
London Borough of Sutton

Pension Fund Annual Report 2019/20



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1. INTRODUCTION

I am pleased to present the Pension Fund Annual Report for 2019/20. This report brings together the Fund's financial statements with a review of financial and investment performance and the work of the shared pensions administration service. It also contains the Fund's key policy documents.

Over the past year the Fund's value has decreased by £23.8m to £640.1m, representing a decrease of 3.6%. This decrease occurred primarily in the final quarter of the year, due to the impact of the Covid-19 pandemic on financial markets. The Fund's investment managers delivered an overall annual return on investment assets of -3.4%, reflecting the fall in the prices of most risk assets, offset to some extent by stability in some lower risk investments such as government bonds. However, returns over a 3 and 5 year period remain positive. The Fund is still heavily weighted towards equity investments at 55% of the portfolio which can provide higher potential returns but at a higher risk than other asset classes. It is worth noting that the value of the Fund's investments recovered significantly after the 31 March 2020 reporting date, though the longer-term outlook remains uncertain.

At the last triennial valuation in 2019 the Fund was assessed at 90% funded, although the estimated funding level at 31 March 2020 fell to 88% (on an unsmoothed basis), due to the fall in investment values during March 2020 noted above. The valuation forms a key part of the Fund's management and directly impacts on the contributions paid by employers, including the council. The valuation will not, however, affect the benefits or contribution rates of individual members, which are set nationally.

The Fund continues to work closely with the London Collective Investment Vehicle (LCIV) to ensure that it provides investment strategies that meet the Fund's needs.

The shared pensions administration services provide the administration of Local Government Pension Scheme (LGPS) for both Sutton Council and Kingston Council, and has continued to operate normally throughout the pandemic. The Fund's membership stands at just over 14,700 across 58 scheme employers, with no significant transfers in or out during the year, and the Fund continues to invest in providing a service to its members, via consultations with employers and access to the self-service portal for individual members

Councillor Jill Whitehead
Chair of the Pension Committee

2. OVERALL FUND MANAGEMENT

Scheme management and advisers

Administering Authority		
London Borough of Sutton		
Supporting Officers		
Richard Simpson, Strategic Director – Resources (Section 151 Officer)		
Victoria Goddard, Assistant Director Finance		
Lisa Doswell, Senior Finance Lead - Treasury and Pensions		
Bradley Peyton, Head of Insurance and Pensions Administration		
Scheme Administrators		
Sutton and Kingston Shared Pensions Administration Service		
Asset Pool		
London Collective Investment Vehicle (LCIV)		
Investment Managers:		
Equities (Active)	Equities (Passive)	Pooled Multi Asset
Newton (LCIV)	Legal and General	Baillie Gifford (LCIV)
Harding Loevner		Pyrford (LCIV)
Schroders		

Property	Fixed Income	Infrastructure
BlackRock	M&G	Partners Group
Aviva	Legal and General	
Invesco		
Investment Adviser	Banker	
David Walker, Hymans Robertson	Lloyds Bank	
Actuary	Legal Advisor	
Barry McKay, Barnett Waddingham	South West London Legal Partnership	
Auditor	AVC Provider	
Grant Thornton	Clerical Medical	
Performance Monitoring	Custodian	
Northern Trust and Hymans Robertson	Northern Trust	

3. FINANCIAL PERFORMANCE

Fund Income and Expenditure From 2015/16 to 2019/20

Income and expenditure of the Fund over the past five years is shown in the table below.

	2015/16	2016/17	2017/18	2018/19	2019/20
	£'000	£'000	£'000	£'000	£'000
Contributions receivable	30,587	34,116	34,359	47,373	39,099
Benefits payable	(32,630)	(26,518)	(32,125)	(66,527)	(32,925)
Net payment (to)/from the Fund	(2,043)	7,598	2,234	(19,154)	6,174
Fund management expenses	(3,192)	(3,263)	(6,115)	(6,308)	(6,015)
Net returns on investment	3,453	4,420	9,923	7,606	9,354
Change in market value	2,172	102,281	17,404	40,070	(33,264)
Net (decrease)/increase in the Fund	390	111,036	23,446	22,214	(23,751)

The above table shows a net increase in the Fund's value of £133m over the past 5 years. This is largely attributed to the change in market value of £128m over this period. The net contributions from members has been mainly positive over the past 5 years with the exception of 2018/19 being particularly affected by group transfers as detailed below. Fund management expenses have been more than covered by net returns on investments and further details on these are also provided below.

Analysis of Contributions and Benefits of the Fund

	2015/16	2016/17	2017/18	2018/19	2019/20
	£'000	£'000	£'000	£'000	£'000
Contributions Receivable					
- Members	5,889	5,661	5,940	6,072	6,555
- Employers	23,188	24,608	24,849	25,251	25,979
- Transfers in	1,510	3,847	3,570	16,050	6,565
Total Contributions	30,587	34,116	34,359	47,373	39,099
Benefits Payable					
- Pensions	(19,667)	(20,435)	(21,240)	(22,023)	(22,926)
- Lump sum retirements and death benefits	(4,729)	(4,095)	(4,550)	(5,170)	(4,587)
- Transfers out	(8,181)	(1,914)	(6,250)	(39,210)	(5,258)
- Refunds	(53)	(74)	(85)	(124)	(154)
Total Benefits Payable	(32,630)	(26,518)	(32,125)	(66,527)	(32,925)
Net Payment to / (from) the Fund	(2,043)	7,598	2,234	(19,154)	6,174

As shown in the table above, the value of Transfers In is £6,565k (2018/19: £16,050k) which consists largely of small individual transfers into the pension Fund from other organisations. 2018/19 transfers in were relatively high due to transfers in from the Royal Borough of Kingston upon Thames in respect of the transfer of the Shared Finance Service, estimated at £9.6m and in respect of the transfer of the Customer Contact Centre, estimated at £1.5m.

Transfers out of the pension fund during 2019/20 are £5,258k (2018/19: £39,925k), also primarily in respect of small individual transfers. The figure of £39,210k for Transfers Out during 2018/19 included the following group transfers payable from the London Borough of Sutton:

- £5.4m in respect of the transfer of Human Resources to Merton,
- £7.7m in respect of the transfer of Human Resources to Kingston,
- £8.9m in respect of the transfer of Highways to Kingston, and
- £13.2m in respect of the transfer of Carshalton College to the London Pension Fund Authority.

Analysis of Fund Management Expenses

The costs of managing the Pension Fund are split into three areas; administration costs, investment management expenses and oversight and governance costs. These costs incurred over the last five years are shown in the table below.

	2015/16	2016/17	2017/18	2018/19	2019/20
	£'000	£'000	£'000	£'000	£'000
Administration Cost					
Internal support costs	300	322	303	395	524
Other	133	63	197	113	291
Sub-total Administration Costs	433	385	500	507	815
Investment Management Expenses					
Management fees	2,622	2,727	4,009	4,446	3,423
Transaction costs	-	-	1,335	1,118	1,421
Custodian	36	45	143	97	37
Sub-total Investment Management Expenses	2,658	2,772	5,487	5,661	4,881
Oversight and Governance Costs					
Actuarial fees	6	33	45	54	113
External audit	21	21	21	16	16
Investment advice	67	36	45	30	84
Other	7	16	17	39	106
Sub-total Oversight & Governance Costs	101	106	128	140	319
Total Fund Management Expenses	3,192	3,263	6,115	6,308	6,015

Administration costs have been fairly constant over the past 5 years although investment management expenses have seen a significant increase from 2017/18 onwards. This is explained in part by the increase in the Fund's value, as managers' fees are based on a percentage of the market value of their portfolio. In addition the Local Government Pension Scheme Advisory Board launched its cost transparency code at this time to improve the quality of information on investment fees. The Fund uses pooled investment vehicles for which it does not receive separate fee invoices; rather the fees are taken directly from the asset value of the fund. The cost transparency code has helped to make identification of these fees easier. Oversight and Governance costs increased in the current year due to consultant fees, mainly attributable to the work of the investment advisers in reviewing the Investment Strategy and higher actuarial fees attributable to the triennial actuarial valuation. Overall, in 2019/20 the cost of managing the Fund represents approximately 0.99% (2018/19: 0.95%) of the value of the Fund. The absolute cost of managing the fund decreased in the year, due to the £42mn decrease in assets under management at year end.

	2015/16	2016/17	2017/18	2018/19	2019/20
Membership number	12,648	13,260	14,236	14,088	14,761
Cost per member					
Administration costs	34	29	35	36	55
Investment Management costs	210	209	385	402	331
Oversight and Governance costs	8	8	9	10	22
Total Fund costs per member	252	246	430	448	407

The above table shows that the Fund cost for each member of the fund declined from 2015/16 to 2016/17, increased from then onwards until 2018/19, due to the inclusion of additional costs in those years, as explained for the previous table and decreased in 2019/20, due to decrease in value of the assets under management.

	2015/16	2016/17	2017/18	2018/19	2019/20
	£'000	£'000	£'000	£'000	£'000
Current Assets	13,894	12,310	18,635	4,545	7,998
Current Liabilities	(1,654)	(3,530)	(7,582)	(13,772)	(560)
Net Current Assets	12,240	8,780	11,053	(9,227)	7,438

Current assets are made up of cash and income due to the Fund at the end of each year.

Current liabilities consist of fund expenses outstanding at year end which includes payments pending for group transfers. The balance at 31 March 2020 of £560k is made up of primarily small outstanding balances in respect of individual transfers out and is significantly less than balance at 31 March 2019 which included £13.1m for a group transfer of Carshalton College to the London Pension Fund Authority.

4. INVESTMENT POLICY AND PERFORMANCE REPORTING

The table below shows the approved target allocations of individual asset classes against the actual allocations for the two most recent years ending 31 March. Allocation to equities is 55%, with the rest allocated to bonds, multi-asset funds and alternative assets such as property and infrastructure. The Fund recently decided to allocate 5% of the Fund to private debt. Currently this 5% is allocated to the Legal & General index-linked gilt fund and shown within the bond allocation in the table below. As a consequence bonds are 6% over target pending investment in a private debt fund. Pooled multi-asset funds together with alternatives (which includes infrastructure) are below target by 2% and 1% respectively. Property is 2% below the target allocation due to its relative performance against other asset classes.

Asset class	Asset Allocation	Asset Allocation	Strategic Asset Allocation	Variance from Strategic Asset Allocation
	31.03.2019	31.03.2020		31.03.2020
Equities	55	54	55	(1)
Bonds	20	21	15	6
Pooled Multi Asset	13	13	15	(2)
Property	8	8	10	(2)
Alternatives	4	4	5	(1)
	100	100	100	

Legal & General (L&G), Harding Loevner, Schroder, M&G, BlackRock and Partner's Group were employed as the Fund's direct investment managers for liquid assets for the three years ending 31 March 2020. The Council also procured fund management services from Newton Investment Management (Newton), Baillie Gifford and Pyrford through the London Collective Investment Vehicle (LCIV). The Fund was also invested in three separate illiquid asset funds; M&G UK Companies Financing Fund, LaSalle UK Real Estate Fund of Funds and Invesco Real Estate UK Residential Fund. The market value of the investment assets under the management of each fund manager as at 31 March 2019 and 31 March 2020 is shown below.

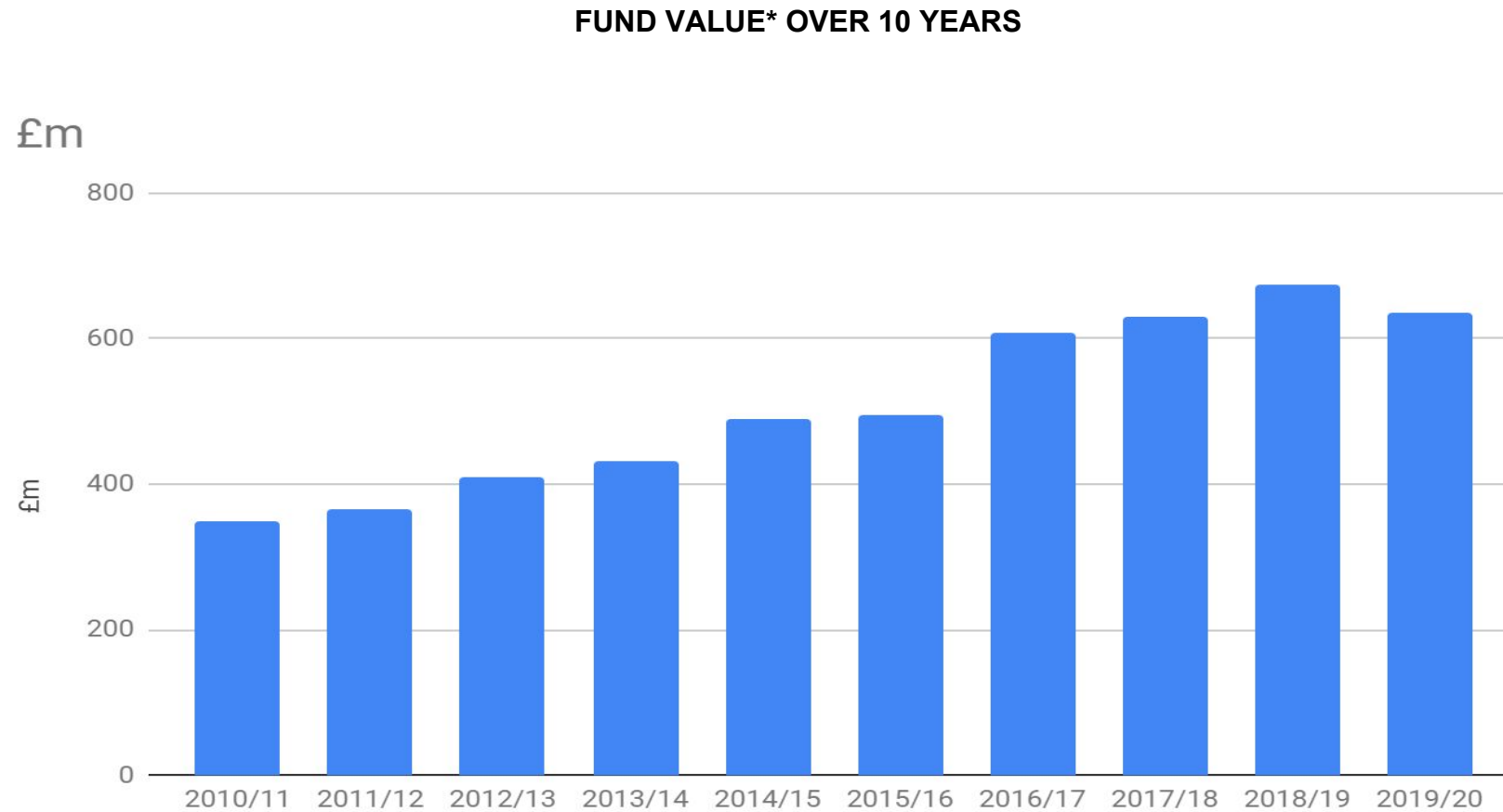
Fund Manager	Value at 31/03/19 £'000	Value at 31/03/20 £'000
Investments managed by London Collective Investment Vehicle	203,031	188,466
Pyrford - LCIV Global Total Return Fund	43,603	42,270
Baillie Gifford - LCIV Diversified Growth Fund	47,165	42,538
Newton - LCIV Global Equity Fund	112,263	103,658
Investments managed outside of London Collective Investment Vehicle	469,863	442,716
Schroder Life QEP Global Active Value Fund	101,192	84,349
Harding Loevner Funds Plc Global Equity Fund	116,940	110,664
Legal & General UK Equity Index Fund	-	-
Legal & General All World Equity Index Fund	41,856	39,235
Legal & General Over 5 Year Index Linked Gilts Fund	35,279	36,110
M&G Alpha Opportunities Fund	48,500	48,067
M&G PP Index Linked Fund	50,144	49,459
M&G UK Companies Financing Fund LP	446	-
LaSalle Investors UK Real Estate Fund of Funds	13,123	12,569
BlackRock UK Property Fund	24,144	22,202
Invesco Real Estate UK Residential Fund SCSp	15,033	15,013
Partners Group Direct & Global 2015 S.C.A., SICAV-SIF & Global 2012 S.C.A., SICAR	23,206	25,048
Total	672,894	631,182

Each fund manager has been set a specific benchmark, as well as a performance target against which they will be measured. This is shown in the table below.

Manager	Asset Pool	Mandate	Benchmark	Performance Target
Newton	Yes	Global equity pooled fund - active	MSCI All Countries World NDR Index	2% above benchmark over rolling 3 year period (gross-of-fees)
Harding Loevner		Global equity pooled fund - active	MSCI All Countries World NDR Index	3% above benchmark over rolling 3 year period (gross-of-fees)
Schroder		Global equity pooled fund - active	MSCI All Countries World NDR Index	3% above benchmark over rolling 3 year period (gross-of-fees)
Legal & General		UK Global equities pooled fund -passive	UK - FT All Share Index	To track the benchmark
Baillie Gifford	Yes	Pooled multi-asset	3 Month LIBOR +3%	3% above benchmark over rolling 3 year period (gross-of-fees)
Pyrford	Yes	Pooled multi asset	3 Month LIBOR +3%	3% above benchmark over rolling 3 year period (gross-of-fees)
M&G		Bonds - Alpha Fund	3 Month LIBOR* +3%	3 Month LIBOR +3 to 5%
M&G		Bonds - Index Linked	FTSE A British Government Over 5 Years Index-Linked	0.75% above benchmark over rolling 3 year period (gross-of-fees)
RREEF / BlackRock		Pooled Property Funds	IPD UK All Pooled Property Funds Index	To outperform the benchmark
Aviva		Property Fund of Funds	IPD UK All Pooled Property Funds Index	To outperform the benchmark
Partners Group		Infrastructure	No tactical benchmark, but target is an absolute return of 8% per annum	No outperformance objective
M&G		UK Companies Financing Fund	No tactical benchmark, but assessed against 7 day LIBID* and targets return of 10% pa net-of-fees	No outperformance objective
Invesco		Residential Property	No tactical benchmark, but targets an absolute return of 8% to 10% per annum	Unleveraged return of 8-9% pa

*The interest rate benchmarks LIBOR and LIBID are expected to be replaced by new interest rate benchmarks after the end of 2021.

The market value of the total investment assets held by the fund managers over the last 10 years is shown below.



*This does not include cash balances held by the Fund and managed by the Council on the Fund's behalf.

Fund History

From 1998 – 2005 the Fund was managed by Henderson Global Investors and Deutsche Asset Management (formerly Morgan Grenfell). The balanced mandate was split equally between both managers and invested in Equities, Bonds and Property.

In 2004, 10% of the total Fund was allocated to property managed by Deutsche Property Asset Management with resources transferred from Henderson Global Investors and the main multi-asset Deutsche portfolio.

In December 2005, the remainder (90%) of the Fund was separated into two global equity mandates and one bond mandate, managed by Aberdeen Fund Management Ltd (formerly Deutsche Asset Management Ltd). The equity element of the Fund was managed by Newton Investment Management and AllianceBernstein, until March 2011 when AllianceBernstein was replaced by Legal & General.

In September 2009 the decision was made to invest in M&G UK Companies Financing Fund and in July 2011 the Pension Fund employed Aviva Investors, a real estate fund-of-funds manager.

In June 2012, the Fund appointed Partners Group as an infrastructure manager.

In October 2012 four new fund managers were appointed. Harding Loevner and Schroder were hired to manage two new pooled global equity mandates and Baillie Gifford and Pyrford were awarded the two new pooled absolute return mandates. The existing segregated mandate with Newton was subsumed in a new pooled global equity mandate with them and the existing pooled global equity mandate with L&G was transferred to a pooled UK equity mandate.

The Property portfolio was managed by RREEF (formerly Deutsche Property Asset Management) until December 2012, when the RREEF UK Core Property mandate amalgamated with BlackRock's UK Property mandate.

In March 2014, the decision was made to transfer the existing bond mandate with Aberdeen to M&G with 40% to be invested in their Index-Linked fund and 60% in their Alpha Opportunities fund. The transition took place at the end of May in 2015.

In November 2015, a decision was made to appoint Invesco as a new residential property manager.

From 2016 the Fund has begun to transfer assets to the London Collective Investment Vehicle (LCIV). The 2 absolute return managers, Baillie Gifford and Pyrford, were appointed by LCIV as their managers of the Diversified Growth Fund and the Global Total Return Fund respectively, so this was a straight forward transition. Similarly, in the following year, LCIV appointed Newton as the manager of their Global Equity Fund and the Fund was able to move assets already managed by Newton into this fund.

Performance

The following two tables provide comparative analyses of performance over 1 year, 3 years, 5 years and 10 years at total Fund level and over 1 year, 3 years and 5 years at fund manager level against the relevant benchmark. All figures are shown net of fees.

