

NOTICE
OF
MEETING

BERKSHIRE PENSION BOARD

will meet on

TUESDAY, 8TH OCTOBER, 2019

At 12.30 pm

at

MINSTER COURT - TOWN HALL

TO: MEMBERS OF THE BERKSHIRE PENSION BOARD

NIKKI CRAIG, ALAN CROSS, JEFF FORD, TONY PETTITT (CHAIRMAN) AND NEIL WILCOX (VICE-CHAIRMAN)

Karen Shepherd – Service Lead - Governance - Issued: September 30th 2019

Members of the Press and Public are welcome to attend Part I of this meeting. The agenda is available on the Council's web site at www.rbwm.gov.uk or contact the Panel Administrator **Andy Carswell 01628 796319**

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AGENDA

STANDING ITEMS

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2.	<u>DECLARATION OF INTEREST</u> To receive any declarations of interest.	5 - 6
3.	<u>MINUTES</u> To approve the minutes of the meeting held on February 20 th 2019.	7 - 10
4.	<u>ACTION TRACKER</u> To note the contents of the Action Tracker.	11 - 12
5.	<u>SCHEME AND REGULATORY UPDATE</u> To receive updates from Kevin Taylor on: a. TPR Governance and administration risk in public service pension schemes; and engagement report b. Fair Deal Consultation	13 - 48
6.	<u>ADMINISTRATION REPORT</u> To note the contents of the report.	49 - 60

WORK PROGRAMME

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7.	<u>LOCAL PENSION BOARD WORKPLAN 2019-20</u> To note the contents of the workplan	61 - 62
8.	<u>TRAINING ITEM - OVERVIEW OF SCHEME GOVERNANCE AND LGPS BENEFITS</u> To receive an overview of the Local Governance Board scheme governance and LGPS benefits.	63 - 70
9.	<u>PENSION FUND ANNUAL REPORT AND ACCOUNTS</u> To receive an overview from Kevin Taylor.	71 - 208

10.	<u>INTERNAL AUDIT REPORT</u> To receive an overview from Kevin Taylor.	209 - 214
11.	<u>RISK MANAGEMENT POLICY</u> To receive an overview from Kevin Taylor.	215 - 228
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EMERGING ISSUES

<u>ITEM</u>	<u>SUBJECT</u>	<u>PAGE NO</u>
13.	<u>IDENTIFIED OR REGISTERED BREACHES</u> For Members to note any identified or registered breaches.	-
14.	<u>FEEDBACK FROM RECENT BARNETT WADDINGHAM/CIPFA SEMINAR</u> To receive a verbal report from Alan Cross and Jeff Ford.	Verbal Report
15.	<u>ANY OTHER BUSINESS</u> To discuss any other items of business.	-

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MEMBERS' GUIDANCE NOTE

DECLARING INTERESTS IN MEETINGS

DISCLOSABLE PECUNIARY INTERESTS (DPIs)

DPIs include:

- Any employment, office, trade, profession or vocation carried on for profit or gain.
- Any payment or provision of any other financial benefit made in respect of any expenses occurred in carrying out member duties or election expenses.
- Any contract under which goods and services are to be provided/works to be executed which has not been fully discharged.
- Any beneficial interest in land within the area of the relevant authority.
- Any license to occupy land in the area of the relevant authority for a month or longer.
- Any tenancy where the landlord is the relevant authority, and the tenant is a body in which the relevant person has a beneficial interest.
- Any beneficial interest in securities of a body where
 - a) that body has a piece of business or land in the area of the relevant authority, and
 - b) either (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body **or** (ii) the total nominal value of the shares of any one class belonging to the relevant person exceeds one hundredth of the total issued share capital of that class.

PREJUDICIAL INTERESTS

This is an interest which a reasonable fair minded and informed member of the public would reasonably believe is so significant that it harms or impairs your ability to judge the public interest. That is, your decision making is influenced by your interest that you are not able to impartially consider only relevant issues.

DECLARING INTERESTS

If you have not disclosed your interest in the register, you **must make** the declaration of interest at the beginning of the meeting, or as soon as you are aware that you have a DPI or Prejudicial Interest. If you have already disclosed the interest in your Register of Interests you are still required to disclose this in the meeting if it relates to the matter being discussed. A member with a DPI or Prejudicial Interest **may make representations at the start of the item but must not take part in discussion or vote at a meeting.** The term 'discussion' has been taken to mean a discussion by the members of the committee or other body determining the issue. You should notify Democratic Services before the meeting of your intention to speak. In order to avoid any accusations of taking part in the discussion or vote, you must move to the public area, having made your representations.

If you have any queries then you should obtain advice from the Legal or Democratic Services Officer before participating in the meeting.

If the interest declared has not been entered on to your Register of Interests, you must notify the Monitoring Officer in writing within the next 28 days following the meeting.

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BERKSHIRE PENSION BOARD

WEDNESDAY, 20 FEBRUARY 2019

PRESENT: Alan Cross, Pettitt (Chairman) and Wilcox (Vice-Chairman)

Officers: Kevin Taylor & Nabihah Hassan-Farooq

INTRODUCTION AND APOLOGIES

The Chair welcomed all attendees to the meeting.

DECLARATION OF INTEREST

None.

MINUTES

RESOLVED UNANIMOUSLY: That the Part I and Part II minutes of the meeting held on September 11th 2018 be agreed as an accurate record, be agreed as an accurate record,

SCHEME AND REGULATORY UPDATE

Kevin Taylor (RBWM) gave an update on the above titled item. Firstly, it was outlined that the Local Government Pension Scheme (Miscellaneous Amendment) Regulations 2018 had now delegated powers to the Secretary of State to issue guidance. MCHLG now had powers to issue guidance without statutory provision in place. Members were informed that there had been a removal of requirement for employers to consent to early release of benefits for those employees with deferred benefits aged 55 years and over. It was noted that employer discretion could be applied to waive any actuarial reduction but the employee no longer needed employer consent to withdraw benefits at a reduced rate. Members were informed that regulation 4 came into effect as of the 17th April 2018. Members discussed whether this date had taken into the consultation phase and whether the publication date had any adverse impact on the regulation.

Members discussed the Local Government Pension Scheme- Actuarial Guidance and early retirement reduction factors had changed from the 8th January 2019.. The percentage reduction had been reduced for both female and males and have been aligned to remove any perceived sex discrimination. Neil Wilcox highlighted that the 'Local Government Pension Scheme- Actuarial guidance' had been dated as the 29th April 2016, it was confirmed that this was an administration error and that the document had been received earlier this year.

Members were informed that the Government had published a written statement which announced a pause in the cost cap process for public service pension schemes pending the outcome of the application to appeal the McCloud case to the Supreme Court. The Board were told that the LGPS Advisory Board would now consider whether, given this announcement, it should withdraw the benefit change recommendations that had been made to the MHCLG as a result of its own cost cap process. It was outlined that if the McCloud principle was upheld that it would be required to make changes to the underpin and that such changes would need to be taken into account by SAB when reviewing its own cost cap calculations. It was noted that all changes that had been scheduled were now on hold and would resume once the judgement had been made upon the McCloud case.

It was also highlighted that the initial SAB proposals to bring the scheme cost back to 19.5% had included the removal of third tier ill health retirements, the introduction of a minimum death grant of £75,000 and an adjustment to the two lowest employee contribution bands. A further

systems which did not translate as it was held in different formats on different systems. Members were told that data testing reports would be run again in 12 months time and that accuracy was currently being reported at 99%.

Members queried whether there was any benchmarking or KPIs set in relation to the data cleansing and it was confirmed that when comparing against other neighbouring local authorities that the data held was significantly better. Members were informed that a report had gone to the Berkshire Pension Panel.

ACTION- That Kevin Taylor provide an update on the data cleansing entries in 6 months.

Nikki Craig highlighted that it was the duty of the employee to update and amend their addresses and it was agreed by all members that the process of constant improvement of data (by updated and amending records) would help keep data refreshed and cleaner on the iConnect system.

ACTION TRACKER

Members noted the contents of the Action Tracker document. Members queried whether information had been sent to the correct recipients and it was confirmed that there was confidence in who had been sent relevant information.

