

**2014-15**

# Annual Report



**The Nottinghamshire  
Local Government Pension Scheme**

administered by



**Nottinghamshire  
County Council**



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# Chair's Foreword

I am pleased to have recently taken on the role of Chairman of the Nottinghamshire Pension Fund Committee, taking over from Cllr Darren Langton who was appointed after the death of Cllr Stella Smedley in October 2014. I take charge of a fund in a good financial position having increased by over £300 million during 2014/15 to stand at just over £4 billion. Strong growth in parts of the global economy, especially in North America, has helped the Fund to generate returns for the year of over 11%.

The Fund's membership also continues to grow and is now in excess of 114,000 members, despite the transfer of the Probation service to the Greater Manchester Pension Fund during the year. Within this growth in membership, the numbers of deferred members and pensioners have increased, partly as a result of the continuing reductions in public service expenditure. This can create increased pressure on the Fund's cash flow if contributions from active members do not increase correspondingly. However, contributing members have also increased and, together with investment returns (in particular investment income), this should mitigate the pressure and allow the fund to continue with its long-term investment strategy.

The Fund takes a long term responsible approach to its investments, actively voting its equity holdings and engaging with companies through its investment managers and membership of the Local Authority Pension Fund Forum. We publish reports of this voting activity on the Fund's website each quarter, where you will also find summary reports of all the Fund's investment holdings.

The last financial year has also been a very busy one. The new Local Government Pension Scheme (LGPS) rules commenced in April 2014, after much preparation work undertaken by the Pension's Office, and a few months later the same team implemented a replacement pensions administration system. Details of all such changes continue to be communicated to members by the Fund's newsletter, Nest Egg, as well as via the dedicated pension fund website ([www.nottspf.org.uk](http://www.nottspf.org.uk)).

Central government continues to consider changes to the management and structure of the LGPS. In addition to the current proposal that greater use be made of passive management of investments, Nottinghamshire County Council has now established, in line with new legislation, a Local Pension Board to assist in complying with LGPS regulations and to ensure that the governance of the scheme continues to be effective and efficient.

## **Cllr Reg Adair**

*Chair of the Nottinghamshire Pension Fund Committee*

# Management and Financial Performance

## Scheme management and advisers

Nottinghamshire County Council is the administering authority for the Local Government Pension Scheme within Nottinghamshire for which it invests and administers funds with over 200 contributing employers and over 39,000 contributing members. The Governance Compliance Statement (page 44) sets out the governance arrangements of the pension fund and covers:

- the delegation of authority to the Nottinghamshire Pension Fund Committee supported by two sub-committees

- the functions and responsibilities of these committees
- the representation of members, employers and trade unions
- stakeholder engagement
- compliance with best practice.

The Local Government Pension Scheme within Nottinghamshire is managed by and receives advice from a number of different organisations/individuals, as listed below:

## Nottinghamshire officers responsible for the fund

|                                                                      |                  |
|----------------------------------------------------------------------|------------------|
| Service Director – Finance & Procurement                             | Nigel Stevenson  |
| Group Manager – Financial Management                                 | Neil Robinson    |
| Senior Accountant – Pensions & Treasury Management                   | Simon Cunnington |
| Service Director HR & Customer Service                               | Marjorie Toward  |
| Group Manager – Business Support Centre and Employee Services Centre | Sarah Stevenson  |
| Payroll & Pensions Team Manager                                      | Jon Clewes       |

## Other organisations/individuals

|                                           |                                             |
|-------------------------------------------|---------------------------------------------|
| Main Investment Managers used by the fund | Schroders                                   |
|                                           | Kames Capital                               |
|                                           | Aberdeen Asset Management                   |
| Fund custodian                            | State Street                                |
| Fund AVC providers                        | Prudential                                  |
|                                           | Scottish Widows                             |
| Fund actuary                              | Barnett Waddingham Public Sector Consulting |
| Banker to the fund                        | Barclays Bank                               |
| The fund auditor                          | KPMG                                        |
| Independent advisor                       | Eric Lambert                                |

## Risk management

The Pension Fund's Risk Management Strategy (page 73) is to:

- identify key risks to the achievement of the Fund's aims
- assess the risks for likelihood and impact
- identify mitigating controls
- allocate responsibility for the mitigating controls
- maintain a risk register detailing these risks, controls and responsibilities
- review and update the risk register on an annual basis
- report the outcome of the review to the Nottinghamshire Pension Fund Committee annually.

The latest approved risk register is on page 77.

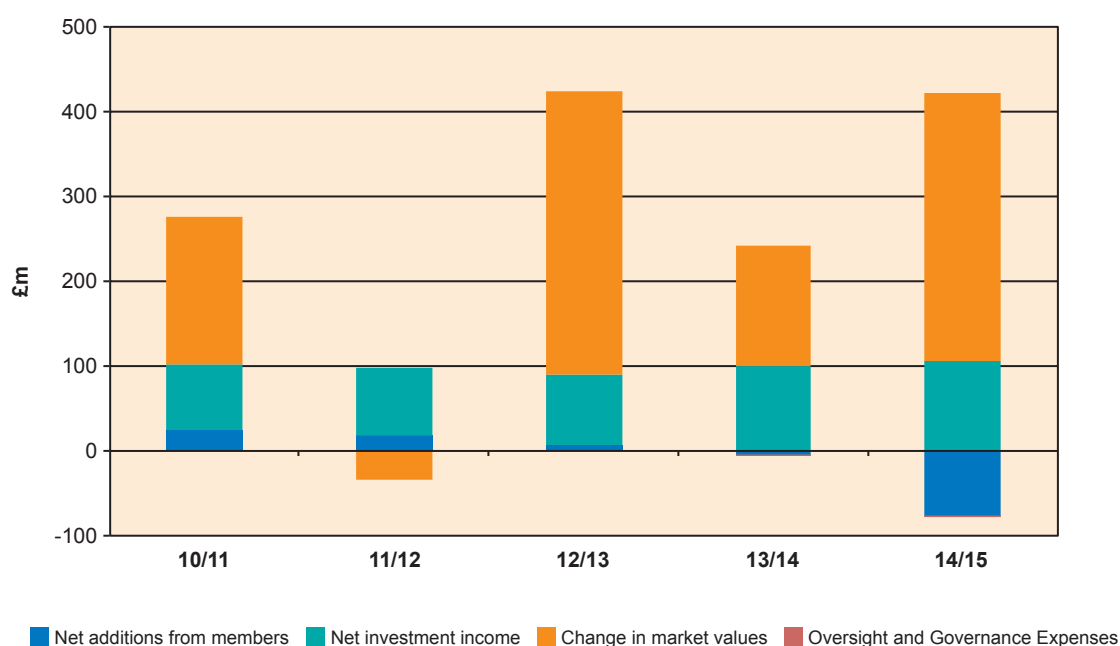
## Financial Performance

The pension fund accounts are shown in detail on pages 16 to 43.

The Fund Account shows a cash outflow of £77m from net dealings with members. However, this includes a transfer of £76m to the Greater Manchester Pension Fund for assets relating to Probation Service pensioners. Investment income for the year was £111m, an increase of 5% on the previous year, and this has been complemented by £316m of net profits from sales and increases in the market value of the Fund's investments.

Overall, the value of the fund has increased by £345m over the year to stand at £4,078m. The chart below shows how the 3 main components have contributed to the Fund's value over the last 5 years.

## Change in Market Value of the Fund



# Investment Policy and Performance

## Investment Policy

The members of the Nottinghamshire Pension Fund Committee are drawn from the County Council, and they have responsibility for determining the investment strategy, asset allocation and management arrangements for the Fund in order to meet the long-term funding objective of achieving and then maintaining sufficient assets to cover 100% of the Fund's projected accrued liabilities.

The Nottinghamshire Pension Fund Committee separately approves the following policy statements governing the investments made by the Pension Fund:

The Funding Strategy Statement (page 49) sets out the aims and purpose of the pension fund and the responsibilities of the administering authority as regards funding the scheme. Its purpose is to explain:

- How the costs of the benefits provided under the Local Government Pension Scheme (the "Scheme") are met through the Fund.
- The objectives in setting employer contribution rates.
- The funding strategy that is adopted to meet these objectives.

The funding objectives are to:

- Set levels of employer contribution that will build up a fund of assets that will be sufficient to meet all future benefit payments from the Fund
- Build up the required assets in such a way that employer contribution rates are kept as low and stable as possible.

It is recognised that investment returns play a significant role in defraying the cost of providing pensions by mitigating the contributions required from employers. The Statement of Investment Principles (page 55) sets out detailed responsibilities relating to the overall investment strategy of the fund including the proposed asset allocation, restrictions on investment types, the type of investment management used and performance monitoring. It also states the fund's approach to responsible investment and corporate governance issues.

The following principles underpin the Fund's investment activity:

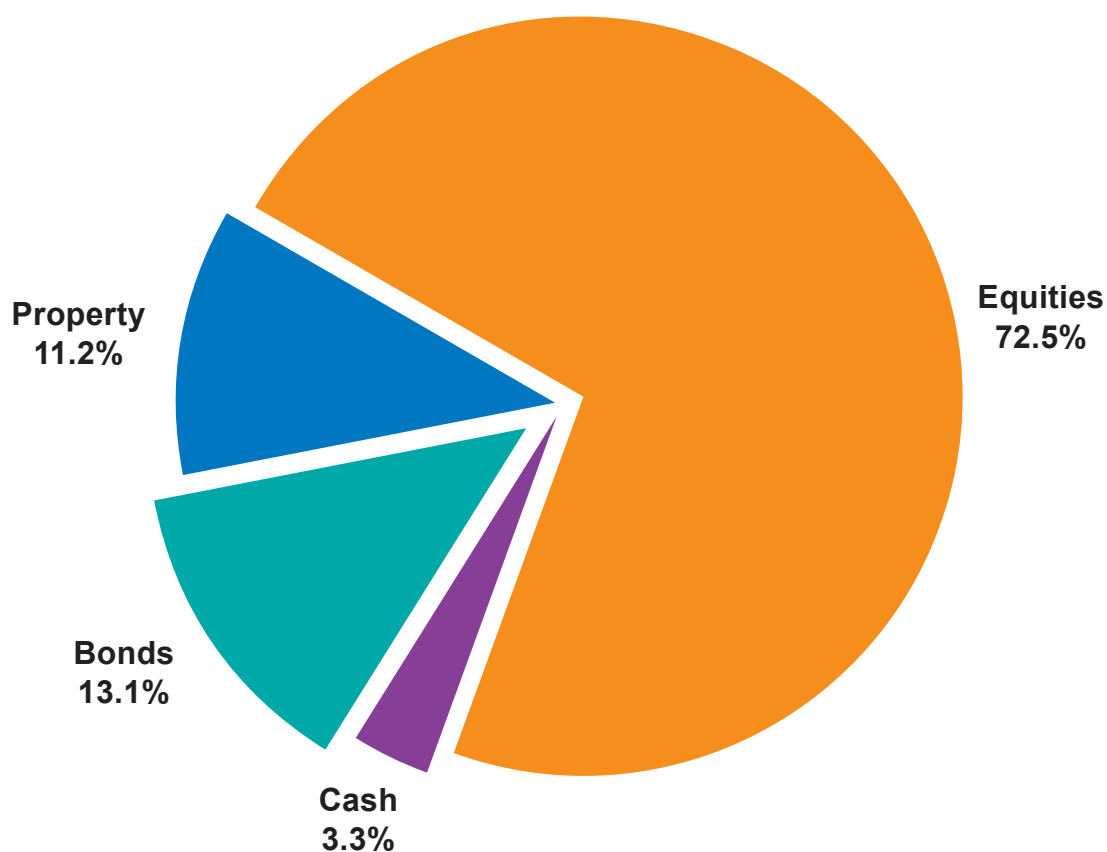
- The Fund will aim to be sufficient to meet all its obligations on a continuing basis.
- The Fund will be invested in a diversified range of assets.
- Proper advice on the suitability of types of investment will be obtained and considered at reasonable intervals.
- The Fund will aim to conduct its business and to use its influence in a long term responsible way.

The Nottinghamshire Pension Fund Committee is responsible for deciding the asset allocation of the fund. The asset allocation currently favours "growth assets" (equities and property) over "defensive assets" (bonds and cash) as the former are expected to outperform the latter over the long term. As the Fund receives significant investment income, it is unlikely to need to sell assets to pay benefits for at least 20 years. This allows the Fund to continue to implement a long term investment strategy.

The agreed asset allocation ranges are those aimed at achieving best returns within acceptable risk parameters. These are shown below.

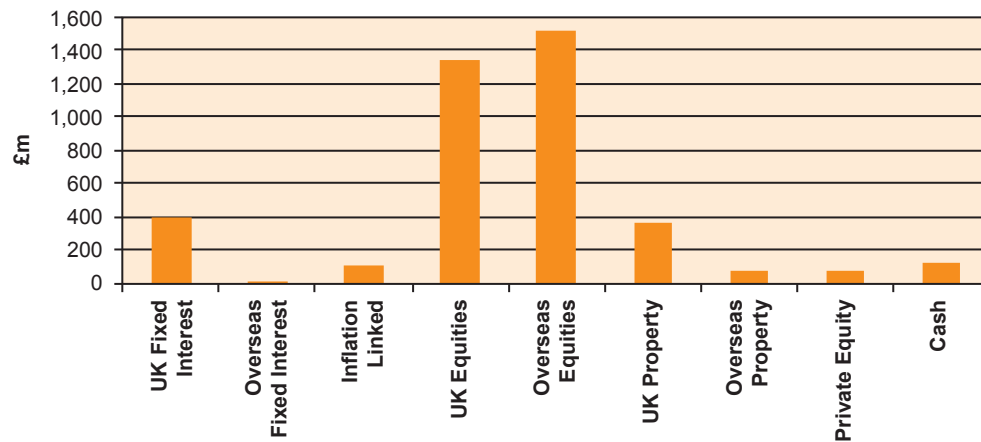
|          |            |
|----------|------------|
| Equities | 55% to 75% |
| Property | 5% to 25%  |
| Bonds    | 10% to 25% |
| Cash     | 0% to 10%  |

At the end of the financial year 2014/15 the actual asset allocation was as shown in the chart below. These allocations are within the agreed ranges.

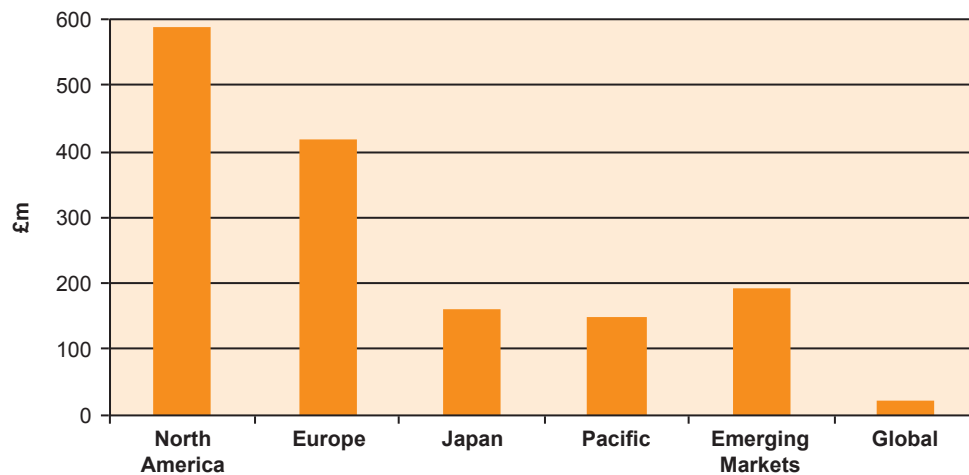


More detail on the actual asset allocation is shown in the following charts.

## Asset Allocation of the Fund 31 March 2015



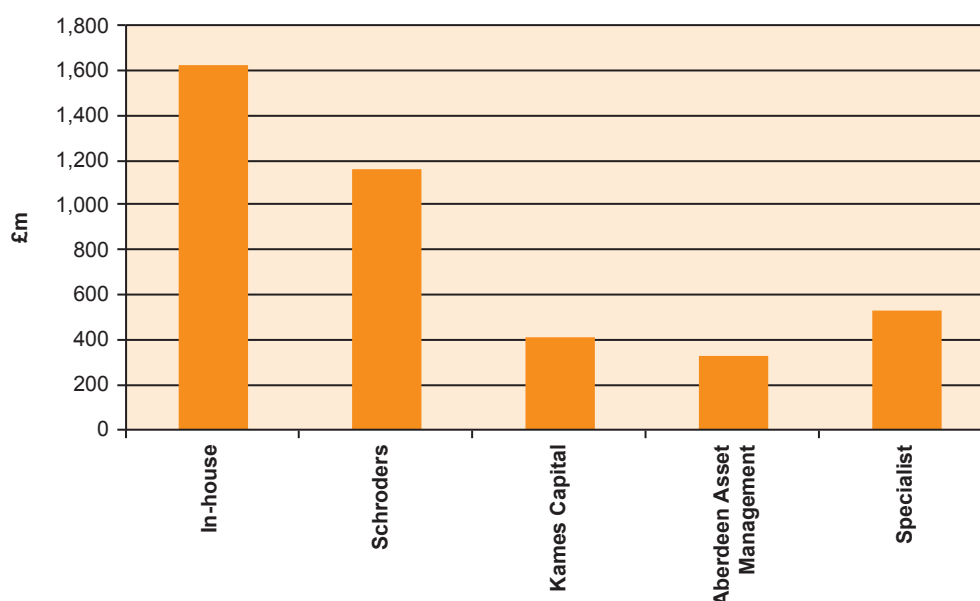
## Breakdown of Overseas Equities



The Pension Fund Committee also determines the investment management arrangements to implement the agreed strategy. The assets of the Fund are

managed within five portfolios and a breakdown of these as at 31 March 2015 is shown below:

## Management of Funds at 31 March 2015



The in-house team of six, led by the Senior Accountant (Pensions and Treasury Management), manages the bulk of the In-house portfolio and monitors all externally managed investments.

The team also records and accounts for all the pension fund investments, producing quarterly valuations for Pensions Investment Sub-committee as well as the annual report and accounts.

## Investment Performance

In 2014/15, the Fund achieved an overall return from its investments of 11.3% compared with its strategic benchmark return of 17.6%. This underperformance is largely a result of the strength of the US economy and the relative weight of the US within global equity markets. The Fund retains a higher weighting to UK equities than the global benchmark as these are expected to provide less volatile returns over time with a higher proportion of dividends. This is reflected in the Fund's longer term performance with returns of 8.6% pa over 5 years, only slightly behind the benchmark of 9.3%. These returns comfortably exceed the requirements of the triennial valuation.

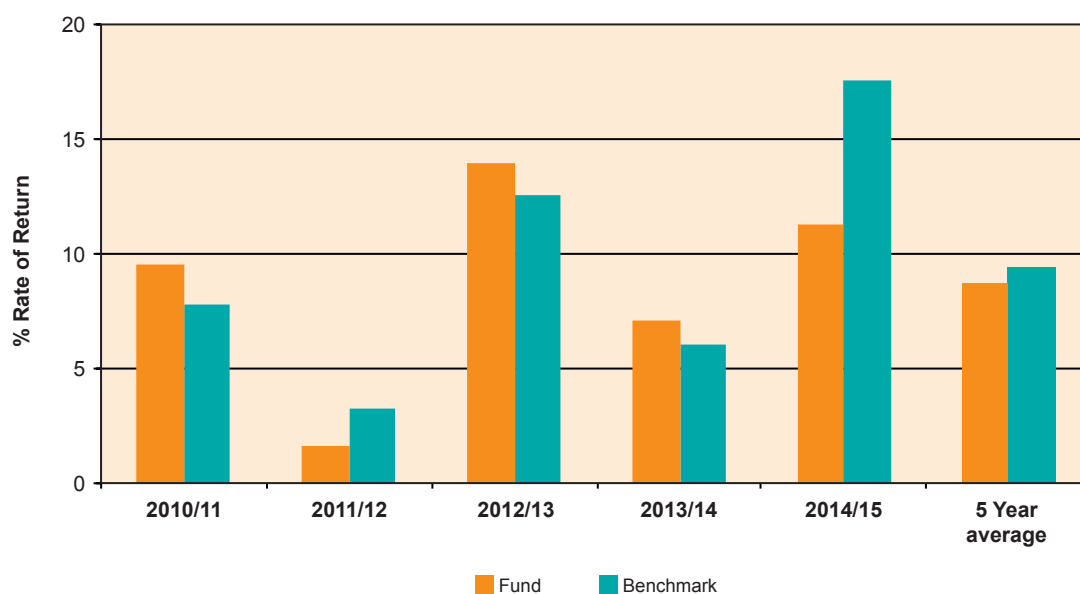
Equities provided a return of 11.6% over the year, benefiting from the US markets. UK bonds also returned positive growth of 13.7% as confidence in the global economic recovery slipped. This sentiment fed through to the property market where the Fund made a return of 12.1% for the year. Detailed performance figures are shown in the table below. Of the Fund's main external managers, Schroders and Kames both exceeded their benchmark over the year (by 1.2% and 0.1% respectively). Aberdeen's performance was 0.2% below benchmark for the year but remains ahead of benchmark over 3 years.

## Fund returns achieved over 1, 3, 5 and 10 years by asset class

| To 31 March  | 1yr         | 3yrs        | 5yrs       | 10yrs      |
|--------------|-------------|-------------|------------|------------|
|              | %           | %           | %          | %          |
| Equities     | 11.6        | 12.6        | 9.6        | 8.9        |
| UK Bonds     | 13.7        | 7.5         | 7.8        | -          |
| Property     | 12.1        | 8.1         | 7.8        | 4.8        |
| <b>Total</b> | <b>11.3</b> | <b>10.7</b> | <b>8.6</b> | <b>7.7</b> |

Information on returns is provided by State Street.  
NB. the above rates of return are net of fees as from 1st April 2014.