Performance	1 year	3 years	5 years	10 years
Fund	(3.4)	2.3	5.6	8.7
Benchmark	(1.1)	3.0	5.4	9.2
Relative return	(2.3)	(0.7)	0.2	(0.5)

At total fund level, as at March 2020 the Fund underperformed the benchmark by 2.3% over the past year, underperformed by 0.7% per annum over three years, outperformed by 0.2% per annum over five years and underperformed by 0.5% per annum over 10 years.

Manager	1 year performance			3 year performance			5 year performance		
	Fund Return	Benchmark Return	Relative return	Fund Return	Benchmark Return	Relative return	Fund Return	Benchmark Return	Relative return
London Collective Investment Vehicle:									
Newton	(2.8)	(6.2)	3.6	3.8	2.3	1.5	7.2	6.9	0.3
Baillie Gifford	(8.8)	3.9	(12.3)	(1.4)	3.8	(5.0)	0.8	3.8	(2.8)
Pyrford	(2.3)	3.9	(6.0)	(0.4)	3.8	(4.1)	1.8	3.8	(1.9)
Other Managers:									
Harding Loevner	(0.5)	(6.7)	6.7	5.8	1.8	4.0	10.0	6.6	3.2
Schroder	(14.3)	(6.7)	(8.1)	(3.8)	1.8	(5.5)	3.0	6.6	(3.4)
Legal & General	(6.2)	(6.2)	-	(1.4)	(1.4)	-	2.4	2.3	0.1
M&G Alpha Opportunities	(3.6)	3.8	(7.1)	-	3.7	(3.5)	1.3	3.6	(2.2)
M&G Index Linked	2.1	2.4	(0.3)	3.0	2.9	0.1	6.5	6.3	0.3
BlackRock	(1.3)	-	(1.3)	4.3	4.9	(0.6)	5.2	5.8	(0.6)
LaSalle	(1.3)	-	(1.3)	3.2	4.9	(1.6)	4.5	5.8	(1.2)
Invesco	2.3	8.0	(5.3)	-	-	-	-	-	-
Partners Group Global 2012	10.3	8.0	2.2	13.5	8.0	5.1	16.7	8.0	
Partners Group Direct 2015	14.2	8.0	5.8	-	-	-	-	-	8.1
Partners Group Global 2015	13.7	8.0	5.3	-	-	-	-	-	-
M&G UK Companies Financing Fund	4.9	0.6	4.3	3.7	0.4	3.2	4.0	0.4	3.7

As a passive manager Legal & General's returns matched the benchmark since inception.

5. ASSET POOLS

In 2015 the Government announced that the 89 LGPS funds nationally should pool their assets into 6 or 7 regional asset pools of at least £25bn each which would have the key objective of delivering management fee savings while maintaining investment performance. In addition, the benefits of scale would allow individual LGPS funds to access investments in infrastructure without an expensive management arrangement. In London the 32 boroughs and the City of London Corporation are shareholders of the London Collective Investment Vehicle (LCIV). LCIV is the asset pooling body set up originally by London Councils. Its objective is to provide funds that meet the investment strategies required by the different LGPS funds in London and to appoint and monitor fund managers to ensure that fee savings are achieved without impacting on performance. As well as appointing active managers, LCIV provides access to lower cost index-tracker funds managed by Blackrock and Legal and General Investment management.

At the end of 2019/20, the London Borough of Sutton Pension Fund had 30% of its fund managed by LCIV with a further 12% managed by Legal and General. The reduction in the management fees of individual managers will also need to cover the running costs of LCIV. The table below shows that the Fund is making contributions to the running costs of LCIV by paying an annual subscription and a development charge. Overall, the Fund has made a cumulative saving of £267k after LCIV expenses. LCIV has been operating for 5 years and is not yet self-financing as many London funds have yet to move their assets over. LCIV currently have 14 funds with £7.6bn of assets.

	2015/16	2016/17	2017/18	2018/19	2019/20
	£'000	£'000	£'000	£'000	£'000
Set up Costs					
Share purchase	150	-	-	-	
Annual subscription	25	25	25	25	25
Development funding charge	-	-	75	65	65
Other	-	-	-	4	4
Transition Costs					
Fee Savings	(6)	(75)	(176)	(253)	(129)
Net Savings Realised	169	(50)	(76)	(159)	(35)

The table below shows how the management costs of the Fund compare between those managed by LCIV and the Fund's existing managers. The Fund has 2 multi-asset fund managers with LCIV which is a more expensive asset class than bonds or equities although it is cheaper than property or infrastructure.

	Asset Pool	Non-Asset Pool	Fund total
	Total	Total	
	£'000	£'000	£'000
Management fees	773	2,440	3,213
Transaction costs	600	821	1,422
Custody fees	28	9	37
Performance fees	-	209	209
Total	1,402	3,479	4,881

6. SCHEME ADMINISTRATION

Pensions Administration

Committed to providing an efficient, cost effective and approachable service to all Fund employers and our members

The shared pensions administration service was formed on 1 April 2016 to provide the administration of Local Government Pension Scheme (LGPS) for the Funds of Sutton Council and Kingston Council. The service administers the LGPS on behalf of scheme employers, including Kingston University, non-teaching staff in schools and academies, and contractors who agree to become admitted bodies within the Scheme. Combined, the Funds have a total membership of circa 30,000 and in excess of 100 scheme employers.

The service has responsibility to:

- Publish annual benefit statements to all active and deferred members via Pensions Online
- Publish pensions saving statements to scheme members that may have breached their annual and/or lifetime allowances
- Set up and amend admission agreements for admitted bodies
- Manage the internal dispute resolution procedure
- Apply the annual pensions increase as directed by HM Treasury
- Submit a quarterly tax return to HM Treasury and pay the required tax charges
- Maintain a membership database
- Undertake an annual data review and complete The Pension Regulator scheme return notice
- Process tasks (such as, retirements and transfers in and out) in accordance with the performance standards
- Maintain a 'breaches of law' register and notify The Pension Regulator of any materially significant breaches
- Provide information and manage the production of admission, cessation and FRS 102 (financial statement) reports via the fund actuary and share with those reports with scheme employers

Main Work Streams Impacting Pension Administration in 2019/20

GMP reconciliation: phase one

Between April 1978 and April 1997 the minimum level of benefit payable to those that were contracted-out of the State Earnings Related Pension Scheme was known as a Guaranteed Minimum Pension (GMP), which still forms part of many members' benefits.

Contracting-out ended in April 2016 and since then, HM Revenue & Customs (HMRC) no longer tracks contracted-out rights. HMRC issued closure schedules to all affected schemes so they could compare the GMP amounts held by HMRC against the scheme records and challenge any differences. This is known as a GMP reconciliation.

If errors are found in the scheme records, members may be being over or underpaid because the annual cost of living pension increases would have been misapplied.

Phase one of the GMP reconciliation was to analyse and investigate the scheme records to reconcile the GMP amounts with HMRC. The outcome of this was that 24,050 (95%) of the member population was reconciled or descoped. The remaining 5% was in a stalemate or awaiting HMRC input.

Using HM Treasury's recommended tolerance of £2 per week, the number of member records that require amendment is 954. Phase two is underway and due to be completed in 2020/21 (see Key Activities planned in 2020/21).

Key Activities planned in 2020/21

In addition to the day-to-day scheme administration, the key activities planned include:

- Preparation for McCloud remedy: It is inevitable that any proposed remedy will result in significant work for the shared pensions administration service.
- Implementation of a drip tray method of work distribution: Once implemented officers will 'drip' the next most critical process according to their capability/experience, rather than rely on an alpha split. This will coincide with improvements to the process maps and deadlines contained in the administration system.
- GMP reconciliation phase two: Rectify any incorrect data identified during phase one and amend any pensions in payment subject to a £2 per week tolerance.
- Appoint a member data services provider: To provide address tracing, mortality screening and death certificates in order to progress a number of difficult overdue processes and to further protect the Fund from overpayments.
- Issue a revised pensions administration strategy pursuant to regulation 59 of the Local Government Pension Scheme Regulations 2013: The strategy sets out the responsibilities of the administering authority and scheme employers in administering the LGPS and must be reviewed at least every three years.

7. GOVERNANCE

Role of Pension Committee

The Pension Committee is responsible for all matters relating to the Pension Fund administered by the London Borough of Sutton on behalf of participating employers. The functions of the Committee, as set out in the Council's Constitution, are below:

Purpose

To be responsible for all matters relating to the Pension Fund operated by the London Borough of Sutton on behalf of all participating employers.

Function

The function of the Pension Committee is:

1. To decide upon the investment policy and strategy of the Fund and arrangements for compliance with all other requirements of government statutes and regulations concerning the Local Government Pension Scheme.
2. To approve all policy statements required or prepared under the LGPS Regulations or any other relevant statute, regulation or statutory guidance.
3. To receive and consider regular reports from each pension fund manager on investment strategy, performance, transactions and other related matters concerning their element of the Council's portfolio.
4. To consider the performance of fund managers in relation to:
 - the Council's performance targets for the manager; and
 - issues concerning the liabilities and assets of the Fund.
5. To appoint managers for the Fund and professional advisers to the Committee, as required.

6. To consider actuarial valuation reports from the actuary and agree recommendations concerning implications for the Pension Fund, including investment strategy and funding arrangements.
7. To agree arrangements for the administration of the Pension Fund including communication with Fund members.
8. To consider and decide upon any other relevant matter relating to the Council's Pension Fund.

The Committee consists of 6 elected Members of the Council and it meets at least four times a year. Members have full voting rights. The membership of the Committee for 2019/20 was as follows:

Cllr Jill Whitehead (Chair)
Cllr Edward Joyce (Vice Chair)
Cllr Richard Clifton
Cllr Sam Weatherlake
Cllr Eric Allen
Cllr Param Nandha

Councillor Jill Whitehead	Councillor Richard Clifton	Councillor Edward Joyce	Councillor Sam Weatherlake	Councillor Eric Allen	Councillor Param Nandha
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Committee attendance						
3 March 2020	✓	✓	✓	✓	✓	✓
19 November 2019	✓	✓	✓	✓	✓	✓
17 September 2019	✓	✓	✓	✓	✓	
4 June 2019	✓	✓	✓	✓	✓	
Training at committee						
Property investments	✓	✓	✓	✓	✓	✓
Fixed income investments	✓	✓	✓	✓	✓	✓
Equities investments	✓	✓	✓	✓	✓	✓
Governance	✓	✓	✓	✓		
Other training						
Hymans Robertson - Ethical investing	✓	✓	✓	✓	✓	✓
Schroders Trustee Training	✓	✓	✓	✓	✓	✓

Role of Pension Board

The Pension Board was established by Full Council at the meeting held on 2 March 2015. An independent Chair was duly appointed. The Board's current Terms of Reference are:

Purpose

The purpose of the Board is to assist the Administering Authority in its role as a scheme manager of the Scheme. In particular to assist the Administering Authority to:

1. secure compliance with the Regulations, any other legislation relating to the governance and administration of the Scheme, and requirements imposed by the Pensions Regulator in relation to the Scheme and;
2. to ensure the effective and efficient governance and administration of the Scheme.

Function

The first core function of the Board is to assist the Administering Authority in securing compliance with the Regulations, any other legislation relating to the governance and administration of the Scheme, and requirements imposed by the Pensions Regulator in relation to the Scheme. Within this core function the Board may determine the areas it wishes to consider including but not restricted to:

1. Review regular compliance monitoring reports which shall include reports to and decisions made under the Regulations by the Committee.
2. Review management, administrative and governance processes and procedures in order to ensure they remain compliant with the Regulations, relevant legislation and in particular the Code.
3. Review the compliance of scheme employers with their duties under the Regulations and relevant legislation.
4. Assist with the development of and continually review such documentation as is required by the Regulations including Governance Compliance Statement, Funding Strategy Statement and Statement of Investment Principles.
5. Assist with the development of and continually review scheme member and employer communications as required by the Regulations and relevant legislation.
6. Monitor complaints and performance relating to the administration and governance of the scheme.
7. Assist with the application of the Internal Dispute Resolution Process.

8. Review the complete and proper exercise of Pensions Ombudsman cases.
9. Review the implementation of revised policies and procedures following changes to the Scheme.
10. Review the arrangements for the training of Board members and those elected members and officers with delegated responsibilities for the management and administration of the Scheme.
11. Review the complete and proper exercise of employer and administering authority discretions.
12. Review the outcome of internal and external audit reports.
13. Review draft accounts and Fund annual report.
14. Review the compliance of particular cases, projects or process on request of the Committee.
15. Any other area within the statement of purpose (i.e. assisting the Administering Authority) the Board deems appropriate.

The second core function of the Board is to ensure the effective and efficient governance and administration of the Scheme. Within this extent of this core function the Board may determine the areas it wishes to consider including but not restricted to:

1. Assist with the development of improved customer services.
2. Monitor performance of administration, governance and investments against key performance targets and indicators.
3. Review the effectiveness of processes for the appointment of advisors and suppliers to the Administering Authority.
4. Monitor investment costs including custodian and transaction costs.
5. Monitor internal and external audit reports.
6. Review the risk register as it relates to the scheme manager function of the authority.
7. Assist with the development of improved management, administration and governance structures and policies.
8. Review the outcome of actuarial reporting and valuations.
9. Assist in the development and monitoring of process improvements on request of Committee.
10. Assist in the development of asset voting and engagement processes and compliance with the UK Stewardship Code.
11. Any other area within the statement of purpose (i.e. ensuring effective and efficient governance of the scheme) the Board deems appropriate.

In support of its core functions the Board may make a request for information to the Committee with regard to any aspect of the Administering Authority's function. Any such request should be reasonably complied with in both scope and timing.

In support of its core functions the Board may make recommendations to the Committee which should be considered and a response made to the Board on the outcome within a reasonable period of time.

The Board consists of 6 voting members; 3 scheme member representatives, 3 employer representatives and an independent Chair. During 2019/20 the following persons held these posts:

The Pension Committee and the Pension Board were supported during the year by the Strategic Director - Resources (S151 Officer), the Head of Investment, Risk and Commercial Finance, and the Head of Insurance and Pensions Administration. During the year the Investment Adviser and the Fund Actuary attended Board meetings to provide advice, support and training.

Governance Compliance Statement

The Local Government Pension Scheme Regulations 2013 (as amended) require Funds to prepare, publish and maintain a Governance Compliance Statement and to measure their governance arrangements against a set of best practice Principles. The assessment should provide a Statement of “full”, “partial” or “non-compliance”, with further explanation provided for any non or partial compliance. The key issues covered by the best practice principles are:

- Formal committee structure
- Committee membership and representation
- Selection and role of lay members
- Voting rights
- Training, facility time and expenses

The Governance Compliance Statement is shown at Section 11.

Risk Management

Responsibility for the Fund’s risk management strategy sits with the Pension Committee. Significant emerging and persistent risks are recorded in the Pension Fund Risk Register which is reviewed regularly by the Committee. The Register is also reviewed by the Pension Board in its role of assisting the Council with securing compliance with control arrangements. The Register is managed and maintained by the Strategic Director - Resources and reviewed by Internal Audit.

Risks are identified from relevant sources of information such as management reports and from reviews undertaken by independent advisers. The actual scores are recorded in the risk register along with gross and net risk scores (likelihood x impact) that determines the RAG ratings. The net score indicates the exposure arising from a risk after mitigation measures have been applied.

The Fund’s key long-term risk is that assets fall short of liabilities such that there are insufficient assets to pay the pensions to members. Investment objectives are set by the Pension Committee with the aim of maximising long-term investment returns within an agreed risk tolerance level to mitigate this risk.

Investment risk and performance are monitored and reviewed regularly by Council Officers. The Pension Committee reviews investment performance on a quarterly basis supported by the investment adviser, Hymans Robertson.

Third party risks such as non or late payment of contributions is monitored and managed by the Council.

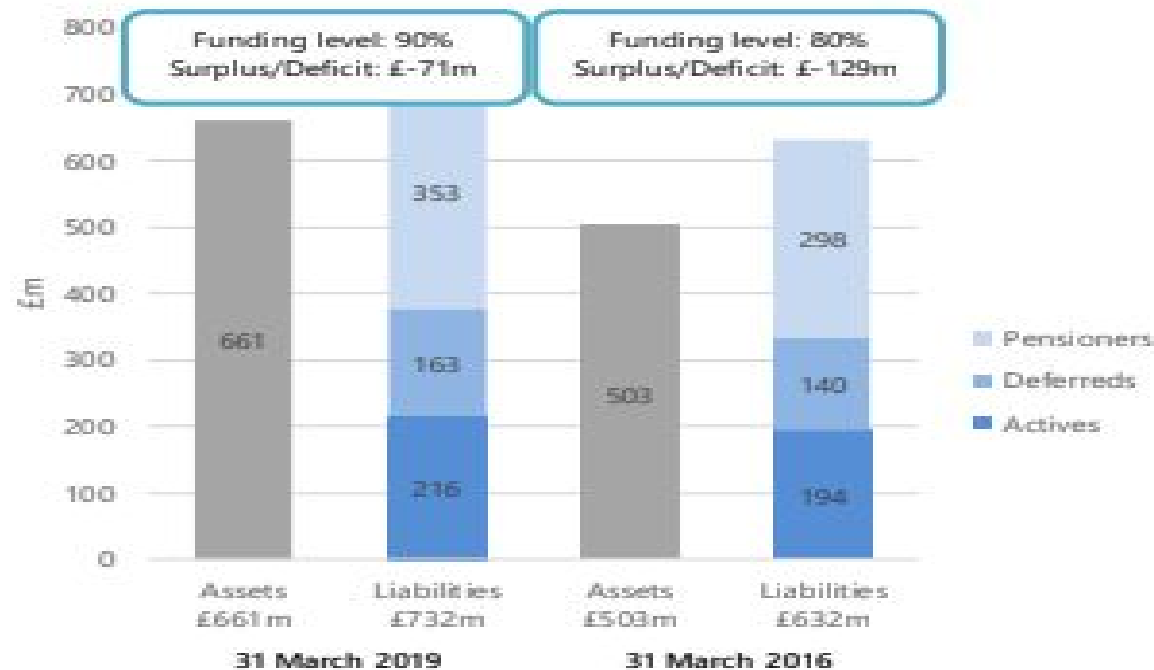
Assurance over the systems operated by the Fund's investment managers and custodian is secured by obtaining relevant documentation, including comfort letters, about their internal control environment.

A formal review of the robustness of the Pension Fund accounting systems is undertaken by the external auditors, Grant Thornton, as part of the annual audit.

8. ACTUARIAL REPORT

The Pension Fund is required by regulations to have an assessment every 3 years of its pension liabilities and the assets available to pay for them. The last triennial valuation took place in 2019 and the results are summarised in the table below. This shows the Fund had a deficit of £71m which represents a funding level of 90%. This compares with a funding level of 80% at the previous valuation in 2016. The full valuation report can be found here:

https://www.sutton.gov.uk/info/200436/customer_services/1752/shared_pension_administration_service/5 . The next valuation is due in 2022.



9. EXTERNAL AUDIT REPORT

Independent auditor's report to the members of London Borough of Sutton on the pension fund financial statements of London Borough of Sutton

Opinion

We have audited the financial statements of London Borough of Sutton Pension Fund (the 'pension fund') administered by London Borough of Sutton (the 'Authority') for the year ended 31 March 2020 which comprise the Fund Account, the Net Assets Statement and notes to the pension fund financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2019/20.

In our opinion, the financial statements:

- give a true and fair view of the financial transactions of the pension fund during the year ended 31 March 2020 and of the amount and disposition at that date of the fund's assets and liabilities,
- have been properly prepared in accordance with the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2019/20; and
- have been prepared in accordance with the requirements of the Local Audit and Accountability Act 2014.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the 'Auditor's responsibilities for the audit of the financial statements' section of our report. We are independent of the Authority in accordance with the ethical requirements that are relevant to our audit of the pension fund's financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

The impact of macro-economic uncertainties on our audit

Our audit of the pension fund financial statements requires us to obtain an understanding of all relevant uncertainties, including those arising as a consequence of the effects of macro-economic uncertainties such as Covid-19 and Brexit. All audits assess and challenge the reasonableness of estimates made by the Strategic Director - Resources and the related disclosures and the appropriateness of the going concern basis of preparation of the financial statements. All of these depend on assessments of the future economic environment.

Covid-19 and Brexit are amongst the most significant economic events currently faced by the UK, and at the date of this report their effects are subject to unprecedented levels of uncertainty, with the full range of possible outcomes and their impacts unknown. We applied a standardised firm-wide approach in response to these uncertainties. However, no audit should be expected to predict the unknowable factors or all possible future implications for a fund associated with these particular events.

