbon economy.

To further support the low carbon transition, the Fund will continue to steadily decarbonise our listed equities portfolios.

Policy advocacy and transparency

The Fund will work alongside like-minded organisations to support the ambitions of the Paris Agreement. This includes advocating for Paris-aligned regulations and policies with governments, policy makers, the investment industry and other stakeholders.

The Fund will aim to be fully transparent with our stakeholders through regular public disclosure, aligned with best practice.

Strategic Actions

Measurement and Observation

The Fund recognises that methodologies for assessing investment related climate change risk are evolving rapidly and we will seek to use the best information available. The Fund will make regular measurements and observations on the climate-related risks and opportunities relating to investment performance. This will include:

- Identification of the most material climate-related risks and opportunities relevant to the Fund;
- Economic assessment of the Fund's asset allocation against plausible climate-related scenarios;
- A carbon risk metrics assessment of the Fund's listed equities and fixed income assets. This includes the following metrics; Portfolio Carbon Footprint, Fossil Fuel Exposure, Carbon Risk Management and Clean Technology. The Fund aims to expand this type of analysis to other asset classes once reliable climate-related data becomes available.
- Regular assessment of progress against the Fund's carbon reduction targets.

Recognising the deficiency of relevant, consistent and comparable climate-related financial data, the Fund will encourage disclosure and the adoption of the recommendations of the TCFD across our investment chain, including external managers and investee companies.

Asset Allocation and Targets

Where permitted by a credible evidence base, the Fund will integrate climate change factors into reviews of our asset allocation, subject to the requirements of the Investment Strategy statement (ISS) and Funding Strategy Statement (FSS). In light of this, the Fund will actively consider allocations to asset classes that improve our ability to meet our investment objectives.

In addition, the Fund believes that the setting of meaningful and measurable targets can be a meaningful aid to set, measure and demonstrate progress towards net zero.

Therefore, as a result the Fund commits to:

- Reduce the carbon footprint (scope 1 and 2 emissions) ¹ of the Fund's listed equities portfolio from its current 30% below the general market (the FTSE All World baseline) to 50% below by the end of 2023.
- The Fund will also reduce the carbon footprint of its listed equities portfolio by a minimum 7.6% each year. This would ensure the Fund's equity portfolio is aligned with the recommendations of the United Nations Environment Programme's report (published November 2019), which stated that global greenhouse gas emissions must fall by 7.6% per year between 2020 and 2039 to deliver the Paris Climate target of reducing the rise in global temperatures to 1.5C.
- The Fund will seek to invest in an increasing proportion of total Fund assets in low carbon and sustainable assets. The paucity of carbon emissions data across many asset classes makes it impossible to set a meaningful Fund wide target for this commitment at present. The Fund will regularly review this with a view to setting a target once sufficient data is available.

¹ Scope 1 Greenhouse Gas Emissions: Direct emissions from owner or sources controlled by the owner, including: on-campus combustion of fossil fuels; and mobile combustion of fossil fuels by institution-controlled vehicles. Scope 2 Greenhouse Gas Emissions: Indirect emissions from the generation of purchased energy

The Fund commits to review progress on delivering against these targets on an annual basis. The targets themselves will be regularly reviewed and the Fund expects to amend the targets as both the scope and quality of investment asset carbon data improves.

Selection, Due Diligence and Monitoring

When considering all new investment decisions, the Fund will assess the material climate-related risks and opportunities and the investment manager's approach to managing climate-related risks. Wherever possible, the Fund will fully assess the impact of all new investment decisions on the carbon footprint of the investment portfolio.

Appointed investment managers will be regularly monitored to ensure climate-related risk is fully integrated into the managers investment process. The Fund will also regularly monitor and review the managers climate-related engagement and voting activity.