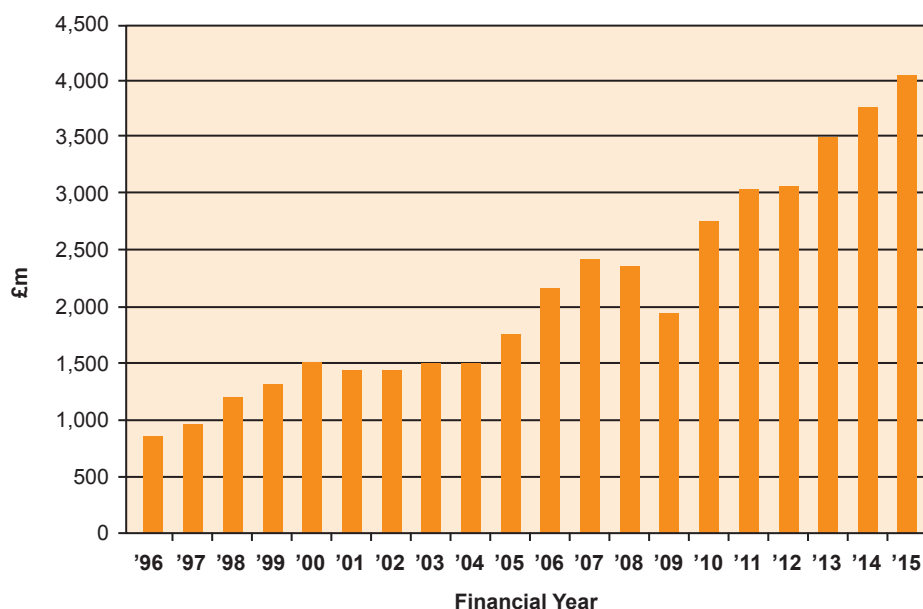
## Investment Performance of the Fund over the last 5 years



## TOP 20 HOLDINGS AS AT 31 MARCH 2015

| Holding                                          | £m                   |              |                           |
|--------------------------------------------------|----------------------|--------------|---------------------------|
| SGST Schroder North American Equity Fund         | 210,774,865          | 5.4%         | US Equities               |
| Kames Diversified Growth Fund (Class B ACC)      | 115,859,581          | 3.0%         | Inflation Linked          |
| Legal & General Asia Pac Ex Jap Dev Eqty Index   | 104,775,723          | 2.7%         | Pacific Basin Equities    |
| Legal & General Japan Equity Index               | 80,810,751           | 2.1%         | Japan Equities            |
| Royal Dutch Shell EUR0.07 'B' (UK)               | 65,343,171           | 1.7%         | UK Equities               |
| RWC Specialist UK Focus Fund                     | 62,134,599           | 1.6%         | UK Equities               |
| HSBC Holdings Plc Ord US\$0.50                   | 56,901,186           | 1.5%         | UK Equities               |
| Legal & General Global Emerging Mkts Index       | 56,417,691           | 1.4%         | Emerging Markets Equities |
| GlaxoSmithKline Plc Ord 25P                      | 53,343,412           | 1.4%         | UK Equities               |
| RWC European Focus Fund                          | 52,074,376           | 1.3%         | Europe Equities           |
| Schroder Instl Dev Mkts Fund A Units             | 48,627,790           | 1.2%         | Emerging Markets Equities |
| Prudential Plc Ord 5P                            | 45,217,551           | 1.2%         | UK Equities               |
| Vodafone Group US\$0.2095238                     | 43,817,953           | 1.1%         | UK Equities               |
| Schroder UT Ltd Instit Pacific Fund Inc          | 43,087,660           | 1.1%         | Pacific Basin Equities    |
| BP Plc Ord US\$0.25                              | 42,839,689           | 1.1%         | UK Equities               |
| AstraZeneca Group US\$0.25                       | 40,909,495           | 1.0%         | UK Equities               |
| Standard Life European Property Growth - A Units | 36,716,216           | 0.9%         | Overseas Property         |
| Legal & General UK Smaller Cos Fund              | 34,885,025           | 0.9%         | UK Equities               |
| Rio Tinto Plc Ord 10P                            | 31,891,084           | 0.8%         | UK Equities               |
| British American Tobacco Ord 25P                 | 31,885,937           | 0.8%         | UK Equities               |
| <b>Total</b>                                     | <b>1,258,313,755</b> | <b>32.1%</b> |                           |

## FUND VALUATION OVER LAST 20 YEARS



# Scheme Administration Arrangements

## The Pensions Office

The Pensions Office is the part of the Nottinghamshire Pension Fund responsible for the administration of the Nottinghamshire Local Government Pension Scheme (LGPS), including the Councillors' LGPS. The Pensions Office undertakes the 'nuts and bolts' of pensions work from setting up new members and updating their records during membership to making payment of their retirement benefits. This work is undertaken in line with the statutory LGPS Regulations. In addition, the office also undertakes some of the employer related work of the LGPS on behalf of Nottinghamshire County Council.

The office is currently separated into the following areas of work:

- Pensions Administration
- Employer Support and Compliance
- Technical/Communications
- Technical/Performance

## Pensions Administration System

A new Pensions Administration System was implemented in the Pensions Office in November 2014 and the Office is continuing to work closely with the software provider in relation to ongoing development. Some of the functions of the system include document imaging, a workflow system which assists with the distribution and prioritisation of work and a contact manager facility linked to pension records which can be utilised to assist Pensions Office staff to answer telephone enquiries.

### Benchmarking

The Pensions Office, as part of measuring its administration cost and performance against other Administering Authorities, belongs to the Pensions Administration Benchmarking Club. This Club is run by the Chartered Institute of Public Finance and Accountancy and we have been a member of it since 2000. Our performance in terms of cost per member

has always been lower than the national average, and we continue to remain one of the cheaper cost-per-member authorities for administration in the country.

## Communications

The Communications Strategy Statement (see page 69) details the overall strategy for involving stakeholders in the pension fund. A key part of this strategy is a dedicated pension fund website. This is available at [www.nottspf.org.uk](http://www.nottspf.org.uk) and includes all of the policy statements as well as a great deal more information about the investments and benefits of the pension fund.

### Benefit Statements

The Pensions Office is required each year to send annual benefits statements to its active and deferred members. The statement is intended to inform the scheme member of the value of their benefits, and provide an overview of when they may become payable.

### Nest Egg

The bright and informative newsletter, Nest Egg is generally produced twice a year. It is accessible to members on the Fund's website or via an e-mail link, and in paper format for those who require one. The publication informs the scheme member, in plain English, of matters such as changes to the pension scheme, topical issues and how to obtain information about the scheme.

### Website Development

Launched in 2007, the website of the Nottinghamshire Pension Fund ([www.nottspf.org.uk](http://www.nottspf.org.uk)) covers all aspects of the LGPS and has information for all different types of stakeholders including active members, councillor members, deferred members, pensioners, their dependants and employers. There is also a section which gives details on the investment performance of the Fund and related matters.

A separate micro-site provides guidance for employing organisations who participate in the Nottinghamshire Pension Fund, known as our Scheme employers. The aim of the site is to assist with the administration procedures and interpretation rules and regulations.

### Employer Support and Compliance function

The Pensions Office's Employer Support and Compliance function is responsible for liaison with scheme employers on a range of matters in relation to their responsibilities under the LGPS Regulations. This includes:

- Supporting employers in undertaking their responsibilities;
- Communicating Regulation and process changes to LGPS employers;
- Analysing training needs and undertaking 'training' of employer representatives, as required;
- Resolving problems in relation to the quality of information supplied by LGPS employers;
- The development of improved communication methods between the Pensions Office and LGPS employers;
- The review and improvement of information and administrative systems.

We also have the following contact with our LGPS Scheme Employer representatives:

- Year-end meetings are undertaken yearly to support preparation for and understanding of reporting requirements at year end;
- New employer meetings, as required (e.g. in line with schools converting to Academy status and therefore becoming LGPS Employers in their own rights);

- Meetings with employer representatives to communicate changes to the LGPS Regulations and the impact on employer responsibilities;
- Ad hoc individual or group support and training sessions with LGPS Employers.

### Membership

The majority of employees of our scheme employers will be brought into the pension scheme automatically, whether through 'contractual enrolment' under the schemes rules or under the Governments 'auto-enrolment' rules. Members can though elect to opt out of the scheme after their first day of employment if they wish.

The membership of the fund over the past three years has been:

|                   | 31/03/13       | 31/03/14       | 31/03/15       |
|-------------------|----------------|----------------|----------------|
| Contributors      | 37,840         | 39,151         | 42,671         |
| Deferred Benefits | 35,187         | 36,311         | 39,711         |
| Pensioners        | 29,797         | 30,824         | 32,015         |
| <b>Total</b>      | <b>102,824</b> | <b>106,286</b> | <b>114,397</b> |

# Statement by the Actuary

## Introduction

The last full triennial valuation of the Nottinghamshire County Council Pension Fund ("the Fund") was carried out as at 31 March 2013 in accordance with the Funding Strategy Statement of the Fund. The results were published in the triennial valuation report dated March 2014. This statement gives an update on the funding position as at 31 March 2015 and comments on the main factors that have led to a change since the full valuation.

The estimated funding position in this statement at 31 March 2015 is based on market movements since the previous valuation rather than being a full valuation with updated member data.

## 2013 Valuation

The results for the Fund at 31 March 2013 were as follows:

- The Fund as a whole had a funding level of 85% i.e. the assets were 85% of the value that they would have needed to be to pay for the benefits accrued to that date, based on the assumptions used. This corresponded to a deficit of £620m.
- To cover the cost of new benefits and to also pay off the deficit over a period of 20 years, a total contribution rate of 18.8% of pensionable salaries would be needed.
- The contribution rate for each employer was set based on the annual cost of new benefits plus any adjustment required to pay for their share of the deficit.

## Assumptions

The assumptions used at the whole Fund level to value the benefits at 31 March 2013 and used in providing this estimate at 31 March 2015 are summarised below:

| Assumption        | 31 March 2013                                                                                                               | 31 March 2015 |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------|---------------|
| Discount rate     | 6.0% p.a.                                                                                                                   | 5.6% p.a.     |
| Pension increases | 2.7% p.a.                                                                                                                   | 2.5% p.a.     |
| Salary increases  | 2.7% until 31 March 2015 then 4.5% p.a.                                                                                     | 4.3% p.a.     |
| Mortality         | S1PA tables with future improvements in line with the CMI 2012 Model with a long term rate of improvement of 1.5% per annum |               |
| Retirement        | Each member retires at a single age, weighted based on when each part of their pension is payable on an unreduced basis     |               |
| Commutation       | Members will convert 50% of the maximum possible amount of pension into cash                                                |               |

The effect of the change in the assumptions over the year is discussed in the final section.

## Assets

The assumptions used to value the liabilities are smoothed based on market conditions around the valuation date so the asset values are also measured in a consistent manner although the difference between the smoothed and market values at either date is not expected to be significant.

At 31 March 2013, the value of the assets used was £3,496m and this has increased over the period to an estimated £4,057m.

## Updated position

The estimated funding position at 31 March 2015 is a funding level of 89%, which is an improvement on the position at 31 March 2013.

The assets have achieved an estimated return of 19% over the period since the 2013 valuation, which is higher than expected at the 2013 valuation and so has improved the position. Payment of deficit contributions during the period in line with agreed contribution schedules has also improved the position. However, movements in the assumptions have increased the value of the liabilities and thus offset some of these improvements.

The next formal valuation will be carried out as at 31 March 2016 with new contribution rates set from 1 April 2017.

**Alison Hamilton FFA**

**Partner, Barnett Waddingham LLP**

# Pension Fund Accounts, Net Assets Statement and Notes

Nottinghamshire County Council is the Administering Authority for the Local Government Pension Scheme (LGPS) within Nottinghamshire. The LGPS is a statutory scheme administered by individual pension funds. The benefits within the scheme are determined by regulation and are guaranteed by statute. The pension fund exists to help defray the cost of paying the pension benefits. Members make contributions to the Fund as specified in the regulations and employers make contributions as determined by the Fund's actuary as part of the triennial valuation of the Fund. All new employees are brought into the scheme automatically, unless a positive election not to participate is received from the employee.

The Authority administers the pension fund for over 300 participating employers and over 110,000 members. The employers include the County Council, the City Council, District Councils and organisations which used to be part of local government (such as Nottingham Trent University, Colleges, Police civilian staff and Academies). They also include organisations which satisfy the conditions to participate in the LGPS and have been admitted to the Fund by the Authority. In general, these organisations are non-profit making, or are undertaking a service which was, or could be, carried out by a local authority.

The operation of the Fund is set out in a number of published policy statements. Under the Governance Compliance Statement, the functions as administering authority of the Fund are delegated to the Nottinghamshire Pension Fund Committee supported by two advisory sub-committees.

The Funding Strategy Statement sets out the aims and purpose of the Fund and details the responsibilities of the administering authority as regards funding the scheme.

The Statement of Investment Principles sets out more detailed responsibilities relating to the overall investment strategy of the Fund including the proposed asset allocation, restrictions on investment types, the type of investment management used and performance monitoring. It also states the Fund's approach to responsible investment and corporate governance issues.

The Communications Strategy Statement details the overall strategy for involving stakeholders in the Fund. A key part of this strategy is a dedicated Fund website (available at [www.nottspf.org.uk](http://www.nottspf.org.uk)).

A separate annual report for the Fund is also produced and this, along with previous years' reports, will be accessible via the the pension fund website. The annual report includes the accounts and the published policies as well as information on the performance of the fund.

The accounts of the fund are set out over the following pages. The CIPFA Code of Practice on Local Authority Accounting in the United Kingdom 2014/15 requires:

- a fund account showing the changes in net assets available for benefits
- a net assets statement showing the assets available at the year end to meet benefits
- supporting notes.

# Pension Fund Accounts 2014-15

## FUND ACCOUNT FOR YEAR ENDED 31 March 2015

|                                                                                     | Notes    | 2013/14<br>£000  | 2014/15<br>£000  |
|-------------------------------------------------------------------------------------|----------|------------------|------------------|
| <b>Contributions</b>                                                                | <b>4</b> |                  |                  |
| Employer contributions                                                              |          | (123,905)        | (130,112)        |
| Member contributions                                                                |          | (41,018)         | (42,714)         |
|                                                                                     |          | <b>(164,923)</b> | <b>(172,826)</b> |
| Transfers in from other pension funds                                               |          | (6,638)          | (6,124)          |
| <b>Benefits</b>                                                                     |          |                  |                  |
| Pensions                                                                            |          | 132,832          | 137,495          |
| Commutation of pensions and lump sum retirement benefits                            |          | 23,115           | 25,991           |
| Lump sum death benefits                                                             |          | 3,793            | 3,324            |
|                                                                                     | <b>5</b> | <b>159,740</b>   | <b>166,810</b>   |
| Payments to and on account of leavers                                               |          | 15,326           | 87,072           |
| Administration Expenses                                                             | <b>6</b> | 1,291            | 1,764            |
| <b>Net withdrawals from dealings with members</b>                                   |          | <b>4,796</b>     | <b>76,696</b>    |
| <b>Oversight and governance expenses</b>                                            | <b>7</b> | <b>628</b>       | <b>572</b>       |
| Investment Income                                                                   | <b>9</b> | (105,388)        | (110,790)        |
| Profits & losses on disposal of investments & changes in value                      |          | (141,271)        | (316,474)        |
| Taxes on income                                                                     |          | 644              | 703              |
| Investment management expenses                                                      | <b>8</b> | 3,892            | 3,838            |
| <b>Net Returns on Investments</b>                                                   |          | <b>(242,123)</b> | <b>(422,723)</b> |
| <b>Net (increase)/decrease in net assets available for benefits during the year</b> |          | <b>(236,699)</b> | <b>(345,455)</b> |
| Opening net assets of the Fund                                                      |          | 3,496,446        | 3,733,145        |
| <b>Net assets available to fund benefits</b>                                        |          | <b>3,733,145</b> | <b>4,078,600</b> |

Payments to and on account of leavers in 2014/15 includes an amount of £76.0 million in respect of the transfer out of liabilities relating to the Nottinghamshire Probation Trust as part of the transfer of services to the National Probation Service. Excluding this bulk transfer, the net withdrawal from dealings with members was £0.7 million.

## NET ASSETS STATEMENT FOR THE YEAR ENDED

|                                                                             | Notes              | 31 March 2014<br>£000 | 31 March 2015<br>£000 |
|-----------------------------------------------------------------------------|--------------------|-----------------------|-----------------------|
| <b>Investment Assets</b>                                                    | <b>10 &amp; 14</b> |                       |                       |
| Fixed Interest Securities                                                   |                    | 360,883               | 412,853               |
| Equities                                                                    |                    | 1,818,478             | 1,983,371             |
| Pooled Investment Vehicles                                                  |                    | 1,091,132             | 1,199,849             |
| Property                                                                    |                    | 288,140               | 321,700               |
| Forward Foreign Exchange                                                    |                    | 191                   | -                     |
| Cash deposits                                                               |                    | 153,469               | 131,916               |
| Other Investment Balances                                                   | <b>12</b>          | 21,670                | 21,568                |
| Investment liabilities                                                      | <b>12</b>          | (2,650)               | (4,571)               |
|                                                                             |                    | <b>3,731,313</b>      | <b>4,066,686</b>      |
| Current assets                                                              | <b>13</b>          | 10,033                | 14,198                |
| Current liabilities                                                         | <b>13</b>          | (8,201)               | (2,284)               |
|                                                                             |                    | <b>1,832</b>          | <b>11,914</b>         |
| <b>Net assets of the fund available to pay benefits<br/>at the year end</b> |                    | <b>3,733,145</b>      | <b>4,078,600</b>      |

The actuarial present value of promised retirement benefits, as required by the *Code of Practice on Local Authority Accounting in the United Kingdom 2014/15*, is shown at note 2c.

## EXPLANATION OF PRIOR PERIOD ADJUSTMENTS

The management costs of the Fund have previously been split between administration expenses and investment management expenses. Following review by CIPFA, a range of costs have been identified that could be more accurately described as oversight and governance costs.

Management costs have been reported for 2014/15 in the three categories recommended by CIPFA and, as a consequence, the costs for 2013/14 have been reclassified. The impact on the Fund Account is shown in the table below. There is no impact on the Net Assets Statement arising from the reclassification.

| <b>Impact on the Fund Account:</b> | <b>Fund Account<br/>2013/14<br/>Original Statement<br/>£000</b> | <b>Adjustment<br/>made<br/>£000</b> | <b>Fund Account<br/>2013/14<br/>As Restated<br/>£000</b> |
|------------------------------------|-----------------------------------------------------------------|-------------------------------------|----------------------------------------------------------|
| Administration Expenses            | 1,442                                                           | (151)                               | 1,291                                                    |
| Oversight and governance expenses  | -                                                               | 628                                 | 628                                                      |
| Investment management expenses     | 4,369                                                           | (477)                               | 3,892                                                    |
|                                    | <b>5,811</b>                                                    | <b>-</b>                            | <b>5,811</b>                                             |

# Notes to the Accounts

## 1 ACCOUNTING POLICIES

### a) Basis of Preparation

The Pension Fund accounts have been prepared in accordance with the *Code of Practice on Local Authority Accounting in the United Kingdom 2014/15* (the Code). On issues where there is no clear guidance in the Code, reference has been made under the hierarchy of standards to *Financial Reports of Pension Schemes: a Statement of Recommended Practice 2007* (the Pensions SORP) or to individual International Accounting Standards (IAS).

Disclosures in the Pension Fund accounts have been limited to those required by the Code.

### b) Debtors and Creditors

The accruals concept is applied to these accounts in compliance with the Code.

### c) Investments

Pension fund investments are carried at fair value in accordance with the Code. Fair value is defined as 'the amount for which an asset could be exchanged or a liability settled, between knowledgeable, willing parties in an arm's-length transaction'. Where an active market exists, the quoted market price is used. Where there is no active market, fair value is established by using valuation techniques.

Specific details on the valuation methods for particular classes of assets are listed below:

- Equities traded through a stock exchange are valued at the latest quoted price. Where more than one price is quoted the 'bid' price is used.
- Unit Trusts and managed funds are valued at the closing single price or the bid price where applicable. These reflect the market value of the underlying investments.
- Unquoted securities and pooled private equity investments are valued at fair value by the fund managers at the year end in accordance with industry accepted guidelines.
- The market value of fixed interest investments is based on the 'clean price', i.e. excludes income accrued at 31 March but not yet due for payment.
- Property investments are stated at open market value based on a quarterly independent valuation at the Net Assets Statement date.

Transaction costs arising on all investment purchases and sales are charged to the Fund Account within 'Profits & losses on disposal of investments & changes in value' by adding to purchase costs and netting against sale proceeds, as appropriate, for all investment types. This achieves consistency between asset classes and ensures all transaction costs are charged to the Fund Account. It also ensures that the financial statements faithfully represent the economic substance of the transactions. The economic substance of purchases and sales of all asset types is to generate returns for the Fund to help mitigate the cost to employers of providing pensions. Transaction costs are ancillary to this purpose.

The change in fair value of investments during the year comprises all increases and decreases in the market value of investments held at any time during the year, including profits and losses realised on sales of investments and unrealised changes in market value.

Forward foreign exchange contracts are "over the counter contracts" under which two parties agree to exchange two currencies on a specified future date at an agreed rate of exchange. These are used to manage the economic exposure to bond markets and hedge against foreign currency movements. These contracts are included at fair value by determining the gain or loss that would arise from closing out the contract at the Net Assets Statement date by entering into an equal and opposite contract at that date. The movements on these contracts during the year are shown in the reconciliation of opening and closing balances of investments at note 10(b).

Cash deposits includes all fixed term deposits, amounts held in call accounts or money market funds and amounts held by the Fund's custodian. These are classed as investment assets in accordance with the Code.

#### **d) Investment Income**

Income is accounted for on an accruals basis for the following:

- interest on cash deposits and fixed interest securities is accrued on a daily basis
- dividends from equities are accrued when the stock is quoted ex-dividend
- rents from property are accrued in accordance with the terms of the lease.

#### **e) Taxes on Income**

UK equity dividends are quoted and accounted for at the net rate. The tax credit, which the Fund is unable to recover, is not recognised (in accordance with the Pensions SORP). Overseas equity dividends are accounted for gross of withholding tax, where this is deducted at source. Partial reclaims of withholding tax, where allowed, are adjusted at the year end by outstanding claims.

#### **f) Foreign Currencies**

Where forward exchange contracts are in place in respect of assets and liabilities in foreign currencies, the contract rate is used. Other assets and liabilities in foreign currencies are expressed in sterling at the rates of exchange ruling at the year-end. Income from overseas investments is translated into sterling at the rate ruling on the date of the transaction. Surpluses and deficits arising on conversion or translation are dealt with as part of the change in market value of investments.