Conclusions relating to going concern

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the Strategic Director - Resources' use of the going concern basis of accounting in the preparation of the pension fund's financial statements is not appropriate; or

- the Strategic Director - Resources has not disclosed in the pension fund's financial statements any identified material uncertainties that may cast significant doubt about the Authority's ability to continue to adopt the going concern basis of accounting for the pension fund for a period of at least twelve months from the date when the pension fund's financial statements are authorised for issue.

In our evaluation of the Strategic Director - Resources' conclusions, and in accordance with the expectation set out within the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2019/20 that the pension fund financial statements shall be prepared on a going concern basis, we considered the risks associated with the fund's operating model, including effects arising from macro-economic uncertainties such as Covid-19 and Brexit, and analysed how those risks might affect the fund's financial resources or ability to continue operations over the period of at least twelve months from the date when the financial statements are authorised for issue. In accordance with the above, we have nothing to report in these respects.

However, as we cannot predict all future events or conditions and as subsequent events may result in outcomes that are inconsistent with judgements that were reasonable at the time they were made, the absence of reference to a material uncertainty in this auditor's report is not a guarantee that the fund will continue in operation.

Emphasis of Matter - effects of Covid-19 on the valuation of unquoted investments including property and infrastructure investments

We draw attention to Note 5 of the financial statements, which describes the effects of the Covid-19 pandemic on the valuation of the pension fund's unquoted investments including property and infrastructure investments as at 31 March 2020. As, disclosed in note 5 to the financial statements, the Covid-19 pandemic means property and infrastructure assets held by fund managers as at 31 March 2020 are reported on the basis of 'material valuation uncertainty' as set out in VPGA 10 of the RICS Valuation Global Standards. Consequently, less certainty and a high degree of caution should be attached to the valuations than would normally be the case. Our opinion is not modified in respect of this matter.

Other information

The Strategic Director - Resources is responsible for the other information. The other information comprises the information included in the Statement of Accounts, other than the pension fund's financial statements, our auditor's report thereon and our auditor's report on the Authority's and group's financial statements. Our opinion on the pension fund's financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the pension fund's financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the pension fund's financial statements or our knowledge of the pension fund obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the pension fund's financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Opinion on other matter required by the Code of Audit Practice published by the National Audit Office on behalf of the Comptroller and Auditor General (the Code of Audit Practice)

In our opinion, based on the work undertaken in the course of the audit of the pension fund's financial statements and our knowledge of the pension fund the other information published together with the pension fund's financial statements in the Statement of Accounts, for the financial year for which the financial statements are prepared is consistent with the pension fund's financial statements.

Matters on which we are required to report by exception

Under the Code of Audit Practice, we are required to report to you if:

- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or

- we make a written recommendation to the Authority under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014, in the course of, or at the conclusion of the audit.

We have nothing to report in respect of the above matters.

Responsibilities of the Authority, the Strategic Director - Resources and Those Charged with Governance for the financial statements

As explained more fully in the Statement of Responsibilities set out on page(s) 15 to 16, the Authority is required to make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this authority, that officer is the Strategic Director - Resources. The Strategic Director - Resources is responsible for the preparation of the Statement of Accounts, which includes the pension fund's financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2019/20, for being satisfied that they give a true and fair view, and for such internal control as the Strategic Director - Resources determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the pension fund's financial statements, the Strategic Director - Resources is responsible for assessing the pension fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless there is an intention by government that the services provided by the pension fund will no longer be provided.

The Audit and Governance Committee is Those Charged with Governance. Those charged with governance are responsible for overseeing the Authority's financial reporting process.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the pension fund's financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Use of our report

This report is made solely to the members of the Authority, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 and as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. Our audit work has been undertaken so that we might state to the Authority's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Authority and the Authority's members as a body, for our audit work, for this report, or for the opinions we have formed.

Iain Murray

Iain Murray, Key Audit Partner
for and on behalf of Grant Thornton UK LLP, Local Auditor
London

27 January 2021

10. PENSION FUND ACCOUNTS 2019/20

These show the income and expenditure of the Sutton Local Government Pension Fund in relation to current employees and pensioners, investment transactions and the position of the Fund at year end including future liabilities.

Sutton Pension Fund Account for the year ended 31 March 2020

2018/19			2019/20
£'000		Note	£'000
	Dealings with members, employers and others directly involved in the Fund		
(31,323)	Contributions	7	(32,534)
(16,050)	Transfers in from other pension funds	8	(6,565)
(47,373)			(39,099)
27,193	Benefits	9	27,513
39,334	Payments to and on account of leavers:	10	5,412
66,527			32,925
19,154	Net (additions) / withdrawals from dealings with members		(6,174)
6,308	Management expenses	11	6,015
25,463	Net (additions)/withdrawals including fund management expenses		(159)
	Returns on Investments		
(7,554)	Investment income	12	(9,399)
(52)	Taxes on income	13	45
(40,070)	(Profit) loss on disposal of investments and changes in the market value of investments	14b	33,264
(47,677)	Net Return on Investments		23,910
(22,214)	Net (Increase)/Decrease in the Net Assets Available for Benefits During the Year		23,751
(641,603)	Opening Net Assets of the Scheme		(663,817)
(663,817)	Closing Net Assets of the Scheme		(640,066)

Sutton Pension Fund Net Assets Statement for the year ended 31 March 2020

2018/19		Note	2019/20
£'000			£'000
673,044	Investment Assets	14	632,628
673,044	Total Net Investments		632,628
4,545	Current Assets	20	7,998
(13,772)	Current Liabilities	21	(560)
663,817	Net Assets of the Fund available to fund benefits at the end of the reporting period		640,066

Notes to the Pension Fund

PF Note 1 - Description of the Fund

a) General

The London Borough of Sutton Pension Fund is part of the Local Government Pension Scheme (LGPS) and is administered by the London Borough of Sutton.

The Fund is governed by the Public Service Pensions Act 2013 and is administered under the following regulations:

- the LGPS Regulations 2014 (as amended)
- the LGPS (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended).
- the LGPS (Management and Investment of Funds) Regulations 2016
- the LGPS (Amendment) Regulations 2018

The Scheme is a contributory defined benefits scheme established in accordance with statute, which provides for the payment of benefits to employees and former employees of the London Borough of Sutton and the admitted and scheduled bodies in the Pension Fund.

These benefits include retirement pensions and early payment of benefits on medical grounds and payment of death benefits where death occurs either in service or in retirement.

b) Pension Committee

The Council has delegated oversight of the Fund to the Pension Committee who make recommendations on the investment policy most suitable to meet the liabilities of the Fund. The Committee is made up of six Members of the Council each of whom has voting rights.

The Committee considers the views of the Strategic Director - Resources (S151 Officer) and obtains, as necessary, advice from the Fund's appointed investment advisers, fund managers and actuary. The implementation of these decisions is delegated to the Strategic Director - Resources (S151 Officer).

c) Membership

Although Scheme employers are required to auto enrol employees into the LGPS, membership of the LGPS is voluntary and employees are free to choose whether to remain in the Scheme or to "opt out" and make their own personal arrangements outside the Scheme. Organisations participating in the London Borough of Sutton Pension Fund include:

- Scheduled bodies which are local authorities or other similar bodies whose staff are automatically entitled to be members of the Fund
- 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 a local authority function following outsourcing to the private sector. This includes designated admitted bodies.

PF Note 1 - Description of the Fund (continued)

Member bodies at 31 March 2020 were as follows:

Scheduled Bodies

Sutton Housing Partnership

Academy Schools (x 38)

Admitted Bodies

Citizens Advice Bureau - Sutton Borough

Citizens Advice Bureau - Beddington & Wallington

Sports and Leisure Management Ltd

Community Options (Heritage Care)

Compass Catering (Overton Grange Academy)

Compass Catering (St Philomena's)

Eldercare

Mitie (facilities and security management)

Cognus (formally Sutton Education Service)

Indigo (formerly Vinci Park)

DB Services (previously NVIRO))

Caterlink

Orchard Hill College

Orchard Childcare

Orchard Hill College Academy Trust

Playwise CIC

Ridgecrest Cleaning

Encompass

PF Note 1 - Description of the Fund (continued)

The following table summarises the membership numbers of the scheme:

2018/19		2019/20
No.		No.
55	Number of Employers with active members	58
Active Members		
2,763	London Borough of Sutton	2,856
2,286	Scheduled bodies	2,469
502	Admitted bodies	512
5,551		5,837
Deferred Members		
3,875	London Borough of Sutton	3,935
549	Scheduled bodies	697
121	Admitted bodies	158
4,545		4,790
Pensioners (including Dependents)		
3,689	London Borough of Sutton	3,763
229	Scheduled bodies	282
74	Admitted bodies	89
3,992		4,134
14,088	Total	14,761

PF Note 1 - Description of the Fund (continued)

d) Benefits

Prior to 1 April 2014, pension benefits under the LGPS were based on final pensionable pay and length of pensionable service. From 1 April 2014, the scheme became a career average scheme, whereby members accrue benefits based on their pensionable pay in that year at an accrual rate of 1/49th.

Key details of the scheme's variants are shown in the table below. Accrued pension is uprated annually in line with the Consumer Prices Index.

	Service pre 1 April 2008	Service 1 March 2008 to 31 March 2014	Service post 31 March 2014
Pension	Accrual rate per annum of 1/80th of final pensionable pay	Accrual rate per annum of 1/60th of final pensionable pay	Accrual rate per annum of 1/49th of current year's pensionable pay
Lump sum	Automatic lump sum of 3 x pension. Option to exchange annual pension for tax free lump sum at a rate of £1 pension for £12 lump sum up to a maximum of 25% of total pension pot.	No automatic lump sum. Option to exchange annual pension for tax free lump sum at a rate of £1 pension for £12 lump sum up to a maximum of 25% of total pension pot.	

There are other benefits provided by the LGPS including early retirement, disability pensions and death benefits. Further information is available here - <https://www.sutton.gov.uk/>

e) Funding

The Pension Fund is financed by contributions from employees, employers (including the Council, admitted and scheduled bodies) and from the Fund's investments. 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 ended 31 March 2020. Under the current scheme members can opt for the 50:50 option where they pay half their contributions for half the benefits.

In 2019/20, employer contribution rates ranged from 15.0% to 26.2% of pensionable pay. Employer contribution rates payable from 1 April 2017 were set by the triennial valuation as at 31 March 2016, the results of which were published on 31 March 2017. The Fund excludes teachers, who have a separate Teachers Pensions Scheme managed by the Teachers Pensions Agency. The Fund also excludes those contributing to the NHS Pensions Scheme.

PF Note 2 - Basis Of Preparation

The Statement of Accounts summarises the Fund's transactions for the 2019/20 financial year and its position as at 31 March 2020. The Accounts have been prepared in accordance with the 'Code of Practice on Local Authority Accounting in the United Kingdom 2019/20' (the Code) issued by the Chartered Institute of Public Finance and Accountancy (CIPFA) 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 Accounts summarise the transactions of the Fund and report on the net assets available to pay pension benefits. The Accounts do not provide for 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 IAS 19 basis, is disclosed at Note 19 of these Accounts.

Accruals Concept

Income and expenditure has been included in the Accounts on an accruals basis. The Fund's financial statements do not take account of liabilities to pay pensions and other benefits after the period end. The adequacy of the Fund to pay future pensions and other benefits is reported upon separately in these accounts.

Valuation of Investments

Investments are stated at their market values as at 31 March 2020 and are determined as follows:

- All investments priced within the Stock Exchange Electronic Trading Service (SETS), a Recognised or Designated Investment Exchange or Over-The-Counter market, are valued at the bid-market prices at close of business on the exchange or market on which the investment trades, or at the last trading price recorded.
- Securities which are not covered by the above are valued at their estimated realisable value. Suspended securities are valued initially at the suspended price but are subject to constant review.
- Investments held in foreign currency have been valued on the relevant basis and translated into Sterling at the rate ruling at the balance sheet date.
- Transactions in foreign currency are translated into Sterling at the exchange rate ruling at the time of transaction.

PF Note 3 - Summary of Significant Accounting Policies

Fund account – revenue recognition

a) Contribution Income

Normal contributions, both from members and employers, are accounted for on an accruals basis at the percentage rate recommended by the Fund actuary in the payroll period to which they relate.

Employer's augmentation contributions and pension 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. (Augmentation is the cost of additional membership awarded by an employer).

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.

Individual transfers in or out are accounted for when received or paid, which is normally when the member liability is accepted or discharged. Bulk (group) transfers are accounted for on an accruals basis in accordance with the terms of the transfer agreement.

Transfers in from members wishing to use the proceeds of their additional voluntary contributions

to purchase scheme benefits are accounted for on a receipts basis.

c) Investment income

- Interest income

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

Income includes the amortisation of any discount or premium, transaction costs or other differences between the initial carrying amount of the instrument and its amount at maturity calculated on an effective interest rate basis.

- Dividend income

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

- Distributions from pooled funds

Distributions from pooled funds are recognised at the date of issue and accrued at year end if not received at that time.

- Movement in the net market value of investments

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

d) Benefits payable

Pensions and lump sum benefits 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. Interest 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.

Investment income, Note 12, is shown gross of irrecoverable taxes deducted. The Fund is reimbursed VAT by HM Revenue and Customs, and the accounts are shown exclusive of VAT.

PF Note 3 - Summary of Significant Accounting Policies - Continued

f) Management Expenses

Pension Fund management expenses are accounted for in accordance with the CIPFA guidance *Accounting for Local Government Pension Scheme Management Expenses (2016)*.

- Administrative Expenses

All administrative expenses are accounted for on an accruals basis. All staff costs of the Pension Administration Team are charged direct 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 to the Fund. Associated management and accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund.

- Investment Management Expenses

All investment management expenses are accounted for on an accruals basis. Fees of the external investment managers and custodian are agreed in the respective mandates governing their appointments. Broadly, these are based on the market value of the investments under their management and therefore increase or decrease as the value of these investments change. The cost of obtaining investment advice from external consultants is included here.

Net Assets Statement

g) Financial assets

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 the asset are recognised by the Fund.

h) Actuarial present value of promised retirement benefits

The actuarial present value of promised retirement benefits should be disclosed and based on the requirements of IAS19 Post-Employment Benefits and relevant actuarial standards. As permitted under the Code, the financial statements include a note disclosing the actuarial present value of retirement benefits (Note 19).

i) Additional Voluntary Contributions

The Fund provides an additional voluntary contributions (AVC) scheme for its members, the assets of which are invested separately from the Pension Fund (see Note 22). AVCs are paid to the AVC providers by employers, specifically for providing additional benefits for individual contributors. Each AVC contributor receives an annual statement from the AVC provider company showing the amount held in their account and the movements in- year.

PF Note 4 - Critical Judgements in Applying Accounting Policies

In applying the accounting policies as set out in Note 3 above, the Council has had to make certain critical judgements about complex transactions or those involving uncertainty about future events.

Pension Fund Liability

The Pension Fund liability is calculated every three years by the appointed actuary, with annual updates in the intervening years. The methodology used is within accepted guidelines and in accordance with IAS 19. Assumptions underpinning the valuations are agreed with the actuary and are summarised at Note 18.

This estimate is subject to significant variances based on changes to the underlying assumption.

PF Note 5 - Assumptions Made About The Future And Other Major Sources Of Estimation Uncertainty

The Statement of Accounts contains 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 in the forthcoming year, as follows:

Item	Uncertainties	Effect if Actual Results Differ from Assumptions
Pension Liability	Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on pension fund assets. There is further uncertainty arising from a legal challenge to the Government's transitional arrangements following the public sector pension reforms in 2015. The McCloud case was upheld by the Court of Appeal in December 2018 which found the transitional arrangements to be discriminatory on the grounds of age and gender. The Government was refused appeal to the Supreme Court in June 2019, leaving it for the Scheme Advisory Body to determine how this matter is to be resolved. In July 2020 MHCLG released a further consultation paper outlining potential remedies, but it should be noted that this approach is not yet finalised.	The sensitivity of the net Pension Fund liability to a change in assumptions can be measured. For example a 0.1% increase in the discount rate assumption would result in an approximate reduction of £15m in the Council's pension liability; a one year increase in member life expectancy would increase the liability by approximately £34m and a 0.1% increase in the rate of salary increase would increase the liability by approximately £1m. The potential impact of the McCloud case has been assessed by the Government Actuary Department (GAD) on a national LGPS-wide basis using a range of assumptions about potential remedies.

A firm of consulting actuaries is engaged to provide the Authority with expert advice about the assumptions to be applied.

The Council's actuaries have applied the same assumptions as used in the GAD review to prepare the IAS26 report, and have allowed for a potential increase in pension liabilities of 0.7%, or £7.0m. This figure was calculated before the July 2020 consultation paper was released, but the actuaries believe that the remedies proposed in the consultation paper are in line with the assumptions they used when preparing the IAS26 report, and so do not believe any further adjustment to the allowance is warranted at this time.

Unquoted
investments

The assets held by the Pension Fund include properties and infrastructure assets managed by Fund Managers on a pooled basis. As the assets are unquoted, values are estimated by Fund Managers using comparable market data, indices and data from third parties, as well as projected revenue streams associated with the assets. Due to the Covid-19 pandemic, there was very limited observable or reliable market data relating to property asset transactions at 31 March 2020, and there was significant uncertainty about revenue projections. As a result valuations have been caveated by Fund Managers' valuation teams as being subject to 'material valuation uncertainty'.

The potential impact of this uncertainty cannot be measured accurately. Total property and infrastructure funds held by the Pension Fund are valued at £74.9m, and a 10% change in the valuation of property and infrastructure would therefore equate to a difference of £7.49m in Fund value.

PF Note 6 - Events After The Reporting Period End

The Statement of Accounts was authorised for issue by the Strategic Director - Resources (S151 Officer) on 15 July 2020. At this date there was one non-adjusting event to report:

The value of the investments of the Fund at 31 May 2020 show an increase from £632.6m to £707.1m. This is an increase of £74.5m or 11.8%.

PF Note 7 - Contributions Receivable

Employees' contributions are calculated on a sliding scale based on a percentage of their gross pay. The Council, scheduled and admitted bodies are required to make contributions determined by the Fund's actuary to maintain solvency of the Fund. The table below shows a breakdown of the total amount of employers' and employees' contributions.

By Category

2018/19		2019/20
£'000		£'000
(6,072)	Employees' contributions	(6,555)
	Employers' contributions	
(18,565)	Normal Contributions	(17,721)
(5,933)	Deficit Recovery Contributions	(8,092)
(753)	Augmentation contributions	(166)
(25,251)		(25,979)
(31,323)		(32,534)

By Authority

2018/19		2019/20
£'000		£'000
(20,736)	London Borough of Sutton	(18,777)
(7,532)	Scheduled bodies	(10,639)
(3,055)	Admitted bodies	(3,118)
(31,323)		(32,534)

PF Note 8 - Transfers In From Other Pension Funds

2018/19		2019/20
£'000		£'000
(4,932)	Individual transfers	(6,565)
(11,118)	Group transfers	-
(16,050)		(6,565)

During the year ended 31 March 2020, no group transfers were received into the Fund.

During the year ended 31 March 2019, the following group transfers were receivable from the Royal Borough of Kingston upon Thames:

- In respect of the transfer of the Shared Finance Service, estimated at £9.6m
- In respect of the transfer of the Customer Contact Centre, estimated at £1.5m

PF Note 9 - Benefits Payable

The tables below show a breakdown of the total amount of benefits payable by category and by authority:

By Category

2018/19		2019/20
£'000		£'000
22,023	Pensions	22,926
4,709	Commutation and Lump sum retirement benefits	3,884
461	Lump sum death benefits	703
27,193		27,513

By Authority

2018/19		2019/20
£'000		£'000
23,895	London Borough of Sutton	23,996
2,445	Scheduled bodies	2,410
853	Admitted bodies	1,107
27,193		27,513

PF Note 10 - Payments To And On Account Of Leavers

2018/19		2019/20
£'000		£'000
124	Refunds to members leaving service	154
35,189	Group transfers	-
4,021	Individual transfers	5,258
39,334		5,412

During the year ended 31 March 2020, no group transfers were paid out of the Fund

During the year ended 31 March 2019, there were four transfers payable from the London Borough of Sutton:

- In respect of the transfer of Human Resources to Merton, estimated at £5.4m
- In respect of the transfer of Human Resources to Kingston, estimated at £7.7m
- In respect of the transfer of Highways to Kingston, estimated at £8.9m
- In respect of the transfer of Carshalton College, estimated at £13.2m

PF Note 11 - Management Expenses

2018/19		2019/20
£'000		£'000
507	Administration Expenses	815
5,661	Investment Management Expenses	4,881
140	Oversight and Governance	319
6,308		6,015

The above table includes audit costs within Oversight and Governance which total £16,170 in 2018/19 (£21,000 in 2017/18)

PF Note 11a - Investment Management Expenses

Investment Management Expenses are further analysed below in line with CIPFA Guidance on Accounting for Management Costs in the LGPS.