Purposeful Stewardship

The Fund will develop an Annual Climate Stewardship Plan, which will set clear goals of engagement, particularly on Paris Alignment, with companies, fund managers, policymakers and other organisations of influence. It is clear that the transition to a low carbon economy will depend on policy intervention, changes in corporate behaviour and changes in technology. It is therefore critical that the Fund engages in these discussions to help shape the policy and business landscape. The Fund's engagement efforts are carried out through its asset pooling company LGPS Central Ltd and through other investment managers.

The Fund will use stewardship techniques to manage the risks and opportunities within our investment portfolio, focusing on the risks and opportunities of greatest magnitude. Engagement will be prioritised using the following criteria: perceived level of climate risk, considering carbon risk metrics; weight of the company in the portfolio; likelihood of achieving change; and ability to leverage investor partnerships.

Climate related investment risk is not restricted to just companies in the energy sector; the Fund will therefore engage across all relevant sectors and on both the energy supply and demand side, including but not limited to fossil fuels, diversified energy, mining, cement, aviation and utilities.

The Fund will collaborate with like-minded investors where possible and be an active participant in selected collaborative initiatives that support the Fund's stewardship aims, such as the Climate Action 100+ (CA100+) engagement project. The objectives of this engagement activity with companies will be largely aligned with a Benchmark Framework launched by CA 100+ in September 2020.

In line with this Framework, the Fund will ask companies to:

- i) Work toward providing disclosures consistent with the Framework enabling investors to assess a company's potential for long-term value creation;
- ii) Set an ambition to achieve net zero emissions by 2050 or sooner across all material GHG emissions, and establish short, medium, and long-term targets to support that ambition;
- iii) Work with investors on action plans to develop and implement net zero transition pathways toward achieving net zero emissions for specific sectors or value chains.

The Fund will make full use of its voting rights and will co-file or support climate-related shareholder resolutions where these align with the Fund's Climate Change Strategy.

Transparency and Disclosure

The Fund will prepare and publish a TCFD report annually, which will include our carbon risk metrics.

The Fund will disclose the stewardship reports of the Fund's key investment managers on a quarterly basis and report on progress against the Fund's Climate Stewardship Plan every year.

The Fund will report progress against its carbon footprint reduction targets every year.

Communications Strategy

May 2022

Introduction

Who are we

The Cheshire Pension Fund ('the Fund') is a regional pension fund, in the North-West of England, who administer the statutory Local Government Pension Scheme (LGPS) on behalf of people working in Local Government and for other qualifying employers within the county.

The Fund is administered by Cheshire West and Chester Council.

The purpose of our communications strategy

As we strive to provide a high quality and consistent service to all members and stakeholders, our communications strategy is key to meeting this aim. We will regularly ensure the work we undertake as part of the strategy is measured for success, quality, and consistency.

Why have we renewed our communications strategy?

We want to assure our members that we will communicate effectively.

We want to ensure that all stakeholders are clear about our vision, objectives and the ways in which we will deliver them. Ensuring that the objectives are consistently and appropriately delivered.

The strategy will aim to provide value for money on all communications activities we carry out. We will ensure that we use services that provide not only value for money but also, reliable, and effective services which members can be confident in.

- Our digital first ambition*, through the introduction of a member self-serve portal, called 'My Cheshire Pension' is where active and deferred members can access their own records including personal details, length of service, their death grant nomination, and use the portal as a means of contacting the Fund.

The portal will; provide the Fund with savings, free up staffing resources, reduce postage, and will also reduce our carbon footprint through printing and posting fewer items.

The portal will be supplemented by improvements to the fund's website, in particular through feedback from our members on how it can better serve them.

- We will ensure, that where we tender for communications work, we look for the best service, not necessarily the cheapest and that it provides the best outcome for all parties.
- We will ensure that services provided are befitting for all members and cost efficiencies are appropriately balanced across all member types.

**Digital First means that we will look to communicate via digital methods as standard. For those members who choose to opt out of receiving electronic communications, we will continue to correspond with them using the method they prefer.*

We will use best practice, ensuring that we always look to the industry as well as peers for insights on success, and failure, to learn and deliver for our members. We will also strive to be a benchmark for other Funds, and our peers within the Pensions industry as a whole.