#### **g) Contributions**

Normal contributions, both from the members and from employers, are accounted for in the payroll month to which they relate at rates as specified in the rates and adjustments certificate. Additional contributions from employers are accounted for on an accruals basis.

#### **h) Benefits Payable**

Under the rules of the Scheme, members can receive a lump sum retirement grant in addition to their annual pension. Lump sum retirement grants are accounted for from the date of retirement. Where

a member can choose whether to take a greater retirement grant in return for a reduced pension these lump sums are accounted for on an accruals basis from the date the option is exercised. Other benefits are accounted for on the date the member leaves the Scheme or on death.

#### **i) Transfers to and from Other Schemes**

Transfer values represent the capital sums either receivable (in respect of members from other pension schemes of previous employers) or payable (to the pension schemes of new employers for members who have left the Scheme). They take account of transfers where the trustees (or administering authority) of the receiving scheme have agreed to accept the liabilities in respect of the transferring members before the year end, and where the amount of the transfer can be determined with reasonable certainty.

#### **j) Other Expenses**

Management expenses are accounted for on an accruals basis. Expenses are recognised net of any recoverable VAT. Nottinghamshire County Council charges the Fund with the costs it incurs in administering the scheme and the Fund.

#### **k) Additional Voluntary Contributions**

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

The AVCs are not included in the Fund's accounts in accordance with regulation 4(2)(b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009. The value of the separately invested AVCs is disclosed at note 15.

## 2 OPERATION OF THE FUND

### a) Contributions and Solvency

With effect from 1 April 2008 The Local Government Pension Scheme (Benefits, Membership and Contributions) Regulations 2007 were introduced.

The principal changes from the 1997 regulations were: the replacement, for future service, of the existing benefits structure (based on a pension of 1/80th of pensionable pay for each year of pensionable service plus an automatic lump sum of three times this amount) by one based on 1/60th of pensionable pay for each year of pensionable service and no automatic lump sum. Under the 2008 scheme, employees were required to make percentage contributions by deduction from earnings at a rate between 5.5% and 7.5% depending on salary.

From 1 April 2014 the new Local Government Pension Scheme was introduced for service accruing after that date. This is a career average revalued earnings (CARE) scheme with an accrual rate of 1/49th of pensionable pay and a retirement age linked to the state retirement age. Employee contribution rates in the new scheme range from 5.5% to 12.5% depending on salary.

Employers are required to make such balancing contributions, determined by the Actuary, as will maintain the fund in a state of solvency, having regard to existing and prospective liabilities.

### b) Actuarial Valuations

As required by the Regulations an Actuarial Valuation of the Fund was carried out as at 31 March 2013. The market value of the Fund's assets at the valuation date was £3,470 million. The Actuary has estimated that the value of the Fund was sufficient to meet 85% of its expected future liabilities in respect of service completed to 31 March 2013. The certified contribution rates are expected to improve this to 100% within a period of 20 years. The full actuarial valuation report is available on the Fund's website at [www.nottspf.org.uk](http://www.nottspf.org.uk).

The Actuarial Valuation was carried out using the projected unit method and the assumptions used within the valuation are shown below along with the equivalent assumptions from the 2010 valuation.

|                                | 31st March 2010<br>% pa | 31st March 2013<br>% pa |
|--------------------------------|-------------------------|-------------------------|
| Expected investment returns:   |                         |                         |
| Equities                       | 7.5%                    | 6.7%                    |
| Gilts                          | 4.5%                    | 3.3%                    |
| Property                       | 5.6%                    | 5.8%                    |
| Discount Rate                  | 6.9%                    | 6.0%                    |
| Retail price inflation (RPI)   | 3.5%                    | 3.5%                    |
| Consumer price inflation (CPI) | 3.0%                    | 2.7%                    |
| Long term pay increases        | 5.0%                    | 4.5%                    |
| Pension Increases              | 3.0%                    | 3.5%                    |

The 2013 valuation produced an average employer contribution rate of 18.8% (2010 18.0%). Employer contributions were certified by the actuaries for the years 2014/15 to 2016/17. For the majority of employers, the rate for future service accrual was

certified as a percentage of salary with an additional cash amount specified for deficit recovery. The employers' contribution rates paid in 2013/14 were set by the 2010 valuation. The following list shows the contributions payable by the main employers.

| Certified employer contributions     |       | 2013/14 | 2014/15     | 2015/16     | 2016/17     |
|--------------------------------------|-------|---------|-------------|-------------|-------------|
| Nottinghamshire County Council       |       | 18.3%   | 13.2%       | 13.2%       | 13.2%       |
|                                      | Plus: |         | £12,638,000 | £12,979,000 | £13,330,000 |
| Nottingham City Council              |       | 18.0%   | 12.5%       | 12.5%       | 12.5%       |
|                                      | Plus: |         | £8,031,000  | £8,880,000  | £9,356,000  |
| Ashfield District Council            |       | 22.4%   | 12.3%       | 12.3%       | 12.3%       |
|                                      | Plus: |         | £1,021,000  | £1,144,000  | £1,272,000  |
| Bassetlaw District Council           |       | 22.1%   | 13.5%       | 13.5%       | 13.5%       |
|                                      | Plus: |         | £1,890,000  | £2,027,000  | £2,127,000  |
| Broxtowe Borough Council             |       | 18.7%   | 13.2%       | 13.2%       | 13.2%       |
|                                      | Plus: |         | £716,000    | £735,000    | £755,000    |
| Gedling Borough Council              |       | 18.2%   | 12.3%       | 12.3%       | 12.3%       |
|                                      | Plus: |         | £555,000    | £569,000    | £585,000    |
| Mansfield District Council           |       | 20.5%   | 13.9%       | 13.9%       | 13.9%       |
|                                      | Plus: |         | £1,075,000  | £1,250,000  | £1,433,000  |
| Newark and Sherwood District Council |       | 21.9%   | 12.5%       | 12.5%       | 12.5%       |
|                                      | Plus: |         | £946,000    | £1,065,000  | £1,189,000  |
| Rushcliffe Borough Council           |       | 19.5%   | 13.0%       | 13.0%       | 13.0%       |
|                                      | Plus: |         | £478,000    | £556,000    | £638,000    |

### c) Actuarial Present Value of Promised Retirement Benefits

The actuarial present value of promised retirement benefits has been calculated by the Fund's actuaries in accordance with IAS 19. To do this, the actuaries rolled forward the value of the Employers' liabilities calculated for the Triennial valuation as at 31 March 2013 allowing for the different financial assumptions required under IAS19. The assumptions used for the purposes of the IAS 19 calculations are as follows:

|                   | 31 March 2013 |           | 31 March 2014 |           | 31 March 2015 |           |
|-------------------|---------------|-----------|---------------|-----------|---------------|-----------|
|                   | % pa          | Real % pa | % pa          | Real % pa | % pa          | Real % pa |
| RPI Increases     | 3.4%          | -         | 3.6%          | -         | 3.3%          | -         |
| CPI increases     | 2.6%          | (0.8%)    | 2.8%          | (0.8%)    | 2.5%          | (0.8%)    |
| Salary Increases  | 4.8%          | 1.4%      | 4.6%          | 1.0%      | 4.3%          | 1.0%      |
| Pension Increases | 2.6%          | (0.8%)    | 2.8%          | (0.8%)    | 2.5%          | (0.8%)    |
| Discount Rate     | 4.5%          | 1.1%      | 4.5%          | 0.9%      | 3.4%          | 0.1%      |

The net liability under IAS 19 is shown below.

|                                    | 31 March 2013    | 31 March 2014    | 31 March 2015    |
|------------------------------------|------------------|------------------|------------------|
|                                    | £000             | £000             | £000             |
| Present value of funded obligation | 5,476,127        | 5,733,792        | 6,886,812        |
| Fair value of scheme assets        | 3,477,023        | 3,708,200        | 4,050,198        |
| <b>Net Liability</b>               | <b>1,999,104</b> | <b>2,025,592</b> | <b>2,836,614</b> |

The present value of funded obligation consists of £6,560.7 million in respect of vested obligation and £326.1 million in respect of non-vested obligation.

**These figures are presented only for the purposes of IAS 19. In particular, they are not relevant for calculations undertaken for funding purposes or for other statutory puposes under UK pensions legislation.**

#### d) Investment Strategy

The investment strategy of the Fund is designed to maximise growth within acceptable risk parameters to help meet the future liabilities. The powers of investment are governed by the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009. The investment policy is set out in the Fund's Statement of Investment Principles, a copy of which is available on the pension fund website ([www.nottspf.org.uk](http://www.nottspf.org.uk)).

The Nottinghamshire Pension Fund Committee, advised by the Pensions Sub-Committee, is responsible for determining the investment strategy of the Fund and the type of investment management to be used. The Pensions Sub-Committee consists of nine elected County Councillors, three representatives of Nottingham City Council, two representatives of the District Councils, two representatives of the Trade Unions, a representative elected by the other scheduled and admitted bodies

and two appointed pensioner representatives. Meetings are also attended by an independent adviser and representatives of the Chief Financial Officer.

The investments are managed by officers of the Authority or by organisations specialising in the management of pension fund assets. The Investments Sub-Committee is responsible for monitoring performance of the fund and meets on a quarterly basis to review the Fund's main investment managers and their performance.

#### e) External Audit

A separate fee is payable to KPMG LLP for audit of the pension fund. The fee for 2014/15 is £33,226 (£29,926 for 2013/14). All fees have been included in the accounts for the period to which they relate. Rebates were also received from the Audit Commission as part of their efficiency savings in advance of closure. The rebate for 2014/15 was £7,171 (£3,120 for 2013/14).

### 3 CONTRIBUTORS AND PENSIONERS

#### Members at 31 March 2015

|                        | County Council | City Council | District Councils | Others | Total          |
|------------------------|----------------|--------------|-------------------|--------|----------------|
| Contributors           | 15,653         | 9,225        | 3,457             | 14,336 | 42,671         |
| Deferred Beneficiaries | 17,987         | 8,963        | 3,631             | 9,130  | 39,711         |
| Pensioners             | 15,187         | 6,339        | 4,594             | 5,895  | 32,015         |
|                        |                |              |                   |        | <b>114,397</b> |

#### Members at 31 March 2014

|                        | County Council | City Council | District Councils | Others | Total          |
|------------------------|----------------|--------------|-------------------|--------|----------------|
| Contributors           | 15,244         | 8,210        | 3,286             | 12,411 | 39,151         |
| Deferred Beneficiaries | 16,932         | 7,850        | 3,456             | 8,073  | 36,311         |
| Pensioners             | 14,702         | 6,114        | 4,479             | 5,529  | 30,824         |
|                        |                |              |                   |        | <b>106,286</b> |

#### 4 ANALYSIS OF CONTRIBUTIONS

|                  | Employers      |                | Members       |               | Total          |                |
|------------------|----------------|----------------|---------------|---------------|----------------|----------------|
|                  | 2013/14        | 2014/15        | 2013/14       | 2014/15       | 2013/14        | 2014/15        |
|                  | £000           | £000           | £000          | £000          | £000           | £000           |
| County Council   | 39,473         | 42,324         | 12,956        | 12,845        | 52,429         | 55,169         |
| Scheduled Bodies | 79,817         | 83,306         | 26,441        | 28,300        | 106,258        | 111,606        |
| Admitted Bodies  | 4,615          | 4,482          | 1,621         | 1,569         | 6,236          | 6,051          |
|                  | <b>123,905</b> | <b>130,112</b> | <b>41,018</b> | <b>42,714</b> | <b>164,923</b> | <b>172,826</b> |

#### 5 ANALYSIS OF BENEFITS

|                          | 2013/14        | 2014/15        |
|--------------------------|----------------|----------------|
|                          | £000           | £000           |
| Pensions                 | 132,832        | 137,495        |
| Commutation and lump sum | 23,115         | 25,991         |
| Lump sum death benefits  | 3,793          | 3,324          |
|                          | <b>159,740</b> | <b>166,810</b> |
| Comprising of:           |                |                |
| County Council           | 65,160         | 68,831         |
| Scheduled Bodies         | 89,657         | 92,802         |
| Admitted Bodies          | 4,923          | 5,177          |
|                          | <b>159,740</b> | <b>166,810</b> |

## 6 ADMINISTRATION EXPENSES

|                               | 2013/14<br>Restated<br>£000 | 2014/15<br>£000 |
|-------------------------------|-----------------------------|-----------------|
| Printing and stationery       | 36                          | 11              |
| Legal fees                    | -                           | 39              |
| Other external fees           | 212                         | 541             |
| Administering Authority Costs | 1,043                       | 1,173           |
|                               | <b>1,291</b>                | <b>1,764</b>    |

## 7 OVERSIGHT AND GOVERNANCE EXPENSES

|                                   | 2013/14<br>Restated<br>£000 | 2014/15<br>£000 |
|-----------------------------------|-----------------------------|-----------------|
| Training and conferences          | 8                           | 17              |
| Printing and stationery           | -                           | 1               |
| Subscriptions and membership fees | 21                          | 28              |
| Actuarial fees                    | 56                          | 9               |
| Audit fees                        | 30                          | 33              |
| Audit Commission rebate           | (3)                         | (7)             |
| Other external fees               | 79                          | 90              |
| Administering Authority Costs     | 437                         | 401             |
|                                   | <b>628</b>                  | <b>572</b>      |

## 8 INVESTMENT MANAGEMENT EXPENSES

|                               | 2013/14<br>Restated<br>£000 | 2014/15<br>£000 |
|-------------------------------|-----------------------------|-----------------|
| Custody fees                  | 299                         | 326             |
| Investment management fees    | 3,420                       | 3,335           |
| Other external fees           | 152                         | 158             |
| Administering Authority Costs | 21                          | 19              |
|                               | <b>3,892</b>                | <b>3,838</b>    |

## 9 INVESTMENT INCOME

| Analysis by type of investment          | 2013/14<br>£000  | 2014/15<br>£000  |
|-----------------------------------------|------------------|------------------|
| Interest from fixed interest securities | (13,472)         | (17,232)         |
| Income from index-linked securities     | (684)            | -                |
| Dividends from equities                 | (66,959)         | (61,158)         |
| Income from pooled investment vehicles  | (5,401)          | (12,876)         |
| Income from property pooled vehicles    | (3,055)          | (3,557)          |
| Net rents from property                 | (14,461)         | (13,661)         |
| Interest on cash deposits               | (854)            | (911)            |
| Other                                   | (502)            | (1,395)          |
|                                         | <b>(105,388)</b> | <b>(110,790)</b> |
| Directly held property                  |                  |                  |
| Rental income                           | (17,001)         | (15,723)         |
| Less operating expenses                 | 2,540            | 2,062            |
| <b>Net rents from property</b>          | <b>(14,461)</b>  | <b>(13,661)</b>  |

## 10 INVESTMENTS

### a) Investment Analysis

|                                      | 31 March 2014    | 31 March 2015    |
|--------------------------------------|------------------|------------------|
|                                      | £000             | £000             |
| Fixed Interest Securities            |                  |                  |
| UK Public Sector                     | 89,020           | 123,886          |
| UK Other                             | 233,576          | 272,302          |
| Overseas Other                       | 38,287           | 16,665           |
| Equities                             |                  |                  |
| UK                                   | 1,150,350        | 1,201,166        |
| Overseas                             | 665,788          | 779,595          |
| Unlisted                             | 2,340            | 2,610            |
| Pooled Investment Vehicles           |                  |                  |
| Unit Trusts                          | 400,043          | 472,802          |
| Other Managed Funds                  | 572,005          | 595,426          |
| Pooled Vehicles Invested in Property |                  |                  |
| Property Unit Trusts                 | 32,743           | 39,545           |
| Other Managed Funds                  | 86,341           | 92,076           |
| Property                             | 288,140          | 321,700          |
| Forward Foreign Exchange             | 191              | -                |
| Cash and Currency                    | 153,469          | 131,916          |
| Investment Liabilities               | -                | (210)            |
| <b>Total Investments</b>             | <b>3,712,293</b> | <b>4,049,479</b> |

The original values of investments are based on purchase cost plus transaction costs. If any investments have been held since 1 April 1974 (when the Authority was given the responsibility for the Fund) these are included at the market value as at that date.

|                                                              | 31 March 2014<br>£000 | 31 March 2015<br>£000 |
|--------------------------------------------------------------|-----------------------|-----------------------|
| Market Value                                                 | 3,712,293             | 4,049,479             |
| Original Value                                               | 2,688,995             | 2,771,543             |
| <b>Excess/ (Deficit) of Market Value over Original Value</b> | <b>1,023,298</b>      | <b>1,277,936</b>      |

The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 contain a number of restrictions on investments. The limits that are relevant to the Fund are specified in the Fund's Statement of Investment Principles as follows:

- a) Not more than 10% of the Fund to be invested in unlisted securities.
- b) Not more than 10% of the Fund to be invested in a single holding.
- c) Not more than 25% of the Fund to be invested in securities which are managed by any one body, i.e. in a unit trust type arrangement.
- d) Not more than 15% of the Fund to be invested in partnerships, with not more than 2% in any one partnership.

No investments have been made contrary to these limits.

**b) Reconciliation of Opening and Closing Values of Investments 2014/15**

|                            | Value at 1<br>April 2014<br>£000 | Purchases<br>at Cost<br>£000 | Proceeds of<br>Sales<br>£000 | Change in<br>Market value<br>£000 | Value at 31<br>March 2015<br>£000 |
|----------------------------|----------------------------------|------------------------------|------------------------------|-----------------------------------|-----------------------------------|
| Fixed Interest Securities  | 360,883                          | 209,548                      | (192,162)                    | 34,584                            | 412,853                           |
| Equities                   | 1,818,478                        | 243,831                      | (227,821)                    | 148,883                           | 1,983,371                         |
| Pooled Investment Vehicles | 972,048                          | 227                          | (7,595)                      | 103,548                           | 1,068,228                         |
| Property Pooled Vehicles   | 119,084                          | 20,369                       | (3,523)                      | (4,309)                           | 131,621                           |
| Property                   | 288,140                          | 29,597                       | (30,760)                     | 34,723                            | 321,700                           |
|                            | <b>3,558,633</b>                 | <b>503,572</b>               | <b>(461,861)</b>             | <b>317,429</b>                    | <b>3,917,773</b>                  |
| Forward Foreign Exchange   | 191                              | 113,640                      | (113,086)                    | (955)                             | (210)                             |
|                            | <b>3,558,824</b>                 | <b>617,212</b>               | <b>(574,947)</b>             | <b>316,474</b>                    | <b>3,917,563</b>                  |
| Cash deposits              | 153,469                          |                              |                              |                                   | 131,916                           |
|                            | <b>3,712,293</b>                 |                              |                              |                                   | <b>4,049,479</b>                  |

## Reconciliation of Opening and Closing Values of Investments 2013/14

|                            | Value at 1<br>April 2013<br>£000 | Purchases<br>at Cost<br>£000 | Proceeds of<br>Sales<br>£000 | Change in<br>Market value<br>£000 | Value at 31<br>March 2014<br>£000 |
|----------------------------|----------------------------------|------------------------------|------------------------------|-----------------------------------|-----------------------------------|
| Fixed Interest Securities  | 323,555                          | 480,789                      | (420,813)                    | (22,648)                          | 360,883                           |
| Index Linked Securities    | 80,739                           | 7,219                        | (84,291)                     | (3,667)                           | -                                 |
| Equities                   | 1,675,534                        | 246,295                      | (226,450)                    | 123,099                           | 1,818,478                         |
| Pooled Investment Vehicles | 906,164                          | 67,114                       | (26,579)                     | 25,349                            | 972,048                           |
| Property Pooled Vehicles   | 121,955                          | 2,886                        | -                            | (5,757)                           | 119,084                           |
| Property                   | 288,075                          | 12,354                       | (37,425)                     | 25,136                            | 288,140                           |
|                            | <b>3,396,022</b>                 | <b>816,657</b>               | <b>(795,558)</b>             | <b>141,512</b>                    | <b>3,558,633</b>                  |
| Forward Foreign Exchange   | 250                              | 158,731                      | (158,549)                    | (241)                             | 191                               |
|                            | <b>3,396,272</b>                 | <b>975,388</b>               | <b>(954,107)</b>             | <b>141,271</b>                    | <b>3,558,824</b>                  |
| Cash deposits              | 81,269                           |                              |                              |                                   | 153,469                           |
|                            | <b>3,477,541</b>                 |                              |                              |                                   | <b>3,712,293</b>                  |

For Forward Foreign Exchange contracts, the purchase cost and sale proceeds represent the sterling value of the currency purchases and sales at the settlement dates specified in the contracts.

Transaction costs are included in the cost of purchases and sale proceeds. The costs charged directly to the fund, such as fees, commissions and stamp duty, amounted to £2.0 million in 2014/15 (£1.9 million in 2013/14). In addition, indirect costs are incurred through the bid-offer spread on investments. This amount is not separately provided.

### c) Management Arrangements

The assets of the Fund are managed within five portfolios and a breakdown of these as at the Net Assets.