2018/19		2019/20
£'000		£'000
4,197	Management Fees	3,213
250	Performance Fees	209
96	Custody Fees	37
1,118	Transaction Costs	1,422
5,661		4,881

PF Note 12 - Investment Income

2018/19		2019/20
£'000		£'000
	Pooled Investments:	
(3,027)	- Equities	(3,784)
(1,940)	- Fixed Income	(2,159)
(1,648)	- Property	(1,910)
(836)	- Other	(1,526)
(104)	Interest on Cash Deposits	(18)
(7,554)		(9,399)

PF Note 13 - Taxes On Income

2018/19		2019/20
£'000		£'000
(52)	Withholding tax - pooled	45
(52)		45

PF Note 14 - Investments

2018/19	Investment Assets	2019/20
£'000		£'000
	Pooled Investment Vehicles - UK:	
33,810	Equities	27,897
108,501	Fixed Income - Public Sector	107,708
31,792	Fixed Income - Corporate	26,077
41,210	Property	39,449
328	Credit	-
5,280	Other*	10,475
	Pooled Investment Vehicles - Overseas:	
368,458	Equities	339,555
22,438	Fixed Income - Public Sector	13,433
22,596	Fixed Income - Corporate	26,671
14,668	Property	14,870
22,841	Infrastructure	25,048
	Other Investment Balances:	
150	London CIV share capital	150
940	Cash deposits	1,266
31	Accrued income and recoverable taxes	31
673,044	Total Net Investment Assets	632,628

*Other includes absolute return, commodities and insurance linked assets within the Fund's holding in Baillie Gifford.

PF Note 14a - Analysis of Pooled Investment Vehicles

Pooled Investment Vehicles:			Other managed funds:				
2019/20	Unit trusts	Unitised insurance policies	OEIC	SICAV	Insurance contract	Partnership	Total
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Equities	328,217	39,235					367,453
Fixed Income	40,252	36,110	48,067		49,459		173,887
Property	39,306			15,013			54,319
Infrastructure				25,048			25,048
Credit						-	-
Other	10,475						10,475
	418,250	75,345	48,067	40,061	49,459	-	631,182

Pooled Investment Vehicles:			Other managed funds:				
2018/19	Unit trusts	Unitised insurance policies	OEIC	SICAV	Insurance contract	Partnership	Total
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Equities	360,412	41,856					402,268
Fixed Income	51,403	35,279	48,500		50,144		185,327
Property	40,845			15,033			55,879
Infrastructure				22,841			22,841
Credit						328	328
Other	5,280						5,280
	457,941	77,135	48,500	37,874	50,144	328	671,923

PF Note 14b - Reconciliation of Movements In Investments`

2019/20	Value 31 March 2019	Purchases at Cost	Sales Proceeds	Change in Market Value	Value 31 March 2020
	£'000	£'000	£'000	£'000	£'000
Pooled Investment Vehicles:					
- Equities	403,069	17,816	(28,496)	(25,794)	366,596
- Fixed Income	183,871	32,238	(31,158)	(3,616)	181,336
- Property	55,985	356	(234)	(2,661)	53,445
- Infrastructure	22,841	2,800	(603)	9	25,048
- Credit	328	-	(332)	4	0
- Other	5,978	319	(188)	(1,203)	4,906
Sub-total Investments	672,073	53,529	(61,010)	(33,261)	631,332
Other Investment Balances:					
Cash deposits	940			0	1,266
Accrued income and recoverable taxes	31			(3)	31
Net Investment Assets	673,044			(33,264)	632,628

PF Note 14b - Reconciliation of Movements In Investments - continued

2018/19	Value 31 March 2018	Purchases at Cost	Sales Proceeds	Change in Market Value	Value 31 March 2019
	£'000	£'000	£'000	£'000	£'000
Pooled Investment Vehicles:					
- Equities	404,029	81,605	(114,393)	31,829	403,069
- Fixed Income	143,920	35,940	(1,292)	5,304	183,871
- Property	54,925	368	(490)	1,182	55,985
- Infrastructure	15,729	7,275	(1,932)	1,769	22,841
- Credit	435	-	(103)	(4)	328
- Other	5,922	111	(71)	16	5,978
Sub-total Investments	624,959	125,299	(118,281)	40,095	672,073
Other Investment Balances:					
Cash deposits	5,497			(10)	940
Accrued income and recoverable taxes	94			(15)	31
Net Investment Assets	630,550			40,070	673,044

PF Note 14c - Investments Analysed By Fund Manager

The market value of the investment assets under the management of each fund manager as at 31 March 2020 is shown below. The Fund's major investments representing more than 5% of net investment assets are also identified in the table.

31 March 2019			31 March 2020	
Market Value	% of total	Fund Manager	Market Value	% of total
£'000	%		£'000	%
Investments managed by London Collective Investment Vehicle				
43,603	6.5%	Pyrford - LCIV Global Total Return Fund	42,270	6.8%
47,165	7.0%	Baillie Gifford - LCIV Diversified Growth Fund	42,538	6.7%
112,263	16.7%	Newton - LCIV Global Equity Fund	103,658	16.4%
203,031	30.2%		188,466	29.9%
Investments managed outside of London Collective Investment Vehicle				
101,192	15.0%	Schroder Life QEP Global Active Value Fund	84,349	13.4%
116,940	17.4%	Harding Loevner Funds Plc Global Equity Fund	110,664	17.5%
41,856	6.2%	Legal & General All World Equity Index Fund	39,235	6.3%
35,279	5.2%	Legal & General Over 5 Year Index Linked Gilts Fund	36,110	5.7%
48,500	7.2%	M&G Alpha Opportunities Fund	48,067	7.6%
50,144	7.5%	M&G PP Index Linked Fund	49,459	7.8%
445	0.1%	M&G UK Companies Financing Fund LP	-	0.0%
13,123	2.0%	LaSalle Investors UK Real Estate Fund of Funds	12,569	1.9%
24,144	3.6%	BlackRock UK Property Fund	22,202	3.5%
15,033	2.2%	Invesco Real Estate UK Residential Fund SCSp	15,013	2.4%
23,206	3.4%	Partners Group Direct & Global 2015 S.C.A., SICAV-SIF & Global 2012 S.C.A., SICAR	25,048	4.0%
469,863	69.8%		442,716	70.1%
672,894	100.0%	Total	631,182	100.0%

PF Note 15 - Fair value – basis of valuation

The basis of the valuation of each class of investment asset is in accordance with the guidance contained in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom (the Code). Asset and liability valuations are classified into three levels, according to the quality and reliability of information used to determine fair values. The investment assets of the Pension Fund are classed, as set out in the table below.

The valuation of financial instruments has been classified into three levels, according to the quality and reliability of information used to determine fair values.

Level 1

Fair values are derived from unadjusted quoted prices in active markets for identical assets or liabilities. Products classified as level 1 comprise quoted equities, quoted fixed securities, quoted index linked securities and unit trusts. Listed investments are shown at bid prices. The bid value of the investment is based on the bid market quotation of the relevant stock exchange. Cash and short term investment debtors and creditors are classified as level 1.

Level 2

Quoted prices are not available and valuation techniques use inputs that are based significantly on observable market data. Investment assets classified at level 2 are those where quoted market prices are not available; for example, where an investment is traded in a market that is not considered to be active, or where valuation techniques are used to determine fair value and where these techniques use inputs that are based significantly on observable market data.

Level 3

At least one input that could have a significant effect on valuation is not based on observable market data. Financial instruments 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, and are valued using various valuation techniques that require significant judgement in determining appropriate assumptions. They include private equity and infrastructure investments. Assurances over the valuations are gained from the independent audit of the accounts.

Description of asset	Valuation hierarchy	Basis of valuation	Observable and unobservable inputs	Key sensitivities affecting the valuations provided
Market quoted investments	Level 1	Recognised at market value	Not required	Not required
Market quoted investments - pooled equity and bond funds	Level 1	Published bid market price on final day of the accounting period	Not required	Not required
Pooled investments - equity and bond funds	Level 2	Closing bid price where bid price published. Closing single price where single price published	NAV based pricing set on a forward pricing basis. Evaluated price feeds	Not required
Pooled investments - UK and overseas property funds	Level 3	Closing bid price where bid price published	NAV based pricing set on a forward pricing basis	Valuations could be affected by material events occurring between reporting date and 31/03/20
Pooled investments - infrastructure fund and loans to companies fund	Level 3	Discounted cashflow method	Projected cashflow information based on agreed investment terms and expected growth rates	Valuations could be affected by material events occurring between reporting date and 31/03/20

PF Note 15a - Fair value hierarchy

31 March 2019					31 March 2020			
Quoted Market Price	Using Observabl e Inputs	With Significant Unobservabl e Inputs	Total		Quoted Market Price	Using Observabl e Inputs	With Significant Unobservabl e Inputs	Total
Level 1	Level 2	Level 3			Level 1	Level 2	Level 3	
£'000	£'000	£'000	£'000		£'000	£'000	£'000	£'000
Pooled Investment Vehicles:								
130,740	271,528	-	402,268	Equities	214,322	153,131	-	367,453
29,802	155,525	-	185,327	Fixed Income		173,887	-	173,887
-	4,039	51,840	55,879	Property	-	4,535	49,784	54,319
-	-	22,841	22,841	Infrastructure	-	-	25,048	25,048
-	-	328	328	Credit	-	-		-
-	5,280	150	5,430	Other	-	10,475	150	10,625
160,542	436,372	75,159	672,073	Financial Assets at fair value through profit and loss	214,322	342,028	74,982	631,332

PF Note 15b: Reconciliation Of Fair Value Measurements Within Level 3

2019/20	Value 31 March 2019	Transfers into Level 3	Transfers out of Level 3	Purchases at Cost	Sales Proceeds	Change in Market Value	Value 31 March 2020
	£'000			£'000	£'000	£'000	£'000
Pooled Investment Vehicles:							
- Property	51,840	-	-	218	(153)	(2,121)	49,783
- Private Equity/Infrastructure	22,841	-	-	3,400	(603)	(591)	25,048
- Credit	327	-	-	-	(332)	4	(0)
- Other	150	-	-	-	-	-	150
Total	75,159	-	-	3,618	(1,087)	(2,708)	74,982

2018/19	Value 31 March 2018	Transfers into Level 3	Transfers out of Level 3	Purchases at Cost	Sales Proceeds	Change in Market Value	Value 31 March 2019
	£'000			£'000	£'000	£'000	£'000
Pooled Investment Vehicles:							
- Property	50,824	-	-	284	(439)	1,171	51,840
- Private Equity/Infrastructure	15,729	-	-	7,275	(1,932)	1,769	22,841
- Credit	434	-	-	-	(103)	(4)	327
- Other	150	-	-	-	-	-	150
Total	67,138	-	-	7,559	(2,474)	2,936	75,159

PF Note 16a - Classification of financial instruments

2018/19			2019/20		
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
£'000	£'000	£'000	£'000	£'000	£'000
<u>Financial Assets</u>					
Pooled Investment Vehicles:					
402,268	-	-	Equities	367,453	-
185,327	-	-	Fixed income	173,887	-
55,879	-	-	Property	54,319	-
22,841	-	-	Infrastructure	25,048	-
328	-	-	Credit	-	-
5,430	-	-	Other*	10,625	-
	4,168	-	Cash deposits		7,918
	1,347	-	Sundry debtors		800
672,073	5,516	-	631,332	8,718	-
<u>Financial Liabilities</u>					
-	-	(13,772)	Creditors	-	16
-	-	(13,772)		-	16
672,073	5,516	(13,772)	Total	631,332	16

*Other includes absolute return, commodities, insurance linked securities and investment in the London CIV

PF Note 16b - Net gains and losses on financial instruments

2018/19		2019/20
£'000		£'000
	Financial Assets	
40,095	Designated at fair value through profit and loss	(33,261)
(25)	Designated at amortised cost	(3)
40,070		(33,264)

PF Note 17 - Nature and extent of risks arising from financial instruments

Key risks

The Pension Fund's activities expose it to a variety of financial risks:

- market risk – the possibility that financial loss might arise for the Pension Fund as a result of changes in such measures as interest rates and stock market movements.
- credit risk – the possibility that other parties might fail to pay amounts due to the Pension Fund.
- liquidity risk – the possibility that the Pension Fund might not have funds available to meet its commitments to make payments.

Overall Procedures for Managing Risk

The Pension Fund's overall risk management procedures focus on the unpredictability of financial markets, and are structured to implement suitable controls to minimise these risks. The procedures for risk management are set out through a legal framework in the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2013 and the associated regulations. These regulations set out permissible financial instruments, require the Administering Authority to maintain and invest on behalf of the Pension Fund in accordance with its investment principles, to take professional advice, to review investment performance and to operate a separate Pension Fund bank account. Overall these procedures

require the Administering Authority to manage Pension Fund risk by maintaining and investing in accordance with a:

- Investment Strategy Statement;
- Funding Strategy Statement;
- Statement of Governance Policy;
- Governance Compliance Statement.

The Pension Fund Investment Strategy is reviewed at least triennially following actuarial valuation by the Pension Fund Panel who monitor investment performance and compliance quarterly, including the internal control arrangements of external fund managers and the custodian.

PF Note 17 - Nature and extent of risks arising from financial instruments - continued

a) Market risk

Market risk is the risk of loss from fluctuations in equity, bond 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.

In general, excessive volatility in market risk is

managed through the diversification of the portfolio in terms of asset classes, geographical and industry sectors and individual securities. To mitigate market risk, the Council and its investment advisors undertake appropriate monitoring of market conditions and benchmarking analysis.

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 are caused by factors specific to the individual instrument or its issuer or

factors affecting all such instruments in the market. The Fund is exposed to share and derivative price risk. This arises from investments held by the Fund for which the future price is uncertain. All securities investments present a risk of loss of capital. 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, is 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 investment strategy.

Other price risk – sensitivity analysis

Potential price changes are determined based on the observed historical volatility of asset class returns. 'Riskier' assets such as equities will display greater potential volatility than bonds as an example. The potential volatilities are consistent with a one standard deviation movement in the change in value of the assets over the last three years. Had the market price of the Fund 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 shown in the table below.

purpose of obtaining a return on investments. These investments are subject to interest rate risks, which represent the risk that the fair value or 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 advisors 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.

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

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

Interest rate risk

The Fund invests in financial assets for the primary

Currency risk – sensitivity analysis

Following analysis of historical data, the council considers the likely volatility associated with foreign exchange rate movements to be 10.0%. This analysis assumes that all other variables, in particular interest rates, remain constant.

The following table summarises the Fund's currency exposure as at 31 March 2020, along with the impact that a 10.0% strengthening / weakening of the pound against the various currencies in which the Fund holds investments would have on the values. The value on increase and value on decrease for an individual currency exposure is calculated with reference to that currency's volatility, relative to GBP, over the three years to March 2020. Because currency changes are not necessarily correlated it is not appropriate to sum the outputs from each currency. In calculating the increase and decrease at a total fund level, it is necessary to establish the change in value of the aggregate of currencies held. It is this change that is applied to the overall currency exposure.

Value as at 31/03/2019	Value on 10% price increase	Value on 10% price decrease	Currency Exposure - Asset Type	Value as at 31/03/2020	Value on 10% price increase	Value on 10% price decrease
£'000	£'000	£'000		£'000	£'000	£'000
368,458	405,304	331,612	Overseas equities	339,555	373,511	305,600
45,034	49,537	40,530	Overseas fixed income	40,103	44,114	36,093
14,668	16,135	13,202	Overseas property	14,870	16,357	13,383
22,841	25,125	20,557	Overseas infrastructure	25,048	27,553	22,543
451,001	496,101	405,901	Total assets available to pay benefits	419,577	461,535	377,619

Other Price Risk -Sensitivity Analysis

Value as at 31/03/2019	Change +/-	Value on increase	Value on decrease	Asset Type	Value as at 31/03/2020	Change +/-	Value on increase	Value on decrease
£'000	%	£'000	£'000		£'000	%	£'000	£'000
402,268	16.8	469,849	334,687	Equities	367,453	28.0	470,339	264,566
185,327	9.5	202,933	167,721	Fixed income	173,887	8.5	188,668	159,107
55,879	14.3	63,869	47,888	Property	54,319	14.6	62,249	46,388
22,841	15.9	26,473	19,209	Infrastructure	25,048	15.6	28,956	21,141
328	0.5	330	326	Credit	-	0.3	-	-
940	0.5	944	935	Cash	1,266	0.3	1,269	1,262
5,461	9.1	5,958	4,964	Other	10,656	9.7	11,690	9,623
673,044		770,356	575,730	Total	632,628		763,171	502,087

PF Note 17 - Nature and extent of risks arising from financial instruments - continued

b) Credit risk

Credit risk represents the risk that the counterparty to a transaction or a financial instrument will fail to discharge an obligation and cause the Fund to incur a financial loss. The market values of investments generally reflect an assessment of credit in their pricing and consequently the risk of loss is implicitly provided for in the carrying value of the Fund's financial assets and liabilities. In essence the Fund's entire investment portfolio is exposed to some form of credit risk. 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 Pension Fund has selected bond managers who have an investment strategy which requires investment only in high investment grade and collateralised products and who use research and market knowledge to minimise exposure to credit risk. The Pension Fund uses a custodian to ensure that all money due is paid in full and on time. Internally invested cash is placed in a special interest bearing account with the Council's bankers.

c) Liquidity risk

Liquidity risk represents the risk that the Fund will not be able to meet its financial obligations as they fall due. The Council therefore takes steps to ensure that the Pension Fund has adequate cash resources to meet its commitments. This will particularly be the case to meet the pensioner payroll costs; and also cash to meet investment commitments. The Pension Fund currently remains cash flow positive with contributions exceeding payable pensions, though this is regularly monitored. The Council has immediate access to a proportion of its Pension Fund cash holdings, as these are held in an instant access special interest bearing account maintained by Council officers. The remainder is invested in fixed term deposits taking into account likely future cash flows. Surplus funds are invested externally with fund managers. In the event of a funding shortfall the LGPS regulations permit the administering authority to borrow on behalf of the Pension Fund for up to 90 days. If required, funds can also be called back from investment managers to meet liabilities.

PF Note 18 - Funding arrangements

Rates of contributions paid by the participating Employers during 2019/20 were based on the actuarial valuation carried out as at 31 March 2016 while rates payable from 1 April 2020 to 31 March 2023 are based on the actuarial valuation carried out as at 31 March 2019 by the Fund's actuary, Barnet Waddington.

The following table shows a summary of the results of the valuation:

Past Service Position	31/03/2019
	£m
Past Service Liabilities	(732)
Market Value of Assets	661
Surplus (Deficit)	(71)
Funding Level	90%

Financial Assumptions	31/03/2019
	Nominal
Discount Rate	4.7%
Salary Increases	3.6%
Pension Increases	2.6%

Contribution Rates	
Employer Future Service Rate	19.2%
Past service adjustment (21 year spread)	6.6%
Total Employer Contribution Rate	25.8%

The majority of employers participating in the Fund pay different rates of contributions depending on their past experience, their current staff profile, and the recovery period agreed with the Administering Authority. Their contribution rates are calculated taking account of the Fund's funding strategy as described in the Funding Strategy Statement, and for the majority of employers using the projected unit actuarial method.

The rates of contributions payable by each participating employer over the period 1 April 2020 to 31 March 2023 are set out in a certificate dated 31 March 2019 which is appended to the actuary's report on the actuarial valuation. For those bodies which have become separate employers within the Fund since the valuation date, their contribution rates have been calculated individually and certified by the Fund's actuary. Revised contribution rates will apply from 1 April 2023, based on the actuarial valuation as at 31 March 2022.

PF Note 19 - Actuarial present value of promised retirement benefits

CIPFA's Code of Practice requires the disclosure for the year ending 31 March 2020, of the actuarial valuation of promised retirement benefits as set out in IAS26, and that the actuarial present value should be calculated on an IAS 19 basis.

IAS26 is the accounting standard that sets out the requirements for accounting and reporting in respect of retirement and the requirements for accounting and reporting of promised retirement benefit plans following the move to financial reporting of the Pension Fund Accounts under the International Financial Reporting Standards (IFRS).

31 March 2019		31 March 2020
£'000		£'000
(1,074,915)	Actuarial Fair Value of Promised retirement benefits	(996,923)
663,817	Net Fund Assets available to fund benefits	631,450
(411,098)	Net Liability	(365,473)

PF Note 20 - Current assets

Restated for 2018-19

31 March 2019		31 March 2020
£'000		£'000
1,231	Contributions	1,321
85	Other debtors	24

2,914	Current receivables	5,609
315	Cash at Bank	1,044
4,545	Total Current Assets	7,998

PF Note 21 - Current liabilities

31 March 2019		31 March 2020
£'000		£'000
(35)	Refund of contributions	(8)
(313)	Unallocated contributions	-
(13,424)	Other Creditors	(552)
(13,772)	Total Current Liabilities	(560)

Other creditors as at 31 March 2019 includes £13.1m accrual for Carshalton College bulk transfer.