The objectives have considered our member types and will constantly be monitored to ensure that they best represent the majority audience, as well as observing changing environments, and taking member feedback into account to ensure we provide all members with a high-quality service.

Executive Summary

The aim of our communications strategy is to underpin the Fund's vision that its members 'understand, value, and engage with their Local Government Pension Scheme (LGPS) pension, whilst planning their journey to retirement.' In-order to achieve this vision, we have six core objectives, along with a supporting set of delivery vehicles which will work together to achieve the overall aim.

We will launch a member self-serve portal (My Cheshire Pension) in 2022/3 for Active members and 2023/4 for Deferred members. Roll out to Pensioner members will then be considered, this will also fall in line with changes to payroll which will support online activity.

This will provide members with an easier way to interact with their benefits and allow them to take a greater ownership of their Local Government Pension. This will be a key area of communication and development in 2022 and 2023 as member engagement will be vital to the success in the take up of My Cheshire Pension.

Our key audience will always be our members; Active, Deferred and Pensioners. However, we have many other audiences and recognise their vital input and support – not limited to but including Employers, Committee, (and) Board members, prospective members, Unions, and Press.

A key risk that needs to be mitigated is that pensions as a subject matter is often viewed as 'complex' or 'boring' or 'confusing'.

We also recognise that a key risk is the internal Subject Matter Expert (SME). This is an area that will provide key subject matter, it will need to be appropriately and carefully managed to ensure consistency across our communications material(s).

We know that pensions aren't a subject that most people will actively engage with on a regular basis, if at all. In fact, a study by Capita confirmed that of their 2,000 respondents, 72% were not engaged with their pensions and 61% were confused by their pension. We also know from our own survey for Active members, in December 2021, that 86% want to know more about their Local Government Pension Scheme (LGPS) pension. So, whilst the subject matter itself is a risk, we find some mitigation in the fact our members want to know more.

Our communication channels will continue to evolve as we plan to launch My Cheshire Pension (MCP) for active members in 2022/23. Digital will become our default by choice; however, we will support all major channels including post, telephone, and email. We will look to develop other methods where appropriate, for all member types.

We will actively encourage our website as the first port of call for basic information, forms, and member education. The website will be re-developed (2022/3/4) to ensure that this is a key pillar in our communications offering.

We will always evaluate our communications work using success measurements amongst other forms of objectivity, from business as usual, to ad-hoc campaigns, to ensure that whatever we deliver is effective and well received, and if not, that we learn lessons, for future work.

Regulatory Framework

This strategy has been produced in accordance with Regulation 61 of the Local Government Pension Scheme Regulations 2013.

The full regulations can be accessed at **The Local Government Pension Scheme Regulations 2013 (legislation.gov.uk)**

The regulatory framework that we follow is the baseline minimum for which we will offer communication services. We will aim to always go above and beyond this baseline where possible.

Stakeholders and typical communications

Fund Members are defined as –

- **Active** - those who are currently contributing into the fund and employed by a fund employer.
- **Deferred** - those who were members of an employer who paid into the fund but are not yet drawing a pension.
- **Pensioner** - those who were contributing into the fund and are now retired and claiming their pension, or their dependents.
- **Prospective Active members** - these are members who are considering joining an employer of the Fund. They would become full active members upon joining.

Committee and boards – Not limited to, but including Pension Fund Committee, Local Pension Board, Investment Sub-Committee and Employer Consultative Forum.

Employers – Any organisation which has been admitted into the Fund and has members who contribute towards their Local Government Pension Scheme (LGPS) through the Fund. We currently have over 300 employers within the Fund.

Unions – Any union which represents members and employers, and who we actively recognise and engage with in-order to discuss appropriate matters and opinions.