REVIEW OF BOARD WORKPLAN

Kevin Taylor outlined the Board's workplan for the upcoming Municipal year. Members were asked to review the contents of the work plan and were informed that the workplan had been amended to include all statutory and standing items that were expected to be considered by the Board. Members were concerned with the scheduling of meetings coinciding appropriately with the Berkshire Pension Fund. Panel meetings to ensure proper consideration is given to relevant business items. It was agreed that there would be four polices considered at each quarter and that this would be mirrored onto the Board's workplan. It was also noted that there would be better use of the Board's time to merge specific items and to update the work plan accordingly.

ACTION- Kevin Taylor to update the work programme to reflect the changes discussed and circulate to Board Members.

REVIEW OF FUND IDRPP PROCEDURES AND CASES

Kevin Taylor gave an overview of the item as above titled. Members were informed that there was a formal Internal Dispute Resolution Procedure (IDRP) available and this was available in the agenda papers. The document was posed to members for review and comment. The IDRP had been written based on LGA guidance. It was highlighted that there were currently 3 cases that were actively going through the Pensions Ombudsman's Office and that the predominant theme related to ill health retirement. Members were informed that the uphold rate when assessing each case was low. Tony Pettitt queried whether these figures reflected the last twelve months and it was confirmed that there had been 6/7 cases raised through the IDRP but not all of these had been escalated through to the Pensions Ombudsmen. Members felt that the 'Guide to the Internal Dispute Resolution Procedure' document should be free from gender bias and accordingly re-written to remove gender bias from the text. It was also discussed that the IDRP cases were an important statistic to track and should be included in future administration reports. It was agreed that this item would review to the Board in twelve months time.

ACTION- That the report return to the Board in 12 months for review.

Members felt that any increase to employer contributions should be increased gradually and not revised without consideration to existing rates.

PENSION FUND PANEL MINUTES

(Not for publication by virtue of Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972

Members noted the Part II minutes of the meeting held on the 17th September and 12th November 2018.

EMPLOYER RISK PROPOSAL

(Not for publication by virtue of Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972

Members noted the contents of the Employer risk proposal.

The meeting, which began at 13:04, finished at 15:09

CHAIRMAN.....

DATE.....

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Pension Board Meetings - Action Tracking Schedule

Action No.	Date of meeting	Minute Item	Action Item Description	Comments	Assigned To	Status	Date
12			b) Adoption of Training Plan.	Board members to inform the DPFM of any training completed.	Board Members	Ongoing.	

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Governance and administration risks in public service pension schemes: an engagement report

Findings from our engagement with 10 local government funds, selected from across the UK, to understand scheme managers' approaches to a number of key risks. As part of each engagement we fed back on good practice and suggested improvements that could be made.

The engagement took place between October 2018 and July 2019 following the results of our annual governance and administration survey, in which we identified that improvements being made across the Local Government Pension Scheme (LGPS) had slowed down. We were pleased to note that scheme managers were already sharing good practice with their LGPS peers and hope that working with us offered scheme managers a new perspective on their funds.

We carried out this review at a high level based on meetings with scheme managers to understand the challenges they face. The meetings were supplemented by a review of some fund documentation and examples of communications sent to members, prospective members and beneficiaries.

It is not a comprehensive evaluation of the funds' operations and is not intended to replace audit requirements, nor is it to be considered as regulatory assurance or an endorsement of the fund by The Pensions Regulator (TPR).

Glossary of terms

Term	Description
CETV	Cash Equivalent Transfer Value, a valuation of a members benefit entitlement that can be transferred to another scheme.
FCA	The Financial Conduct Authority, which regulates firms in the financial sector including IFAs.
Firm	A business in the financial sector carrying out activities that require authorisation from the FCA.
Fund	A locally administered element of a wider pension scheme.
IFA	Independent Financial Adviser, a person with FCA authorisation to advise people about financial decisions.
Member	A person who has paid into and expects to receive or is receiving a benefit from a pension scheme.
PAS	Pension Administration Strategy, a document detailing roles and responsibilities

	as well as penalties for non-compliance with duties to the fund.
Pension Board	A body that supports and advises the scheme manager.
Pension committee	A body running a pension scheme with the delegated authority of the scheme manager.
PSPS	Public Service Pension Scheme
Saver	A potential beneficiary of a pension scheme, whether or not they are a member.
s.151 officer	A senior member of staff at a Local Authority. Controls resourcing across the Authority, including for the running of the local element of the Local Government Pension Scheme.
Scheme	A pension scheme which may have separate funds within it.
Scheme manager	The person or body legally responsible for the operation of a PSPS.
SLA	Service Level Agreement, an agreed and measurable level of quality usually forming part of a contract.

Executive summary

Overall we found a number of common areas, some requiring improvement but others demonstrating good practice relating to the

various risk areas we investigated. The key improvement areas are summarised below. These findings align with the findings from our **annual public service governance and administration survey** (<https://www.thepensionsregulator.gov.uk/en/document-library/research-and-analysis#b856d02f01714192895cdb91e84a4410>)

Key person risk: While most scheme managers demonstrated a good knowledge of what we expect, many funds have a lack of comprehensive documented policies and procedures. We also found an over-reliance on controls put in place by the Local Authority with little interaction between the scheme manager and Local Authority. This was particularly prevalent in relation to cyber security but this theme overlays several of the risk areas we explored.

Pension boards: Engagement levels varied, with concerns being raised about the frequency some pension boards meet and their appetite to build their knowledge and understanding. We saw evidence of some pension boards not wanting to review full documents, instead relying on much reduced summaries and leading us to question how they could fulfil their function. Others were well run and engaged.

Fraud / scams: We saw evidence of scheme managers learning from wider events and taking steps to secure scheme assets. However, not all were as vigilant when it came to protecting members from potential scams.

Employers: We saw considerable variance in the approaches taken to dealing with the risks surrounding employers, such as receiving contributions and employer insolvency. Generally this was connected to fund resourcing but also related to different philosophies related to taking security over assets.

The following sections detail our findings and recommendations, together with case studies we believe will be helpful to the PSPS community.

Key findings and associated case studies

Area of focus: Record-keeping

Code of Practice 14 – Governance and administration of public service pension schemes

(<https://www.thepensionsregulator.gov.uk/en/document-library/codes-of-practice/code-14-public-service-pension-code-of-practice#e6e12897999d45e5bc8ead7983fd15b4>)

Failure to maintain complete and accurate records and put in place effective internal controls to achieve this can affect the ability of schemes to carry out basic functions. Poor record-keeping can result in schemes failing to pay benefits in accordance with scheme regulations, processing incorrect transactions and paying members incorrect benefits.

Findings	Recommendations
<p>Many scheme managers have moved from annual to monthly member data collection and found this enabled them to verify data at an earlier stage, with some funds providing monthly reports to employers highlighting the quality of data submitted and action points they need to complete.</p> <p>Well-run funds are aware of the quality of the common and scheme specific data they hold. Where it is not entirely accurate robust and measurable, data improvement plans are in place. scheme managers of these funds consider a range of methods to improve data quality,</p>	<ul style="list-style-type: none"> ● Scheme managers should be aware of how the member data they hold is measured. Data quality needs regular review. A robust data improvement plan should be implemented as appropriate. ● The quality of member data should be understood by the Scheme Manager and Pension Board. It should be recorded and tracked to ensure common and scheme specific data is of good quality. An action plan should be implemented to address any poor data found. ● Although not a legal requirement, a PAS could

including tracing exercises and improving contract management methods.

They also generally have a robust PAS in place which detail rights and obligations of all parties to the fund.

be implemented clearly setting out responsibilities and consequences of not complying with duties to the fund. The Pension Board should review the PAS and ensure it will stand up to challenges from employers.

Record-keeping case study 1

One scheme manager we engaged with identified concerns with the accuracy of both the common and scheme specific data it held about the fund members. Following engagement with TPR, the scheme manager created and implemented a robust data improvement plan to drive up record-keeping standards.