PF Note 22 - Additional voluntary contributions

A number of active Fund members have elected to pay additional voluntary contributions to increase their personal benefits. Regulation 4(1) (b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 require that these are not paid into the Pension Fund.

The total AVCs paid by members in 2019/20 were £98k (£109k in 2018/19), as below:

31 March 2019		31 March 2020
£'000		£'000
109	Clerical Medical	98
109		98

These are invested with the Council's approved AVC providers and are money purchase arrangements. At 31 March 2020, the total estimated value of the AVC funds with Clerical Medical and Utmost was £632k (£762k at 31 March 2019).

PF Note 23 - Related party transactions

The Council is a related party to the Fund and in accordance with the regulations the Council's expenses in administering the Scheme are charged to the Fund. The amount charged by the Council for 2019/20 was £524,197 (£395,312 in 2018/19)

Two of the Councillors voting on the Pension Committee are members of the Pension Fund.

The key management personnel for the Pension Fund are the same as for the Council as a whole. Their costs have been reasonably apportioned between the Pension Fund Accounts and the Authority's Accounts, and are within scheme administration and investment management expenses as above. The costs of the Strategic Director - Resources (S151 Officer) cannot reasonably be apportioned in this way. Extra disclosure can be seen in the Authority's accounts under the notes related to Senior Officers remuneration and Related Party Transactions.

PF Note 24 - Contingent liabilities and contingent assets

The Fund has a contingent liability in respect of a guarantee provided to the City of London Pension Fund for the pension liabilities of the London CIV. There are no known material contingent assets as at 31 March 2020. There are no outstanding contractual commitments and no material relating non-adjusting events occurring subsequent to the period end.

11. GOVERNANCE COMPLIANCE STATEMENT

1. Summary

Regulation 55(1) of the Local Government Pension Scheme Regulations 2013 (SI2014-1146) requires the Administering Authority (Sutton Council) to maintain a statement, which assesses the pension fund governance arrangements against guidance from the Secretary of State, and to make revisions to the statement following a material change in the arrangements. Part 1 of this statement relates to the arrangements for pension fund administration. Part 2 relates to the arrangements for the Local Pension Board, a stand-alone body. By producing such a statement (shown below) the Administering Authority is compliant with the legislation from the Secretary of State; however the statement does show that there are two areas where best practice is not met. These areas relate to the inclusion of scheme representatives on the Pension Committee.

Part 1: Pension fund administration

2. Delegation to the pension committee

Guidance:	Assessment:
2.1 The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.	Compliant - This is discharged through a formal decision-making committee, the Pension Committee.

Guidance:	Assessment:
2.2 Representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.	Non Compliant - Under the best practice guidance issued by MHCLG, scheme member representatives may be included as members of the Pension Committee. There are currently no scheme representatives on the Pension Committee. However scheme representatives are included within the Pension Board.
2.3 Where a secondary committee or panel has been established the structure ensures effective communication across both levels.	Not applicable as there is currently no secondary committee or panel.
2.4 Where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel.	Not applicable as there is currently no secondary committee or panel.

3. Committee membership and representation

Guidance:	Assessment:
3.1 All key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include employing authorities, scheme members, independent professional observers, and expert advisors.	Non Compliant - See comments under 2.2 above. All key stakeholders are represented on the Pension Board.
Guidance:	Assessment:
3.2 Where lay members sit on a main or secondary committee, they are treated equally in terms of access to papers and meetings, training and are given full opportunity to contribute to the decision making process, with or without voting rights.	Not applicable as there are currently no such members.

3.3 Committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee.	Compliant - Members receive induction training and further training to enable them to fulfil their roles and responsibilities. An annual training plan ensures that any knowledge and skill gaps are filled.
3.4 At the start of any meeting, committee members are invited to declare any financial or pecuniary interest related to specific matters on the agenda.	Compliant - Members receive briefings and training including the need to declare at the start of any meeting any financial or pecuniary interest related to specific matters on the agenda.

4. Voting

Guidance:	Assessment:
4.1 The policy of individual administering authorities on voting rights is clear and transparent, including the justification for not extending voting rights to each body or group represented on main LGPS committees.	Compliant - The policy on voting rights is clear and transparent. All elected members on the Pension Committee have equal voting rights. All member or employer representatives on the Pension Board have equal voting rights.

5. Training / facility time / expenses

Guidance:	Assessment:
5.1 In relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process.	Compliant - The Committee and the Board have adopted the CIPFA Knowledge and Skills Framework and an annual training plan for each body exists. Members have equal access to training and reimbursement of expenses to enable them to fulfil their roles and responsibilities.

5.2 That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum.	Compliant - As above.
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6. Meetings (frequency/ quorum)

Guidance:	Assessment:
6.1 An administering authority's main committee or committees meet at least quarterly.	Compliant - The Pension Committee meets with a quorum at quarterly intervals as required by its terms of reference.
6.2 An administering authority's secondary committee or panel meets at least twice a year and is synchronised with the dates when the main committee sits.	Not applicable as there is currently no secondary committee or panel.
Guidance:	Assessment:
6.3 An administering authority who do not include lay members in their formal governance arrangements, provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.	Compliant - All key stakeholders are represented on the Pension Board.

7. Access

Guidance:	Assessment:
7.1 Subject to any rules in the Council's Constitution, all members of main and secondary committees or panels have equal access to committee papers, documents and advice that falls to be considered at meetings of the main committee.	Compliant - All members have equal access to papers, documents and advice.

8. Scope

Guidance:	Assessment:
8.1 Administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.	Compliant - Under the Pension Committee's terms of reference it can consider any matter relevant to the Pension Fund. Wider scheme issues are evident in policy statements.

9. Publicity

Guidance:	Assessment:
9.1 Administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the Scheme is governed can express an interest in wanting to be part of those arrangements.	Compliant - The Governance Policy and Communications Policy are published on the Council's web site along with details of planned meetings of the Pension Committee that are open to stakeholders.

Part 2: Arrangements for the local pension board

10. Functions of the Board

Guidance:	Assessment:
10.1 The terms should set out the function of the Board i.e. to assist the Administering Authority to secure compliance and ensure the effective and efficient governance and administration of the LGPS.	Compliant - This is clearly set out in the Pension Board Functions.

11. Membership

Guidance:	Assessment:
11.1. The terms should include the number of each category of Board member (including other representatives), the appointment and selection process, term of office and procedures for termination of office.	Compliant - The Pension Board consists of 7 members and is constituted as follows: · 3 Scheme employer representatives · 3 scheme member representatives · 1 Independent member selected by the Administering Authority Person specifications and job descriptions exist for each role. Vacancies are publicised. Officers from the Administering Authority assess each candidate's statement against the Person Specification and form a shortlist of suitable candidates. If there are more than 3 suitable candidates for each vacancy then a ballot will be held. Representatives serve for a fixed two year term which can be extended subject to re-nomination. Termination occurs automatically at the expiry of a term. Other than ceasing to be eligible a Board member may only be removed from office during a term by the unanimous agreement of all of the other Board members. The removal of the independent member requires the consent of the Scheme Manager.

12. Code of conduct

Guidance:	Assessment:
12.1. The terms should refer to the requirement for the Local Pension Board to have a code of conduct for its members and that members of the Board should abide by the code.	Compliant - Board members are subject to the code of conduct for Board members.

13. Voting rights

Guidance:	Assessment:
13.1. The terms should: set out that employer and member representatives of the Board have equal voting rights; indicate where the chair is from either the employer or member representatives whether the chair has a casting vote; and note that other members do not have voting rights on the Board.	Compliant - The Board consists of 6 voting members, as follows: 3 Member Representatives; and 3 Employer Representatives. There is an equal number of Member and Employer Representatives and 1 independent Chair who is not entitled to vote.

14. Conflict of interests

Guidance:	Assessment:
14.1. The terms should refer to the requirement for the Board to always act within the terms of reference. The Local Pension Board should have a conflicts policy for its members and that members should abide by the policy and provide information that the Administering Authority may reasonably require from time to time to ensure that members do not have a conflict of interest.	Compliant – The terms provide the purpose, scope and administrative procedures for the Board and requires the Board at all times to act in a reasonable manner in the conduct of its purpose and abide by the conflicts policy and code of conduct. All members of the Board must declare on appointment and at any such time as their circumstances change, any potential conflict of interest arising as a result of their position on the Board.

15. Appointment of a chair / vice-chair

Guidance:	Assessment:
15.1. The terms should specify whether the Board is to have a chair and/or vice-chair and if so specify the roles, including administrative and leadership responsibilities, and how they are appointed.	Compliant – The terms cover the appointment of an independent chair and a vice chair and their responsibilities.

16. Role of advisers

Guidance:	Assessment:
16.1. The terms should set out the role of professional advisers, or other advisers to the Board and the process for their appointment and agreeing their fees. In addition the process for the Board accessing existing advisers to the Administering Authority should also be set out.	Compliant - The Board may be supported through the appointment of advisers and can consult with such advisers to the Board and on such terms as it shall see fit within the budget for the Board that is met from the Fund. The Chair is required to notify the Administering Authority of any proposed use of the existing advisers to the Pension Committee or of the intention to consult with other advisers.

17. Role of officers

Guidance:	Assessment:
17.1. The terms should set out the role of officers of the Administering Authority to the Board, for example in the provision of secretariat services to the Board or providing pension fund information to the Board.	Compliant – The role of officers is to provide support to the Board. This includes finance, pension administration and secretarial support.

18. Administration of meetings including data protection

Guidance:	Assessment:
18.1. The terms should include the notice period of Board meetings, the circulation of papers in advance of meetings, the decision making process, recording minutes of meetings, a procedure for dealing with urgent items of business and the publication of information.	Compliant – The Board meets as a minimum 3 times each year. The Chair of the Board with the consent of the Board membership may call additional meetings. The agenda notice and supporting papers must be issued at least 5 clear working days in advance of a meeting except in the case of matters of urgency. Any urgent items of business must be agreed by the Chair and be of such matter that cannot wait until the next ordinary meeting. The Board seeks to reach consensus and decisions are put to a vote when it cannot be reached. Draft minutes of each meeting must be circulated to all Board members within 10 working days after the meeting. Draft minutes are then subject to formal agreement by the Board at their next meeting. The minutes may, with the agreement of the Board, be edited to exclude items on the grounds that they would either involve the likely disclosure of exempt information as specified in Part 1 of Schedule 12A of the Local Government Act 1972 or it being confidential for the purposes of Section 100A(2) of that Act and/or they represent data covered by the Data Protection Act 2018.

19. Quorum

Guidance:	Assessment:
19.1. The terms should specify a quorum for meetings and in particular whether the quorum should include a minimum number of employer and member representatives.	Compliant - A meeting is only quorate when at least one employer member representative, one employer representative and the Independent Chair are present. Substitute members are included within the quorum. A meeting that becomes inquorate may continue but any decisions will be non-binding.

20. Attendance requirements

Guidance:	Assessment:
20.1. The terms should specify the requirements for attending meetings and the consequences of continued failure to attend Board meetings.	Compliant - Representatives should endeavour to attend all meetings and are required to attend at least 2 out of 3 meetings each year. Board membership may be terminated prior to the end of the term of office due to a Board member no longer being able to demonstrate to their capacity to attend and prepare for meetings or to participate in required training.

21. Role of substitutes

Guidance:	Assessment:
21.1. The terms should specify whether members are allowed to send substitutes to meetings where they are unable to attend themselves. Training requirements should also be considered where substitutes are permitted.	Compliant - Substitutes can be appointed by Member representatives. Where appointed, substitutes should be named and must undertake the same training as full members. Substitutes are allowed to attend on behalf of absent representatives if sufficient notice is given.

22. Creation of working groups / sub-committees

Guidance:	Assessment:
22.1. The terms should specify whether the Board has the power to set up working groups or sub-committees.	Compliant - The Board may establish sub-committees.

23. Allowances / expenses

Guidance:	Assessment:
23.1. The terms should specify the policy in relation to the payment of allowances and expenses to Board members.	Compliant - An annual allowance is paid to the Independent Chair, in line with the Administering Authority's policy on allowances. The Administering Authority does not pay allowances for Board members. Expenses are paid to Board members in line with the Administering Authority's policy on expenses.

24. Budget

Guidance:	Assessment:
24.1. The terms should set out a process for the Board to have access to a budget for specified purposes	Compliant - The Board is provided with adequate resources to fulfil its role set out in the terms. The budget is met from the Fund and determined by The Strategic Director – Resources.

25. Knowledge and Understanding

Guidance:	Assessment:
25.1. The terms should refer to the requirement for the Board to have a policy and framework to meet the knowledge and understanding requirements of the 2004 Act.	Compliant - The Board has adopted the CIPFA Knowledge and Skills Framework and has an annual training plan for the Board.

26. Reporting

Guidance:	Assessment:
26.1. The terms should include arrangements for the reporting of information to the Administering Authority including direct reporting arrangements where the Board has material concern. In addition the methods used to communicate to scheme members and employers should be included.	Compliant - The Board is required to report its requests, recommendations or concerns to the Pension Committee. The Board should report any concerns over a decision made by the Pension Committee to the Committee subject to the agreement of at least 50% of voting Board members provided that all voting members are present. If not all voting members are present then the agreement should be of all voting members who are present, where the meeting remains quorate. Where the Board is satisfied that there has been a breach of regulation which has been reported to the Committee and has not been rectified within a reasonable period of time it is under an obligation to escalate the breach. The appropriate internal route for escalation is to the Monitoring Officer and / or the Section 151 Officer. The Board may report concerns to the LGPS Scheme Advisory Board for consideration subsequent to, but not instead of, using the appropriate internal route for escalation. Board members are also subject to the requirements to report breaches of law under the Act and the Code [and the whistleblowing provisions set out in the Administering Authority's whistleblowing policy].
Guidance:	Assessment:

	Where the Board is not satisfied with the response received it may request that a notice of its concern be placed on the website and in the Fund's annual report. Board agendas and minutes and training and attendance logs may be published using the following means: on the Fund's website, as part of the Fund's own annual report; as part of the Governance Compliance Statement.
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12. INVESTMENT STRATEGY STATEMENT

Introduction and background

This is the Investment Strategy Statement (“ISS”) of the London Borough of Sutton Pension Fund (“the Fund”), which is administered by Sutton Council, (“the Administering Authority”). The ISS is made in accordance with Regulation 7 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 (“the Regulations”).

The ISS has been prepared by the Fund’s Pension Committee (“the Committee”) having taken advice from the Fund’s investment adviser, Hymans Robertson LLP. The Committee acts on the delegated authority of the Administering Authority.

The ISS, which was approved by the Committee on 20 March 2017, is subject to periodic review at least every three years and without delay after any significant change in investment policy. The Committee has consulted on the contents of the Fund’s investment strategy with such persons it considers appropriate.

The Committee seeks to invest in accordance with the ISS, any Fund money that is not needed immediately to make payments from the Fund. The ISS should be read in conjunction with the Fund’s Funding Strategy Statement.

The suitability of particular investments and types of investments

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 dependants, on a defined benefits basis. This funding position will be reviewed at each triennial actuarial valuation, or more frequently as required.

In order to meet this primary objective the Committee aims to:

- Maximise the returns from investments whilst keeping risk within acceptable levels
- Contribute towards achieving and maintaining a future funding level of 100%
- Enable employer contribution rates to be kept as stable as possible

The Committee has translated its objectives into a suitable strategic asset allocation benchmark for the Fund. This benchmark is consistent with the Committee's views on the appropriate balance between generating a satisfactory long-term return on investments whilst taking account of market volatility and risk and the nature of the Fund's liabilities.

It is intended that the Fund's investment strategy will be reviewed at least every three years following actuarial valuations of the Fund.

In addition, the Committee monitors its investment strategy on an ongoing basis, focusing on factors including, but not limited to:

- Suitability given the Fund's level of funding and liability profile
- The level of expected risk
- Outlook for asset returns

The Committee also monitors the Fund's actual allocation on a regular basis to ensure it does not notably deviate from the target allocation. Actual against target allocation for each of the main asset classes is recorded within the quarterly performance monitoring report. Any planned rebalancing activity is reported and discussed at committee.

Fund Investment Beliefs

The investment beliefs of the Fund are set out below. These beliefs underpin the investment strategy taken by the Fund.

Belief: Clear and well defined objectives are essential to achieve future success

The Committee is aware that there is a need to generate a sufficient level of return from the Fund's assets, while at the same time having a clear understanding of the potential risks and ensuring there is sufficient liquidity available to pay members' benefits as they fall due. The Committee have considered their own priorities and believe that setting clear objectives for the Fund is key in providing focus for the way the investment strategy is implemented.

Belief: Strategic asset allocation is a key determinant of risk and return, and thus is typically more important than manager or stock selection

The Committee understands that having the appropriate strategy in place is a key driver of the Fund's future success. As a result, priority is given to more strategic investment matters.

Belief: Funding and investment strategy are linked

The Committee understands that a number of funding related aspects feed into investment strategy decisions, including maturity, sponsor covenant and level of required return. Given this, actuarial and investment matters, most notably setting investment strategy, are looked at in tandem by the Committee.

Belief: The Committee will take an appropriate level of investment risk

As a long term LGPS Fund the Committee acknowledge the need to take investment risk to ensure the affordability and sustainability of the Fund. However, the level of risk will be set which is aligned to the long term objectives, with a view to taking appropriate and not unnecessary levels of risk and managing funding level volatility.

The analysis in this report helps test whether the current strategy is aligned to these beliefs or if there are areas where it could be improved.

Investment of money in a wide variety of investments

Asset classes

The Fund may invest in quoted and unquoted securities of UK and overseas markets including equities and fixed interest and index linked bonds, cash, property and commodities either directly or through pooled funds. The Fund may also make use of contracts for differences and other derivatives either directly or in pooled funds investing in these products for the purpose of efficient portfolio management or to hedge specific risks.

The Committee reviews the nature of Fund investments on a regular basis, with particular reference to suitability and diversification. The Committee seeks and considers written advice from a suitably qualified person in undertaking such a review. If, at any time, investment in a security or product not previously known to the Committee is proposed, appropriate advice is sought and considered to ensure its suitability and diversification.

The Fund's target investment strategy is set out below. The table also includes the maximum percentage of total Fund value that it will invest in these asset classes. In line with the Regulations, the authority's investment strategy does not permit more than 5% of the total value of all investments of fund money to be invested in entities which are connected with that authority within the meaning of section 212 of the Local Government and Public Involvement in Health Act 2007.

Table 1: Fund allocation

Asset Class	Target Allocation %
UK Equities	13
Overseas Equities	42
Total Equities	55
Property	10
Absolute Return	15
Bonds	15
Infrastructure	5
Total	100

As part of the 31 March 2019 actuarial valuation the Fund Actuary has assumed a discount rate and therefore required rate of return on the Fund assets of 4.7% p.a. This includes an allowance for prudence. The Committee believes that the current investment strategy will generate returns in excess of the required return while taking an appropriate degree of risk and tests the ability of the strategy to meet the Fund's objectives as part of the strategy review process.

Managers

The Committee has appointed a number of investment managers all of whom are authorised under the Financial Services and Markets Act 2000 to undertake investment business.

The Committee, after seeking appropriate investment advice, has agreed specific benchmarks with each manager so that, in aggregate, they are consistent with the overall asset allocation for the Fund. The Fund's investment managers will hold a mix of investments which reflects their views relative to their respective benchmarks. Within each major market and asset class, the

managers will maintain diversified portfolios through direct investment or pooled vehicles. The manager of the passive funds in which the Fund invests holds a mix of investments within each pooled fund that reflects that of their respective benchmark indices.

The approach to risk, including the ways in which risks are to be measured and managed

The Committee is aware that the Fund has a need to take risk (e.g. investing in growth assets) to help it achieve its funding objectives. It has an active risk management programme in place that aims to help it identify the risks being taken and put in place processes to manage, measure, monitor and (where possible) mitigate the risks being taken. One of the Committee's overarching beliefs is to only take as much investment risk as is necessary.

The principal risks affecting the Fund are set out below, we also discuss the Fund's approach to managing these risks and the contingency plans that are in place:

Funding risks

Financial mismatch – The risk that Fund assets fail to grow in line with the developing cost of meeting the liabilities.

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 the Fund's liabilities.