Statement date is shown below:

|                                | 31 March 2014    |               | 31 March 2015    |               |
|--------------------------------|------------------|---------------|------------------|---------------|
|                                | £000             | %             | £000             | %             |
| In-house                       | 1,557,437        | 42.1%         | 1,616,513        | 39.9%         |
| Schroder Investment Management | 1,011,414        | 27.2%         | 1,161,491        | 28.7%         |
| Kames Capital                  | 361,074          | 9.7%          | 417,018          | 10.3%         |
| Aberdeen Property Investors    | 294,459          | 7.9%          | 329,340          | 8.1%          |
| Specialist                     | 487,909          | 13.1%         | 525,117          | 13.0%         |
| <b>Total</b>                   | <b>3,712,293</b> | <b>100.0%</b> | <b>4,049,479</b> | <b>100.0%</b> |

A breakdown of material pooled holdings managed by external managers within the In-house and Specialist portfolios is shown below:

|                   | 31 March 2014 | 31 March 2015 |
|-------------------|---------------|---------------|
|                   | £000          | £000          |
| <b>In-house</b>   |               |               |
| Legal & General   | 259,562       | 298,820       |
| <b>Specialist</b> |               |               |
| Kames Capital     | 102,543       | 118,769       |
| RWC Capital       | 134,638       | 127,580       |
| Standard Life     | 49,428        | 64,589        |

#### d) Asset Allocation

The asset allocation of the Fund as at the Net Assets Statement date is shown below:

|                          | 31 March 2014    |               | 31 March 2015    |               |
|--------------------------|------------------|---------------|------------------|---------------|
|                          | £000             | %             | £000             | %             |
| UK Fixed Interest        | 322,597          | 8.7%          | 396,188          | 9.8%          |
| Overseas Fixed Interest  | 38,287           | 1.0%          | 16,665           | 0.4%          |
| UK Equities              | 1,287,335        | 34.7%         | 1,336,470        | 33.0%         |
| Overseas Equities:       |                  |               |                  |               |
| US                       | 488,001          | 13.2%         | 586,559          | 14.5%         |
| Europe                   | 397,607          | 10.7%         | 417,433          | 10.3%         |
| Japan                    | 117,074          | 3.2%          | 161,430          | 4.0%          |
| Pacific Basin            | 134,542          | 3.6%          | 147,863          | 3.6%          |
| Emerging Markets         | 169,878          | 4.6%          | 192,149          | 4.7%          |
| Global                   | 18,094           | 0.5%          | 21,394           | 0.5%          |
| UK Property              | 327,785          | 8.8%          | 368,885          | 9.1%          |
| Overseas Property        | 79,439           | 2.1%          | 84,436           | 2.1%          |
| Private Equity           | 75,451           | 2.0%          | 72,441           | 1.8%          |
| Multi-Asset              | 102,543          | 2.8%          | 115,860          | 2.9%          |
| Forward Foreign Exchange | 191              | -             | (210)            | -             |
| Cash                     | 153,469          | 4.1%          | 131,916          | 3.3%          |
| <b>Total</b>             | <b>3,712,293</b> | <b>100.0%</b> | <b>4,049,479</b> | <b>100.0%</b> |

#### e) Property

Direct property is shown at open market value (as defined by International Valuation Standards Committee) as determined by Savills Commercial Limited. The analysis of property is:

|                              | 31 March 2014<br>£000 | 31 March 2015<br>£000 |
|------------------------------|-----------------------|-----------------------|
| Freehold                     | 288,140               | 321,700               |
| Leasehold more than 50 years | -                     | -                     |
|                              | <b>288,140</b>        | <b>321,700</b>        |
| Original Value               | 285,068               | 273,485               |

#### f) Analysis of Pooled Investment Vehicles

The underlying economic exposure of pooled investment vehicles is shown below:

|                    | 31 March 2014<br>£000 | 31 March 2015<br>£000 |
|--------------------|-----------------------|-----------------------|
| UK Equities        | 158,665               | 158,248               |
| Overseas Equities: |                       |                       |
| US                 | 192,984               | 226,251               |
| Japan              | 72,746                | 67,597                |
| Europe             | 71,166                | 91,980                |
| Pacific Basin      | 134,542               | 147,863               |
| Emerging Markets   | 148,198               | 169,204               |
| Global             | 18,094                | 21,394                |
| UK Property        | 39,645                | 47,185                |
| Overseas Property  | 79,439                | 84,436                |
| Private Equity     | 73,110                | 69,831                |
| Multi-Asset        | 102,543               | 115,860               |
| <b>Total</b>       | <b>1,091,132</b>      | <b>1,199,849</b>      |

## g) Private Equity Funds

The Fund has made commitments to a number of private equity funds. The original commitment amounts are shown below in the fund currencies:

| <b>Funds</b>                                | <b>Currency</b> | <b>Commitment<br/>millions</b> |
|---------------------------------------------|-----------------|--------------------------------|
| Wilton Private Equity Fund LLC              | USD             | 14                             |
| Pantheon Europe Fund III                    | EUR             | 10                             |
| East Midlands Regional Venture Capital Fund | GBP             | 5                              |
| Coller International Partners IV            | USD             | 10                             |
| Schroders Private Equity Fund of Funds III  | EUR             | 22                             |
| DCM Private Equity Fund II                  | USD             | 18                             |
| Pantheon Europe Fund V                      | EUR             | 15                             |
| Coller International Partners V             | USD             | 18                             |
| Catapult Growth Fund LP                     | GBP             | 4                              |
| Altius Associates Private Equity Fund       | USD             | 10                             |
| Partners Group Secondary 2008               | EUR             | 13                             |
| DCM Private Equity Fund III                 | USD             | 16                             |
| Coller International Partners VI            | USD             | 16                             |
| Altius Associates Private Equity Fund II    | USD             | 15                             |
| Partners Group Global Infrastructure        | EUR             | 12                             |
| Foresight Nottingham Fund LP                | GBP             | 10                             |
| Altius Real Assets Fund I                   | USD             | 15                             |
| Aberdeen SVG Private Equity                 | USD             | 15                             |
| DCM Private Equity Fund IV                  | USD             | 16                             |

These commitments are drawn by the funds over time as investments are made in underlying companies. The undrawn commitment as at 31 March 2015 was £75.7 million (£79.3 million at 31 March 2014). Of the funds above, the following were new commitments made during 2014/15:

| <b>Funds</b>                | <b>Currency</b> | <b>Commitment<br/>millions</b> |
|-----------------------------|-----------------|--------------------------------|
| Aberdeen SVG Private Equity | USD             | 15                             |

#### **h) Analysis of derivatives**

Open Forward Foreign Exchange contracts at 31 March 2015

| <b>Settlement</b>                                   | <b>Currency<br/>Bought</b> | <b>Local<br/>Value<br/>£000</b> | <b>Currency<br/>Sold</b> | <b>Local<br/>Value<br/>£000</b> | <b>Asset<br/>Value<br/>£000</b> | <b>Liability<br/>Value<br/>£000</b> |
|-----------------------------------------------------|----------------------------|---------------------------------|--------------------------|---------------------------------|---------------------------------|-------------------------------------|
| Up to 3 months                                      | GBP                        | 1,065                           | EUR                      | (1,490)                         | -                               | (15)                                |
| Up to 3 months                                      | GBP                        | 13,621                          | USD                      | (20,500)                        | -                               | (195)                               |
|                                                     |                            |                                 |                          |                                 | -                               | (210)                               |
| <b>Total net forward foreign exchange contracts</b> |                            |                                 |                          |                                 | <b>(210)</b>                    |                                     |

Open Forward Foreign Exchange contracts at 31 March 2014

| <b>Settlement</b>                                   | <b>Currency<br/>Bought</b> | <b>Local<br/>Value<br/>£000</b> | <b>Currency<br/>Sold</b> | <b>Local<br/>Value<br/>£000</b> | <b>Asset<br/>Value<br/>£000</b> | <b>Liability<br/>Value<br/>£000</b> |
|-----------------------------------------------------|----------------------------|---------------------------------|--------------------------|---------------------------------|---------------------------------|-------------------------------------|
| Up to 3 months                                      | GBP                        | 12,503                          | EUR                      | (15,000)                        | 97                              | -                                   |
| Up to 3 months                                      | GBP                        | 25,900                          | USD                      | (43,000)                        | 94                              | -                                   |
|                                                     |                            |                                 |                          |                                 | <b>191</b>                      | <b>-</b>                            |
| <b>Total net forward foreign exchange contracts</b> |                            |                                 |                          |                                 | <b>191</b>                      |                                     |

## 11 CONTINGENT LIABILITIES

The fund has 19 private equity funds which have undrawn commitments as at 31 March 2015 of £75.7 million (£79.3 million at 31 March 2014).

## 12 OTHER INVESTMENT BALANCES AND LIABILITIES

|                                     | 31 March 2014<br>£000 | 31 March 2015<br>£000 |
|-------------------------------------|-----------------------|-----------------------|
| <b>Other investment balances</b>    |                       |                       |
| Outstanding investment transactions | 1,376                 | 1,364                 |
| Investment income                   | 20,294                | 20,204                |
|                                     | <b>21,670</b>         | <b>21,568</b>         |
| <b>Investment Liabilities</b>       |                       |                       |
| Outstanding investment transactions | -                     | (1,728)               |
| Investment income                   | (2,650)               | (2,843)               |
|                                     | <b>(2,650)</b>        | <b>(4,571)</b>        |

## 13 CURRENT ASSETS AND LIABILITIES

|                                  | 31 March 2014<br>£000 | 31 March 2015<br>£000 |
|----------------------------------|-----------------------|-----------------------|
| <b>Current Assets</b>            |                       |                       |
| Contributions due from employers | 8,865                 | 8,951                 |
| Other                            | 1,168                 | 5,247                 |
|                                  | <b>10,033</b>         | <b>14,198</b>         |
| <b>Current Liabilities</b>       |                       |                       |
| Payments in advance              | (720)                 | -                     |
| Sundry creditors                 | (838)                 | (794)                 |
| <b>Other</b>                     | <b>(6,643)</b>        | <b>(1,490)</b>        |
|                                  | <b>(8,201)</b>        | <b>(2,284)</b>        |

## 14 FINANCIAL INSTRUMENTS

- a) The various financial instruments held by the Fund are valued at fair value. The following tables analyse the fair value of financial assets and liabilities by asset class.

31 March 2015

|                              | Designated<br>at Fair Value<br>through profit<br>and loss<br>£000 | Loans and<br>Receivables<br>£000 | Financial<br>liabilities at<br>amortised<br>cost<br>£000 | Totals<br>£000   |
|------------------------------|-------------------------------------------------------------------|----------------------------------|----------------------------------------------------------|------------------|
| <b>Financial Assets</b>      |                                                                   |                                  |                                                          |                  |
| Fixed Interest Securities    | 412,853                                                           | -                                | -                                                        | 412,853          |
| Equities                     | 1,983,371                                                         | -                                | -                                                        | 1,983,371        |
| Pooled Investment Vehicles   | 1,068,228                                                         | -                                | -                                                        | 1,068,228        |
| Property Pooled Vehicles     | 131,621                                                           | -                                | -                                                        | 131,621          |
| Forward Foreign Exchange     | -                                                                 | -                                | -                                                        | -                |
| Cash deposits                | -                                                                 | 131,916                          | -                                                        | 131,916          |
| Other investment balances    | -                                                                 | 21,568                           | -                                                        | 21,568           |
| Current Assets               | -                                                                 | 14,198                           | -                                                        | 14,198           |
|                              | <b>3,596,073</b>                                                  | <b>167,682</b>                   | <b>-</b>                                                 | <b>3,763,755</b> |
| <b>Financial Liabilities</b> |                                                                   |                                  |                                                          |                  |
| Investment Liabilities       | -                                                                 | -                                | (4,571)                                                  | (4,571)          |
| Current Liabilities          | -                                                                 | -                                | (2,284)                                                  | (2,284)          |
|                              | -                                                                 | -                                | <b>(6,855)</b>                                           | <b>(6,855)</b>   |
|                              | <b>3,569,073</b>                                                  | <b>167,682</b>                   | <b>(6,855)</b>                                           | <b>3,756,900</b> |

31 March 2014

|                              | Designated<br>at Fair Value<br>through profit<br>and loss<br>£000 | Loans and<br>Receivables<br>£000 | Financial<br>liabilities at<br>amortised cost<br>£000 | Totals<br>£000   |
|------------------------------|-------------------------------------------------------------------|----------------------------------|-------------------------------------------------------|------------------|
| <b>Financial Assets</b>      |                                                                   |                                  |                                                       |                  |
| Fixed Interest Securities    | 360,883                                                           | -                                | -                                                     | 360,883          |
| Equities                     | 1,818,478                                                         | -                                | -                                                     | 1,818,478        |
| Pooled Investment Vehicles   | 972,048                                                           | -                                | -                                                     | 972,048          |
| Property Pooled Vehicles     | 119,084                                                           | -                                | -                                                     | 119,084          |
| Forward Foreign Exchange     | 191                                                               | -                                | -                                                     | 191              |
| Cash deposits                | -                                                                 | 153,469                          | -                                                     | 153,469          |
| Other investment balances    | -                                                                 | 21,670                           | -                                                     | 21,670           |
| Current Assets               | -                                                                 | 10,033                           | -                                                     | 10,033           |
|                              | <b>3,270,684</b>                                                  | <b>185,172</b>                   | <b>-</b>                                              | <b>3,455,856</b> |
| <b>Financial Liabilities</b> |                                                                   |                                  |                                                       |                  |
| Investment Liabilities       | -                                                                 | -                                | (2,650)                                               | (2,650)          |
| Current Liabilities          | -                                                                 | -                                | (8,201)                                               | (8,201)          |
|                              | -                                                                 | -                                | <b>(10,851)</b>                                       | <b>(10,851)</b>  |
|                              | <b>3,270,684</b>                                                  | <b>185,172</b>                   | <b>(10,851)</b>                                       | <b>3,445,005</b> |

No financial assets were reclassified during the accounting period.

## b) Valuation of financial instruments carried at fair value

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 derived from quoted market price.

- this includes all quoted equity, fixed interest and index linked instruments.

**Level 2** Fair values derived from valuation techniques based significantly on observable inputs.

- this includes all pooled property investments.

**Level 3** Fair values derived from valuation techniques where at least one significant input is not based on observable market data.

- this includes unlisted shares and investments in private equity funds.

| As at 31 March 2015                | Level 1<br>£000  | Level 2<br>£000 | Level 3<br>£000 | Total<br>£000    |
|------------------------------------|------------------|-----------------|-----------------|------------------|
| <b>Financial Assets</b>            |                  |                 |                 |                  |
| Fair value through profit and loss | 3,389,401        | 131,621         | 75,051          | 3,596,073        |
| Loans and receivables              | 167,682          | -               | -               | 167,682          |
| <b>Total</b>                       | <b>3,557,083</b> | <b>131,621</b>  | <b>75,051</b>   | <b>3,763,755</b> |
| <b>Financial Liabilities</b>       |                  |                 |                 |                  |
| Fair value through profit and loss | -                | -               | -               | -                |
| Financial liabilities              | (6,855)          | -               | -               | (6,855)          |
| <b>Total</b>                       | <b>(6,855)</b>   | <b>-</b>        | <b>-</b>        | <b>(6,855)</b>   |
| <b>Net</b>                         | <b>3,550,228</b> | <b>131,621</b>  | <b>75,051</b>   | <b>3,756,900</b> |

| As at 31 March 2014                | Level 1<br>£000  | Level 2<br>£000 | Level 3<br>£000 | Total<br>£000    |
|------------------------------------|------------------|-----------------|-----------------|------------------|
| <b>Financial Assets</b>            |                  |                 |                 |                  |
| Fair value through profit and loss | 3,073,809        | 119,084         | 77,791          | 3,270,684        |
| Loans and receivables              | 185,172          | -               | -               | 185,172          |
| <b>Total</b>                       | <b>3,258,981</b> | <b>119,084</b>  | <b>77,791</b>   | <b>3,455,856</b> |
| <b>Financial Liabilities</b>       |                  |                 |                 |                  |
| Fair value through profit and loss | -                | -               | -               | -                |
| Financial liabilities              | (10,851)         | -               | -               | (10,851)         |
| <b>Total</b>                       | <b>(10,851)</b>  | <b>-</b>        | <b>-</b>        | <b>(10,851)</b>  |
| <b>Net</b>                         | <b>3,248,130</b> | <b>119,084</b>  | <b>77,791</b>   | <b>3,445,005</b> |

### c) Nature and extent of risks arising from financial instruments

The aims of the Fund are to:

- manage employers' liabilities effectively
- ensure that sufficient resources are available to meet all liabilities as they fall due
- maximise the returns from investments within reasonable risk parameters
- enable employer contribution rates to be kept as nearly constant as possible and at reasonable cost to the taxpayers, scheduled, resolution and admitted bodies.

The key risks to the achievement of these aims, as well as measures to mitigate those risks, are set out in the various Fund policies (available at [www.nottspf.org.uk](http://www.nottspf.org.uk)) including:

- Statement of Investment Principles
- Funding Strategy Statement
- Governance Compliance Statement
- Risk Management Strategy and Risk Register

The Risk Register identifies the highest risks as arising from:

- Fund assets are assessed as insufficient to meet long term liabilities
- Standing data and permanent records are not accurate
- Significant variations from assumptions used in the actuarial valuation

Actions have been agreed to mitigate these risks.

The Fund's primary risk is that its assets fall short of its long term liabilities. The Funding Strategy Statement states that the funding objectives are to:

- Set levels of employer contribution that will build up a fund of assets that will be sufficient to meet all future benefit payments from the Fund
- Build up the required assets in such a way that employer contribution rates are kept as low and stable as possible.

The most significant effect on the funding level arises from changes in the discount rate used by the actuaries. The sensitivity analysis below (prepared by the Fund's actuaries) shows the impact of a movement of 0.1% in the discount rate.

| Adjustment to discount rate              | +0.1%     | 0.0%      | -0.1%     |
|------------------------------------------|-----------|-----------|-----------|
| Present Value of Total Obligation (£000) | 6,757,872 | 6,886,812 | 7,018,341 |

The Fund deficit at the last triennial valuation was £620 million. With no other change in assumptions, an increase in the discount rate of just under 0.5% would reduce the deficit to nil.

For the first time in 2013/14 there was a net withdrawal from dealings with members. This was the case again in 2014/15, although the net withdrawal would have been marginal but for the transfer out in respect of the Nottinghamshire Probation Trust. However, the Fund continues to receive significant investment income and it is therefore unlikely that assets will have to be realised in order to meet pension benefits. This allows the Fund to implement a long term investment strategy and minimise the impact of short term fluctuations in investment and currency markets. The strategy, and the assumptions that underpin it, are reviewed on a regular basis and cash flows are monitored closely to ensure there is sufficient liquidity to meet forecast cash flows.

The investment strategy is aimed at achieving best returns in line with the requirements of the triennial valuation whilst minimising risk and overall variability in future employers' contribution rates. A key part of managing the investment risk is by ensuring an adequate number of suitably qualified investment managers and by requiring managers to hold a diversified spread of assets. The level of risk in the equities block is managed by a balance between passive and active management.

Policies are reviewed regularly to reflect changes in activity and in market conditions. Responsibility for reviewing and revising the policies rests with the Nottinghamshire Pension Fund Committee.

### 15 MEMBERS ADDITIONAL VOLUNTARY CONTRIBUTIONS

The Nottinghamshire Fund provides an additional voluntary contribution (AVC) scheme to enable members to purchase additional benefits. Contributions are paid over to, and invested separately by, the two scheme providers, Prudential and Scottish Widows. The contributions are not included in the Fund's accounts in accordance with regulation 4(2)(b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009. The value of the separately invested AVCs is shown below:

|                 | 31 March 2014 | 31 March 2015 |
|-----------------|---------------|---------------|
|                 | £000          | £000          |
| Prudential      | 33,667        | 33,573        |
| Scottish Widows | 3,282         | 3,298         |
|                 | <b>36,949</b> | <b>36,871</b> |

## 16 RELATED PARTY TRANSACTIONS

Under IAS 24, a party is related to an entity if:

- the party is a member of the key management personnel
- the party is a post-employment benefit plan for the benefit of employees of the entity.

The purpose of related party disclosures is to provide information on transactions and balances that could have an effect on the operations or financial position of an entity. For example, related parties may enter into transactions that unrelated parties would not and transactions between related parties may not be made at the same amounts as between unrelated parties.

Disclosures are required for:

- the nature of the related party relationship
- key management personnel compensation
- information about the transactions and outstanding balances necessary for an understanding of the potential effect of the relationship on the financial statements.

Nottinghamshire County Council is the administering authority for the Local Government Pension Scheme (LGPS) within Nottinghamshire and is one of the major employers within the scheme. Information regarding key management personnel is provided within the main accounts of Nottinghamshire County Council. Members and officers of the Council involved in managing the Fund are allowed to be members of the LGPS. All transactions between Nottinghamshire County Council and the Fund and all benefit payments from the Fund are in accordance with the regulations governing the LGPS. There are no transactions therefore that are made on a different basis from those with non-related parties.

# Governance Compliance Statement

## 1 Introduction

- 1.1 This is the governance compliance statement of the Nottinghamshire pension fund which is part of the Local Government Pension Scheme and administered by Nottinghamshire County Council (the council). The statement has been prepared as required by the Local Government Pension Scheme (Administration) Regulations 2008.

## 2 Governance Arrangements

- 2.1 Under the terms of the council's constitution, the functions of the council as administering authority of the pension fund are delegated to the Nottinghamshire Pension Fund Committee. This is in line with guidance from the Chartered Institute of Public Finance & Accountancy (CIPFA).
- 2.2 The Nottinghamshire Pension Fund Committee meets four times a year and its members act in a quasi-trustee capacity. Under the constitution, it is responsible for Administering the Nottinghamshire Pension Fund, including investments by and management of pension funds.
- 2.3 The Pensions Investment Sub-Committee has responsibility for investment performance management of the Fund Managers and making appropriate recommendations to the Nottinghamshire Pension Fund Committee. Meetings are held four times a year. The sub-committee may appoint a working party to consider future policy & development.
- 2.4 The Pensions Sub-Committee has responsibility for making recommendations to the Nottinghamshire Pension Fund Committee on matters relating to the administration and investment of the Pension Fund. Meetings are held four times a year.

- 2.5 The number of voting members of the Nottinghamshire Pension Fund Committee is determined by the Council at its annual meeting. The number of voting members of the sub-committees is determined by the Nottinghamshire Pension Fund Committee on the basis of the council's constitution.

## 3 Functions and Responsibilities

- 3.1 The Nottinghamshire Pension Fund Committee separately approves the pension fund's Funding Strategy Statement, Statement of Investment Principles, Risk Management Strategy and Communications Strategy Statement.
- 3.2 The Funding Strategy Statement sets out the aims and purpose of the pension funds and the responsibilities of the administering authority as regards funding the scheme. Funding is the making of advance provision to meet the cost of accruing benefit promises and the long term objective is to achieve and then maintain assets equal to 100% of projected accrued liabilities. These responsibilities are delegated to the Nottinghamshire Pension Fund Committee, advised by the two Sub-Committees.
- 3.3 The Statement of Investment Principles sets out more detailed responsibilities relating to the overall investment strategy of the funds including the proposed asset allocation, restrictions on investment types, the type of investment management used and performance monitoring. It also covers the funds' policy on trustee training and expenses and states the funds' approach to socially responsible investment and corporate governance issues. These responsibilities are delegated to the Nottinghamshire Pension Fund Committee, advised by the two Sub-Committees.