One of the data areas of concern for the scheme manager was the number of missing member addresses - this resulted in data scores of 60-80% for common and scheme specific categories. After a review of available resources, the scheme manager undertook a tracing exercise and within a short period of time was able to locate and carry out existence checks on over 90% of the deferred members without known addresses. The exercise also involved reviewing the way active and pensioner members are communicated with to ensure the fund holds the correct contact details for them.

This is an example of a scheme manager taking a holistic approach to improving its record-keeping standards. It gave consideration to the resource available so the project achieved a positive result while providing good value for money. The scheme manager has established that having a data improvement plan which is regularly reviewed will improve oversight of the actions it needs to take and the associated deadlines.

Record-keeping case study 2

The scheme manager of a fund we engaged with openly communicated with us about the challenges it faced in producing Annual Benefit Statements. We were told delays were caused by employers not providing member data to the scheme manager on time, and there were issues with the accuracy of some member data provided by employers.

Having considered its operational structure, and our expectations on governance and administration, the scheme manager reorganised itself internally. With the support of the s.151 officer, the scheme manager developed and implemented a robust data improvement plan which could be measured.

As well as creating a data improvement plan the scheme manager also strengthened its pension administration strategy, outlining responsibilities and the timeframes for action. This document made the consequences of non-compliance by employers clear, such as financial penalties. The scheme manager has also introduced regular employer forums to help further raise standards with employers.

As a result the scheme manager has seen a marked improvement in employer engagement and the quality of member data it holds. It continues to actively monitor both data quality and employer compliance.

Area of focus: Internal controls

Code of Practice 14 – Governance and administration of public service pension schemes

(<https://www.thepensionsregulator.gov.uk/en/document-library/codes-of-practice/code-14-public-service-pension-code-of-practice#d4afe35ae78c404688a62e103fd192c5>)

The scheme manager of a public service pension scheme must establish and operate internal controls. These must be adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules and in accordance with the requirements of the law.

Findings

Recommendations

There were a range of approaches to identifying, monitoring and mitigating risks to the funds we engaged with. Some funds had detailed risk management frameworks in place and clear defined procedural documents. Others lack detailed risk registers or do not review the risks to the fund on a frequent basis, with little oversight of work being done to identify or mitigate risks.

We found evidence across a number of funds of key person risk, where a long serving member of staff has developed a high level of knowledge about their role and internal processes but this knowledge is not documented. This leaves these funds exposed to the risk of a sharp downturn in administration and governance standards should the key person unexpectedly leave their role.

Funds with an engaged s.151 officer who has a good relationship with the scheme manager are more likely to have clear and robust internal controls.

- A risk register should be in place and cover all potential risk areas. It should be regularly reviewed by the pension board.
- The scheme manager should take a holistic view to risks and understand how they are connected.
- The pension board should have good oversight of the risks and review these at each pension board meeting.
- Internal controls and processes should be recorded, avoiding an over reliance on a single person's knowledge levels.
- The scheme manager should ensure all processes are documented and reviewed on a regular basis.
- Decision and action logs covering all decisions provide a useful reference point as decisions recorded in minutes can be hard to locate.

Internal controls case study 1

A scheme manager has reviewed the approach it takes to maintaining a risk register, having found the approach it was taking could be more effective.

The scheme manager developed a high level document which identifies a wide range of risks with all members of the senior leadership team having a role in the identification and scoring of potential risks.

This document is supported by detailed 'risk maps' which provide:

- (i) a description of the identified risks
- (ii) the person responsible for overseeing the risk
- (iii) how the risk is scored and
- (iv) details of the mitigating actions and controls in place

Action points identified have clear timescales for completion with an identified person being responsible for delivery.

The full risk register is made available to the pension committee and pension board each time they meet and its review is a standing item on both agendas. This allows for constructive oversight and challenge, along with a clear process to act on feedback provided.

This is an example of a fund which is engaged at all levels of seniority to identify and mitigate risks to good saver outcomes. There are clear, identified processes in place along with strong oversight of the work being done. This approach was devised before TPR began to engage with the scheme manager and demonstrates a clear desire to improve.

Internal controls case study 2

A scheme manager has developed two risk registers, one for the pension committee (which acts as delegated scheme manager) and a separate, shorter, register for the pension board.

The risk register for the pension board had been reduced in size and detail at the request of the pension board. We have concerns the reduced risk register will prevent the pension board members from having full oversight of all the fund's risk and applying their knowledge and understanding in an appropriate way as they will not be fully conversant with the facts surrounding each risk.

The pension board also only reviews the risk register twice a year. We believe the risk register should be a standing item on the agenda for both the pension committee and the pension board and reviewed at each meeting – ie it will be reviewed at least each four times a year by each body.

We gave feedback to the scheme manager about our concerns and recommendations, and would encourage funds that adopt similar practices to consider how they can make more effective use of the pension board and improve the engagement levels of its members.

Area of focus: Administrators

Code of Practice 14 – Governance and administration of public service pension schemes

(<https://www.thepensionsregulator.gov.uk/en/document-library/codes-of-practice/code-14-public-service-pension-code-of-practice#458801ec082a49e0bb494b6ff7480d12>)

Good administration is the bedrock of a well-run fund. A scheme manager should work well with its administrator or administration team, and ensure the right people and processes are in place to ensure members' benefits are administered to a high standard.

Findings	Recommendations
Better performing scheme managers have a close	<ul style="list-style-type: none"> • Scheme managers must agree targets and have a

relationship with their administrator, whether they use a third party provider or an internal team. In these instances robust SLAs are in place which are routinely monitored by senior managers. These scheme managers are also willing to effectively challenge reports from administrators to ensure they fully understand the work being done.

Not all scheme managers have clear oversight of the work being done by administrators or question the information provided by them when it is appropriate to do so. This leads to the scheme manager not understanding how well the fund is performing and can act as a barrier between the scheme manager and both participating employers and members.

There is a variety of methods used to appoint third party administrators, and scheme managers generally carefully consider the best approach for the individual circumstances of their fund.

strong understanding of what service providers are expected to achieve. The scheme manager should challenge and escalate as appropriate should agreed standards not be met.

- Contract lengths should be known and planned against to allow sufficient time to consider contract extensions or for the tender process, as appropriate. This mitigates risks in handing over to a new administrator.
- It is helpful for the administrator to attend and present to pension board meetings as pension board members can use their knowledge and understanding to effectively challenge reports being provided.
- Scheme managers should hold regular meetings with their service providers to monitor performance.

Administrator case study 1

A scheme manager had entered into a outsourcing contract with an administrator. The administrator's performance over a period of time was unsatisfactory, and targets and SLAs were not consistently met. Despite the council's finance director personally intervening with the administrator, matters were not improved to acceptable levels and penalty clauses were invoked.

The scheme manager decided to terminate the contract and review alternative administrative options, with a key aim of including more visibility, which the previous contract type arrangement had not provided.

The scheme manager decided not to take the administration back in house, but to enter into a third option, a shared service partnership with another administrator. This is charged on a shared cost per member basis. The new administrator also provides administrative services for a few other public service funds. The scheme manager is now part of a collaborative board and engages regularly with other scheme managers, has better visibility and good reporting functionality which now enables easy monitoring of the administrator's performance.

Data quality improvements were recognised as a key focus for the new administrator on its appointment. The scheme manager developed and put in place a robust data improvement plan with the new administrator and has made considerable improvements in its data quality scores in a short period of time. They are now using the plan as a living document to continue to target the areas needing improvement.

Administrator case study 2

One of the scheme managers had appointed a third party administrator using a partnership agreement, rather than a commercial contract. This demonstrates one of a number of approaches taken by scheme managers to secure administration services.

The scheme manager has established a clear set of objectives for the administrator and receives monthly reports about whether these are being met. The reports are shared with the pension board. Additionally, at each pension board meeting a representative of the administrator is present. This allows the pension board members to directly question the administrator about the work it is doing on behalf of the scheme manager and ensure that good saver outcomes are achieved.

Even when a scheme manager uses an outsourced administration service it remains liable for the work done on its behalf. This example demonstrates positive steps taken by a scheme manager to ensure it has effective oversight and can hold an administrator to account.