The Committee measures and manages financial mismatch in two ways. As indicated above, the Committee has set a strategic asset allocation benchmark for the Fund. This benchmark was set taking into account asset liability modelling which focused on probability of success and level of downside risk. The Committee is currently in the process of carrying out a strategic review following the completion of the 2016 actuarial valuation which will consider the probability of achieving the Fund's objectives and the level of risk being taken within the strategy. The Committee assesses risk relative to the strategic benchmark by monitoring the Fund's asset allocation and investment returns relative to the benchmark. The Committee also assesses risk relative to liabilities by monitoring the delivery of benchmark returns relative to liabilities.

The Committee also seeks to understand the assumptions used in any analysis and modelling so they can be compared to their own views and the level of risks associated with these assumptions to be assessed.

The Committee 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.

Asset risks

Concentration - The risk that a significant allocation to any single asset category and its underperformance relative to expectation would result in difficulties in achieving funding objectives.

Illiquidity - The risk that the Fund cannot meet its immediate liabilities because it has insufficient liquid assets.

Currency risk – The risk that the currency of the Fund’s assets underperforms relative to Sterling (i.e. the currency of the liabilities).

Environmental, social and governance (“ESG”) – The risk that ESG related factors reduce the Fund’s ability to generate the long-term returns.

Manager underperformance - The failure by the fund managers to achieve the rate of investment return assumed in setting their mandates.

The Committee measures and manages asset risks as follows.

The Fund’s strategic asset allocation benchmark invests in a diversified range of asset classes. The Committee has put in place rebalancing arrangements to ensure the Fund’s “actual allocation” does not deviate substantially from its target. The Fund invests in a range of investment mandates each of which has a defined objective, performance benchmark and manager process which, taken in aggregate, help reduce the Fund’s asset concentration risk. By investing across a range of assets, including liquid quoted equities and bonds, as well as property, the Committee has recognised the need for access to liquidity in the short term.

The Fund invests in a range of overseas markets which provides a diversified approach to currency markets; the Committee also assesses the Fund's currency risk during their risk analysis. Details of the Fund's approach to managing ESG risks is set out later in this document.

The Committee has considered the risk of underperformance by any single investment manager and have attempted to reduce this risk by appointing more than one manager, using a range of approaches for equity investment and having a proportion of the Scheme's assets managed on a passive basis. The Committee assesses the Fund's managers' performance on a regular basis, and will take steps, including potentially replacing one or more of their managers, if underperformance persists.

Other provider risk

Transition risk - The risk of incurring unexpected costs in relation to the transition of assets among managers. When carrying out significant transitions, the Committee seeks suitable professional advice.

Custody risk - The risk of losing economic rights to Fund assets, when held in custody or when being traded.

Credit default - The possibility of default of a counterparty in meeting its obligations.

The Committee monitors and manages risks in these areas through a process of regular scrutiny of its providers, and audit of the operations it conducts for the Fund, or has delegated such monitoring and management of risk to the appointed investment managers as appropriate (e.g. custody risk in relation to pooled funds). The Committee has the power to replace a provider should serious concerns exist.

The approach to pooling investments, including the use of collective investment vehicles and shared services

The Fund is a participating scheme in the London Collective Investment Vehicle (CIV) Pool. The proposed structure and basis on which the London CIV Pool will operate was set out in the July 2016 submission to Government.

Assets to be invested in the Pool

The Fund's intention is to invest its assets through the London CIV Pool as and when suitable Pool investment solutions become available. An indicative timetable for investing through the Pool was set out in the July 2016 submission to Government. The key criteria for assessment of Pool solutions will be as follows:

1. That the Pool enables access to an appropriate solution that meets the objectives and benchmark criteria set by the Fund
2. That there is a clear financial benefit to the Fund in investing in the solution offered by the Pool, should a change of provider be necessary.

At the time of preparing this statement the Fund has already invested the following assets via the London CIV Pool:

Asset Class	Manager	% of Fund Assets	Benchmark & Performance Objective
Absolute Return	Baillie Gifford	6.7	Benchmark: 3 month LIBOR + 3% Performance Objective: 3% above benchmark over rolling 3 year period (gross of fees)
Absolute Return	Pyrford	6.7	Benchmark: 3 month LIBOR + 3% Performance Objective: 3% above benchmark over rolling 3 year period (gross of fees)
Global Equities	Newtons	16.3	Benchmark: 3 month LIBOR + 3% Performance Objective: 3% above benchmark over rolling 3 year period (gross of fees)

The fund holds 12% or £68m of its assets in life funds and intends to retain these outside of the London CIV in accordance with government guidance on the retention of life funds outside pools for the time being. The Fund agrees for the London CIV to monitor the passive funds as part of the broader pool. Newton Global Equities mandate transferred into the London CIV during the year.

At the time of preparing this statement the Fund holds the following mandates outside of the London CIV.

Opportunities for investing in these asset classes through the CIV will be reviewed as and when opportunities arise.

Asset Class	Manager	% of Fund Assets	Benchmark & Performance Objective	Reason for not investing via the London CIV Pool
Global Equities	Harding Loevner	15.7	Benchmark: MSCI All Countries World NDR Index Performance objective: 3% above benchmark over rolling 3 year period (gross of fees)	No other global equity managers available
Global Equities	Schroder	15.9	Benchmark: MSCI All Countries World NDR Index Performance objective: 3% above benchmark over rolling 3 year period (gross of fees)	No other global equity managers available

Asset Class	Manager	% of Fund Assets	Benchmark & Performance Objective	Reason for not investing via the London CIV Pool
Bonds	M&G (Alpha Fund)	8	Benchmark: 3 Month LIBOR + 3% Performance objective: 3 Month LIBOR + 3 to 5 %	No bond managers on London CIV panel
Bonds	M&G (Index Linked)	8	Benchmark: FTSE A British Government Over 5 Years Index-Linked Performance objective: 0.75% above benchmark over rolling 3 years period (gross of fees)	No bond managers on London CIV panel
Property	Blackrock	3.7	Benchmark: IPD UK All Pooled Property Funds Index Performance objective: To outperform the benchmark	

Asset Class	Manager	% of Fund Assets	Benchmark & Performance Objective	Reason for not investing via the London CIV Pool
Property	Aviva	2	Benchmark: IPD UK All Pooled Property Funds Index Performance objective: To outperform the benchmark	No property managers on London CIV panel
Property	Invesco	0.4	Performance objective: Unleveraged return of 8-9%	No property managers on London CIV panel

The fund holds £16.7m or 2.8% of the fund in illiquid assets and these will remain outside of the London CIV pool. The cost of exiting these strategies early would have a negative financial impact on the Fund. These will be held as legacy assets until such time as they mature and proceeds re-invest through the pool assuming it has appropriate strategies available or until the Fund changes asset allocation and makes a decision to disinvest

Structure and governance of the London CIV Pool

The July 2016 submission to Government of the London CIV Pool provided a statement addressing the structure and governance of the Pool, the mechanisms by which the Fund can hold the Pool to account and the services that will be shared or jointly procured. As the Pool develops and the structure and governance of the Pool are fully established the Fund will include this information in future iterations of the ISS.

How social, environmental or corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments

The Fund is committed to being a long term steward of the assets in which it invests and expects this approach to protect and enhance the value of the Fund in the long term. In making investment decisions, the Fund seeks and receives proper advice from internal and external advisers with the requisite knowledge and skills. In addition the Pensions Committee undertakes training on a regular basis and this will include training and information sessions on matters of social, environmental and corporate governance.

The Fund requires its investment managers to integrate all material financial factors, including corporate governance, environmental, social, and ethical considerations, into the decision-making process for all fund investments. It expects its managers to follow good practice and use their influence as major institutional investors and long-term stewards of capital to promote good practice in the investee companies and markets to which the Fund is exposed.

The Fund expects its external investment managers (and specifically the London Collective Investment Vehicle through which the Fund will increasingly invest) to undertake appropriate monitoring of current investments with regard to their policies and practices on all issues which could present a material financial risk to the long-term performance of the fund such as corporate governance and environmental factors. The Fund expects its fund managers to integrate material ESG factors within its investment analysis and decision making.

Effective monitoring and identification of these issues can enable engagement with boards and management of investee companies to seek resolution of potential problems at an early stage. Where collaboration is likely to be the most effective mechanism for encouraging issues to be addressed, the Fund expects its investment managers to participate in joint action with other institutional investors as permitted by relevant legal and regulatory codes.

The Fund monitors this activity on an ongoing basis with the aim of maximising its impact and effectiveness.

The Fund will invest on the basis of financial risk and return having considered a full range of factors contributing to the financial risk including social, environment and governance factors to the extent these directly or indirectly impact on financial risk and return.

The exercise of rights (including voting rights) attaching to investments

Voting rights

The Fund recognises the importance of its role as stewards of capital and the need to ensure the highest standards of governance and promoting corporate responsibility in the underlying companies in which its investments reside. The Fund recognises that ultimately this protects the financial interests of the Fund and its ultimate beneficiaries. The Fund has a commitment to actively exercising the ownership rights attached to its investments reflecting the Fund's conviction that responsible asset owners should maintain oversight of the companies in which it ultimately invests recognising that the companies' activities impact upon not only their customers and clients, but more widely upon their employees and other stakeholders and also wider society.

The Committee has delegated the exercise of voting rights to the investment managers on the basis that voting power will be exercised by them with the objective of preserving and enhancing long term shareholder value. Accordingly, the Fund's managers have produced written guidelines of their process and practice in this regard. The managers are strongly encouraged to vote in line with their guidelines in respect of all resolutions at annual and extraordinary general meetings of companies under Regulation 7(2)(f).

Stewardship

The Committee has formally agreed to adhere to the Stewardship Code as published by the Financial Reporting Council. The Committee expects both the London CIV Pool and any directly appointed fund managers to also comply with the Stewardship Code and this is monitored on an annual basis.

As part of its compliance with the Stewardship Code the Fund has adopted a set of Voting Intention Guidelines. The current guidelines can be found on the Fund's website. The Committee publishes an annual report of voting activity as part of the Fund's annual report. In addition to the Fund's compliance with the Stewardship Code, the Fund believes in collective engagement and is a member of the Local Authority Pension Fund Forum (LAPFF), through which it collectively exercises a voice across a range of corporate governance issues.

13. FUNDING STRATEGY STATEMENT

Introduction

This is the Funding Strategy Statement for the London Borough of Sutton Pension Fund (the Fund). It has been prepared in accordance with Regulation 58 of the Local Government Pension Scheme Regulations 2013 as amended (the Regulations) and describes London Borough of Sutton's strategy, in its capacity as administering authority, for the funding of the London Borough of Sutton Pension Fund.

The Fund's employers and the Fund Actuary, Barnett Waddingham LLP, have been consulted on the contents of this statement.

This statement should be read in conjunction with the Fund's Investment Strategy Statement (ISS) and has been prepared with regard to the guidance (*Preparing and Maintaining a funding strategy statement in the LGPS 2016 edition*) issued by the Chartered Institute of Public Finance and Accountancy (CIPFA).

Purpose of the Funding Strategy Statement

The purpose of this Funding Strategy Statement (FSS) is to:

- Establish a clear and transparent fund-specific strategy that will identify how employers' pension liabilities are best met going forward;
- Support the desirability of maintaining as nearly constant a primary contribution rate as possible, as defined in Regulation 62(6) of the Regulations;
- Ensure that the regulatory requirements to set contributions to meet the future liability to provide Scheme member benefits in a way that ensures the solvency and long-term cost efficiency of the Fund are met; and
- Take a prudent longer-term view of funding those liabilities.

Aims and purpose of the Fund

The aims of the Fund are to:

- Manage employers' liabilities effectively and ensure that sufficient resources are available to meet all liabilities as they fall due;
- Enable primary contribution rates to be kept as nearly constant as possible and (subject to the administering authority not taking undue risks) at reasonable cost to all relevant parties (such as the taxpayers, scheduled, resolution and admitted bodies), while achieving and maintaining Fund solvency and long-term cost efficiency, which should be assessed in light of the risk profile of the Fund and employers, and the risk appetite of the administering authority and employers alike; and
- Seek returns on investment within reasonable risk parameters.

The purpose of the Fund is to:

- Pay pensions, lump sums and other benefits to Scheme members as provided for under the Regulations;

- Meet the costs associated in administering the Fund; and
- Receive and invest contributions, transfer values and investment income.

Funding objectives

Contributions are paid to the Fund by Scheme members and the employing bodies to provide for the benefits which will become payable to Scheme members when they fall due.

The funding objectives are to:

- Ensure that pension benefits can be met as and when they fall due over the lifetime of the Fund;
- Ensure the solvency of the Fund;
- Set levels of employer contribution rates to target a 100% funding level over an appropriate time period and using appropriate actuarial assumptions, while taking into account the different characteristics of participating employers;
- Build up the required assets in such a way that employer contribution rates are kept as stable as possible, with consideration of the long-term cost efficiency objective; and
- Adopt appropriate measures and approaches to reduce the risk, as far as possible, to the Fund, other employers and ultimately the taxpayer from an employer defaulting on its pension obligations.

In developing the funding strategy, the administering authority should also have regard to the likely outcomes of the review carried out under Section 13(4)(c) of the Public Service Pensions Act 2013. Section 13(4)(c) requires an independent review of the actuarial valuations of the LGPS funds; this involves reporting on whether the rate of employer contributions set as part of the actuarial valuations are set at an appropriate level to ensure the solvency of the Fund and the long-term cost efficiency of the Scheme so far as relating to the pension Fund. The review also looks at compliance and consistency of the actuarial valuations.

Key parties

The key parties involved in the funding process and their responsibilities are set out below.

The administering authority

The administering authority for the Fund is London Borough of Sutton. The main responsibilities of the administering authority are to:

- Operate the Fund in accordance with the LGPS Regulations;
- Collect employee and employer contributions, investment income and other amounts due to the Fund as stipulated in the Regulations;
- Invest the Fund's assets in accordance with the Fund's Investment Strategy Statement;
- Pay the benefits due to Scheme members as stipulated in the Regulations;
- Ensure that cash is available to meet liabilities as and when they fall due;
- Take measures as set out in the Regulations to safeguard the Fund against the consequences of employer default;
- Manage the actuarial valuation process in conjunction with the Fund Actuary;
- Prepare and maintain this FSS and also the ISS after consultation with other interested parties;

- Monitor all aspects of the Fund's performance;
- Effectively manage any potential conflicts of interest arising from its dual role as both Fund administrator and Scheme employer; and
- Enable the Local Pension Board to review the valuation process as they see fit.

Scheme employers

In addition to the administering authority, a number of other Scheme employers participate in the Fund.

The responsibilities of each employer that participates in the Fund, including the administering authority, are to:

- Collect employee contributions and pay these together with their own employer contributions, as certified by the Fund Actuary, to the administering authority within the statutory timescales;
- Notify the administering authority of any new Scheme members and any other membership changes promptly;
- Develop a policy on certain discretions and exercise those discretions as permitted under the Regulations;
- Meet the costs of any augmentations or other additional costs in accordance with agreed policies and procedures; and
- Pay any exit payments due on ceasing participation in the Fund.

Scheme members

Active Scheme members are required to make contributions into the Fund as set by the Ministry of Housing, Communities and Local Government (MHCLG).

Fund Actuary

The Fund Actuary for the Fund is Barnett Waddingham LLP. The main responsibilities of the Fund Actuary are to:

- Prepare valuations including the setting of employers' contribution rates at a level to ensure Fund solvency and long-term cost efficiency after agreeing assumptions with the administering authority and having regard to the FSS and the Regulations;
- Prepare advice and calculations in connection with bulk transfers and the funding aspects of individual benefit-related matters such as pension strain costs, ill-health retirement costs, compensatory added years costs, etc;
- Provide advice and valuations on the exiting of employers from the Fund;
- Provide advice and valuations relating to new employers, including recommending the level of bonds or other forms of security required to protect the Fund against the financial effect of employer default;
- Assist the administering authority in assessing whether employer contributions need to be revised between valuations as permitted or required by the Regulations;
- Ensure that the administering authority is aware of any professional guidance or other professional requirements which may be of relevance to their role in advising the Fund; and
- Advise on other actuarial matters affecting the financial position of the Fund.

Funding strategy

The factors affecting the Fund's finances are constantly changing, so it is necessary for its financial position and the contributions payable to be reviewed from time to time by means of an actuarial valuation to check that the funding objectives are being met.

The most recent actuarial valuation of the Fund was carried out as at 31 March 2019. The results of the 2019 valuation are set out in the table below:

2019 valuation results	
Surplus (Deficit)	(£71m)
Funding level	90%

On a whole Fund level, the primary rate required to cover the employer cost of future benefit accrual was 19.2% of payroll p.a.

The individual employer contribution rates are set out in the Rates and Adjustments Certificate which forms part of the Fund's 2019 valuation report.

The actuarial valuation involves a projection of future cashflows to and from the Fund. The main purpose of the valuation is to determine the level of employers' contributions that should be paid to ensure that the existing assets and future contributions will be sufficient to meet all future benefit payments from the Fund. A summary of the methods and assumptions adopted is set out in the sections below.

Funding method

The key objective in determining employers' contribution rates is to establish a funding target and then set levels of employer contribution rates to meet that target over an agreed period.

The funding target is to have sufficient assets in the Fund to meet the accrued liabilities for each employer in the Fund.

For all employers, the method adopted is to consider separately the benefits accrued before the valuation date (past service) and benefits expected to be accrued after the valuation date (future service). These are evaluated as follows:

- The past service funding level of the Fund. This is the ratio of accumulated assets to liabilities in respect of past service. It makes allowance for future increases to members' pay and pensions. A funding level in excess of 100% indicates a surplus of assets over liabilities; while a funding level of less than 100% indicates a deficit; and
- The future service funding rate (also referred to as the primary rate as defined in Regulation 62(5) of the Regulations) is the level of contributions required from the individual employers which, in combination with employee contributions is expected to cover the cost of benefits accruing in future.

The adjustment required to the primary rate to calculate an employer's total contribution rate is referred to as the secondary rate, as defined in Regulation 62(7). Further details of how the secondary rate is calculated for employers is given below in the Deficit recovery/surplus amortisation periods section.

The approach to the primary rate will depend on specific employer circumstances and in particular may depend on whether an employer is an “open” employer – one which allows new recruits access to the Fund, or a “closed” employer – one which no longer permits new staff access to the Fund. The expected period of participation by an employer in the Fund may also affect the total contribution rate.

For open employers, the actuarial funding method that is adopted is known as the Projected Unit Method. The key feature of this method is that, in assessing the future service cost, the primary rate represents the cost of one year’s benefit accrual only.

For closed employers, the actuarial funding method adopted is known as the Attained Age Method. The key difference between this method and the Projected Unit Method is that the Attained Age Method assesses the average cost of the benefits that will accrue over a specific period, such as the length of a contract or the remaining expected working lifetime of active members.

The approach by employers may vary to reflect an employer’s specific circumstance. However, in general the closed employers in the Fund are admission bodies who have joined the Fund as part of an outsourcing contract and therefore the Attained Age Method is used in setting their contributions. All other employers (for example the council, higher education bodies and academies) are generally open employers and therefore the Projected Unit Method is used. The administering authority holds details of the open or closed status of each employer.

Valuation assumptions and funding model

In completing the actuarial valuation it is necessary to formulate assumptions about the factors affecting the Fund’s future finances such as price inflation, pay increases, investment returns, rates of mortality, early retirement and staff turnover etc.

The assumptions adopted at the valuation can therefore be considered as:

- The demographic (or statistical) assumptions which are essentially estimates of the likelihood or timing of benefits and contributions being paid, and
- The financial assumptions which will determine the estimates of the amount of benefits and contributions payable and their current (or present) value.

Future price inflation

The base assumption in any valuation is the future level of price inflation over a period commensurate with the duration of the liabilities, as measured by the Retail Price Index (RPI). This is derived using the 20 year point on the Bank of England implied Retail Price Index (RPI) inflation curve, with consideration of the market conditions over the six months straddling the valuation date. The 20 year point on the curve is taken as 20 years is consistent with the average duration of an LGPS Fund.

Future pension increases

Pension increases are linked to changes in the level of the Consumer Price Index (CPI). Inflation as measured by the CPI has historically been less than RPI due mainly to different calculation methods. A deduction of 1.0% p.a. is therefore made to the RPI assumption to derive the CPI assumption.

Future pay increases

As some of the benefits are linked to pay levels at retirement, it is necessary to make an assumption as to future levels of pay increases. Historically, there has been a close link between price inflation and pay increases with pay increases exceeding price inflation in the longer term. The long-term pay increase assumption adopted as at 31 March 2019 was CPI plus 1.0% p.a. which includes allowance for promotional increases.

Future investment returns/discount rate

To determine the value of accrued liabilities and derive future contribution requirements it is necessary to discount future payments to and from the Fund to present day values.

The discount rate that is adopted will depend on the funding target adopted for each Scheme employer.