- 3.4 Financial Regulations specify that the Service Director (Finance) is responsible for arranging the investment of the Pension Fund. Operational matters falling under this responsibility are exercised by the Senior Accountant (Pensions & Treasury Management).
- 3.5 The Risk Management Strategy aims to reduce or eliminate risks which may jeopardise the achievement of the Fund's key objectives. It includes a risk register that identifies and prioritises the main risks to the operation of the fund. Responsibility for the Risk Management Strategy is delegated to the Nottinghamshire Pension Fund Committee, advised by the two Sub-Committees.
- 3.6 The Communications Strategy Statement details the overall strategy for involving stakeholders in the pension funds. The stakeholders identified are:
- trustees
  - current and prospective scheme members
  - scheme employers
  - administration staff
  - other bodies.

Responsibility for the communications strategy is delegated to the Nottinghamshire Pension Fund Committee, advised by the Pensions Sub-Committee.

## 4 Representation

- 4.1 The Nottinghamshire Pension Fund Committee has 9 members all of whom are current county councillors. The political make-up of the committee is in line with the current council and the chair is normally appointed by Council. All members have full voting rights.
- 4.2 The Pensions Investment Sub-Committee has 17 members consisting of the following representatives:
- County Councillors (9)
  - Nottingham City Council (3)
  - Nottinghamshire Local Authorities' Association (2)
  - scheduled and admitted bodies (1)
  - trade unions (2)
- 4.3 The Pensions Sub-Committee has 19 members consisting of the following representatives:
- County Councillors (9)
  - Nottingham City Council (3)
  - Nottinghamshire Local Authorities' Association (2)
  - scheduled and admitted bodies (1)
  - trade unions (2)
  - pensioners (2)
- 4.4 All members on both sub-committees have voting rights where allowed by relevant regulation.
- 4.5 Meetings of the Sub-Committees are also attended by officers of the County Council and an independent adviser. This ensures the Sub-Committees have access to "proper advice" as required by the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009. Proper advice is defined as the advice of a person who is reasonably believed to be qualified by their ability in and practical experience of financial matters. This includes any such person who is an officer of the administering authority.

## 5 Stakeholder Engagement

- 5.1 An annual meeting of the pension funds is held in October to which all employer representatives and scheme members are welcome. The purpose of the meeting is to report on investment performance and current issues of concern to the pension funds.
- 5.2 A number of other initiatives to involve stakeholders are currently in place including:
- regular employers meetings
  - meetings between employers and actuaries
  - Nottinghamshire Finance Officers meetings
  - the annual report for the pension funds
  - Nest Egg magazine for all members
  - Pensions road shows at various venues around the County
  - dedicated pension fund web site.

## 6 Review and Compliance with Best Practice

- 6.1 This statement will be kept under review and will be revised and published following any material change in the governance arrangements of the pension funds.
- 6.2 The regulations require a statement as to the extent to which the governance arrangements comply with guidance issued by the Secretary of State. The guidance contains best practice principles and these are shown below with the assessment of compliance.

| Ref.      | Principles                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Compliance and Comments                                                                                                                                                                                       |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>A</b>  | <b>Structure</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                               |
| <b>a.</b> | The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.                                                                                                                                                                                                                                                                                             | <b>Fully compliant</b>                                                                                                                                                                                        |
| <b>b.</b> | That representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.                                                                                                                                                                                                                 | <b>Fully compliant</b>                                                                                                                                                                                        |
| <b>c.</b> | That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.                                                                                                                                                                                                                                                                                                                                 | <b>Fully compliant</b>                                                                                                                                                                                        |
| <b>d.</b> | That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel.                                                                                                                                                                                                                                                                                          | <b>Fully compliant</b>                                                                                                                                                                                        |
| <b>B</b>  | <b>Representation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                               |
| <b>a.</b> | That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include :- <ul style="list-style-type: none"> <li>i employing authorities (including non-scheme employers, eg, admitted bodies);</li> <li>ii scheme members (including deferred and pensioner scheme members),</li> <li>iii independent professional observers, and</li> <li>iv expert advisors (on an ad-hoc basis).</li> </ul> | <b>Fully compliant</b><br>The sub-committees include representatives from employing authorities, scheduled and admitted bodies and scheme members. An independent adviser attends the sub-committee meetings. |
| <b>b.</b> | That 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.                                                                                                                                                                                                             | <b>Fully compliant</b>                                                                                                                                                                                        |
| <b>C</b>  | <b>Selection and role of lay members</b>                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                               |
| <b>a.</b> | That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee.                                                                                                                                                                                                                                                                                                       | <b>Fully compliant</b><br>All members of the Nottinghamshire Pension Fund Committee and its sub-committees are aware of their responsibilities for the oversight of the funds.                                |
| <b>D</b>  | <b>Voting</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                               |
| <b>a.</b> | 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.                                                                                                                                                                                                                                              | <b>Fully compliant</b>                                                                                                                                                                                        |

| Ref       | Principles                                                                                                                                                                                                                                                     | Compliance and Comments                                                                                                                                                                                                                                                         |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>E</b>  | <b>Training/facility time/expenses</b>                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                 |
| <b>a.</b> | That in relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process. | <b>Fully compliant</b><br>Members are encouraged to receive suitable training to help them discharge their responsibilities including attending training courses, conferences and meetings. Travel and subsistence arrangements are those which prevail for the County Council. |
| <b>b.</b> | That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum.                                                                                                        | <b>Fully compliant</b>                                                                                                                                                                                                                                                          |
| <b>F</b>  | <b>Meetings (frequency/quorum)</b>                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                 |
| <b>a.</b> | That an administering authority's main committee or committees meet at least quarterly.                                                                                                                                                                        | <b>Fully compliant</b><br>The Nottinghamshire Pension Fund Committee meets 4 times a year.                                                                                                                                                                                      |
| <b>b.</b> | That an administering authority's secondary committee or panel meet at least twice a year and is synchronised with the dates when the main committee sits.                                                                                                     | <b>Fully compliant</b><br>The Pensions Sub-committee meets 4 times a year.<br>The Investment Sub-Committee meets 4 times a year.                                                                                                                                                |
| <b>c.</b> | That administering authorities 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.                                            | <b>Fully compliant</b>                                                                                                                                                                                                                                                          |
| <b>G</b>  | <b>Access</b>                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                 |
| <b>a.</b> | That subject to any rules in the councils 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.                      | <b>Fully compliant</b>                                                                                                                                                                                                                                                          |
| <b>H</b>  | <b>Scope</b>                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                 |
| <b>a.</b> | That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.                                                                                                                                | Fully compliant<br>Scheme issues are decided by the Nottinghamshire Pension Fund Committee after consideration at the Pensions Sub-committee.                                                                                                                                   |
| <b>I</b>  | <b>Publicity</b>                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                 |
| <b>a.</b> | That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the scheme is governed, can express an interest in wanting to be part of those arrangements.       | <b>Fully compliant</b><br>The governance compliance statement is published on the pension fund website and is included with the relevant committee report (available on the County Council website).                                                                            |

# Funding Strategy Statement

## Introduction

- 1 This is the Funding Strategy Statement (FSS) for the Nottinghamshire County Council Pension Fund. It has been prepared in accordance with Regulation 58 of the Local Government Pension Scheme Regulations 2013 (“the Regulations”) and describes Nottinghamshire County Council’s strategy, in its capacity as Administering Authority, for the funding of the Nottinghamshire County Council Pension Fund (“the Fund”).
- 2 The Statement describes a single strategy for the Fund as a whole. The Fund Actuary, Barnett Waddingham LLP, has been consulted on the contents of this Statement.

## Purpose of the Funding Strategy Statement

- 3 The purpose of this Funding Strategy Statement is to explain the funding objectives of the Fund and in particular:
  - How the costs of the benefits provided under the Local Government Pension Scheme (the “Scheme”) are met through the Fund
  - The objectives in setting employer contribution rates
  - The funding strategy that is adopted to meet these objectives.

## Purpose of the Fund

- 4 The purpose of the Fund is to:
  - Pay pensions, lump sums and other benefits provided under the Regulations
  - Meet the costs associated in administering the Fund
  - Receive contributions, transfer values and investment income.

## Funding Objectives

- 5 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.
- 6 The funding objectives are to:
  - Set levels of employer contribution that will build up a fund of assets that will be sufficient to meet all future benefit payments from the Fund
  - Build up the required assets in such a way that employer contribution rates are kept as low and stable as possible.

## Key Parties

- 7 The key parties involved in the funding process and their responsibilities are as follows.

## The Administering Authority

- 8 The Administering Authority for the Pension Fund is Nottinghamshire County Council. The main responsibilities of the Administering Authority are to:
  - Collect employee and employer contributions
  - Invest the Fund’s assets
  - Pay the benefits due to Scheme members
  - Manage the actuarial valuation process in conjunction with the Fund Actuary
  - Prepare and maintain this FSS and also the Statement of Investment Principles (SIP) after consultation with other interested parties as appropriate
  - Monitor all aspects of the Fund’s performance.

## Scheme Employers

- 9 In addition to the Administering Authority, a number of other Scheme Employers, including Admission Bodies, participate in the Fund. The responsibilities of each Scheme 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
  - Exercise any discretions permitted under the Regulations
  - Meet the costs of any augmentations or other additional costs in accordance with agreed policies and procedures
  - Notify the Administering Authority of significant changes in the employer's structure or membership.

## Fund Actuary

- 10 The Fund Actuary for the Pension Fund is Barnett Waddingham LLP. The main responsibilities of the Fund Actuary are to:
- Advise interested parties on funding strategy and completion of actuarial valuations in accordance with the FSS and the Regulations
  - Advise on other actuarial matters affecting the financial position of the Fund.

## Funding Strategy

- 11 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.

- 12 The actuarial valuation involves a projection of future cash flows 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.

## Funding Method

- 13 The key objective in determining employer's contribution rates is to establish a funding target and then set levels of employer contribution to meet that target over an agreed period.
- 14 The funding target is to have sufficient assets in the Fund to meet the accrued liabilities for each employer in the Fund. The funding target may, however, depend on certain employer circumstances and in particular, whether an employer is an "open" employer – one which allows new staff access to the Fund, or a "closed" employer 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 chosen funding target.
- 15 For open employers, the actuarial funding method that is adopted is known as the Projected Unit Funding Method which considers separately the benefits in respect of service completed before the valuation date ("past service") and benefits in respect of service expected to be completed after the valuation date ("future service"). This approach focuses on:
- 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 for pensions in payment. A funding level in excess of 100 per cent indicates a surplus of assets over liabilities; while a funding level of less than 100 per cent indicates a deficit

- The future service funding rate which is the level of contributions required from the individual employers which, in combination with employee contributions, is expected to support the cost of benefits accruing in future.

- 16 The key feature of this method is that, in assessing the future service cost, the contribution rate represents the cost of one year's benefit accrual.
- 17 For closed employers, the 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 the remaining expected working lifetime of active members.

## Valuation Assumptions and Funding Model

- 18 In completing the actuarial valuation it is necessary to formulate assumptions about the factors affecting the Fund's future finances such as inflation, pay increases, investment returns, rates of mortality, early retirement and staff turnover.
- 19 The assumptions adopted at the valuation can therefore be considered as:
- The statistical assumptions which are essentially estimates of the likelihood of benefits and contributions being paid
  - The financial assumptions which will determine the estimates of the amount of benefits and contributions payable and their current or present value.
- 20 An explanation of these key assumptions is included in the following paragraphs but further details of all of the assumptions adopted can be found in the latest actuarial valuation report.

## Future Price Inflation

- 21 The base assumption in any valuation is the future level of price inflation over a period commensurate with the duration of the liabilities. This is derived by considering the average difference in yields over the appropriate period from conventional and index linked gilts during the six months straddling the valuation date to provide an estimate of future price inflation as measured by the Retail Price Index (or "RPI").

## Future Pay Inflation

- 22 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 inflation. Historically, there has been a close link between price and pay inflation with pay increases exceeding price inflation in the longer term.

## Future Pension Increases

- 23 Pension increases are linked to changes in the level of the Consumer Price Index (or "CPI"). Inflation as measured by the CPI has historically been less than RPI due mainly to different calculation methods. An adjustment is therefore made to the RPI assumption to derive the CPI assumption.

## Future Investment Returns/Discount Rate

- 24 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 employer.
- 25 For open employers, 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

underlying 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.

- 26 For closed employers, an adjustment may be made to the discount rate in relation to the remaining liabilities, once all active members are assumed to have retired if at that time (the projected “termination date”), the employer becomes an exiting employer under Regulation 64. The Fund Actuary will incorporate such an adjustment after consultation with the Administering Authority.
- 27 The adjustment to the discount rate for closed employers is to set a higher funding target at the projected termination date, so that there are sufficient assets to fund the remaining liabilities on a “minimum risk” rather than on an ongoing basis. The aim is to minimise the risk of deficits arising after the termination date.

## Asset Valuation

- 28 For the purposes 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.

## Statistical Assumptions

- 29 The statistical assumptions incorporated into the valuation, such as future mortality rates, are based on national statistics. These are adjusted as appropriate to reflect the individual circumstances of the Fund and/or individual employers.

## Deficit Recovery/Surplus Amortisation Periods

- 30 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 from the value of accrued liabilities, depending on how the actual experience of the Fund differs from the actuarial assumptions. Accordingly the Fund will normally either be in surplus or in deficit.
- 31 Where the actuarial valuation discloses a significant surplus or deficit then the levels of required employers’ contributions will include an adjustment to either amortise the surplus or fund the deficit over a period of years.
- 32 The 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 and any likely limited period of participation in the Fund
  - The implications in terms of stability of future levels of employers’ contribution.

## Pooling of Individual Employers

- 33 The general 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.
- 34 However, certain groups of individual employers are pooled for the purposes of determining contribution rates to recognise common characteristics or where the number of Scheme members is small.

- 35 The main purpose of pooling is to produce more stable employer contribution levels in the longer term whilst recognising that ultimately there will be some level of cross-subsidy of pension cost amongst pooled employers.

## Cessation Valuations

- 36 On the cessation of an employer's participation in the Scheme, the Fund Actuary will be asked to make a termination assessment. Any deficit in the Fund in respect of the employer will be due to the Fund as a termination contribution, unless it is agreed by the Administering Authority and the other parties involved that the assets and liabilities relating to the employer will transfer within the Fund to another participating employer.
- 37 In assessing the financial position on termination, the Fund Actuary may adopt a discount rate based on gilt yields and adopt different assumptions from those used at the previous valuation in order to protect the other employers in the Fund from having to fund any future deficits which may arise from the liabilities that will remain in the Fund.

## Links with the Statement of Investment Principles

- 38 The main link between the FSS and the SIP relates to the discount rate that underlies the funding strategy as set out in the FSS, and the rate of investment return which is expected to be achieved by the underlying investment strategy as set out in the SIP.
- 39 As explained above, the ongoing discount rate that is adopted in the actuarial valuation is derived by considering the expected return from the underlying investment strategy. This ensures consistency between the funding strategy and investment strategy.

## Risks and Counter Measures

- 40 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.
- 41 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

- 42 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.
- 43 The valuation results are most sensitive to the real discount rate. Broadly speaking an increase/decrease of 0.5 per cent per annum in the real discount rate will decrease/increase the valuation of the liabilities by 10 per cent, and decrease/increase the required employer contribution by around 2.5 per cent of payroll.
- 44 However, the Pensions Investment Sub-Committee regularly monitors the investment returns achieved by the fund managers and receives advice from officers and independent advisers on investment strategy.
- 45 The Committee may also seek advice from the Fund Actuary on valuation related matters. In addition, the Fund Actuary may provide funding updates between valuations to check whether the funding strategy continues to meet the funding objectives.

## Demographic Risks

- 46 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 reduce the funding level by approximately 1%.
- 47 The actual mortality of pensioners in the Fund is monitored by the Fund Actuary at each actuarial valuation and assumptions are kept under review.
- 48 The liabilities of the Fund can also increase by more than has been planned as a result of early 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.

## Regulatory Risks

- 49 The benefits provided by the Scheme and employee contribution levels are set out in Regulations determined by central Government. Regulations also place certain limitations on how the assets can be invested. The tax status of the invested assets is also determined by the Government.
- 50 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.
- 51 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.

## Employer Risks

- 52 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
  - An employer ceasing to exist without having fully funded their pension liabilities.
- 53 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.
- 54 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.

## Monitoring and Review

- 55 This FSS is reviewed formally, in consultation with the key parties as appropriate, at least every three years to tie in with the triennial actuarial valuation process.
- 56 The Administering Authority also monitors the financial position of the Fund between actuarial valuations and may review the FSS more frequently if necessary.

# Statement of Investment Principles

## Introduction

- 1 The County Council is an administering authority of the Local Government Pension Scheme (the “Scheme”) as specified by the Local Government Pension Scheme Regulations 2013 (the LGPS Regulations). It is required by Regulation 53 of the LGPS Regulations to maintain a pension fund for the Scheme.
- 2 The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 (the “Investment Regulations”) govern the management of the pension fund and the investment of fund money. According to Regulation 12 of the Investment Regulations an administering authority is required to prepare, maintain and publish a Statement of Investment Principles (SIP).
- 3 The SIP must cover policy on:
  - the types of investment to be held
  - the balance between different types of investments
  - risk, including the ways in which risks are to be measured and managed
  - the expected return on investments
  - the realisation of investments
  - the extent (if at all) to which social, environmental or ethical considerations are taken into account in the selection, retention and realisation of investments
  - the exercise of the rights (including voting rights) attaching to investments
  - stock lending.
- 4 The SIP must also state the extent to which the administering authority complies with relevant guidance given by the Secretary of State, and give reasons for any areas of non-compliance. The relevant guidance is published by CIPFA in

the *Principles for Investment Decision Making and Disclosure in the Local Government Pension Scheme in the United Kingdom 2012*. This provides best practice for managing investments and includes a guide to the application of the 2008 *Investment Governance Group Principles* to LGPS funds.

## Purpose of the Fund

- 5 The purpose of the Fund is to:
  - Pay pensions, lump sums and other benefits provided under the LGPS Regulations
  - Meet the costs associated in administering the Fund
  - Receive contributions, transfer values and investment income
  - Invest any Fund money not needed immediately to make payments.

## Principles

- 6 The following principles underpin the Fund’s investment activity:
  - The Fund will aim to be sufficient to meet all its obligations on a continuing basis.
  - The Fund will be invested in a diversified range of assets.
  - Proper advice on the suitability of types of investment will be obtained and considered at reasonable intervals.
  - The Fund will aim to conduct its business and to use its influence in a long term responsible way.

## Key Parties

- 7 The key parties involved in the Fund’s investments and their responsibilities are as follows.

## The Administering Authority

- 8 The Administering Authority for the Pension Fund is Nottinghamshire County Council. Under the terms of the Council's constitution, the functions of the Council as administering authority are delegated to the Nottinghamshire Pension Fund Committee supported by two Sub-Committees. The full governance arrangements of the Fund are detailed in the Fund's Governance Compliance Statement.
- 9 The members of the Committees act in a quasi-trustee capacity and are hereafter referred to as "Trustees".

## Trustees

- 10 The Trustees recognise their full responsibility for the oversight of the Fund, and operate to a Code of Conduct. The Trustees shall:
- Determine the overall investment strategy, and what restrictions, if any, are to be placed on particular types and market locations of investments
  - Determine the type of investment management to be used and appoint and dismiss fund managers
  - Receive quarterly reports on performance from the main fund managers and question them regularly on their performance
  - Receive independent reports on the performance of fund managers on a regular basis
  - Be encouraged to receive suitable training to help them discharge their responsibilities and attend such training courses, conferences and meetings that deliver value for money to the Fund.

## Chief Finance Officer

- 11 Under the Council's constitution, the Service Director (Finance & Procurement) is designated the Council's Chief Finance Officer (also known as the Section 151 Officer). The Group Manager (Financial Strategy & Compliance) is the deputy Section 151 Officer. Financial Regulations specify that the Section 151 Officer is responsible for arranging the investment of the Pension Fund. Operational matters falling under this responsibility are exercised by the Senior Accountant (Pensions & Treasury Management).
- 12 Authorised signatories for operational matters relating to pension fund investments are:
- Service Director (Finance & Procurement)
  - Group Manager (Financial Strategy & Compliance)
  - Group Manager (Financial Management)
  - Senior Accountant (Pensions & Treasury Management)
  - Investments Officer
- 13 Representatives of the Service Director (Finance & Procurement) provide advice to the Trustees and attend meetings of the Pension Fund Committees as required.

## Independent Adviser

- 14 The Fund has an Independent Adviser who attends meetings of the Pensions Investment Sub-Committee, Pensions Sub-Committee and Pensions Working Party as required.
- 15 The independent adviser is engaged to provide advice on:
- the objectives and policies of the fund
  - investment strategy and asset allocation
  - the fund's approach to responsible investment
  - choice of benchmarks

- investment management methods and structures
- choice of managers and external specialists
- activity and performance of investment managers and the fund
- the risks involved with existing or proposed investments
- the fund's current property portfolio and any proposals for purchases, sales, improvement or development
- new developments and opportunities in investment theory and practice.

## Asset Allocation

- 16 It is widely recognised that asset allocation is the most important factor in driving long term investment returns. The balance between different asset classes depends largely on the expected returns from each asset class and the target return for the Fund. It is also recognised that investment returns play a significant role in defraying the cost of providing pensions by mitigating the contributions required from employers.
- 17 Employers' contributions are determined as part of the triennial actuarial valuation of the Fund. The actuarial valuation involves a projection of future cash flows to and from the Fund and its main purpose is to determine the level of employers' contributions that should ensure that the existing assets and future contributions will be sufficient to meet all future benefit payments from the Fund.
- 18 The Fund Actuary estimates the future cash flows which will be paid from the Fund for the benefits relating to service up to the valuation date. They then discount these projected cash flows using the discount rate to get a single figure for the value of the past service liabilities. This figure is the amount of money which, if invested now, would be sufficient to make

these payments in future provided that the future investment return was equal to at least the discount rate used.