Administrator case study 3

A scheme manager was informed that its third party administrator intended to restructure in order to improve the level of service it provided to its clients. The administrator was confident that the restructure would not affect its business as usual work and the scheme manager took comfort from this without seeking more detailed assurances.

The restructure did not go as planned, which led to delays in member data being processed and SLAs not being met for around six months. The scheme manager has since increased the number of both operational and strategic meetings it holds with the administrator to combat the declining performance of the administrator.

As part of this work the scheme manager has set clearly documented expectations and provided priorities to the administrator to minimise the number and impact of poor saver outcomes. The scheme manager has now developed new ways of working with the administrator to ensure it probes the administrator's plans in more detail in the future.

This is an example of a scheme manager placing excessive reliance on assurances from an administrator without seeking evidence that

supported the assurances. Robust contract management is important and will help scheme managers to identify upcoming risks to savers and to build a strong understanding of the information being provided.

Area of focus: Member communication

Code of Practice 14 – Governance and administration of public service pension schemes

(<https://www.thepensionsregulator.gov.uk/en/document-library/codes-of-practice/code-14-public-service-pension-code-of-practice#d4afe35ae78c404688a62e103fd192c5>)

The law requires scheme managers to disclose information about benefits and scheme administration to scheme members and others. This allows savers to understand their entitlements and make informed financial decisions.

Findings	Recommendations
<p>A number of scheme managers are currently reviewing the documents they send to savers. It is widely appreciated that pensions and retirement provision is complicated, and communication with savers needs to be in plain English. A variety of methods are being used, with the strongest scheme managers in this area working closely with a technical team and also enlisting the assistance of non-technical staff to check readability and whether it is comprehensive.</p>	<ul style="list-style-type: none"> • Information sent to members should be clear, precise and free from jargon. • There should be senior oversight of communications sent to members and prospective members. • It is often helpful for scheme managers to measure the effectiveness of their communication with savers, eg measuring website traffic and running surveys.

Not all scheme managers fully appreciate the extent of their duties to provide information to savers, with some not knowing about the legal duty to inform active members where employee contributions are deducted but not paid to the fund within the legislative timeframe.

Member communication case study 1

A scheme manager had previously delegated responsibility for communication with members to its third party administrator. However, it had a number of concerns about the quality of the service being provided, which included how members were kept informed and the level of detail provided.

The scheme manager took the decision to change its administrator and has now taken greater control over the communication with members. This has led to the development of a new pension administration strategy, with clear expectations around member communications being set and monitored.

A new website is being developed and the scheme manager recognises that having a clear online presence is an important method of communicating with current and potential members.

It is important to communicate with members, potential members and other relevant savers in a clear way. The information provided by a scheme manager will be used by members to make important decisions about their financial affairs. This is an example of a scheme manager looking to improve the member experience through revising the way it communicates.

Member communication case study 2

We engaged with a scheme manager that has developed a detailed communication strategy, which covers the content, frequency, format and methods of communicating. The scheme manager actively promotes the benefits of joining the fund to prospective members and through the participating employers.

Two people are responsible for different aspects of member communications, with all material being formally approved by the scheme manager before being used. The scheme manager has developed a wide range of accessible materials for savers, including a website, a wide range of information booklets, and newsletters.

Members are informed clearly of how they can raise any queries or concerns about the operation of the fund. This includes members being able to go to the scheme manager's offices in person to discuss any queries with a suitable member of staff.

The scheme manager conducts annual surveys of its members, publishing the outcomes on its website and in its annual report. It uses this information, together with complaint trends, to identify how it can provide a better service to savers.

Area of focus: Internal Dispute Resolution Procedure (IDRP)

Code of Practice 14 – Governance and administration of public service pension schemes

<https://www.thepensionsregulator.gov.uk/en/document-library/codes-of-practice/code-14-public-service-pension-code-of-practice#e6e12897999d45e5bc8ead7983fd15b4>

Scheme managers must make and implement dispute resolution arrangements that comply with the requirements of the law as set out in the Code to help resolve pensions disputes between the scheme manager and a person with an interest in the scheme.

Findings

Recommendations

Some scheme managers have clear procedures in place for recording, and learning from, complaints and disputes they receive. They use this information to make changes to the way the fund is run in order to provide the best possible service to beneficiaries.

Not all the complaints procedures and IDRP's we saw were clear about who was entitled to use them, and in some cases details of how to complain were not clearly published. This limits the ability of people with an interest in the funds to raise concerns and restricts a useful source of information for scheme managers.

Not all scheme managers have a clear definition of a complaint. It is important for scheme managers to act in a consistent manner and if what a complaint looks like is not known this will affect its ability to put things right.

- There should be a clear internal policy on how to handle complaints, including escalation to suitable senior members of staff.
- People entitled to use the IDRP should be given clear information about how it operates.
- This information should be easily available, eg on the fund website.
- The pension board and scheme manager should have oversight of all complaints and outcomes, including those not dealt with in-house.
- Complaints and compliments could be analysed to identify changes that can be made to improve the operation of the fund.

IDRP case study 1

All the scheme managers we engaged with operate a two stage IDRP, where the first and second stages are looked at by people who are independent of each other.

Initially, one of the scheme managers we engaged with didn't have oversight of complaints entering the first stage of the IDRP. These complaints were dealt with by employers as they were not considered to be issues about the fund or an in-house administration matter. This meant the scheme manager did not have full oversight of the first stage complaints and therefore could not identify whether there were any trends or patterns that needed addressing, eg an employer training issue.

Following engagement as part of the cohort work, we recommended that the scheme manager develop greater oversight of the work being done on its behalf. The scheme manager now recognises this is an area where it should improve and has amended its processes to ensure it is aware of how member outcomes are being managed when first stage IDRP complaints are received.

IDRP case study 2

Like all other funds we engaged with, this scheme manager operates a two tier IDRP. However, the scheme manager stood out in this instance for the detailed and methodical manner in which it records complaints that are raised.

All complaints are recorded in a single log which detail how it progresses, potentially from an initial concern through to a finding issued by the Pensions Ombudsman. This allows the scheme manager to analyse complaint trends and the learning points are used to improve the operation of the fund.

Additionally, all actions relating to complaints have a clear owner. This allows for strict quality control and helps ensure complaints are dealt with as soon as possible.

We would encourage all scheme managers, where they have not already done so, to adopt a detailed and auditable approach to monitor complaints and compliments received through all channels.

Area of focus: pension boards

Code of Practice 14 – Governance and administration of public service pension schemes

(<https://www.thepensionsregulator.gov.uk/en/document-library/codes-of-practice/code-14-public-service-pension-code-of-practice#e6e12897999d45e5bc8ead7983fd15b4>)

The role of the pension board is to assist the scheme manager with the operation of the scheme. Pension board members are required to have an appropriate level of knowledge and understanding in order to carry out their function.

Findings	Recommendations
<p>Scheme managers have a variety of methods for appointing pension board members and the structure of these boards also varies between funds. In some cases board member rotation is staggered to help preserve knowledge levels. Additionally, some boards have independent chairs, depending on the needs of the individual pension board.</p>	<ul style="list-style-type: none"> ● The scheme manager should arrange training for pension board members and set clear expectations around meeting attendance. ● Individual pension board member training and training needs should be assessed and clearly recorded. ● The pension board should meet an appropriate number of times a year, at least quarterly. ● Processes should be in place to deal with an ineffective pension board member by either the chair of the pension board or the scheme manager. ● Scheme managers should be aware of the risk of pension board member
<p>We also found a mix of engagement levels amongst pension board members. Some scheme managers are able to call on strong, committed pension boards to assist them with the operation of the fund. Other scheme managers face challenges around pension board members who routinely fail to attend</p>	

meetings or complete the training they need to meet the required level of knowledge and understanding.

The relationships between pension boards and scheme managers varied - where the pension board had a strong relationship with the scheme manager, including a willingness to challenge, we found better-run funds.

turnover and ongoing training needs.