The discount rate that is applied to all projected liabilities reflects a prudent estimate of the rate of investment return that is expected to be earned from the Fund's long-term investment strategy by considering average market yields in the six months straddling the valuation date. The discount rate so determined may be referred to as the "ongoing" discount rate.

It may be appropriate for an alternative discount rate approach to be taken to reflect an individual employer's situation. This may be, for example, to reflect an employer targeting a cessation event or to reflect the administering authority's views on the level of risk that an employer poses to the Fund. The Fund Actuary will incorporate any such adjustments after consultation with the administering authority.

A summary of the financial assumptions adopted for the 2019 valuation is set out in the table below:

Financial assumptions as at 31 March 2019	
RPI inflation	3.6% p.a.
CPI inflation	2.6% p.a.
Pension/deferred pension increases and CARE revaluation	In line with CPI inflation
Pay increases	CPI inflation + 1.0% p.a.
Discount rate	4.7% p.a.

Asset valuation

For the purpose of the valuation, the asset value used is the market value of the accumulated fund at the valuation date, adjusted to reflect average market conditions during the six months straddling the valuation date. This is referred to as the smoothed asset value and is calculated as a consistent approach to the valuation of the liabilities.

The Fund's assets are allocated to employers at an individual level by allowing for actual Fund returns achieved on the assets and cash flows paid into and out of the Fund in respect of each employer (e.g. contributions received and benefits paid).

Demographic assumptions

The demographic assumptions incorporated into the valuation are based on Fund-specific experience and national statistics, adjusted as appropriate to reflect the individual circumstances of the Fund and/or individual employers.

Further details of the assumptions adopted are included in the Fund's 2019 valuation report.

McCloud/Sargeant judgements

The McCloud/Sargeant judgements were in relation to two employment tribunal cases which were brought against the government in relation to possible age and gender discrimination in the implementation of transitional protection following the introduction of the reformed 2015 public service pension schemes from 1 April 2015. These judgements were not directly in relation to the LGPS, however, do have implications for the LGPS.

In December 2018, the Court of Appeal ruled that the transitional protection offered to some members as part of the reforms amounted to unlawful discrimination. On 27 June 2019 the Supreme Court denied the government's request for an appeal in the case. A remedy is still to be either imposed by the Employment Tribunal or negotiated and applied to all public service schemes, so it is not yet clear how this judgement may affect LGPS members' past or future service benefits. It has, however, been noted by government in its 15 July 2019 statement that it expects to have to amend all public service schemes, including the LGPS.

Further details of this can be found below in the Regulatory risks section.

At the time of drafting this FSS, it is still unclear how the McCloud/Sargeant judgements will affect current and future LGPS benefits. As part of the Fund's 2019 valuation, in order to mitigate the risk of member benefits being uplifted and becoming more expensive, the potential impact of McCloud was covered by the prudence allowance included in the discount rate assumption. As the remedy is still to be agreed the cost cannot be calculated with any certainty, however, the Fund Actuary expects it is likely to be less than the impact of reducing the discount rate assumption by 0.05%.

Guaranteed Minimum Pension (GMP) indexation and equalisation

As part of the restructuring of the state pension provision, the government needs to consider how public service pension payments should be increased in future for members who accrued a Guaranteed Minimum Pension (GMP) from their public service pension scheme and expect to reach State Pension Age (SPA) post-December 2018. In addition, a resulting potential inequality in the payment of public service pensions between men and women needs to be addressed. Information on the current method of indexation and equalisation of public service pension schemes can be found [here](https://www.gov.uk/government/consultations/indexation-and-equalisation-of-gmp-in-public-service-pension-schemes/consultation-on-indexation-and-equalisation-of-gmp-in-public-service-pension-schemes) (<https://www.gov.uk/government/consultations/indexation-and-equalisation-of-gmp-in-public-service-pension-schemes/consultation-on-indexation-and-equalisation-of-gmp-in-public-service-pension-schemes>).

On 22 January 2018, the government published the outcome to its *Indexation and equalisation of GMP in public service pension schemes* consultation, concluding that the requirement for public service pension schemes to fully price protect the GMP element of individuals' public service pension would be extended to those individuals reaching SPA before 6 April 2021. HMT published a Ministerial Direction on 4 December 2018 to implement this outcome, with effect from 6 April 2016. Details of this outcome and the Ministerial Direction can be found [here](#).

The 2019 valuation assumption for GMP is that the Fund will pay limited increases for members that have reached SPA by 6 April 2016, with the government providing the remainder of the inflationary increase. For members that reach SPA after this date, it is assumed that the Fund will be required to pay the entire inflationary increase.

Deficit recovery/surplus amortisation periods

Whilst one of the funding objectives is to build up sufficient assets to meet the cost of benefits as they accrue, it is recognised that at any particular point in time, the value of the accumulated assets will be different to the value of accrued liabilities, depending on how the actual experience of the Fund differs to the actuarial assumptions. This theory applies down to an individual employer level; each employer in the Fund has their own share of deficit or surplus attributable to their section of the Fund.

Where the valuation for an employer discloses a deficit then the level of required employer contributions includes an adjustment to fund the deficit over a maximum period of 16 years but this will be subject to contract length for admission bodies. The adjustment may be set either as a percentage of payroll or as a fixed monetary amount.

Where the valuation for an employer discloses a surplus then the level of required employer contribution may include an adjustment to amortise the surplus over a period agreed with the administering authority and the Fund actuary.

The deficit recovery period or amortisation period that is adopted for any particular employer will depend on:

- The significance of the surplus or deficit relative to that employer's liabilities;
- The covenant of the individual employer (including any security in place) and any limited period of participation in the Fund;
- The remaining contract length of an employer in the Fund (if applicable); and
- The implications in terms of stability of future levels of employers' contribution.

As part of the 2019 valuation, the Fund commissioned an employer covenant review from Barnett Waddingham LLP based on an analysis of credit risk reports obtained from Dun & Bradstreet (D&B). Where the review highlighted any concerns with regard to the default risk of an employer, particular attention was given to the deficit recovery period adopted for the employer and whether any security for the Fund was in place.

A general summary of the approach used for employers in the Fund is set out in the table below, however, the approach adopted may differ to reflect the situation specific to the employer.

Pooling of individual employers

The policy of the Fund is that each individual employer should be responsible for the costs of providing pensions for its own employees who participate in the Fund. Accordingly, contribution rates are set for individual employers to reflect their own particular circumstances.

However, certain groups of individual employers are pooled for the purposes of determining contribution rates to recognise common characteristics, recognise particular historic liabilities or where the number of Scheme members is small.

The funding pools adopted for the Fund at the 2019 valuation are summarised in the table below:

Pool	Type of pooling	Notes
Academies	Past and future service pooling	All academies in the pool pay the same total contribution rate and have the same funding level
CAB pool	Past and future service pooling	All employer in the pool pay the same total contribution rate and have the same funding level
Ill-health risk pooled employers	Ill-health risk only	Applies to all employers in the Fund apart from the major scheduled bodies

The main purpose of pooling is to produce more stable employer contribution levels, although recognising that ultimately there will be some level of cross-subsidy of pension cost amongst pooled employers.

All academies will form part of the Academies pool apart from exceptional cases as agreed by the administering authority.

Forming/disbanding a funding pool

Where the Fund identifies a group of employers with similar characteristics and potential merits for pooling, it is possible to form a pool for these employers. Advice should be sought from the Fund Actuary to consider the appropriateness and practicalities of forming the funding pool.

Conversely, the Fund may consider it no longer appropriate to pool a group of employers. This could be due to divergence of previously similar characteristics or an employer becoming a dominant party in the pool (such that the results of the pool are largely driven by that dominant employer). Where this scenario arises, advice should be sought from the Fund Actuary.

Funding pools should be monitored on a regular basis, at least at each actuarial valuation, in order to ensure the pooling arrangement remains appropriate.

New employers joining the Fund

When a new employer joins the Fund, the Fund Actuary is required to set the contribution rates payable by the new employer and allocate a share of Fund assets to the new employer as appropriate. The most common types of new employers joining the Fund are admission bodies and new academies. These are considered in more detail below.

Admission bodies

New admission bodies in the Fund are commonly a result of a transfer of staff from an existing employer in the Fund to another body (for example as part of a transfer of services from a council or academy to an external provider under Schedule 2 Part 3 of the Regulations). Typically these transfers will be for a limited period (the contract length), over which the new admission body employer is required to pay contributions into the Fund in respect of the transferred members.

Funding at start of contract

Generally, when a new admission body joins the Fund, they will become responsible for all the pension risk associated with the benefits accrued by transferring members and the benefits to be accrued over the contract length. This is known as a full risk transfer. In these cases, it may be appropriate that the new admission body is allocated a share of Fund assets equal to the value of the benefits transferred, i.e. the new admission body starts off on a fully funded basis. This is calculated on the relevant funding basis and the opening position may be different when calculated on an alternative basis (e.g. on an accounting basis).

However, there may be special arrangements made as part of the contract such that a full risk transfer approach is not adopted. In these cases, the initial assets allocated to the new admission body will reflect the level of risk transferred and may therefore not be on a fully funded basis or may not reflect the full value of the benefits attributable to the transferring members.

Contribution rate

The contribution rate may be set on an open or a closed basis. Where the funding at the start of the contract is on a fully funded basis then the contribution rate will represent the primary rate only; where there is a deficit allocated to the new admission body then the contribution rate will also incorporate a secondary rate with the aim of recovering the deficit over an appropriate recovery period.

Depending on the details of the arrangement, for example if any risk sharing arrangements are in place, then additional adjustments may be made to determine the contribution rate payable by the new admission body. The approach in these cases will be bespoke to the individual arrangement.

Security

To mitigate the risk to the Fund that a new admission body will not be able to meet its obligations to the Fund in the future, the new admission body may be required to put in place a bond in accordance with Schedule 2 Part 3 of the Regulations, if required by the letting authority and administering authority.

If, for any reason, it is not desirable for a new admission body to enter into a bond, the new admission body may provide an alternative form of security which is satisfactory to the administering authority.

Risk-sharing

Although a full risk transfer (as set out above) is most common, subject to agreement with the administering authority where required, new admission bodies and the relevant letting authority may make a commercial agreement to deal with the pension risk differently. For example, it may be agreed that all or part of the pensions risk remains with the letting authority.

Although pensions risk may be shared, it is common for the new admission body to remain responsible for pensions costs that arise from:

- above average pay increases, including the effect on service accrued prior to contract commencement; and
- redundancy and early retirement decisions.

The administering authority may consider risk-sharing arrangements as long as the approach is clearly documented in the admission agreement, the transfer agreement or any other side agreement. The arrangement also should not lead to any undue risk to the other employers in the Fund.

Legal and actuarial advice in relation to risk-sharing arrangements should be sought where required.

New academies

When a school converts to academy status, the new academy (or the sponsoring multi-academy trust) becomes a Scheme employer in its own right.

Funding at start

On conversion to academy status, the new academy will be allocated assets based on the active cover of the relevant local authority at the conversion date. The active cover approach is based on the funding level of the local authority's active liabilities, after fully funding the local authority's deferred and pensioner liabilities.

New free schools will be allocated zero assets as they are not formed through conversion from a pre-existing school. Any liabilities that are transferred to the free school by individual members will have associated transfer of assets on an individual basis.

Contribution rate

The contribution rate payable when a new academy or free school joins the Fund will be in line with the contribution rate certified for the academies at the 2019 valuation.

Cessation valuations

When a Scheme employer exits the Fund and becomes an exiting employer, as required under the Regulations the Fund Actuary will be asked to carry out an actuarial valuation in order to determine the liabilities in respect of the benefits held by the exiting employer's current and former employees. The Fund Actuary is also required to determine the exit payment due from the exiting employer to the Fund or the exit credit payable from the Fund to the exiting employer.

Any deficit in the Fund in respect of the exiting employer will be due to the Fund as a single lump sum payment, unless it is agreed by the administering authority and the other parties involved that an alternative approach is permissible. For example:

- It may be agreed with the administering authority that the exit payment can be spread over some agreed period;
- the assets and liabilities relating to the employer may transfer within the Fund to another participating employer; or
- the employer's exit may be deferred subject to agreement with the administering authority, for example if it intends to offer Scheme membership to a new employee within the following three years.

Similarly, any surplus in the Fund in respect of the exiting employer may be paid from the Fund to the employer as an exit credit, subject to the agreement between the relevant parties and any legal documentation. Further detail on the Fund's exit credit policy is outlined below.

In assessing the value of the liabilities attributable to the exiting employer, the Fund Actuary may adopt differing approaches and adopt different assumptions, depending on the employer and the specific details surrounding the employer's cessation scenario.

Exit credit policy

Under advice from MHCLG, administering authorities should set out their exit credit policy in their Funding Strategy Statement. Having regard to any relevant considerations, the administering authority will take the following approach to the payment of exit credits:

- Any employer who cannot demonstrate that they have been exposed to underfunding risk during their participation in the Fund will not be entitled to an exit credit payment. This will include the majority of "pass-through" arrangements. This is on the basis that these employers would not have not been asked to pay an exit payment had a deficit existed at the time of exit.
- The administering authority does not need to enquire into the precise risk sharing arrangement adopted by an employer but it must be satisfied that the risk sharing arrangement has been in place before it will pay out an exit credit. The level of risk that an employer has borne will be taken into account when determining the amount of any exit credit. It is the responsibility of the exiting employer to set out why the arrangements make payment of an exit credit appropriate.
- Any exit credit payable will be subject to a maximum of the actual employer contributions paid into the Fund as certified in the Rates and Adjustments certificate only which will therefore exclude early retirement costs.
- As detailed above, the Fund Actuary may adopt differing approaches depending on the specific details surrounding the employer's cessation scenario. The default approach to calculating the cessation position will be on a minimum-risk basis unless it can be shown that there is another employer in the Fund who will take on financial responsibility for the liabilities in the future. If the administering authority is satisfied that there is

another employer willing to take on responsibility for the liabilities (or that there is some other form of guarantee in place) then the cessation position may be calculated on the ongoing funding basis.

- The administering authority will pay out any exit credits within six months of the cessation date where possible. A longer time may be agreed between the administering authority and the exiting employer where necessary. For example if the employer does not provide all the relevant information to the administering authority within one month of the cessation date the administering authority will not be able to guarantee payment within six months of the cessation date.
- Under the Regulations, the administering authority has the discretion to take into account any other relevant factors in the calculation of any exit credit payable and they will seek legal advice where appropriate.

Bulk transfers

Bulk transfers of staff into or out of the Fund can take place from other LGPS Funds or non-LGPS Funds. In either case, the Fund Actuary for both Funds will be required to negotiate the terms for the bulk transfer – specifically the terms by which the value of assets to be paid from one Fund to the other is calculated.

The agreement will be specific to the situation surrounding each bulk transfer but in general the Fund will look to receive the bulk transfer on no less than a fully funded transfer (i.e. the assets paid from the ceding Fund are sufficient to cover the value of the liabilities on the agreed basis).

A bulk transfer may be required by an issued Direction Order. This is generally in relation to an employer merger, where all the assets and liabilities attributable to the transferring employer in its original Fund are transferred to the receiving Fund.

Links with the Investment Strategy Statement (ISS)

The main link between the Funding Strategy Statement (FSS) and the ISS relates to the discount rate that underlies the funding strategy as set out in the FSS, and the expected rate of investment return which is expected to be achieved by the long-term investment strategy as set out in the ISS.

As explained above, the ongoing discount rate that is adopted in the actuarial valuation is derived by considering the expected return from the long-term investment strategy. This ensures consistency between the funding strategy and investment strategy.

Risks and counter measures

Whilst the funding strategy attempts to satisfy the funding objectives of ensuring sufficient assets to meet pension liabilities and stable levels of employer contributions, it is recognised that there are risks that may impact on the funding strategy and hence the ability of the strategy to meet the funding objectives.

The major risks to the funding strategy are financial, although there are other external factors including demographic risks, regulatory risks and governance risks.

Financial risks

The main financial risk is that the actual investment strategy fails to produce the expected rate of investment return (in real terms) that underlies the funding strategy. This could be due to a number of factors, including market returns being less than expected and/or the fund managers who are employed to implement the chosen investment strategy failing to achieve their performance targets.

The valuation results are most sensitive to the real discount rate (i.e. the difference between the discount rate assumption and the price inflation assumption). Broadly speaking an increase/decrease of 0.1% p.a. in the real discount rate will decrease/increase the valuation of the liabilities by 2%, and decrease/increase the required employer contribution by around 0.7% of payroll p.a.

However, the Investment and Pension Fund Committee regularly monitors the investment returns achieved by the fund managers and receives advice from the independent advisers and officers on investment strategy.

The Committee may also seek advice from the Fund Actuary on valuation related matters.

In addition, the Fund Actuary provides funding updates between valuations to check whether the funding strategy continues to meet the funding objectives.

Demographic risks

Allowance is made in the funding strategy via the actuarial assumptions for a continuing improvement in life expectancy. However, the main demographic risk to the funding strategy is that it might underestimate the continuing improvement in longevity. For example, an increase of one year to life expectancy of all members in the Fund will increase the liabilities by approximately 4%.

The actual mortality of pensioners in the Fund is monitored by the Fund Actuary at each actuarial valuation and assumptions are kept under review. For the past two funding valuations, the Fund has commissioned a bespoke longevity analysis by Barnett Waddingham's specialist longevity team in order to assess the mortality experience of the Fund and help set an appropriate mortality assumption for funding purposes.

The liabilities of the Fund can also increase by more than has been planned as a result of the additional financial costs of early retirements and ill-health retirements. However, the administering authority monitors the incidence of early retirements; and procedures are in place that require individual employers to pay additional amounts into the Fund to meet any additional costs arising from early retirements.

From 1 April 2020, the administering authority implemented an ill-health self-insurance pool within the Fund whereby a portion of all employers' contributions into the Fund are allocated to a segregated ill-health section of the Fund. When a tier 1 or tier 2 ill-health retirement occurs from active status, a funding strain (i.e. the difference between the value of the benefits payable to the ill-health member and the value that was assumed as part of the actuarial valuation) is generated in the employer's section of the Fund. As part of the self-insurance policy, assets equal to the funding strain are transferred from the segregated ill-health assets section of the Fund to the employer's section of the Fund to cover the funding strain. This arrangement would exclude the major scheduled bodies.

The Fund reserves the right to preclude the use of the ill-health self-insurance reserve where there is evidence to suggest a higher than anticipated experience for an individual employer. The Fund also reserves the right to enforce Regulation 36(3) of the Regulations as appropriate.

Maturity risk

The maturity of a Fund (or of an employer in the Fund) is an assessment of how close on average the members are to retirement (or already retired). The more mature the Fund or employer, the greater proportion of its membership that is near or in retirement. For a mature Fund or employer, the time available to generate investment returns is shorter and therefore the level of maturity needs to be considered as part of setting funding and investment strategies.

The cashflow profile of the Fund needs to be considered alongside the level of maturity: as a Fund matures, the ratio of active to pensioner members falls, meaning the ratio of contributions being paid into the Fund to the benefits being paid out of the Fund also falls. This therefore increases the risk of the Fund having to sell assets in order to meet its benefit payments.

The government has published a consultation (*Local government pension scheme: changes to the local valuation cycle and management of employer risk*) which may affect the Fund's exposure to maturity risk. More information on this can be found in the Regulatory risks section below.

Regulatory risks

The benefits provided by the Scheme and employee contribution levels are set out in Regulations determined by central government. The tax status of the invested assets is also determined by the government.

The funding strategy is therefore exposed to the risks of changes in the Regulations governing the Scheme and changes to the tax regime which may affect the cost to individual employers participating in the Scheme.

However, the administering authority participates in any consultation process of any proposed changes in Regulations and seeks advice from the Fund Actuary on the financial implications of any proposed changes.

There are a number of general risks to the Fund and the LGPS, including:

- If the LGPS was to be discontinued in its current form it is not known what would happen to members' benefits.
- The potential effects of GMP equalisation between males and females, if implemented, are not yet known.
- More generally, as a statutory scheme the benefits provided by the LGPS or the structure of the scheme could be changed by the government.
- The State Pension Age is due to be reviewed by the government in the next few years.

At the time of preparing this FSS, specific regulatory risks of particular interest to the LGPS are in relation to the McCloud/Sargeant judgements, the cost cap mechanism and the timing of future funding valuations consultation. These are discussed in the sections below.

McCloud/Sargeant judgements and cost cap

The 2016 national Scheme valuation was used to determine the results of HM Treasury's (HMT) employer cost cap mechanism for the first time. The HMT cost cap mechanism was brought in after Lord Hutton's review of public service pensions with the aim of providing protection to taxpayers and employees against unexpected changes (expected to be increases) in pension costs. The cost control mechanism only considers "member costs". These are the costs relating to changes in assumptions made to carry out valuations relating to the profile of the Scheme members; e.g. costs relating to how long members are expected to live for and draw their pension. Therefore, assumptions such as future expected levels of investment returns and levels of inflation are not included in the calculation, so have no impact on the cost management outcome.