19. The discount rate is based on the expected long term future investment returns from various asset classes. At the latest valuation, these were as follows:

| Asset Class          | Expected Return (pa) |
|----------------------|----------------------|
| Equities             | 6.7%                 |
| Gilts                | 3.3%                 |
| Corporate Bonds      | 3.9%                 |
| Property             | 5.8%                 |
| Cash                 | 3.1%                 |
| <b>Discount Rate</b> | <b>6.0%</b>          |

- 20 At the latest valuation, the Fund was assessed to have a deficit of £620m and a funding level of 85%. Deficit recovery contributions have been certified for the majority of employers but any returns in excess of the discount rate will help to recover the Fund to a fully funded position.
- 21 The agreed asset allocation ranges for the Fund are shown below along with the Fund's strategic benchmark and liability based benchmark.

| Asset Class                      | Allocation Ranges | Strategic Benchmark      |        |
|----------------------------------|-------------------|--------------------------|--------|
| Equities                         | 55% to 75%        | FTSE All World           | 65.0%  |
| Property                         | 5% to 25%         | IPD annual universe      | 15.0%  |
| Bonds                            | 10% to 25%        | FTSE UK Gilt All Stock   | 17.5%  |
| Cash                             | 0% to 10%         | LIBID 7 Day              | 2.5%   |
| <b>Liability Based Benchmark</b> |                   | FTSE UK Gilts IL > 5 Yrs | 100.0% |

- 22 These ranges will be kept under regular review. If it appears likely that these limits might be breached because of market movements, reference will be made to a meeting of the Pensions Working Party for advice. The proportions are those aimed at achieving best returns within acceptable risk parameters. The Fund will vary between the asset classes according to market circumstances, relative performance and cash flow requirements.
- 23 The asset allocation currently favours “growth assets” (equities and property) over “defensive assets” (bonds and cash) as the former are expected to outperform the latter over the long term. Although net additions from members (contributions received less benefits paid) are now expected to be negative for the foreseeable future, the Fund receives significant investment income and a recent report by the Fund Actuary shows that the Fund is unlikely to need to sell assets to pay benefits for at least 20 years. This allows the Fund to continue to implement a long term investment strategy.
- 24 As the funding level approaches 100%, the asset allocation will be reviewed to consider whether it is appropriate to change the mix of growth versus defensive assets.

## Investment Policy

- 25 The policy of the Fund will be to treat the equity allocation as a block aimed at maximising the financial returns to the funds (and thus minimising employers’ contributions) consistent with an acceptable level of risk. The block of Bonds, Property and Cash is aimed at lowering overall risk (at the cost of anticipated lower return).
- 26 The Trustees have agreed an allocation to private equity and infrastructure. This will be effected principally through fund of funds arrangements to increase diversification and reduce risk. The allocation is based on *committed* amounts and, owing to the nature of these funds, the actual net investment level will be significantly lower. New investments will be made over time to target a commitment level of 10% of the Fund (within an allocation range up to 15% to allow for movements in market value).
- 27 Investments, such as private equity and infrastructure, that fall outside the high level asset classes will be included within the most appropriate class for reporting purposes and assessed against the relevant part of the strategic benchmark.
- 28 Cash will be managed and invested on the Fund’s behalf by the County Council in line with its treasury management policy. The policy is to invest surplus funds prudently, giving priority to security and liquidity rather than yield. If losses occur, however, the Fund will bear its share of those losses.
- 29 Pension fund cash is separately identified each day and specific investment decisions will be made on any surplus cash identified, based on the estimated cash flow requirements of the Fund. As the majority of cash is allocated to individual investment managers and may be called by them for investment at short notice, it is expected that the majority of cash will be placed on call or on short-term fixed deposits. Unallocated balances may be placed directly with the Fund’s custodian.
- 30 Joint investments using a combination of Fund cash and County Council cash may be made where this is in the best interests of the Fund. In considering such investments, guidance issued by the Department for Communities and Local Government will be followed and the Fund will receive its fair share of interest in proportion to the share of cash invested.
- 31 Other asset classes, such as hedge funds and currency, will be reviewed as part of the regular asset allocation strategy review and, if a decision to invest in other assets is made, the Statement of Investment Principles will be revised accordingly.

## Risk Management

- 32 The Fund has adopted a Risk Management Strategy to:
- a) identify key risks to the achievement of the Fund's objectives
  - b) assess the risks for likelihood and impact
  - c) identify mitigating controls
  - d) allocate responsibility for the mitigating controls
  - e) maintain a risk register detailing the risk features in a)-d) above
  - f) review and update the risk register on a regular basis
  - g) report the outcome of the review to the Nottinghamshire Pension Fund Committee.
- 33 The Risk Register is a key part of the strategy as it identifies the main risks to the operation of the Fund, prioritising the risks identified and detailing the actions required to further reduce the risks involved.
- 34 A key part of managing the investment risk is by ensuring an adequate number of suitably qualified investment managers and by requiring managers to hold a diversified spread of assets, which will be reviewed regularly by the Pensions Investment Sub-committee. The level of risk in the equities block will be managed by a balance between passive and active management that may be varied from time to time, according to performance and emerging knowledge and experience of the market.
- 35 It is believed that active management can add value to the Fund but only over the long term, and decisions to appoint or dismiss fund managers will be given careful consideration. It is accepted that investment performance (particularly from equities) can be volatile but, as a long term investor, the Fund can ride out this volatility as long as projected net cash flow continues to be positive.
- 36 The correlation between UK and overseas markets has increased significantly over recent time, reflecting the increasing globalisation of the market. The Fund will therefore make no distinction between the relative holdings of UK and overseas equities, but will take into account exchange rate risks when deciding the balance. As a long term investor, the Fund does not undertake currency hedging. Individual managers may hedge currency risks but only with prior approval from the Fund.
- 37 In addition, the following constraints will apply. These constraints will be reviewed from time to time, and if changes are made, these will be incorporated into a revised Statement of Investment Principles, and amendments will be published.
- Not more than 10% of the Fund to be invested in unlisted securities.
  - Not more than 10% of the Fund to be invested in a single holding.
  - Not more than 25% of the Fund to be invested in securities which are managed by any one body, i.e. in a unit trust type arrangement.
  - Not more than 15% of the Fund to be invested in partnerships, with not more than 2% in any one partnership.
  - Not to enter into any stock lending arrangements.
  - No underwriting without prior approval.
  - No involvement in derivatives (including currency options) without prior approval.

## Other Issues

- 38 The Fund's assets are held in custody by a combination of an independent custodian, investment managers and in-house. The performance of fund managers will be measured against individual benchmarks, and the overall fund, including cash returns, against the strategic benchmark. Performance will be measured by an independent agency. The statement of accounts will be audited by the County Council's external auditors.
- 39 The Fund has an independent adviser who will be present at meetings of the Sub-Committee along with appropriate officers of the administering authority. This is considered best practice in accordance with the requirements for "proper advice" in the governing regulations.
- 40 The investment management arrangements of the Fund can be found in the latest annual report (available on the Fund's website, [www.nottspf.org.uk](http://www.nottspf.org.uk)). The Fund also publishes details of its holdings on the website on a quarterly basis.
- 41 This Statement of Investment Principles will be kept under review and will be revised following any material changes in policy.
- 42 The following appendices are attached:
- Appendix A – the Fund's Statement on Responsible Investment
  - Appendix B – compliance with the *Principles for Investment Decision Making and Disclosure in the Local Government Pension Scheme in the United Kingdom 2012*.

# Appendix A

## Statement on Responsible Investment

### 1 Statement of Principles

1.1 The Nottinghamshire Fund adopts a long term approach to responsible investment. The Trustees recognise their full responsibility for the oversight of the Funds and are charged with determining the overall investment strategy and the type of investment management used. The investment strategy is aimed at achieving best returns whilst minimising risk and overall variability in future employers' contribution rates. Environmental, social and governance (ESG) issues will be taken into account where these are considered likely to impact on returns.

1.2 The Fund supports best practice in corporate governance and adopts the Stewardship Code as recommended by the *Principles for Investment Decision Making and Disclosure in the Local Government Pension Scheme in the United Kingdom 2012*. The Code states that institutional investors should:

- Publicly disclose their policy on how they will discharge their stewardship responsibilities.
- Have a robust policy on managing conflicts of interest in relation to stewardship and this policy should be publicly disclosed.
- Monitor their investee companies.
- Establish clear guidelines on when and how they will escalate their activities as a method of protecting and enhancing shareholder value.
- Be willing to act collectively with other investors where appropriate.
- Have a clear policy on voting and disclosure of voting activity.
- Report periodically on their stewardship and voting activities.

1.3 The Fund has adopted a number of specific policies to implement its approach to long term responsible investment and its responsibilities under the Stewardship Code.

### 2 Policies Adopted

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

2.2 Investment performance is monitored on a quarterly basis and the Fund expects investment managers to engage with companies to address concerns affecting performance. The Fund also holds a number of investments that specifically focus on engaging with the management of under-performing companies in order to generate superior returns.

2.3 The Fund believes that the greatest impact on behaviour can be achieved when working together with others. It is a member of the Local Authority Pension Fund Forum (LAPFF) which exists to promote the investment interests of local authority pension funds and to maximise their influence as shareholders in promoting corporate social responsibility and high standards of corporate governance amongst the companies in which they invest. The Fund actively supports the work of LAPFF and sees this as an important element of its stewardship responsibilities.

2.4 The Fund continues to exercise its ownership rights by adopting a policy of actively voting stock it holds. The Fund retains responsibility for voting (rather than delegating this to investment managers) and proxy votes are submitted for the majority of its global equity holdings.

2.5 Voting is in line with corporate governance best practice and the Fund subscribes to independent research services for voting advice. Voting activity is reported to the Pensions Sub-Committee and disclosed on the Fund website. In exceptional circumstances the Fund will combine with others on a specific issue but only after appropriate consultation.

2.6 In order to ensure ownership rights can be exercised, the Fund holds and will continue to hold, investments in its own name where possible, rather than in the name of investment managers. It will continue to oppose those processes, such as stock lending, which also deprive the Fund of the ability to meet its corporate governance objectives.

# Appendix B

## Summary of Compliance with the Principles for Investment Decision Making and Disclosure in the Local Government Pension Scheme in the United Kingdom 2012

| Principle                                                                                                                                                                                                                                                                                                                                                                      | CIPFA Guidance Key Issues                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Compliance          | Proposed Actions                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|------------------------------------------------------------------------------------|
| <b>1. Effective Decision Making</b><br>a) Decisions are taken by persons or organisations with the skills, knowledge, advice and resources necessary to make them effectively and monitor their implementation.<br>b) Those persons or organisations have sufficient expertise to be able to evaluate and challenge the advice they receive, and manage conflicts of interest. | <ul style="list-style-type: none"> <li>• Separate Committee responsible for the Pension Fund.</li> <li>• Governance Compliance Statement published.</li> <li>• Roles of Members, officers, external advisors and managers defined.</li> <li>• Committee has specified appropriate skills.</li> <li>• Skills and knowledge audit of Committee's membership occur.</li> <li>• Committee has sub committees or a panel to progress significant areas between meetings of the Committee.</li> <li>• Committee obtains proper advice from officers and external investment managers.</li> <li>• Training plan for Members in place.</li> <li>• Papers and reports should be clear and comprehensive and circulated in advance of meetings.</li> <li>• A medium term business plan for the Pension Fund should be in place.</li> </ul> | Generally compliant | 1. A training needs assessment will be carried out with members of the Committees. |

| Principle                                                                                                                                                                                                                                                                                                                                                                                                                            | CIPFA Guidance Key Issues                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Compliance          | Proposed Actions                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|----------------------------------------------------------------------------------------|
| <p><b>2. Clear Objectives</b></p> <p>An overall investment objective(s) should be set out for the fund that takes account of the scheme's liabilities, the potential impact on local taxpayers, the strength of the covenant for non local authority employers, and the attitude to risk of both the administering authority and scheme employers, and these should be clearly communicated to advisors and investment managers.</p> | <ul style="list-style-type: none"> <li>● In setting objectives, the Committee has considered: <ul style="list-style-type: none"> <li>• the fund's liabilities</li> <li>• the adequacy of assets</li> <li>• the maturity of the Fund's liabilities</li> <li>• its cashflow</li> </ul> and has sought proper advice. </li> <li>● Risk is considered as part of the asset allocation strategy.</li> <li>● Funding levels and employer contribution rates are considered and the advice of the Actuaries sought.</li> <li>● The Committee considers whether to request an Asset Liability Study.</li> <li>● The Committee states the range of investments it is prepared to include in its asset allocation and say why some asset classes may have been excluded.</li> <li>● The Committee takes proper advice, including from specialist independent advisors where appropriate.</li> <li>● Advisors are appointed in open competition and are set performance objectives.</li> <li>● The Committee understands transaction related costs incurred, including commission, and has a strategy for ensuring these costs are properly controlled.</li> </ul> | Generally compliant | <p>2. A report is provided to a future Sub-Committee on transaction related costs.</p> |

| Principle                                                                                                                                                                                                                                                                                                                                          | CIPFA Guidance Key Issues                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Compliance          | Proposed Actions                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3. Risk and Liabilities</b><br>a) In setting and reviewing their investment strategy, administering authorities should take account of the form and structure of liabilities.<br>b) These include the implications for local taxpayers, the strength of the covenant for participating employers, the risk of their default and longevity risk. | <ul style="list-style-type: none"> <li>• The Committee sets an overall investment objective for the fund that represents its best judgement of what is necessary to meet the fund's liabilities and takes account of the Committee's attitude to risk.</li> <li>• Appropriate performance benchmarks have been set.</li> <li>• The Statement of Investment Principles includes a description of the risk assessment framework used for potential and existing investments.</li> <li>• The triennial valuation includes a risk assessment in relation to the valuation of its liabilities/assets and factors affecting long term performance.</li> <li>• The Committee uses internal and external audit reports to satisfy itself on the fund's internal controls.</li> <li>• The Investment Strategy is suitable for the fund's objectives and takes account of the ability to pay of the employers in the fund.</li> <li>• The Annual Report includes an overall risk assessment in relation to each of the fund's activities.</li> </ul> | Generally compliant | <ol style="list-style-type: none"> <li>3. The triennial valuation report is presented to the Pensions Investment Sub-Committee highlighting key factors such as the need for risk assessments in relation to the Fund's liabilities and assets.</li> <li>4. Relevant Audit reports be presented to future Sub-Committees as appropriate.</li> <li>5. Undertake employer risk analysis and consider actions arising to mitigate risks to the Fund.</li> </ol> |

| Principle                                                                                                                                                                                                                                                                                                                                           | CIPFA Guidance Key Issues                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Compliance          | Proposed Actions                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4. Performance Assessment</b><br>a) Arrangements should be in place for the formal measurement of performance of the investments, investment managers and advisors.<br>b) Administering authorities should also periodically make a formal assessment of their own effectiveness as a decision making body and report on this to scheme members. | <ul style="list-style-type: none"> <li>• The Committee should consider whether existing index benchmarks are appropriate and consider whether active or passive management are appropriate for managing the Fund's assets.</li> <li>• Performance targets in relation to a benchmark should specify clear time periods and risk limits, and monitoring arrangements should include reports on tracking errors.</li> <li>• In addition to overall Fund returns, the return achieved in each asset class should be measured so that the impact of different investment choices can be assessed.</li> <li>• Although returns will be measured quarterly, a longer timeframe (typically 3–7 years) should be used to assess the effectiveness of Fund management arrangements.</li> <li>• Returns should be obtained from specialist performance measurement agencies independent of the fund managers.</li> <li>• Actuarial services should be market tested periodically.</li> <li>• When assessing managers and advisors, the extent to which decisions have been delegated should be considered.</li> <li>• The Committee should set out its expectations of its own performance in its business plan which should be assessed and reported in the fund's Annual Report.</li> </ul> | Generally compliant | <ol style="list-style-type: none"> <li>6. Reports on Fund performance from the Fund's performance measurement agency are presented to the Pensions Sub-Committee.</li> <li>7. The Fund's strategic and portfolio benchmarks to are kept under regular review.</li> <li>8. The Sub Committees to consider setting a performance framework to help assess their own performance.</li> </ol> |

| Principle                                                                                                                                                                                                                                                                                                                                                                                                                                                       | CIPFA Guidance Key Issues                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Compliance | Proposed Actions                                                                                                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>5. Responsible Ownership</b></p> <p>Administering Authorities should:</p> <p>a) adopt, or ensure their investment managers adopt, the Institutional Shareholders Committee (ISC) Statement of Principles on the responsibilities of shareholders and agents</p> <p>b) include a statement of their policy on responsible ownership in the Statement of Investment Principles</p> <p>c) report periodically on the discharge of such responsibilities.</p> | <ul style="list-style-type: none"> <li>● Policies regarding responsible ownership must be disclosed in the statement of Investment Principles.</li> <li>● The Committee should ensure that investment managers have an explicit strategy, setting out the circumstances in which they will intervene in a company that is acceptable within the Committee's policy.</li> <li>● Funds should be aware of the ISC Code on the Responsibilities of Institutional Investors and the United Nations Environment Programme Finance Initiative.</li> <li>● Authorities may wish to consider seeking alliances with other pension funds to enhance its influence on environmental, social and governance issues e.g. LAPFF.</li> </ul> | Compliant  | <p>9. The Statement on Responsible Investment within the Statement of Investment Principles to be updated as necessary to reflect guidance available and presented to the Pensions Sub-Committee as appropriate.</p> |

| Principle                                                                                                                                                                                                                                                                                                                                                                                           | CIPFA Guidance Key Issues                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Compliance | Proposed Actions                                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>6. Transparency and Reporting</b></p> <p>Administering Authorities should:</p> <p>a) act in a transparent manner, communicating with stakeholders on issues relating to their management of investments, its governance and risks, including performance against stated objectives.</p> <p>b) provide regular communication to scheme members in the form they consider most appropriate.</p> | <ul style="list-style-type: none"> <li>• The Governance Compliance Statement should be maintained regularly.</li> <li>• The Communication Statement should contain sufficient information.</li> <li>• The Annual Report should be compared to the regulations setting out the required content.</li> <li>• The content of the Statement of Investment Principles, the Funding Strategy Statement and the Governance Compliance Statement should comply with the relevant guidance and requirements.</li> </ul> | Compliant  | <p>10. The core source documents namely the Statement of Investment Principles, Funding Strategy Statement, Governance Compliance Statement and the Communication Statement continue to be updated as necessary to reflect guidance available and presented to the Pensions Sub-Committee as appropriate.</p> |

# Communications Strategy Statement

## 1 Purpose

- 1.1 The aim of this communications strategy is to ensure that all stakeholders are kept informed of current and future developments within the Pension Fund and that our communications are clear, concise and accessible to all.

## 2 Background

- 2.1 The Local Government Pension Scheme is one of the most important benefits an employer may offer, and the giving of information and its feedback can only enhance the operation of the fund. An effective communications strategy is therefore vital for an organisation like ours which strives to provide a high quality, cost effective and consistent service to its customers. The impact that good communication has on the efficient running of the fund cannot be understated.
- 2.2 The requirement to produce a communication strategy originates from the then Office of the Deputy Prime Minister who issued the Local Government Pension Scheme (Amendment) (No.2) Regulations 2005, which obliged each pension fund administering authority to prepare and publish and maintain a policy statement on governance, and a policy statement on its communication strategy. The Local Government Pension Scheme Regulations 2013 provides the current legislative basis for both governance (regulation 55) and communication (regulation 61) requirements.
- 2.3 The policy statement on the communication strategy is required to set out how the authority would communicate with members, members' representatives, prospective members and employing authorities; and for the promotion of the Scheme to prospective members and their employing authorities.

- 2.4 A report was presented to the Pensions Administration Sub-Committee on 24 October 2005, outlining key aspects of a Communications Strategy and based on the views of the Committee the final draft is as noted below in section 3.
- 2.5 The contents of this statement will be subject to review and revision following a material change in policy.

## 3 Strategy

- 3.1 This report intends to consult the Committee about the potential and the scope of communications. The report sets out the mechanisms which are to be used to meet those communication needs. The Pensions Office would use the most appropriate communication medium for the audiences receiving the information. This may involve using more than one method of communication.
- 3.2 There are six distinct groups with whom the Pensions Office needs to communicate with:
- a) Trustees
  - b) Scheme Members
  - c) Prospective Scheme Members
  - d) Scheme Employers
  - e) Administration Staff
  - f) Other Bodies

### Trustees

- 3.3 The Pensions Office would aim to develop a micro site on the County Council Intranet to contain relevant information for Trustees with regard to training and the roles of the trustees. The development of knowledge and training can be provided by Officers under investment and administration matters, and supplemented by attendance at relevant external training sessions, conferences, and seminars. The role of the Trustees can be supplemented through the Pensions Committee, Investment

Committee, and the Pensions Administration Sub Committee, at which specific advice can be provided by Officers. All the respective Committees will be provided with information and reports on all relevant pension matters, and where approval and leadership on issues is required.

- 3.4 It is worth noting the ten investment principles as set out in the Myner's report in relation to the role of Trustees and Fund Management. The principles are as set out below:

- a) Effective Decision Making
- b) Clear Objectives
- c) Focus On Asset Allocation
- d) Expert Advice
- e) Explicit Manager Mandates
- f) Activism
- g) Appropriate Benchmarks
- h) Performance Measurement
- i) Transparency
- j) Regular Reporting

The Pension Fund already complies with most parts of the principles, and the extent of compliance is disclosed in the Statement of Investment Principles. There is currently a Government Treasury Working Party which is looking to assess the extent of compliance by Pension Funds generally, and it is already apparent that Public Sector Schemes are doing better than Private Sector Schemes. Nevertheless, the Working Party is likely to reemphasise the importance of Trustees having 'familiarity' with investment matters.

### **Scheme Members**

- 3.5 The Pensions Office would aim to develop an extensive internet website containing scheme details, scheme leaflets, etc. There would be links to other organisations relevant to scheme members, e.g. Employers, AVC Providers, Employers' Organisations, etc.

- 3.6 The publication of 'Nest Egg' for Active Members and Pensioners would continue, which would target specific issues related to their needs. The communications with Pensioners needs to be developed in the context of informing on pertinent issues, such as Health, Finances, etc. It is intended that the Pensions Office would liaise with Employers to ascertain up to date address details of members in order to send the 'Nest Egg' to home addresses. It would then request members to inform the office of any address changes. This would ensure that all Active Members of the LGPS received a copy of the publication. We would also consider upon request attending various Pensioner forums or meetings to inform on issues or answer questions relating to the LGPS.

- 3.7 The Pensions Office would send Benefit Illustrations to all Active and Deferred Members. There is development work underway to improve upon the timing of the despatch of such illustrations, so that members receive the statements soon after the end of the previous year end.

- 3.8 An extensive range of scheme literature is produced by the Pensions Office and is supplied to employing bodies and Scheme Members directly. Copies of the scheme literature will form part of the website.