- Regular contact between the scheme manager and chair of the pension board is helpful. An open and auditable dialogue outside of formal meetings can help improve the governance and administration of the fund.
- The chairs of the pension board and pension committee should consider attending each other's meetings to observe as this leads to better transparency.
- Pension board members should be fully engaged and challenge parties where appropriate.

Pension board case study 1

One scheme manager spoke to us about the challenge it has faced regarding attendance at pension board meetings, and ensuring the pension board has the required level of knowledge and understanding. At one time it had to reschedule a meeting of the pension board because so few people attended the meeting.

Since then the scheme manager has changed its policy on pension board meetings. One pension board member with a low attendance record has been removed and replaced with a more engaged representative.

The scheme manager is also reviewing how it records the training that pension board members attend. Currently, training is recorded at a high level and there is no clear method of identifying training needs, although informal discussions take place between the scheme manager and individual pension board members.

The scheme manager has recognised that it needs to better understand how pension board members are meeting their obligation to have an appropriate level of knowledge.

Pension board case study 2

Another scheme manager we engaged with has reviewed how the pension board operates and decided to appoint an independent chair. While the chair does not have voting rights, this person lends their expertise to the running of the pension board to ensure meetings run effectively.

Having an independent chair is not compulsory but in this instance is a positive example of a scheme manager being aware of the needs of the local pension board and taking steps to ensure it operates effectively.

The scheme manager has also developed a strong working relationship with the chair, holding a number of informal meetings outside of the formal pension board meetings. This working practice allows the scheme manager to ensure the pension board receives all the information it needs and that the scheme manager can comprehensively answer any anticipated questions.

Area of focus: Employers and contributions

Code of Practice 14 – Governance and administration of public service pension schemes

<https://www.thepensionsregulator.gov.uk/en/document-library/codes-of-practice/code-14-public-service-pension-code-of-practice#e6e12897999d45e5bc8ead7983fd15b4>

Contributions must be paid to the scheme in accordance with scheme regulations. Scheme managers are also reliant on employers to provide accurate and timely member data, which is required for the effective administration of the scheme.

<

Findings

Scheme managers monitoring the payment of contributions often face the challenge of payroll providers making a single payment for several employers and delaying sending a breakdown of the amount paid. Some scheme managers have been working with participating employers to encourage them to provide training to payroll providers where the payroll company won't engage with a body it doesn't have a direct contractual relationship with. Changing a payroll provider can cause issues. Early engagement with the employer and provider is helpful to mitigate later problems.

Scheme managers have a variety of ways of assessing the risk of employers failing to pay contributions or having a disorderly exit from the fund, depending on the fund's resources. Better resourced and funded scheme managers will carry out detailed covenant assessments of all

Recommendations

- Scheme managers should understand the financial position of participating employers and take a risk-based and proportionate approach to identifying employers most at risk of failing to pay contributions. Red, Amber, Green reporting often provides extra focus.
- Employer solvency should be considered on an ongoing basis and not just at the time of each valuation.
- Where employers outsource the payroll function, early engagement with the employer on the potential risks will help them manage their supplier.
- Employers may exit the fund so it is helpful to have a principle based policy on how to manage this given that circumstances are likely to vary in individual situations.

participating employers, with other scheme managers only reviewing those they believe to pose the highest risk.

Most scheme managers seek security from employers to mitigate the risk of a failure to pay contributions. Some scheme managers rely on guarantees, particularly in relation to participating employers providing outsourced services. Others expect the majority of employers to set up a bond. Only a few scheme managers accepted a wide range of security types, generally those with larger funds.

Decisions around what security to require are often based on previous ways of operating, rather than considering the best option in individual circumstances.

- Scheme managers should develop an understanding of the risk and benefits of a range of security types, such as charges, bonds and guarantees.
- Scheme managers should consider whether accepting a range of security types will offer more effective protection to the fund, rather than focussing on a single form of security.
- Scheme managers should understand which employers have not provided any security for unpaid contributions and consider what appropriate steps can be taken to secure fund assets.
- Where security is in place, Scheme Managers should have a policy on when the security should be triggered.

Employer case study 1

Having a robust method for reviewing employer risk is a high priority for one of the scheme managers we engaged with. It has developed a process to maintain oversight of the various participating employers in the fund, covering a range of topics from the provision of member data to the strength of the employer covenant.

Each employer is risk rated and the risk levels are regularly monitored. This allows the scheme manager to gain advance notice of potential problems so it can take steps to mitigate the risks and to provide comfort that guarantors are in a position to pay additional amounts to the fund if a call on the guarantee is made.

This information is also used to inform employers of any failures to meet their obligations to the fund at an early stage, identifying action points they need to carry out.

Employer case study 2

Scheme manager 1 has decided to incorporate a charging policy for seeking the reimbursement of costs caused by an employer's failure to comply with its obligations into admission agreements. This means the scheme manager has a clear policy in place that all employers will be aware of when they start to participate in the fund.

Not all scheme managers have approached the issue of employer compliance in the same way. Scheme manager 2 has a small portfolio of participating employers and relies on having a good relationship with them in order to achieve compliance. This scheme manager also considers that as most employers are supported by central government it need not be concerned with affordability.

We were concerned about the lack of formal processes to ensure compliance. While the scheme manager has not encountered difficulties to date, we have recommended that it makes some improvements. Additionally, all scheme managers should remember that, should a participating employer suffer an insolvency event, any missing payments due to the fund will need to be paid by someone and there should not be an over-reliance on the taxpayer and other employers.

Area of focus: Cyber security

Guidance: Cyber security principles for pension schemes
(<https://www.thepensionsregulator.gov.uk/en/document-library/regulatory-guidance/cyber-security-principles-the-pensions-regulator>)

Pension schemes hold large amounts of personal data and assets which can make them a target for fraudsters and criminals. scheme

managers need to take steps to protect their members and assets accordingly.

Findings

Most scheme managers are heavily reliant on the security systems put in place by the Local Authority, with some not engaging with how the procedures in place affect the fund. Scheme managers of well run funds have a good understanding of the IT systems in place, even where these are implemented by the Local Authority.

Some scheme managers have not given consideration to the risks posed by cyber crime. For these funds, cyber security did not appear on the risk register before our engagement with the scheme manager.

Scheme managers that are aware of the risks associated with cyber crime generally have robust procedures in place to test the effectiveness of both cyber security and resilience methods.

Recommendations

- Scheme managers and pension boards should understand the risk posed to data and assets held by the fund so steps can be taken to mitigate the risks. This should be reflected in the risk register.
- Regular, independent, penetration testing should be carried out. Scheme managers should consider physical security as well as protection against remote attacks.
- Where cyber security is maintained by the Local Authority rather than the scheme manager, the scheme manager should understand the procedure and ensure the fund's requirements are met.
- Scheme managers should be aware of the cyber security processes used by third party providers, such as the administrator or custodian, that handle fund assets or data.

Cyber security case study 1

A scheme manager we engaged with identified cyber security as one of the top risks to the fund. It demonstrated a good awareness of the processes put in place by the Local Authority and carries out testing of these processes.

The scheme manager had recently tested both its cyber defences and the wider business continuity plan. As a result it is confident it can provide a good service to savers in the event of a wide variety of disaster scenarios.

As part of our engagement we also found the scheme manager has processes in place to assess the adequacy of steps taken by its service providers to protect member data. This gives the scheme manager comfort that member data will be secure when being handled by other bodies.

Although the scheme manager has not implemented its own controls it has rigorously reviewed the process put in place by the Local Authority. It has satisfied itself that those processes are of a sufficient standard to protect the fund and its savers.

Cyber security case study 2

A scheme manager had not considered the importance of cyber security until we engaged with them as part of this work. The scheme manager was reliant on the security measures put in place by the council but did not engage on the topic, so it was not clear how it was affected.

Cyber security did not appear on the fund's risk register and the scheme manager was not actively considering the dangers of a successful cyber attack on the fund.

Following our engagement, the scheme manager has developed its understanding of the risks surrounding cyber security. It now records the risk on its risk register and as part of the Local

Authority's strategy all staff will receive mandatory training in cyber security.