The 2016 HMT cost cap valuation revealed a fall in these costs and therefore a requirement to enhance Scheme benefits from 1 April 2019. However, as a funded Scheme, the LGPS also had a cost cap mechanism controlled by the Scheme Advisory Board (SAB) in place and HMT allowed SAB to put together a package of proposed benefit changes in order for the LGPS to no longer breach the HMT cost cap. These benefit changes were due to be consulted on with all stakeholders and implemented from 1 April 2019.

However, on 20 December 2018 there was a judgement made by the Court of Appeal which resulted in the government announcing their decision to pause the cost cap process across all public service schemes. This was in relation to two employment tribunal cases which were brought against the government in relation to possible discrimination in the implementation of transitional protection following the introduction of the reformed 2015 public service pension schemes from 1 April 2015. Transitional protection enabled some members to remain in their pre-2015 schemes after 1 April 2015 until retirement or the end of a pre-determined tapered protection period. The claimants challenged the transitional protection arrangements on the grounds of direct age discrimination, equal pay and indirect gender and race discrimination.

The first case (McCloud) relating to the Judicial Pension Scheme was ruled in favour of the claimants, while the second case (Sargeant) in relation to the Fire scheme was ruled against the claimants. Both rulings were appealed and as the two cases were closely linked, the Court of Appeal decided to combine the two cases. In December 2018, the Court of Appeal ruled that the transitional protection offered to some members as part of the reforms amounts to unlawful discrimination. On 27 June 2019 the Supreme Court denied the government's request for an appeal in the case. A remedy is still to be either imposed by the Employment Tribunal or negotiated and applied to all public service schemes, so it is not yet clear how this judgement may affect LGPS members' past or future service benefits. It has, however, been noted by government in its 15 July 2019 statement that it expects to have to amend all public service schemes, including the LGPS.

At the time of drafting this FSS, it is not yet known what the effect on the current and future LGPS benefits will be.

Consultation: Local government pension scheme: changes to the local valuation cycle and management of employer risk

On 8 May 2019, the government published a consultation seeking views on policy proposals to amend the rules of the LGPS in England and Wales. The consultation covered:

- amendments to the local fund valuations from the current three year (triennial) to a four year (quadrennial) cycle;
- a number of measures aimed at mitigating the risks of moving from a triennial to a quadrennial cycle;
- proposals for flexibility on exit payments;
- proposals for further policy changes to exit credits; and
- proposals for changes to the employers required to offer LGPS membership.

The consultation is currently ongoing: the consultation was closed to responses on 31 July 2019 and an outcome is now awaited. This FSS will be revisited once the outcome is known and reviewed where appropriate.

Timing of future actuarial valuations

LGPS valuations currently take place on a triennial basis which results in employer contributions being reviewed every three years. In September 2018 it was announced by the Chief Secretary to HMT, Elizabeth Truss, that the national Scheme valuation would take place on a quadrennial basis (i.e. every four years) along with the other public sector pension schemes. These results of the national Scheme valuation are used to test the cost control cap mechanism and

HMT believed that all public sector schemes should have the cost cap test happen at the same time with the next quadrennial valuation in 2020 and then 2024.

At the time of drafting the FSS we understand the next Fund valuation will be at 31 March 2022.

Managing employer exits from the Fund

The consultation covers:

- Proposals for flexibility on exit payments. This includes:
 - o Formally introducing into the Regulations the ability for the administering authority to allow an existing employer to spread the required exit payment over a fixed period.
 - o Allowing employers with no active employers to defer payment of an exit payment in return for an ongoing commitment to meeting their existing liabilities (deferred employer status).
- Proposals for further policy changes to exit credits. MHCLG issued a partial response to this part of the consultation on 27 February 2020 and an amendment to the Regulations came into force on 20 March 2020, although having effect from 14 May 2018. The amendment requires funds to consider the exiting employer's exposure to risk in calculating any exit credit due (for example a pass through employer who is not responsible for any pensions risk would likely not be due an exit credit if the amendments are made to the Regulations) and to have a policy for exit credits in their FSS which has been included earlier in this version.

Changes to employers required to offer LGPS membership

At the time of drafting this FSS, under the current Regulations further education corporations, sixth form college corporations and higher education corporations in England and Wales are required to offer membership of the LGPS to their non-teaching staff.

With consideration of the nature of the LGPS and the changes in nature of the further education and higher education sectors, the government has proposed to remove the requirement for further education corporations, sixth form college corporations and higher education corporations in England to offer new employees access to the LGPS. Given the significance of these types of employers in the Fund there is, however, likely to be only a minimal impact on the level of maturity of the Fund and the cashflow profile.

This also brings a small increased risk to the Fund in relation to these employers becoming exiting employers in the Fund. Should they decide not to admit new members to the Fund, the active membership attributable to the employers will gradually reduce to zero, triggering an exit under the Regulations and a potential significant exit payment. This has the associated risk of the employer not being able to meet the exit payment and thus the exit payment falling to the other employers in the Fund.

Employer risks

Many different employers participate in the Fund. Accordingly, it is recognised that a number of employer-specific events could impact on the funding strategy including:

- Structural changes in an individual employer's membership;
- An individual employer deciding to close the Scheme to new employees; and

- An employer ceasing to exist without having fully funded their pension liabilities.

However, the administering authority monitors the position of employers participating in the Fund, particularly those which may be susceptible to the events outlined, and takes advice from the Fund Actuary when required. In particular, the Fund will commission an employer risk review from the Fund Actuary on a regular basis, once in every valuation cycle as a minimum, to help identify the employers in the Fund that might be considered as high risk. In the case of admitted bodies, the Fund has a policy of requiring some form of security from the employer, in the form of a guarantee or a bond, in case of employer default where the risk falls to the Fund. Where the risk of default falls on the liabilities of an original letting authority, the Fund provides advice to the letting authority to enable them to make a decision on whether a guarantee, some other form of security or a bond should be required.

In addition, the administering authority keeps in close touch with all individual employers participating in the Fund to ensure that, as administering authority, it has the most up to date information available on individual employer situations. It also keeps individual employers briefed on funding and related issues.

Governance risks

Accurate data is necessary to ensure that members ultimately receive their correct benefits. The administering authority is responsible for keeping data up to date and results of the actuarial valuation depend on accurate data. If incorrect data is valued then there is a risk that the contributions paid are not adequate to cover the cost of the benefits accrued.

Monitoring and review

This FSS is reviewed formally, in consultation with the key parties, at least every three years to tie in with the current triennial actuarial valuation process.

The most recent valuation was carried out as at 31 March 2019, certifying the contribution rates payable by each employer in the Fund for the period from 1 April 2020 to 31 March 2023.

The next funding valuation will be due as at 31 March 2022 but the period for which contributions will be certified remains unconfirmed.

The administering authority also monitors the financial position of the Fund between actuarial valuations and may review the FSS more frequently if necessary.

14. PENSIONS ADMINISTRATION STRATEGY (INCLUDES COMMUNICATIONS POLICY STATEMENT)

Introduction

The pensions administration strategy (“the strategy”) sets out the responsibilities of the administering authority and scheme employers in administering the LGPS.

The role of administering authority for Sutton Council and Kingston Council is discharged by the shared pensions administration service and the shared finance service. Both of these services are hosted by Sutton Council. The shared HR service, hosted by Kingston Council, provides the pensioner payroll.

The strategy has been created pursuant to [regulation 59](#) of the Local Government Pension Scheme Regulations 2013 and shall be reviewed at least every three years.

There are four sections of the strategy and those are:

- Roles and deadlines of all parties
- Administering authority’s performance standards
- A statement about scheme communications
- Scope of additional costs that will be recovered from scheme employers

Roles and deadlines

Each of the parties to the LGPS has specific roles and responsibilities. It is important that this is clear to ensure we all discharge them fully.

If a stated deadline falls on a weekend or bank holiday then the deadline is the working day immediately prior.

Role	Deadline
Administering authority	
Shared Finance Service	
Appoint a fund actuary, investment advisors, custodians and fund managers	As required
Lead and publish the triennial valuation (as at 31st March 2016 and on 31st March in every third year afterwards) and annual summary valuation pursuant to regulation 62	Every three years and annually
Publish the audited fund annual accounts pursuant to regulation 56	Annually
Publish a pension fund annual report pursuant to regulation 57	Annually
Publish a funding strategy statement pursuant to regulation 58	At least every three years
Publish an investment strategy statement pursuant to regulation 7 of the Local Government Pension Scheme	At least every three years

(Management and Investment of Funds) Regulations 2016	
Publish a governance compliance statement pursuant to regulation 55	At least every three years
Produce the business strategy for the fund	Every three years
Support the Pensions Committee/Panel and the Pension Board	Quarterly
Maintain the fund risk register	Quarterly
Manage fund cash and bank accounts	As required
Monitor fund investments and performance reporting	At least quarterly
Complete the SF3 and other investment returns	Annually and as required
Complete the quarterly Office for National Statistics financial survey of pension schemes	Quarterly
Monitor the financial strength of scheme employers	Annually
Sign off admission agreement terms regarding the financial arrangements between the parties	As required
Shared Pensions Administration Service	

Publish annual benefit statements to all active and deferred members via Pensions Online	31st August
Publish pensions saving statements to scheme members that may have breached their annual and/or lifetime allowances	6th October
Set up and amend admission agreements for admitted bodies	As soon as practicable
Manage the internal dispute resolution procedure	In accordance with the procedure
Apply the annual pensions increase as directed by HM Treasury	April pensioner payroll cut-off
Submit a quarterly tax return to HM Treasury and pay the required tax charges	14th day of the second month following the end of the relevant period
Maintain a membership database	Not applicable
Undertake an annual data review and complete The Pension Regulator scheme return notice	November, as directed by The Pension Regulator
Process tasks in accordance with the performance standards	See table below
Maintain a 'breaches of law' register and notify The Pension Regulator of any materially significant breaches, which may result from:	As soon as practicable

• A failure to issue annual benefit statements or pension savings statements in time • Errors and omissions identified by the internal dispute resolution procedure • Scheme employers failing to pay contributions on time or accurately • Other breaches of a legal requirement	
Provide information and manage the production of admission, cessation and FRS 102 (financial statement) reports via the fund actuary and share with those reports with scheme employers	As required
Shared HR Service	
Pay pensioners their monthly LGPS benefits	29th day of the month for Kingston pensioners and the last Thursday of the month for Sutton pensioners.
Issue pension payslips in March, April and if the net monthly pension changes by £5 or more	Issued on the relevant pay date.
Scheme employers	
Submit the monthly contributions return in the required format	19th day of the month after which the deductions are made

Pay the monthly contributions to the fund pursuant to the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014	Payment received by 19th day of the month after which the deductions are made
Submit an annual return in the required format	7th May
Calculate and pay redundancy and/or severance payments	As soon as practicable
Provide the data required for FRS 17 (retirement benefits) calculations if requested	20 working days prior to the accounting date (ie 31st March, 31st July, 31st August etc).
Provide any additional data required for interim and/or cessation valuations	As soon as practicable
Publish a statement of policy about the exercise of discretionary functions pursuant to regulation 60	Within six months of becoming a scheme employer
Calculate pensionable pay and determine a scheme member's final pay, when required	As required
Admit its employees into LGPS	By their starting date or auto enrollment date
Inform us about new scheme members, members leaving the scheme, or changes to employment (working hours, unpaid leave, unauthorised absences, reductions	20 working days after their starting date, leaving date or date of the change

in pay and 50/50 scheme elections) using the required form or template	
Give notice of a scheme member's intention to retire	20 working days prior to the intended retirement date
Make the first instance decision about an ill-health retirement following receipt of the independent registered medical practitioner's report	As soon as practicable
Respond to general queries from the administering authority	10 working days
Respond to errors or missing information identified by the administering authority	20 working days or sooner if required
Pay invoices for any recoverable additional costs	30 calendar days from the invoice date
Commence the deduction of additional contributions (APCs or AVCs) following an election from the scheme member or instruction from the administering authority	As soon as practicable
Scheme members	
Use Pensions Online to: • calculate a retirement quotation (over 55s only) • update your personal details • view your service, earnings and contributions information	Not applicable

view your annual benefit statements	
Complete an expression of wish form for any potential death grant payment	Not applicable
Give notice to their scheme employer of an intention to retire	60 working days prior to the intended retirement date
When joining, complete a previous service form to notify the administering authority about any existing LGPS pension benefits	1 year from date of joining
Fund actuary	
Undertake the triennial valuation (including the recommended contribution schedules) and annual summary valuations	Every 3 years (next due 2022) and annually
Produce admission, cessation, conversion and FRS 102 (financial statement) reports	As required

Performance standards for processing tasks

The service target is the shared pensions administration service's target but in order to meet the overall process targets it will need to rely on other parties acting promptly. The targets have been set after accounting for any legal requirements and to achieve a suitable service level for scheme members.

Process	Service target	Overall process target	Legal deadline
Send a notification of joining the LGPS to a scheme member	20 working days from receipt of all information	40 working days from date of joining	Two months from date of joining the

			scheme
Inform a scheme member who left the scheme of their calculated benefits (refund or deferred)	30 working days from receipt of all information	40 working days from date of leaving	No more than two months from date of initial notification
Request transfer details for transfer in (including interfunds)	5 working days from receipt of the request	40 working days from member's initial request	Two months from the date of request
Calculate and provide transfer in (including interfunds) quotation to scheme member	15 working days from receipt of all information		
Provide details of transfer value (including interfunds) for transfer out or divorce proceedings	20 working days from receipt of all information	60 working days from date of request	Three months from date of request
Notify a scheme member of their final retirement benefits	10 working days from receipt of all information	20 working days from date of retirement	One month from date of retirement if on or after normal pension age or two months from date of retirement if before normal pension age
Request financial information from scheme employer's payroll provider	10 working days from date of request	40 working days from date of request	No more than two months from date of request unless there has

Provide a retirement quotation (limited to once per 12 month period)	20 working days from receipt of all information		already been a request in the last 12 months
Calculate and notify dependant(s) of their amount of death benefits	10 working days from receipt of all information	40 working days from date of death	No more than two months from date of becoming aware of death
Pay contribution refund to scheme member following their election	10 working days from receipt of all information	20 working days from date of request	Not applicable
Answer general correspondence	10 working days from receipt of correspondence	Not applicable	Not applicable

Communication statement

This statement confirms the procedures used for communication and information sharing between the various LGPS parties, including scheme members and their representatives, prospective members, and scheme members. It is required by [regulation 61](#).

There are certain key principles that form the basis of approach to communication. They are:

- Digital first communication but alternative methods as required
- Self service when appropriate
- Using plain language to help parties to make informed decisions

Provision of information and publicity about the scheme

The policy will set out the channels of communication that will be communicated and their frequency. It will include an engagement plan that will include events for employers, members of the scheme and prospective members of the scheme.

We are committed to using technology to enhance services, improve accessibility and broaden inclusion. We are developing our use of digital communication through our secure member portal, [Pensions Online](#), and email. Wherever possible, we will use a digital first means of communication, however, we recognise that individuals may have specific needs with regards to the format or language of our communication. As such, reasonable alternative material will always be made available on request.

Annual benefit statements are digitally published on [Pensions Online](#) and unless requested, a scheme member will not receive a paper copy. Using [Pensions Online](#), active and deferred scheme members can view their statements, other documents and membership information.

We shall maintain the service's web pages on both [Sutton Council's website](#) and [Kingston Council's website](#) to provide information about the LGPS. The contents shall be reviewed at least twice per year. This is where we will publish the key scheme documents, such as the annual accounts. The web pages will not duplicate the core scheme information found on the [LGPS website](#) but rather link to it where possible and only add information that is specific to the respective fund.

When it is prudent to share scheme updates to scheme members, these messages will be added to the council websites. In addition, we will ask every scheme employer to cascade such messages to its active scheme members. If it is relevant to share the message with deferred or retired scheme members, we will circulate it using the principle of digital first, where possible. These updates may include changes to the scheme regulations.

During an actuarial valuation year, we shall hold meetings with scheme employers and the fund actuary to discuss the results and implications of the valuation and other actuarial matters.

The LGPS and other pension schemes can prove confusing to its members. As such, all communication sent by us will be written using plain language where possible and where not, will include suitable definitions. We will also utilise 'drop-in' sessions for scheme members after the publication of key annual documents like the annual benefit statements and pensions savings statements. This will give active members an opportunity to discuss their options in person, without offering them any financial advice.

Each fund's governance arrangements include a committee/panel and a board, which receives reports from the administering authority. These reports are presented by officers and will include general updates and specific recommendations for decisions where the power to decide them has not been delegated to officers.

Forms and templates for scheme employers

Forms

Scheme employers need to submit information in accordance with specific requirements to support the efficient administration of the LGPS. The following forms must be used and can be found on the council websites:

- Notification of joining employee (LG2)
- Notification of leaving employee (LG3)
- Notification of an employment change (LG4)
- Notification of changes to multiple post employee (LG5)

Templates

In some situations, often due to a scheme employer's payroll provider, it is not always possible to use specific templates. As such, our templates are optional and scheme employers can choose to use their own format. However, the returns must still contain all of the fields found in our template. The following templates can be found on the council websites:

- Monthly contributions return (LG1)
- Annual return
- BDI return for bulk notification of joining employees

Sharing information with external bodies

From time to time the administering authority shall share scheme member and scheme employer information with the following external bodies:

- Cabinet Office
- Ministry of Housing, Communities & Local Government
- Department for Work & Pensions
- Government Actuary's Department
- HM Revenue & Customs
- Local Government Association
- The fund actuary (Barnett Waddingham LLP and Hymans Robertson LLP)
- The external auditor (Grant Thornton UK LLP)
- The member data service provider (Accurate Data Services)

Recoverable additional costs

The standard cost of administering the fund is factored into the contribution rates but there are circumstances that will require the recovery of additional costs.

Any such costs will be monitored by the administering authority and the relevant party will be invoiced for payment, either annually or on an ad-hoc basis depending on the type of cost.

Performance penalties

This type of recovery is dealt with according to [regulation 70](#), which allows the administering authority to levy such charges on account of a scheme employer's unsatisfactory performance in carrying out its functions. These recoveries are required as a penalty to ensure the smooth running of the LGPS.

Any such recovery should be avoided where possible and scheme employers should seek advice from the administering authority if they experience any difficulties. The administering authority will not seek a recovery if there has been early engagement and suitable effort to comply. In the event that a recovery is required, the administering authority will provide the scheme employer with a written notice.

The penalties will be calculated as follows:

Unsatisfactory performance	Threshold	Charge
Late submission of joiner or leaver form	According to the roles and deadlines section	£50
High quantity of starters and leavers notified in annual return	More than 5% of scheme employer's active membership	£250 plus any other applicable charges
Late submission of annual return	According to the roles and deadlines section	£250 plus £50 per working day

Late submission of monthly contributions return	According to the roles and deadlines section	£125 plus £25 per working day
Poor quality of data in annual return or failure to provide information in the required format	More than 5% of data lines requiring amendment or deletion	Additional time spent to resolve at £125 per half day
Regulator fines as a result of scheme employer	Not applicable	The fine amount plus £100

Actuarial and other fees

Any requests for advice or work that is outside of the requirements of an administering authority as defined by the LGPS regulations will be recoverable from the relevant scheme employer or scheme member. This may include:

- Legal advice concerning admission or cessation
- Accounting valuation reports (FRS 102, etc)
- Site visits or seminars

Such recoveries will recharge the cost incurred from the third party provider with no uplift or administration fee. If the work is to be undertaken by the administering authority itself, the fees will be agreed with the scheme employer or scheme member before work commences.

Interest on late payments

According to [regulation 71](#), scheme employers are liable for interest on late payments including contributions and performance penalties. Interest will be charged according to this regulation on any overdue amounts. In addition, there will be a £100 charge for the administration of such action.

Divorce proceedings

Scheme members shall be liable for the administration costs of implementing a pension sharing order or other order related to divorce proceedings. The charge for this work is fixed at £500.

Strain costs

Pension strain costs or capital costs can occur in a number of situations. Depending on the situation, the scheme employer may be liable for the costs or the costs will be paid from the pension fund (the employer contribution rates include an element to cover these risks). The typical situations are as follows:

- Death - costs paid from pension fund
- Ill-health retirement - costs paid from pension fund
- Redundancy of an employee over the age of 55 - costs paid by scheme employer
- Retirement of an employee over the age of 55 on grounds of efficiency or where the scheme employer chooses to waive the actuarial reduction that would otherwise apply - costs paid by scheme employer

Essentially, if the scheme employer controls when the costs occur (i.e. it chooses to do something) then they are liable for the costs. If it is out of their control/fortuitous, the pension fund pays.