- 3.9 The Pensions Office continues to issue periodic pay advices to scheme pensioners. This can be utilised as a communication mechanism, as messages can be included on the advice, e.g. to reinforce the needs for pensioners to ensure that in the event of their demise or change of address that the service is notified promptly.

- 3.10 The Pensions Office utilises both surface and e-mail to receive and send correspondence.

- 3.11 A dedicated telephone help line has been established and is widely publicised in scheme literature.

3.12 The Pensions Office aims to provide more frequent Pensions Roadshows around the County, whilst undertaking satellite Roadshows and surgeries, as requested, by specific organisations.

3.13 There would be other miscellaneous actions taken for Scheme Members, such as Customer Satisfaction Surveys, Specific Customer Complaints and Commendations, and the tracking and contacting of Deferred Beneficiaries.

### **Prospective Scheme Members**

3.14 As part of the Government's aim to encourage the public to save for the future, the Pensions Office would aim to target prospective members. This would be done by ensuring that all new appointees receive the scheme booklet. There would be specific information on the website for non-joiners and with data from Employers would focus on specific groups to market the scheme, e.g. by messages on payslips.

3.15 Staff from the Pensions Office would attend induction courses for new recruits to inform of the scheme and the benefits the LGPS offers. We would utilise the Pension Roadshows to, and in partnership with the Department of Works & Pensions and AVC Providers, target specific non-members to provide a more informed choice.

3.16 The Pensions Office would work with the Trade Unions to ensure that the scheme is understood, and that all related pension issues are communicated effectively through the Unions.

### **Scheme Employers**

3.17 The Pensions Office aims to work in partnership with Scheme Employers to assist them in the application of the scheme. It is intended to establish a frequent 'dialogue meeting' with District Councils and other group Employers to pass information, and identify and resolve cases. A 'Technical Newsletter' would

be developed to communicate issues under current debate and any changes on Employer functions.

3.18 We currently have an Employer's Guide through which they are informed of administration responsibilities. An Internet site would be developed for manuals and scheme literature to be available for Employers.

3.19 It is intended that Employer Forums would be established to facilitate discussion with small employers and subsequently improve communication. Staff from the Pensions Office attend Pre-Retirement Courses at District Councils to inform retiring members of specific retirement issues.

3.20 The Pensions Office uses the 'CIVICA UPM' database to hold member records. It is intended to achieve greater web compatibility and the transmission of data electronically. Furthermore, we intend to develop systems so that major Employers have access through the internet to pension records of employees together with a calculation suite, for the provision of estimates direct to employees

### **Administration Staff**

3.21 The Pensions Office currently ensures that all new staff receive robust induction and training, so that they are able to undertake their duties and responsibilities effectively. The Pensions Office has Team Meetings and Management Team Meetings to discuss issues ranging from planning to communications. It is intended to establish an Issues Meeting which will require a cross section of staff from the Pensions Office to discuss issues and concerns.

3.22 There is currently an Intranet site for the administration staff called 'Documents on Line', which needs to be further developed. A Review Group would also be established to review on a periodic basis the Pensions Office's work practices and process, including communications.

## Other Bodies

- 3.23 The Trade Unions are a valuable organisation for the Pensions Office to ensure that the details of the LGPS's availability are brought to their members' attention. The management of the Pensions Office regularly attend various national and regional forums to share issues of common interest and develop and establish best practice, i.e. the National Information Forum, and the East Midlands Pensions Officer Group. The Pension Manager attends the annual Pension Managers' conference in Torquay to discuss various common and pertinent issues. The meeting of the Additional Voluntary Contribution Providers are also attended on a regular basis to discuss various issues, and to, as required, circulate information to scheme members.
- 3.24 The Pensions Office is a member of the Pensions Benchmarking Club which is run by the Chartered Institute of Public Finance and Accountancy (CIPFA). We provide information on membership numbers and administration costs and subsequently benchmark our costs and service with all members and specified members of the Club.
- 3.25 Staff from the Pensions Office undertake visits to Comparator Administering Authorities to learn and share new practices and systems, and to facilitate new ideas and solutions which have a common goal.

# Risk Management Strategy

## Introduction

- 1 This is the Risk Management Strategy for the Nottinghamshire County Council Pension Fund. Risk Management is a key element in the Fund's overall framework of internal control and its approach to sound governance. However, it is not an end in itself, but a means of minimising the costs and disruption to the Fund caused by undesirable or unexpected events. The aim is to eliminate or reduce the frequency of risk events occurring (where possible and practicable) and minimise the severity of the consequences if they do occur.
- 2 Risk can be defined as any event or action which could adversely affect the Fund's ability to achieve its purpose and objectives. Risk management is the process by which:
  - risks are systematically identified
  - the potential consequences are evaluated
  - the element of risk is reduced where reasonably practicable
  - actions are taken to control the likelihood of the risk arising and reducing the impact if it does

## Purpose and Objectives of the Fund

- 3 The purpose of the Fund is to:
  - Pay pensions, lump sums and other benefits provided under the LGPS Regulations
  - Meet the costs associated in administering the Fund
  - Receive contributions, transfer values and investment income
  - Invest any Fund money not needed immediately to make payments.
- 4 The funding objectives are to:
  - Set levels of employer contribution that will build up a fund of assets that will

be sufficient to meet all future benefit payments from the Fund

- Build up the required assets in such a way that employer contribution rates are kept as low and stable as possible.

- 5 The following principles underpin the Fund's investment activity:

- The Fund will aim to be sufficient to meet all its obligations on a continuing basis.
- The Fund will be invested in a diversified range of assets.
- Proper advice on the suitability of types of investment will be obtained and considered at reasonable intervals.
- The Fund will aim to conduct its business and to use its influence in a long term responsible way.

## Key Parties

- 6 The key parties involved in the Fund and their responsibilities are as follows.

## The Administering Authority

- 7 The Administering Authority for the Pension Fund is Nottinghamshire County Council. The main responsibilities of the Administering Authority are to:
  - Collect employee and employer contributions
  - Invest the Fund's assets
  - Pay the benefits due to Scheme members
  - Manage the actuarial valuation process in conjunction with the Fund Actuary
  - Prepare and maintain the Funding Strategy Statement (FSS) and Statement of Investment Principles (SIP) after consultation with other interested parties as appropriate
  - Monitor all aspects of the Fund's performance.

## Scheme Employers

8 In addition to the Administering Authority, a number of other Scheme Employers, including Admission Bodies, participate in the Fund. The responsibilities of each Scheme 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
- Exercise any discretions permitted under the Regulations
- Meet the costs of any augmentations or other additional costs in accordance with agreed policies and procedures
- Notify the Administering Authority of significant changes in the employer's structure or membership.

## Trustees

9 The members of the Nottinghamshire Pension Fund Committee and its Sub-Committees act in a quasi-trustee capacity and are hereafter referred to as "Trustees". The main responsibilities of the Trustees are to:

- Determine the overall investment strategy, and what restrictions, if any, are to be placed on particular types and market locations of investments
- Determine the type of investment management to be used and appoint and dismiss fund managers
- Receive quarterly reports on performance from the main fund managers and question them regularly on their performance

- Receive independent reports on the performance of fund managers on a regular basis
- Be encouraged to receive suitable training to help them discharge their responsibilities and attend such training courses, conferences and meetings that deliver value for money to the Fund.

## Fund Actuary

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

- Advise interested parties on funding strategy and completion of actuarial valuations in accordance with the FSS and the Regulations
- Advise on other actuarial matters affecting the financial position of the Fund.

## Chief Finance Officer

11 Under the Council's constitution, the Service Director (Finance & Procurement) is designated the Council's Chief Finance Officer (also known as the Section 151 Officer). The Group Manager (Financial Management) is the deputy Section 151 Officer. Financial Regulations specify that the Section 151 Officer is responsible for arranging the investment of the Pension Fund. Operational matters falling under this responsibility are exercised by the Senior Accountant (Pensions & Treasury Management).

12 Representatives of the Service Director (Finance & Procurement) provide advice to the Trustees on investment matters and attend meetings of the Pension Fund Committees as required.

## Service Director (HR & Customer Service)

- 13 The Service Director (HR & Customer Service) is responsible for the Pensions Administration function, operated by the Pensions Office within the Business Support Centre. This function covers:
- Pensions administration and employers support
  - Pensions administration systems
  - Communications
  - Technical/performance support
- 14 Representatives of the Service Director (HR & Customer Service) provide advice to the Trustees on pension administration matters and attend meetings of the Pension Fund Committees as required.

## Independent Adviser

- 15 The Fund has an Independent Adviser who attends meetings of the Pensions Investment Sub-Committee, Pensions Sub-Committee and Pensions Working Party as required.
- 16 The independent adviser is engaged to provide advice on:
- the objectives and policies of the fund
  - investment strategy and asset allocation
  - the fund's approach to responsible investment
  - choice of benchmarks
  - investment management methods and structures
  - choice of managers and external specialists
  - activity and performance of investment managers and the fund
  - the risks involved with existing or proposed investments

- the fund's current property portfolio and any proposals for purchases, sales, improvement or development
- new developments and opportunities in investment theory and practice.

## Risk Management Strategy

- 17 The Pension Fund's Risk Management Strategy is to:
- a) identify key risks to the achievement of the Fund's aims
  - b) assess the risks for likelihood and impact
  - c) identify mitigating controls
  - d) allocate responsibility for the mitigating controls
  - e) maintain a risk register detailing the risk features in a)-d) above
  - f) review and update the risk register on an annual basis
  - g) report the outcome of the review to the Nottinghamshire Pension Fund Committee.
- 18 The Risk Register is a key part of the Risk Management Strategy as it identifies the main risks to the operation of the Fund, prioritising the risks identified and detailing the actions required to further reduce the risks involved. These actions will link to the Service Plan process currently reported to the Nottinghamshire Pension Fund Committee in accordance with the *Principles for Investment Decision Making and Disclosure in the Local Government Pension Scheme in the United Kingdom 2012*.

19 All staff involved in the Pension Fund and Members of the Nottinghamshire Pension Fund Committee and its two Sub-Committees need to have an appropriate level of understanding of risk and how risks affect the performance of the Fund. To consolidate the risk management process, the Pension Fund Committee will be asked to:-

- agree the Risk Management Strategy
- approve the Risk Register and agreed actions
- receive and approve the Annual Governance Statement, which will comment upon the Fund's risk management process.

20 By adopting this approach, the Pension Fund will be able to demonstrate a clear commitment, at a strategic level, to the effective management of Pension Fund risks. The Risk Management Strategy and Risk Register will be kept under review and will be revised following any material changes in policy.

# Risk Register

## Objectives

- The objectives of the Risk Register are to:
  - identify key risks to the achievement of the Fund's objectives
  - assess the significance of the risks
  - consider existing controls to mitigate the risks identified
  - Identify additional action required.

## Risk Assessment

- Identified risks are assessed separately and for each the following is determined:
  - the likelihood of the risk materialising
  - the severity of the impact/potential consequences if it does occur.
- Each factor is evaluated on a sliding scale of 1 to 5 with 5 being the highest value i.e. highest likelihood/most severe impact/consequences. The risk evaluation tables below have been used in order to assess specific risks and to introduce a measure of consistency into the risk assessment process. The overall rating for each risk is calculated by multiplying the likelihood value against the impact value.

### LIKELIHOOD:

|   |                |                  |
|---|----------------|------------------|
| 1 | Rare           | 0 to 5% chance   |
| 2 | Unlikely       | 6 to 20% chance  |
| 3 | Possible       | 21 to 50% chance |
| 4 | Likely         | 51 to 80% chance |
| 5 | Almost certain | 81%+ chance      |

### IMPACT:

|   |               |                  |
|---|---------------|------------------|
| 1 | Insignificant | 0 to 5% chance   |
| 2 | Minor         | 6 to 20% chance  |
| 3 | Moderate      | 21 to 50% chance |
| 4 | Significant   | 51 to 80% chance |
| 5 | Catastrophic  | 81%+ chance      |

- Having scored each risk for likelihood and impact, the risk ratings can be plotted onto the following matrix to enable risks to be categorised into Low, Medium, High and Very High Risk.

|                 |                   |                     |                 |                 |               |                       |
|-----------------|-------------------|---------------------|-----------------|-----------------|---------------|-----------------------|
| Relative Impact | Catastrophic (5)  | M                   | H               | VH              | VH            | VH                    |
|                 | Significant (4)   | M                   | H               | VH              | VH            | VH                    |
|                 | Moderate (3)      | M                   | M               | H               | H             | H                     |
|                 | Minor (2)         | L                   | L               | M               | M             | M                     |
|                 | Insignificant (1) | L                   | L               | L               | L             | L                     |
|                 |                   | (1)<br>Rare         | (2)<br>Unlikely | (3)<br>Possible | (4)<br>Likely | (5)<br>Almost Certain |
|                 |                   | Relative Likelihood |                 |                 |               |                       |

- This initial assessment gives the inherent risk level. Existing controls are then identified and each risk is re-assessed to determine if the controls are effective at reducing the risk rating. This gives the current (or residual) risk level. The current risk rating scores and categories are then used to prioritise the risks shown in the register in order to determine where additional action is required in accordance with the following order of priority:

**Red** = Very High Priority

Take urgent action to mitigate the risk.

**Orange** = High Priority

Take action to mitigate the risk.

**Yellow** = Medium Priority

Check current controls and consider if others are required.

**Green** = Low Priority

No immediate action other than to set a review date to re-consider your assessment.

## Nottinghamshire Pension Fund Risk Register

| Nottinghamshire Pension Fund Risk Register | Risk                                                                               | Inherent Risk |        |           | Current Risk |        |   |
|--------------------------------------------|------------------------------------------------------------------------------------|---------------|--------|-----------|--------------|--------|---|
|                                            |                                                                                    | Rating        | Change | Rating    | Change       |        |   |
|                                            | Risk Inv3 Fund assets are assessed as insufficient to meet long term liabilities.  | 16            | ↔      | VERY HIGH | 9            | HIGH   | ★ |
|                                            | Risk Adm1 Standing data & permanent records are not accurate.                      | 16            | ↑      | VERY HIGH | 9            | HIGH   | ★ |
|                                            | Risk Inv4 Significant variations from assumptions used in the actuarial valuation. | 12            | ↓      | HIGH      | 9            | HIGH   | ★ |
|                                            | Risk Gov3 An effective performance management framework is not in place.           | 12            | ↓      | VERY HIGH | 6            | MEDIUM | ★ |
|                                            | Risk Inv1 Inappropriate investment strategy is adopted.                            | 12            | ↔      | VERY HIGH | 6            | MEDIUM | ★ |
|                                            | Risk Inv5b Custody arrangements.                                                   | 12            | ↓      | VERY HIGH | 6            | MEDIUM | ★ |
|                                            | Risk Adm2 Inadequate controls to safeguard pension fund records.                   | 12            | ↔      | VERY HIGH | 6            | MEDIUM | ★ |
|                                            | Risk Gov1 Pension Fund governance arrangements are not effective.                  | 9             | ↔      | HIGH      | 6            | MEDIUM | ★ |
|                                            | Risk Gov2 Pension Fund objectives are not defined and agreed.                      | 9             | ↔      | HIGH      | 6            | MEDIUM | ★ |
|                                            | Risk Gov4 Inadequate resources are available to manage the pension fund.           | 9             | ↑      | HIGH      | 6            | MEDIUM | ★ |
|                                            | Risk Inv2 Fund cash is insufficient to meet its current obligations.               | 9             | ↔      | HIGH      | 6            | MEDIUM | ★ |
|                                            | Risk Inv5a Fund manager mandates.                                                  | 9             | ↔      | HIGH      | 6            | MEDIUM | ★ |
|                                            | Risk Inv5d Financial Administration.                                               | 9             | ↔      | HIGH      | 6            | MEDIUM | ★ |
|                                            | Risk Adm3 Failure to communicate adequately with all relevant stakeholders.        | 9             | ↑      | HIGH      | 6            | MEDIUM | ★ |
|                                            | Risk Gov5 Failure to adhere to relevant legislation and guidance.                  | 9             | ↑      | HIGH      | 4            | LOW    | ★ |
|                                            | Risk Inv5c Accounting arrangements.                                                | 6             | ↓      | MEDIUM    | 4            | LOW    | ★ |
|                                            | Risk Inv5e Stewardship.                                                            | 6             | ↔      | MEDIUM    | 4            | LOW    | ★ |

Key to Risk Rating change since previous version of Risk Register:

 Increase
  Decrease
  No Change
  New

## Governance

**Risk: Gov1 - Pension Fund governance arrangements are not effective.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Impact | Risk Rating |                              |   |
|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------------------------------|---|
| <b>Inherent Risk</b>    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3      | 9           | HIGH                         | ↔ |
| <b>Current Risk</b>     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3      | 6           | MEDIUM                       | ★ |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>The Council's constitution clearly delegates the functions of administering authority of the pension fund to the Nottinghamshire Pension Fund Committee (NPF Committee), supported by two Sub-Committees.</li> <li>The terms of reference of each Sub-Committee are agreed.</li> <li>The Fund publishes a Governance Compliance Statement which details the governance arrangements of the Fund and assesses compliance with best practice. This is kept regularly under review.</li> <li>A training policy is in place which requires Members to receive continuing training and all new Members to attend the Local Government Employers training course.</li> <li>Officers of the Council attend meetings of the NPF Committee and Sub-Committees.</li> <li>The Fund has a formal contract for an independent adviser to give advice on investment matters. They are contracted to attend each meeting of the pension fund Sub-Committees.</li> </ul> |        |             |                              |   |
| <b>Action Required</b>  | <ul style="list-style-type: none"> <li>Continue to monitor via existing processes.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |        |             |                              |   |
| <b>Responsibility</b>   | Group Manager (Financial Management)<br>Group Manager (BSC)<br>Group Manager (Legal Services)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |        |             | <b>Timescale</b><br>On-going |   |

## Governance

**Risk: Gov2 - Pension Fund objectives are not defined and agreed.**

|                         | Likelihood                                                                                                                                                                                                                                                    | Impact | Risk Rating |                              |   |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------------------------------|---|
| <b>Inherent Risk</b>    | 3                                                                                                                                                                                                                                                             | 3      | 9           | HIGH                         | ↔ |
| <b>Current Risk</b>     | 2                                                                                                                                                                                                                                                             | 3      | 6           | MEDIUM                       | ★ |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>Purpose and objectives are outlined in the Funding Strategy Statement (FSS) and Statement of Investment Principles (SIP). Both documents are approved by the NPF Committee and reviewed on a regular basis.</li> </ul> |        |             |                              |   |
| <b>Action Required</b>  | <ul style="list-style-type: none"> <li>Continue to monitor via existing processes.</li> </ul>                                                                                                                                                                 |        |             |                              |   |
| <b>Responsibility</b>   | NPF Committee<br>Group Manager (Financial Management)                                                                                                                                                                                                         |        |             | <b>Timescale</b><br>On-going |   |

## Governance

**Risk: Gov3 - An effective performance management framework is not in place.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Impact | Risk Rating |                                |   |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|--------------------------------|---|
| <b>Inherent Risk</b>    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 4      | 12          | VERY HIGH                      | ↓ |
| <b>Current Risk</b>     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 3      | 6           | MEDIUM                         | ★ |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>Investment performance is reported quarterly to the Pensions Investment Sub-Committee. The Fund's main managers attend each quarter and officers receive regular updates from the Fund's other managers.</li> <li>Poor investment performance is considered by the Sub-Committees and referred for decision if necessary to the NPF Committee.</li> <li>Fund strategic benchmark has been implemented to improve monitoring of decisions regarding asset allocation and investment management arrangements.</li> </ul> |        |             |                                |   |
| <b>Action Required</b>  | <ul style="list-style-type: none"> <li>Consider performance monitoring framework for Fund Administration.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                          |        |             |                                |   |
| <b>Responsibility</b>   | Group Manager (Financial Management)<br>Group Manager (BSC)<br>Group Manager (Legal Services)                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |        |             | <b>Timescale</b><br>March 2016 |   |

## Governance

**Risk: Gov4 - Inadequate resources are available to manage the pension fund.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                       | Impact | Risk Rating |                              |   |
|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------------------------------|---|
| <b>Inherent Risk</b>    | 3                                                                                                                                                                                                                                                                                                                | 3      | 9           | VERY HIGH                    | ↑ |
| <b>Current Risk</b>     | 2                                                                                                                                                                                                                                                                                                                | 3      | 6           | MEDIUM                       | ★ |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>The pension fund is managed by the Pensions &amp; Treasury Management and HR Pensions teams.</li> <li>Operating costs are recharged to the pension fund in accordance with regulations.</li> <li>Staffing levels and structures are kept under regular review.</li> </ul> |        |             |                              |   |
| <b>Action Required</b>  | <ul style="list-style-type: none"> <li>Continue to monitor via existing processes.</li> </ul>                                                                                                                                                                                                                    |        |             |                              |   |
| <b>Responsibility</b>   | Group Manager (Financial Management)<br>Group Manager (BSC)                                                                                                                                                                                                                                                      |        |             | <b>Timescale</b><br>On-going |   |

## Governance

**Risk: Gov5 - Failure to adhere to relevant legislation and guidance.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                       | Impact | Risk Rating |                              |   |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------------------------------|---|
| <b>Inherent Risk</b>    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3      | 9           | HIGH                         | ↑ |
| <b>Current Risk</b>     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3      | 4           | LOW                          | ★ |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>• An established process exists to inform members and officers of statutory requirements and any changes to these.</li> <li>• Sufficient resources are in place to implement LGPS changes while continuing to administer the scheme.</li> <li>• Membership of relevant professional groups ensures changes in statutory and other requirements are registered before the implementation dates.</li> </ul> |        |             |                              |   |
| <b>Action Required</b>  | • Continue to monitor requirements via appropriate sources.                                                                                                                                                                                                                                                                                                                                                                                      |        |             |                              |   |
| <b>Responsibility</b>   | Group Manager (Financial Management)<br>Group Manager (BSC);<br>Senior Accountant - Pensions & TM                                                                                                                                                                                                                                                                                                                                                |        |             | <b>Timescale</b><br>On-going |   |