The scheme manager has also started engaging with third party service providers to ensure they also have robust cyber security and data protection procedures in place. This gives the scheme manager better oversight of how member data is protected when not under the scheme manager's direct control and marks a significant improvement in how this risk is monitored and mitigated.

Area of focus: Internal fraud and false claims

Code of Practice 14 – Governance and administration of public service pension schemes

(<https://www.thepensionsregulator.gov.uk/en/document-library/codes-of-practice/code-14-public-service-pension-code-of-practice#015b082d7b984f94a598a6377fae1b29>)

Schemes without strong internal controls are at greater risk. This includes having a clear separation of responsibilities and procedures which prevent a single member of staff from having unfettered access to scheme assets. Strong internal controls, particularly over financial transactions, also help mitigate the risk of assets being misappropriated.

Findings	Recommendations
Scheme managers generally appear to have an awareness of the risks of fraud against their fund, both from an internal and external source. We found scheme managers are generally aware of publicised fraudulent activity that have affected other pension schemes and have taken steps to review their own procedures.	<ul style="list-style-type: none"> ● Scheme managers should regularly review their procedures to protect the fund's assets from potential fraud. ● A clearly auditable process should be in place for the authorising of payments. Ideally, this would require more than one person to provide authority to make the payment.

Scheme managers of well run funds typically take steps to regularly screen member existence. Their scheme managers are also aware that not all incorrectly claimed pension benefits are the result of an attempt to defraud the fund and can identify when to treat a situation with sensitivity.

Most scheme managers have introduced multiple levels of sign offs, with more than one person being required to agree to a payment being made. The scheme managers were also aware of frauds involving other funds, where this had been made public. They had taken steps to reduce their own vulnerability to similar issues.

- A scheme manager should have a policy in place to differentiate between a potential fraud and a potential honest mistake by a saver.
- Where a fraud is detected in the scheme manager's fund, or another one, they should take steps to stop the fraud and analyse causes to prevent a reoccurrence.
- When paper records are being used they should be held securely to prevent the risk of loss or mis-appropriation.

Fraud case study 1

A scheme manager has worked with its administrator to put in stringent measures to prevent fraudulent activity. In addition to participating in the National Fraud Initiative, it does regular life certificate exercises as part of the fund's policy, checking mortality and addresses. Where doubts are raised the scheme manager will suspend payments pending clarification.

Many of the members of the fund are now non-resident in the UK, which provides challenges to the scheme manager in locating members. The scheme manager has adopted an innovative use of

technology for the foreign domiciled members by arranging video calls to speak to the member who must show their passports to provide their identity and confirm personal details.

The scheme manager demonstrated good awareness of the risk of internal fraud by connected persons, and there is clear segregation of duties. Additionally the workflow processes being system driven provide automatic checks with different people checking and authorising the processes. Suspicious payments are immediately reported to senior management to check.

Fraud reporting policies are clear, and internal auditors are involved whenever there is suspicion of a fraudulent activity. The fraud reporting goes immediately to directorship and chief executive level.

Fraud case study 2

In this instance the scheme manager has strong controls in place to identify potential frauds against the fund assets.

The scheme manager works with the National Fraud Initiative to identify instances of possibly fraudulent claims for a benefit from the fund. The scheme manager's work in this area is supplemented by its involvement with the 'Tell Us Once' initiative and the use of a third party agency to help identify when beneficiaries have passed away.

The scheme manager also demonstrated an awareness of the risks associated with members and other potential beneficiaries being overseas. It carries out existence checks on these people as well as those residing in the United Kingdom.

When a payment is due to be made, the scheme manager has introduced a vigorous set of controls. This has led to a clear separation of duties and the requirement for payments to be independently authorised, reducing the risk of fund employees misappropriating fund assets.

Conclusion

We've outlined some areas of good practice in this report, and also some areas where we remain concerned and expect scheme managers to improve where appropriate. Overall, we noted:

- Not all funds are the same and there is a variety of equally valid approaches to mitigating risk used across funds in the LGPS.
- It is important that scheme managers recognise, and maintain, a separation between the fund and Local Authority to avoid an over-reliance on the Local Authority's policies and procedures. When establishing its own policies and procedures a scheme manager should be able to seek assistance from the pension board, meaning steps should also be taken to ensure the pension board is able to fulfil its role. Where this is not possible, scheme managers should feed into creating Local Authority policies to make sure they are fit for purpose.
- There are clear benefits to the operation of the fund where there is an engaged s.151 officer who is directly involved.
- Good quality data and record-keeping standards underpin all aspects of successfully running a fund and these areas should be treated as a priority in order to drive good outcomes.
- Scheme managers that have developed and implemented a robust pension administration strategy have found them useful. While not a legal requirement, scheme managers should consider whether this type of document will be useful and look to introduce them where this is the case.
- A common risk is the unexpected departure of key members of the scheme manager's staff. Succession planning and clearly recorded processes help mitigate this risk.
- Measuring governance and administration is challenging and requires more than just an analysis of raw figures. Scheme managers should therefore put in place appropriate reporting measures that they believe capture both quantitative and qualitative assessments. This approach should be tailored to the specific circumstances of their fund.
- Scheme managers should take a holistic approach when considering the governance and administration risks to their fund. Most risks are connected to each other and a scheme manager

should understand how a risk materialising will impact on other areas of governance and administration.

- Risks to funds are constantly changing and evolving. For example, the methods used by scammers change over time. Scheme managers should be alert to the changing nature of risks and adapt their approaches accordingly.
- Many scheme managers have a clear understanding of how their funds operate and want to provide the best experience for savers. Where scheme managers liaise with each other to discuss common challenges and solutions to them, whether at formal events or through ad hoc engagement, often leads to improved governance standards. We encourage such action.

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01 April 2019

LGF Reform and Pensions Team
Ministry of Housing, Communities and Local Government
2nd Floor, Fry Building
2 Marsham Street
LONDON
SW1P 4DF

Dear Sirs

**LGPS: Fair Deal – Strengthening pension protection
Response to policy consultation**

This is a response to the above consultation from the Royal Borough of Windsor & Maidenhead (RBWM) in its role as the administering authority to the Royal County of Berkshire Pension Fund (RCBPF).

RBWM is generally supportive of the Government's Fair Deal policy and the introduction of this policy to the LGPS and we hope that the introduction of Fair Deal will allay some, if not all, of the concerns we currently have with the existing arrangements as they relate to pension protection.

We feel it important that scheme members' (and eligible employees') pension rights are protected upon compulsory transfer to the private sector. Under existing arrangements we are concerned that the admission of private sector employers into the Scheme is normally done so on a 'closed' basis meaning that as those existing 'transferred' Scheme members leave or retire and exit the Scheme, new employees appointed by the admission body are not admitted to the LGPS. We have grave concerns about this arrangement as it restricts the numbers of individuals eligible to join and contribute to the LGPS whilst the level of liabilities continues to increase.

However, we are supportive of the removal of the 'broadly comparable' pension scheme option for staff transfers from a future date to be set by the introduction of amending regulations.

Response to Question 1

We agree with paragraphs 15 to 17. Paragraph 18 raises further questions to which we would appreciate clarification.

- How should the term 'even if they were not formerly in the employment of the Fair Deal employer' be defined? To be granted protection an individual must surely

Duncan Sharkey - Managing Director

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 @rbwm  search: rbwm

Response to Question 5

We are fully supportive of the deemed employer option providing the Fair Deal employer as the deemed employer and their chosen independent service provider understand the need to set out in their commercial contract the associated pension risks. The administering authority cannot and must not be held in anyway accountable for the contractual arrangements made between the Fair Deal employer and their chosen service contractor.