Stakeholders – Any person who has a vested and legitimate interest in the Fund. This is not limited to, but is likely to include: Councillors, MPs, HM Revenue and Customs, the Pensions Regulator (tPR), the Pensions Ombudsman (tPO), Money and Pensions Service, and other such professional agencies.

Press – Any journalist, publication both in print and online who has an active and legitimate interest in the fund and the activities it carries out.

Objectives

When setting our objectives, we have kept members at the forefront of what we do. In late 2021, we conducted a survey amongst Active members which gave us both qualitative and quantitative information, helping us to understand what worked well and areas for improvement.

The survey in 2021 told us the following.

Active members want to know more about their Local Government Pension Scheme (LGPS) Pension (86%); They do not fully understand their Annual Benefit Statement (ABS – estimate of benefits at normal retirement age) (64%);

Members underuse our website (with only 48% having used it);

Women are more likely to interact about their pension than men (73%);

Younger generation interaction remains low (9%).

As a result, the main areas for development were identified as **Annual Benefit Statements (ABS), Retirement interaction and support**, and providing **more general support** for all members but specifically – a younger demographic, and also encouraging more men to engage with their pensions.

We will commit to holding regular surveys for **all** member types, where possible and relevant, to inform the work that we undertake.

Our vision

Our objectives should always be striving towards the overarching vision that members: understand, value, and engage with their Local Government Pension Scheme (LGPS pension), whilst planning their journey to retirement.

Our core communication objectives are:

- Our communications are always clear and with explainable definitions and terms, we avoid pension jargon where possible, and plain English is used.
- Our communications are evaluated, and feedback is used to measure their effectiveness. in-order to provide the service that best supports our members
- To encourage engagement and interest in member's pensions, we will ensure that the services we offer are accessible, intuitive, attractive and engaging.
- We will proactively market and promote the member self-serve portal, where possible, in all our core communications, to encourage members join and use the service.
- We will improve understanding of the Fund and enable members to make informed choices about their pension.
- We commit to clear and transparent communications of the fund's investments, including Responsible Investment (RI).

The objectives within this strategy are to be achieved in the next one to five years (2022- 27), notwithstanding any unforeseen external or internal pressures which render them unachievable or delayed. They are dependent upon employer and other stakeholder support, as well as member involvement.

We will aim to achieve our core objectives through the following delivery vehicles:

- Regular focus groups (with all member types, where possible and appropriate).
- Regular webinars for members (delivering 'focus' sessions on particular subjects or 'meeting the expert' sessions and ask your most pressing question(s)).
- Regular engagement with employers (at least one per year), and other stakeholders; where relevant and appropriate.
- Deliver engaging content, both online and in person.
- Increase our digital content for members and employers.
- Provide all member types with effective tools to understand their pension and the choices available to them.
- Member and employer surveys to measure the satisfaction levels from members. At least one survey per year and at least one full member survey every 18 months.
- National awards entry and recognition to validate the communications including independent assessment and measurement of effectiveness of our communications
- Proactive media relations, within the industry, locally and wider afield. Sharing positive news from within the Funds activities.
- We will promote Responsible Investment (RI) through a series of informative and engaging documents. We will also ensure that our content around this subject is easily available to any Fund member or member of the public.
- Review, and redesign Annual Benefit Statement (ABS), so that it becomes easier to understand for members and is then used as a benchmark by peers.
- Providing a communications activities report on the work in the calendar year, and their successes, which will be part of the Fund's Annual Report.
- Develop and deploy My Cheshire Pension (MCP) as a primary means of communications between members and the Fund, the aim is that we encourage members to use this function first, as it'll provide the quickest possible way to access their data.

- MCP will evolve each year, based on member use and technological developments. We will look to improve the communications aspect and ensure that members have a seamless experience, improving the overall customer experience. Member feedback will be assessed annually, and actioned, where appropriate, to provide the best possible user interaction for members.

Communications channels

Communications channels should be varied with the ability to meet the majority of our audiences. Communications channels in the last twenty years have shifted away from traditional methods of telephone and letters (via post) to email and online delivery (selfserve).