## Investments

**Risk: Inv1 - Inappropriate investment strategy is adopted.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Impact | Risk Rating |                              |   |
|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------------------------------|---|
| <b>Inherent Risk</b>    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 4      | 12          | VERY HIGH                    | ↔ |
| <b>Current Risk</b>     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 3      | 6           | MEDIUM                       | ★ |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>• The Investment Strategy is in accordance with LGPS investment regulations and is documented, reviewed and approved by the NPF Committee.</li> <li>• The Strategy takes into account the expected returns assumed by the actuary at the triennial valuation.</li> <li>• Investment performance is monitored against the Fund's strategic benchmark.</li> <li>• A regular review takes place of the Fund's asset allocation strategy by the Pension Fund Working Party.</li> <li>• An external advisor provides specialist guidance to the Pensions Investment Sub-Committee on the investment strategy.</li> </ul> |        |             |                              |   |
| <b>Action Required</b>  | • Continue to monitor via existing processes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |        |             |                              |   |
| <b>Responsibility</b>   | Group Manager (Financial Management)<br>Senior Accountant - Pensions & TM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |        |             | <b>Timescale</b><br>On-going |   |

## Investments

**Risk: Inv2 - Fund cash is insufficient to meet its current obligations.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Impact | Risk Rating |                              |   |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------------------------------|---|
| <b>Inherent Risk</b>    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3      | 9           | HIGH                         | ↔ |
| <b>Current Risk</b>     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3      | 6           | MEDIUM                       | ★ |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>Fund cash flow is monitored daily and a summary fund account is reported to Pensions Investment Sub-Committee each quarter.</li> <li>Annual accounts are produced for the pension fund and these show the movements in net cash inflow.</li> <li>Regular assessment of Fund assets and liabilities is carried out through actuarial valuations.</li> <li>The Fund's Investment and Funding Strategies are regularly reviewed.</li> </ul> |        |             |                              |   |
| <b>Action Required</b>  | <ul style="list-style-type: none"> <li>Continue to monitor via existing processes.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                   |        |             |                              |   |
| <b>Responsibility</b>   | Investments Sub-Committee<br>Group Manager (Financial Management)<br>Senior Accountant (Pensions & TM)                                                                                                                                                                                                                                                                                                                                                                          |        |             | <b>Timescale</b><br>On-going |   |

## Investments

**Risk: Inv3 - Fund assets are assessed as insufficient to meet long term liabilities.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Impact | Risk Rating |                              |   |
|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------------------------------|---|
| <b>Inherent Risk</b>    | 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 4      | 16          | VERY HIGH                    | ↔ |
| <b>Current Risk</b>     | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3      | 9           | HIGH                         | ★ |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>Fund assets are kept under review as part of the Fund's performance management framework.</li> <li>Regular assessment of Fund assets and liabilities is carried out through Actuarial valuations.</li> <li>The Fund's Investment and Funding Strategies are regularly reviewed.</li> <li>An external advisor provides specialist guidance to the Pensions Investment Sub-Committee on the investment strategy.</li> </ul> |        |             |                              |   |
| <b>Action Required</b>  | <ul style="list-style-type: none"> <li>Continue to monitor via existing processes.</li> <li>Review cash flow projections prepared by actuaries on a regular basis.</li> </ul>                                                                                                                                                                                                                                                                                    |        |             |                              |   |
| <b>Responsibility</b>   | Investments Sub-Committee<br>Group Manager (Financial Management)<br>Senior Accountant (Pensions & TM)                                                                                                                                                                                                                                                                                                                                                           |        |             | <b>Timescale</b><br>On-going |   |

## Investments

**Risk: Inv4 - Significant variations from assumptions used in the actuarial valuation.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                          | Impact | Risk Rating |                              |    |
|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------------------------------|----|
| <b>Inherent Risk</b>    | 4                                                                                                                                                                                                                                                                                                                                                                                                                                   | 3      | 12          | HIGH                         | ⬇️ |
| <b>Current Risk</b>     | 3                                                                                                                                                                                                                                                                                                                                                                                                                                   | 3      | 9           | HIGH                         | ★  |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>Actuarial assumptions are reviewed by officers and discussed with the actuaries.</li> <li>Sensitivity analysis undertaken on assumptions to measure impact.</li> <li>Valuation undertaken every 3 years.</li> <li>Monitoring of cash flow position and preparation of medium term business plan.</li> <li>Contributions made by employers vary according to their member profile.</li> </ul> |        |             |                              |    |
| <b>Action Required</b>  | <ul style="list-style-type: none"> <li>Continue to monitor via existing processes.</li> <li>Review cash flow projections prepared by actuaries on a regular basis.</li> </ul>                                                                                                                                                                                                                                                       |        |             |                              |    |
| <b>Responsibility</b>   | Group Manager (Financial Management)<br>Senior Accountant (Pensions & TM)                                                                                                                                                                                                                                                                                                                                                           |        |             | <b>Timescale</b><br>On-going |    |

## Investments

**Risk: Inv5 - Inadequate controls to safeguard pension fund assets.**

**Inv5a - Fund manager mandates.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Impact | Risk Rating |                              |    |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------------------------------|----|
| <b>Inherent Risk</b>    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3      | 9           | HIGH                         | ↔️ |
| <b>Current Risk</b>     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3      | 6           | MEDIUM                       | ★  |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>Complete and authorised client agreements are in place. This includes requirement for fund managers to report quarterly on their performance.</li> <li>Client portfolios are managed in accordance with investment objectives.</li> <li>AAF 01/06 (or equivalent) reports on internal controls of service organisations are reviewed for external managers.</li> <li>In-House Fund has a robust framework in place which is regularly tested by internal audit.</li> <li>Fund Managers maintain an appropriate risk management framework to minimise the level of risk to Pension Fund assets.</li> </ul> |        |             |                              |    |
| <b>Action Required</b>  | <ul style="list-style-type: none"> <li>Continue to monitor via existing processes.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |        |             |                              |    |
| <b>Responsibility</b>   | Group Manager (Financial Management)<br>Senior Accountant (Pensions & TM)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |        |             | <b>Timescale</b><br>On-going |    |

## Investments

### Inv5b - Custody arrangements.

|                  | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Impact | Risk Rating |                       |   |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|-----------------------|---|
| Inherent Risk    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 4      | 12          | VERY HIGH             | ↓ |
| Current Risk     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 3      | 6           | MEDIUM                | ★ |
| Current Controls | <ul style="list-style-type: none"> <li>• Complete and authorised agreements are in place with external custodian.</li> <li>• AAF 01/06 (or equivalent) report on internal controls of service organisations is reviewed for external custodian.</li> <li>• Regular reconciliations carried out to check external custodian records.</li> <li>• Where assets are custodied in-house, physical stock certificates are held in a secure cabinet to which access is limited.</li> </ul> |        |             |                       |   |
| Action Required  | • Continue to monitor via existing processes.                                                                                                                                                                                                                                                                                                                                                                                                                                       |        |             |                       |   |
| Responsibility   | Group Manager (Financial Management)<br>Senior Accountant (Pensions & TM)                                                                                                                                                                                                                                                                                                                                                                                                           |        |             | Timescale<br>On-going |   |

## Investments

### Inv5c - Accounting arrangements.

|                  | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Impact | Risk Rating |                       |   |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|-----------------------|---|
| Inherent Risk    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2      | 6           | MEDIUM                | ↓ |
| Current Risk     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2      | 4           | LOW                   | ★ |
| Current Controls | <ul style="list-style-type: none"> <li>• Pension Fund accounting arrangements conform to the Local Authority Accounting Code, relevant IFRS/IAS and the Pensions' SORP.</li> <li>• The Pension Fund subscribes to the CIPFA Pensions Network and Technical Information Service and officers attend courses as appropriate.</li> <li>• Regular reconciliations are carried out between in-house records and those maintained by external custodian and investment managers.</li> <li>• Internal Audits are carried out regularly.</li> <li>• External Audit review the Pension Fund's accounts annually.</li> </ul> |        |             |                       |   |
| Action Required  | • Continue to monitor via existing processes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |        |             |                       |   |
| Responsibility   | Group Manager (Financial Management)<br>Senior Accountant (Pensions & TM)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |        |             | Timescale<br>On-going |   |

## Investments

### Inv5d - Financial Administration.

|                  | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Impact | Risk Rating |                       |   |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|-----------------------|---|
| Inherent Risk    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3      | 9           | HIGH                  | ↔ |
| Current Risk     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3      | 6           | MEDIUM                | ★ |
| Current Controls | <ul style="list-style-type: none"> <li>The pension fund adheres to the County Council's financial regulations with appropriate separation of duties and authorisation limits for transactions.</li> <li>Daily cash settlements are made with external custodian to maximise returns on cash.</li> <li>Investment transactions are properly authorised, executed and monitored.</li> <li>Contributions due to the fund are governed by Scheme rules which are implemented by the Pensions Manager.</li> <li>The Pension fund maintains a bank account which is operated within regulatory guidelines.</li> </ul> |        |             |                       |   |
| Action Required  | Continue to monitor via existing processes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |        |             |                       |   |
| Responsibility   | Group Manager (Financial Management)<br>Senior Accountant (Pensions & TM)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |        |             | Timescale<br>On-going |   |

## Investments

### Inv5e - Stewardship.

|                  | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Impact | Risk Rating |                       |   |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|-----------------------|---|
| Inherent Risk    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 2      | 6           | MEDIUM                | ↔ |
| Current Risk     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 2      | 4           | LOW                   | ★ |
| Current Controls | <ul style="list-style-type: none"> <li>The pension fund aims to be a long term responsible investor and has adopted the FRC's Stewardship code.</li> <li>The Fund is a member of Local Authority Pension Fund Forum (LAPFF) and National Association of Pension Funds (NAPF), and supports their work on shareholder engagement.</li> <li>The pension fund has a contract in place for a proxy voting services. Voting is reported to the Pensions Sub-Committee each quarter and published on the Fund website.</li> </ul> |        |             |                       |   |
| Action Required  | Continue to monitor via existing processes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |        |             |                       |   |
| Responsibility   | Group Manager (Financial Management)<br>Senior Accountant (Pensions & TM)                                                                                                                                                                                                                                                                                                                                                                                                                                                   |        |             | Timescale<br>On-going |   |

## Administration

**Risk: Adm1 - Standing data and permanent records are not accurate.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Impact | Risk Rating |                              |   |
|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------------------------------|---|
| <b>Inherent Risk</b>    | 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 4      | 16          | VERY HIGH                    | ↑ |
| <b>Current Risk</b>     | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 3      | 9           | HIGH                         | ★ |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>• Business processes are in place to identify changes to standing data.</li> <li>• Records are supported by appropriate documentation; input and output checks are undertaken; reconciliation occurs to source records once input.</li> <li>• Documentation is maintained in line with agreed policies.</li> <li>• Change of details form sent out to members alongside annual statement.</li> <li>• Data matching exercises (National Fraud Initiative) help to identify discrepancies.</li> <li>• Data cleansing has been undertaken as part of transfer to new Pensions Administration system.</li> </ul> |        |             |                              |   |
| <b>Action Required</b>  | <ul style="list-style-type: none"> <li>• Continue to monitor via existing processes.</li> <li>• Introduce quarterly monitoring of returns from major fund employers.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |        |             |                              |   |
| <b>Responsibility</b>   | Group Manager (BSC)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |        |             | <b>Timescale</b><br>On-going |   |

## Administration

**Risk: Adm2 - Inadequate controls to safeguard pension fund records.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                              | Impact | Risk Rating |                              |   |
|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|------------------------------|---|
| <b>Inherent Risk</b>    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                       | 4      | 12          | VERY HIGH                    | ↑ |
| <b>Current Risk</b>     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                       | 3      | 6           | MEDIUM                       | ★ |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>• ICT Disaster Recovery Plan and Security Plan are agreed and in place.</li> <li>• New Data Centre and back up arrangements in place</li> <li>• Software is regularly updated to meet LGPS requirements.</li> <li>• Audit trails and reconciliations are in place.</li> <li>• Documentation is maintained in line with agreed policies</li> <li>• Physical records are held securely.</li> </ul> |        |             |                              |   |
| <b>Action Required</b>  | <ul style="list-style-type: none"> <li>• Continue to monitor via existing processes.</li> </ul>                                                                                                                                                                                                                                                                                                                                         |        |             |                              |   |
| <b>Responsibility</b>   | Group Manager (BSC)                                                                                                                                                                                                                                                                                                                                                                                                                     |        |             | <b>Timescale</b><br>On-going |   |

## Administration

**Risk: Adm3 - Failure to communicate adequately with all relevant stakeholders.**

|                         | Likelihood                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Impact | Risk Rating |                               |   |
|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|-------------------------------|---|
| <b>Inherent Risk</b>    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3      | 9           | HIGH                          | ↑ |
| <b>Current Risk</b>     | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3      | 6           | MEDIUM                        | ★ |
| <b>Current Controls</b> | <ul style="list-style-type: none"> <li>• A communications strategy is in place.</li> <li>• The Fund website is periodically updated and Nest Egg newsletter is published regularly.</li> <li>• The Fund has an annual meeting aimed at all participating employers.</li> <li>• The Pensions Sub-Committee has representatives of the County Council, City Council, Nottinghamshire Local Authorities, Trade Unions, Scheduled and Admitted Bodies.</li> <li>• Regular Pension road shows and communication takes place.</li> <li>• Meetings are held regularly with employers within the Fund.</li> <li>• Benefit Illustrations are sent annually to contributing and deferred Fund members.</li> <li>• Annual report, prepared in accordance with statutory guidelines, is published on the website.</li> </ul> |        |             |                               |   |
| <b>Action Required</b>  | <ul style="list-style-type: none"> <li>• Consider employer risk analysis to safeguard contributions to the Fund.</li> <li>• Carry out a review of the communications strategy.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |        |             |                               |   |
| <b>Responsibility</b>   | Group Manager (BSC)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |        |             | <b>Timescale</b><br>June 2015 |   |

# List of Active Fund Employers

## Employer Name

A1 Housing Bassetlaw  
 Advance Housing and Support Ltd  
 Alderman White School  
 All Saints Catholic Voluntary Academy  
 Ambleside Primary School  
 Archbishop Cranmer CE Academy  
 Arnbrook Primary School  
 Arnold Hill Academy  
 Ashfield Citizens Advice Bureau  
 Ashfield DC Councillors  
 Ashfield District Council  
 Ashfield Homes  
 Ashfield School  
 Autism East Midlands (NORSACA)  
 Balderton Parish Council  
 Barnby Road Trust  
 Barnsley Premier Leisure  
 Bassetlaw Citizens Advice Bureau  
 Bassetlaw District Council & Councillors  
 Becket School  
 Beech Academy  
 Bespoke Cleaning Services  
 Bestwood Advice Centre  
 Bestwood Community School  
 Bestwood Partnership Forum  
 Bilborough College  
 Bingham Town Council  
 Birklands Primary School  
 Bishop Alexander LEAD Academy  
 BKSB Limited  
 Blessed Robert Widmerpool Cath School  
 Blidworth Parish Council  
 Blue Bell Primary School  
 Bluecoat Academy  
 Bluecoat Beechdale Academy  
 Bramble Academy  
 Bramcote Crematorium Joint Committee  
 Bramcote Hills School  
 Brocklewood Primary School  
 Broxtowe Borough Council & Councillors  
 Brunts Academy  
 Bulwell Academy  
 Burton Joyce Parish Council

Calverton Parish Council  
 Capita It Services (BSF) Ltd  
 Carers Federation  
 Carillion Limited  
 Carillion Service (Farnborough)  
 Carlton-le-Willows  
 Central College Nottingham  
 Chetwynd Primary  
 Child Migrants Trust  
 Chilwell School  
 Christ The King School  
 Citizens Advice Broxtowe  
 Civica UK Ltd  
 Clifton Advice Centre  
 Compass Contract Services  
 Cotgrave Candleby Lane School  
 Cotgrave Town Council  
 Crime Reduction Initiatives  
 Cropwell Bishop Parish Council  
 Disabilities Living Centre  
 Djanogly City Acad Nottm  
 Djanogly Northgate Acad Nottm  
 Djanogly Strelley Academy  
 Dukeries Academy  
 East Bridgford St Peters CE Academy  
 East Leake Academy  
 East Midlands Further Education Council  
 Edale Rise Primary and Nursery School  
 Edna G Olds Academy  
 Edwinstowe Parish Council  
 Experience Nottm Ltd  
 Fairfield Primary Academy  
 Faith In Families  
 Family Action  
 Family Care for Nottm  
 Farnborough Academy  
 Fernwood Academy  
 Firbeck Academy  
 Foxwood Grant Maintained School/academy  
 Futures Advice, Skills and Employment Ltd  
 Gedling Borough Council & Councillors  
 George Spencer Academy  
 Glapton Academy (The)  
 Glenbrook Primary School  
 Good Shepherd Academy

Greasley Parish Council  
 Greenfields Centre Ltd  
 Greenwood Academies Trust  
 Groundwork Greater Nottingham  
 Hall Park Academy  
 Harworth & Bircotes Town Council  
 Harworth C of E Academy  
 Hempshill Hall Primary School  
 Highbank Primary & Nursery School  
 Hillside Primary & Nursery School  
 Hogarth Primary & Nursery School  
 Holgate Academy (The)  
 Holme Pierrepont Leisure Trust  
 Holy Cross Academy  
 Holy Trinity Catholic Voluntary Academy  
 Huntingdon Academy  
 Independent Cleaning Service  
 Institute of Crem and Cremation Management (ICCM)  
 Joseph Whitaker School  
 Jubilee LEAD Academy  
 Kimberley School  
 Kingston Park  
 Kirkby College  
 Lafarge Tarmac Ltd  
 Langar Cum Barnstone DC  
 LEAD Multi Academy Trust  
 Leamington Primary and Nursery Academy  
 Leverton CE Academy  
 Magnus Church of England Academy  
 Manor Academy Trust  
 Mansfield & District Crematorium Joint Ctte  
 Mansfield Citizens Advice Bureau  
 Mansfield District Council & Councillors  
 Mansfield District Leisure Trust Ltd  
 Mansfield Primary Academy  
 Mansfield Road Baptist Housing  
 Meadows Advice Group  
 Meden School  
 Mellors Catering Services (OLSE)  
 Mellors Catering Services Limited (Rushcliffe)  
 Mellors Catering Services Limited (Southwark)  
 MENCAP  
 Mercury Cleaning Solutions Ltd  
 Metropolitan Housing Trust  
 Milford Academy  
 National Church of England Academy Trust

Nethergate School  
 New Charter Housing (Gedling Homes)  
 New College Nottingham  
 Newark & Sherwood DC & Councillors  
 Newark & Sherwood Homes  
 Newark Academy  
 Newark Emmaus Trust Ltd  
 Newark Town Council  
 Newstead Parish Council  
 Norbridge Academy  
 North Notts Coll (Early Years)  
 North Notts College of FE  
 Nottingham Academy  
 Nottingham Assoc of Local Councils  
 Nottingham Citi Care Partnership  
 Nottingham Citizens Advice Bureau  
 Nottingham City Council - EMC  
 Nottingham City Council & Councillors  
 Nottingham City Homes  
 Nottingham City Transport PLC  
 Nottingham Contemporary Arts  
 Nottingham Emmanuel School  
 Nottingham Free School  
 Nottingham Girls Academy  
 Nottingham Ice Centre Ltd  
 Nottingham Regeneration  
 Nottingham Revenues & Benefits Ltd  
 Nottingham Trent University  
 Nottingham University Samworth Academy  
 Nottinghamshire Combined Fire Authority  
 Nottinghamshire County Council  
 Nottinghamshire County Scout Association  
 Nottinghamshire Deaf Society  
 Nottinghamshire Fire & Rescue (Trading)  
 Nottinghamshire Police Authority  
 NTU Union of Students  
 NUASt (Nottm Uni Academy of Science  
 & Technology)  
 Nuthall Parish Council  
 Old Basford School  
 Ollerton & Boughton Town Council  
 Our Lady & St Edwards Catholic Primary  
 Our Lady Perpetual Succour Catholic Primary  
 Outwood Academy Portland  
 Outwood Academy Valley  
 Partnership Council

Peafield Lane Academy  
 Pearsons Young Persons Centre  
 Portland School  
 Priory Catholic Vol Academy  
 Quarrydale Academy  
 Queen Elizabeth's Academy  
 Radcliffe on Trent Parish Council  
 Radford Academy  
 Rainworth Parish Council  
 Ravenshead Parish Council  
 Redhill School  
 Redhill Trust - Carlton Academy  
 Renewal Trust  
 Retford Oaks Academy  
 Rosslyn Park Primary & Nursery School  
 Ruddington Parish Council  
 Rural Community Action Notts  
 Rushcliffe Academy  
 Rushcliffe Borough Council & Councillors  
 Sacred Heart Academy  
 Samworth Church Academy  
 Scape Systems Ltd  
 Selston Parish Council  
 Serlby Park School  
 Sherwood & Newark CAB  
 Sherwood E-act Academy  
 Sir Donald Bailey  
 Skegby Junior Academy  
 SLM Limited  
 Sneinton C of E Academy  
 South Nottinghamshire Academy  
 South Wold Community School  
 Southern Electric Contracting Limited  
 Southwark Primary  
 Southwell Leisure Centre  
 Southwell Town Council  
 Sparken Hill Academy  
 St Ann's Well Academy  
 St Augustine Primary School  
 ST Edmund Campion  
 St Hugh's College  
 St Margaret Clitherow Academy  
 St Mary Magdalene C of E Primary School  
 St Mary's Catholic Primary School  
 St Patricks Catholic Primary School  
 St Philip Neri with St Bede Catholic Voluntary School

St Teresa's Catholic Primary School  
 Stapleford Town Council  
 Stonesoup Academy  
 Streetwise Environmental Ltd  
 Sunnyside Spencer Academy  
 Sutton Community Academy  
 Sycamore Academy  
 Taylor Shaw Limited  
 The Elizabethan Academy Trust  
 The Flying High Academy  
 Thera East Midlands Ltd  
 Tollerton Parish Council  
 Toot Hill School  
 Top Valley Academy  
 Trent Valley Drainage Board  
 Trinity School  
 Trowell Parish Council  
 Tuxford Academy  
 Tuxford Primary Academy  
 United Response  
 UPP (Nottingham) Ltd  
 Vision Studio School  
 Wainwright Primary School  
 Warren Hill Academy Trust  
 Warsop Parish Council  
 Webb Support Services Limited  
 West Bridgford School  
 West Notts College of FE  
 Whitemoor Academy  
 Windmill Primary Academy



**The Nottinghamshire Local Government Pension Scheme**  
is administered by Nottinghamshire County Council

Notts LG Pensions Office, Business Support Centre, Nottinghamshire County Council  
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