Response to Question 6

We have the following comments:

- Paragraph 31 - We note it is proposed that the Fair Deal employer will have the 'option' of remaining the deemed employer for the transferred staff. Subject to the outcome of this consultation, would any consideration be given to an administering authority having the regulatory power to set out in policy that the deemed employer option would be its approved and only option.
- Paragraph 32 – For clarification purposes it would be helpful to understand fully what is meant by the term 'the service provider would not have full scheme employer responsibilities under the LGPS Regulations 2013'. Regulations should be clear as to what scheme employer responsibilities the service provider would have.
- Paragraph 34 – This would be of considerable advantage to scheme members, the administering authority and its pension administration team.
- Paragraph 35 – This paragraph seems to be proposing that the service provider will not become a 'scheme employer' as such under the deemed employer option. This would by implication seem to remove the need for any actuarial assessment to set an employer rate and bond level as currently required for admission bodies thereby providing cost savings for the service provider. It would be helpful if guidance/regulations could make it absolutely clear whether under the deemed employer option the service provider:
 - will be expected to pay the same employer contribution rate as the Fair Deal employer;
 - will or will not be required to procure a bond/indemnity of any kind;
 - will upon appointing new employees to work on the service contract admit them to the LGPS (subject to the usual rules) although those employees will be deemed to be employed by the Fair Deal employer for pension purposes (in this way the Scheme is not closed to new members);
 - has no requirement to produce an employer's policy statement as required by Regulation 60 of the LGPS 2013 Regulations;
 - will be held accountable for any additional pension costs that might arise as a result of any decision taken by the service provider e.g. strain costs; and
 - that any conditions concerning pension costs and risks are the responsibility of the Fair Deal employer and their chosen service provider as set out in their service contract (as per paragraph 37).
- Paragraphs 38 & 39 – Require further detail before being able to comment.

Response to Question 10

We are not aware of any other equalities impacts.

Response to Question 11

We believe this to be the right approach.

Response to Question 12

Whilst we believe that the draft regulations achieve this aim it would be helpful to receive clarification as to what constitutes a merger or takeover and whether at the point of exiting one Scheme, active scheme members could remain. In such a scenario would scheme members retain a right to defer their accrued pension benefits in the exiting employer's Pension Fund or would they be required to transfer those rights over to the new employer's Pension Fund?

Response to Question 13

Any guidance issued by the Secretary of State should be explicit

As requested my details are as follows:

- Kevin Taylor, Deputy Pension Fund Manager.
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 - Email: kevin.taylor@rbwm.gov.uk
 - Tel: 01628 796715

Yours sincerely



Kevin Taylor
Deputy Pension Fund Manager

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Report Title:	Administration Report
Contains Confidential or Exempt Information?	YES - Part I
Member reporting:	Councillor Sharpe, Chairman Berkshire Pension Fund and Pension Fund Advisory Panels
Meeting and Date:	Berkshire Pension Fund and Pension Fund Advisory Panels – 23 September 2019
Responsible Officer(s):	Kevin Taylor, Deputy Pension Fund Manager, Philip Boyton, Pension Administration Manager
Wards affected:	None

www.rbwm.gov.uk



REPORT SUMMARY

1. This report deals with the administration of the Pension Fund for the period 1 April 2019 to 30 June 2019
2. It recommends that Members (and Pension Board representatives) note the Key Administrative Indicators throughout the attached report.
3. Good governance requires all aspects of the Pension Fund to be reviewed by the Administering Authority on a regular basis
4. There are no financial implications for RBWM in this report

1. DETAILS OF RECOMMENDATION(S)

RECOMMENDATION: That Panel notes the report and:

- All areas of governance and administration as reported
- All key performance indicators

Please note that Administration Reports are provided to each quarter end date (30 June, 30 September, 31 December and 31 March) and presented at each Panel meeting subsequent to those dates.

2. REASON(S) FOR RECOMMENDATION(S) AND OPTIONS CONSIDERED

The Pension Panels have a duty in securing compliance with all governance and administration issues.

3. KEY IMPLICATIONS

Failure to fulfil the role and purpose of the Administering Authority could lead to the Pension Fund and the Administering Authority being open to challenge and intervention by the Pensions Regulator.

4. FINANCIAL DETAILS / VALUE FOR MONEY

Not applicable.

5. LEGAL IMPLICATIONS

None.

6. RISK MANAGEMENT

None.

7. POTENTIAL IMPACTS

None.

8. CONSULTATION

Not applicable.

9. TIMETABLE FOR IMPLEMENTATION

Not applicable.

10. APPENDICES

None.

11. BACKGROUND DOCUMENTS

None.

12. CONSULTATION (MANDATORY)

Name of consultee	Post held	Date issued for comment	Date returned with comments
Cllr. Julian Sharpe	Chairman – Berkshire Pension Fund Panel		
Rob Stubbs	Section 151 Officer		