We will continue to offer the following methods, without ruling out the need to add additional methods or withdrawing methods that are no longer necessary:

- Website and online services
- Digital delivery via video and webinar functionality
- Self Service (via My Cheshire Pension) – from 2022-23
- Emails
- Telephone service
- Letters delivered via post
- Roadshows / Pensions in Person
- Social Media will be kept under review

Resources

Some items will be carried out in business-as-usual activity – such as annual reports and Annual Benefit Statements, and some will require a defined input in-order to be realised – such as a webinar on a set subject or a video on a set subject.

Where possible, the Fund will take the lead for costs and organisation. There will be no costs to members for the activities we provide. There will be no additional financial cost to employers for this activity. However, it will require some resource support. We will ask that employers take responsibility when we provide materials, events and other items that will benefit members – such as sharing the materials and ensuring members have access to them.

Key risks, issues and dependencies

With any communications activity there will always be a risk that it doesn't achieve the primary aim. We will always be mindful of our audiences and manage risks appropriately to best serve our members.

The key risks identified in this strategy are as follows:

- Members do not want to engage with their pension.
- Subject Matter Experts (SMEs) leave the business and are not replaced in a reasonable timeframe, leaving communications work exposed to delays.
- Employers do not engage with Fund or are unable to support the work being offered.
- The cost of the work outweighs the benefits by too much.
- When spending money on communications work, externally, we ensure the effective use of public money in delivering a set outcome.
- Internal resource constraints (when required to carry out additional communication work, alongside business as usual).
- External influences such as Covid-19, geo-political issues, and technology developments.
- Staff turnover.
- Stakeholder pressures.
- Overarching business objectives may need a greater support, i.e., Valuation, McCloud.

Risks are mitigated through a Risks Actions Issues and Decisions (RAID) risk log. A RAID log is regularly reviewed and updated to ensure all key areas of risk are properly investigated and actioned where appropriate. This allows a full governance of the work being undertaken and proposed and keeps an appropriate overview.

Evaluating our work

Every piece of communications work we carry out, from Annual Benefit Statement (ABS) distribution to ad-hoc campaigns to lunchtime webinars, will need to be evaluated. This means that we will take views from our staff, employers (and their staff), and crucially from members. We will also seek other stakeholder feedback where possible and relevant.

Evaluating our work will also provide key intelligence on what areas we have improved and what areas we can then look to further improve.

Our commitment

We will commit to:

- always seeking feedback from an activity, where possible.
- always being transparent with that feedback, where possible, and sharing this on our website.
- always seeking to improve the services we provide and offer, to members and key stakeholders.

For every major piece of work we do, as outlined in our objectives, we will commit to seeking feedback.

We will not seek feedback on 'business as usual' activities. However, we will routinely review and recognise where improvements can be made and implement them as soon as feasibly possible.

Annual evaluation

We will commit to proving an annual evaluation review in which we will take stock of activities and results. We will look at the overall communications strategy and review what has changed and what potentially needs to be added or removed, in-order to provide a better service for members.

Independent auditor's report

The Cheshire Pension Fund Statement of Accounts form part of its Administering Authority (Cheshire West and Chester Council) Statement of Accounts. The auditors of Cheshire West and Chester Council are still finalising their audit of the Council accounts and the audit report for the Cheshire Pension Fund cannot be issued until the Cheshire West and Chester Council audit is complete. The auditors for the Cheshire Pension Fund have indicated that they intend to issue an unqualified audit opinion for the Fund's accounts. The Annual Report will be updated for the auditor's report as soon as this is available

Contacts and Further Information

For more information about the Cheshire Pension Fund, please contact our helpdesk as follows:

Email: pensions@cheshirewestandchester.gov.uk **Tel:** 01244 976000

Or use our Website: www.cheshirepensionfund.org

Alternatively, you can contact a member of the Pensions Management Team as follows:

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To promote accessibility for all, this document can be made available in other formats upon request.