ADMINISTRATION REPORT

QUARTER 1 – 2019/20

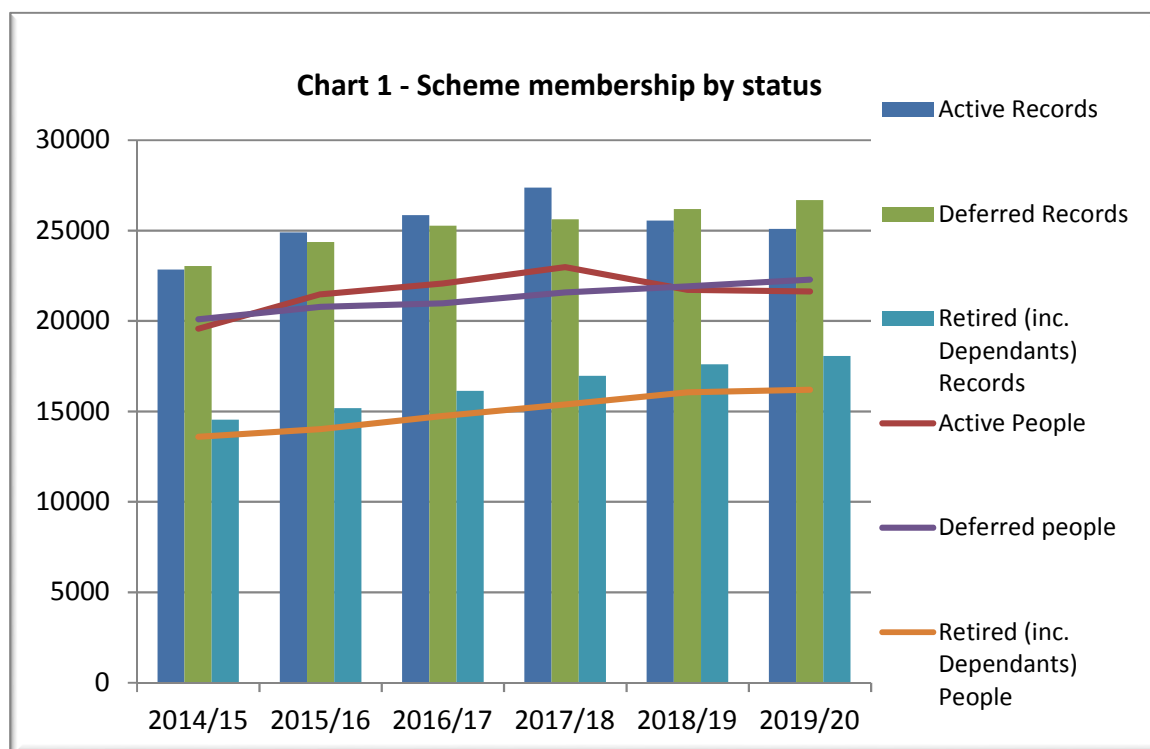
1 April 2019 to 30 June 2019

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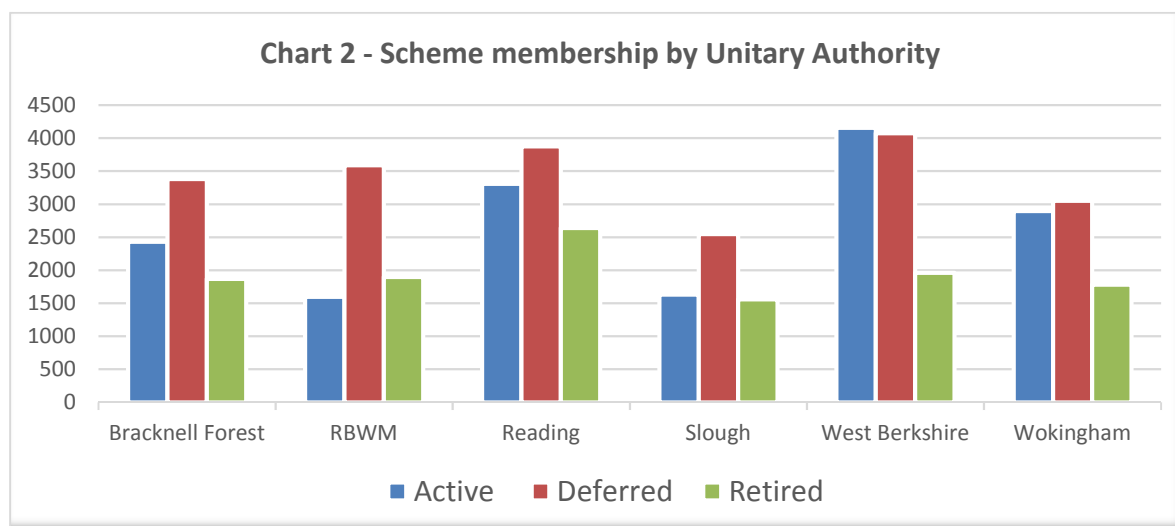
1. ADMINISTRATION

1.1 Scheme Membership



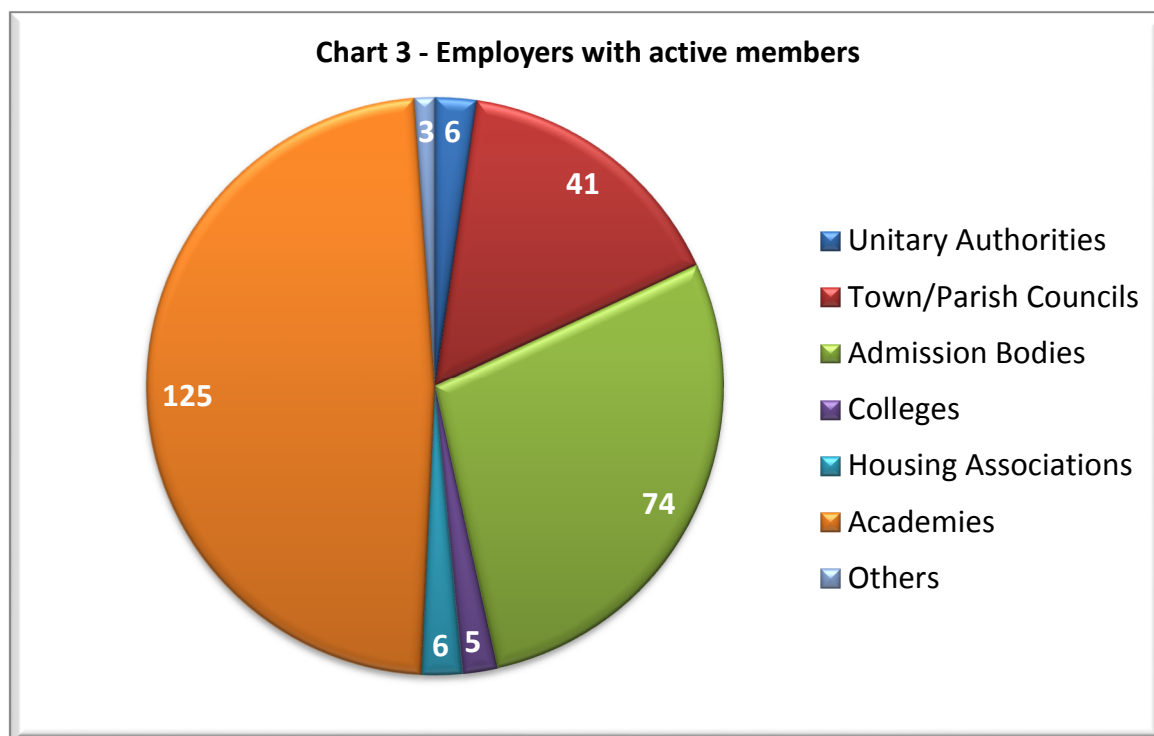
TOTAL MEMBERSHIP			
Active Records	25,094	Active People	21,637
Deferred Records	26,686	Deferred People	22,291
Retired Records	18,057	Retired People	16,197
TOTAL	69,837	TOTAL	60,125

1.2 Membership by Employer



Membership movements in this Quarter (and previous Quarter)						
	Bracknell	RBWM	Reading	Slough	W Berks	Wokingham
Active	-221 -112	-57 -126	-346 -363	-230 -20	-188 -173	+171 -128
Deferred	-3 +33	-3 -10	+91 +15	+39 -3	+92 +117	+99 +103
Retired	+56 +26	+46 +70	+82 5341	+46 +19	+82 +53	+86 +42

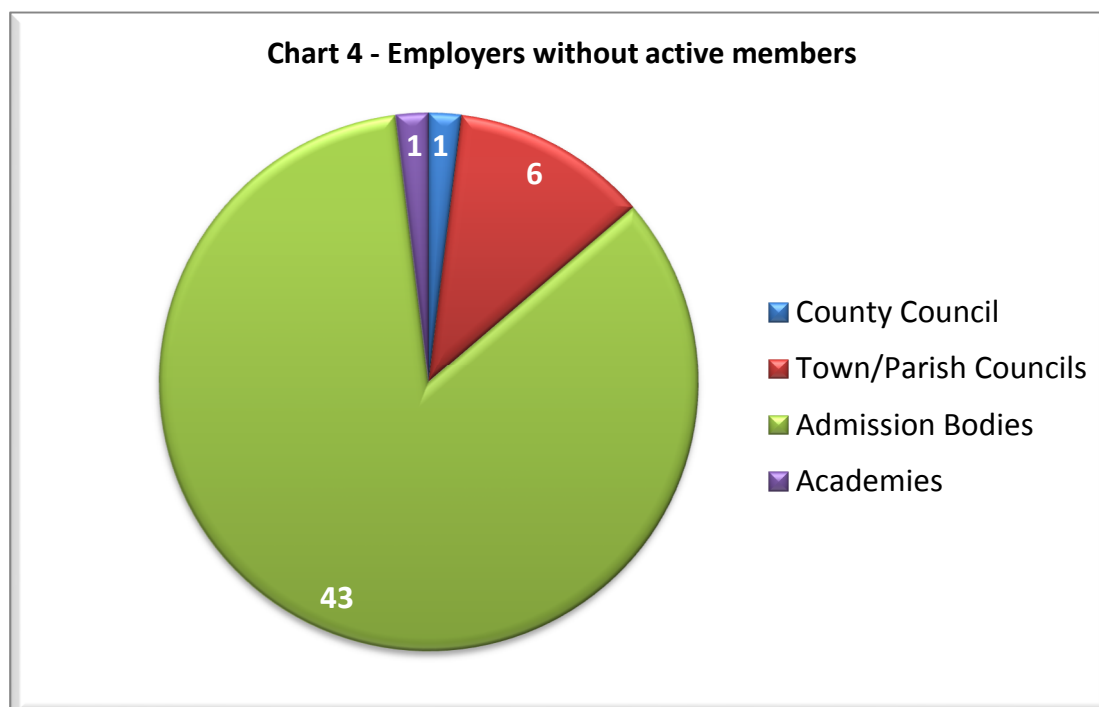
1.3 Scheme Employers



New employers since last report:

Admission Bodies: Regency Cleaning Services Ltd (Maiden Erlegh Schools Trust), VolkerHighways (Wokingham BC)

Academies: Claycots Primary School



Exiting employers: None

1.4 Scheme Employer Key Performance Indicators

Table 1A – i-Connect users Quarter 1 (1 April 2019 to 30 June 2019)					
Employer	Starters	Leavers	Changes	Total	Achieved
Bracknell Forest Cncl	158	107	124	389	98.5269%
RBWM	199	104	80	383	95.2596%
Reading BC	294	156	209	659	99.2643%
Slough BC	92	59	111	262	92.6573%
West Berks Council	350	204	304	858	98.5348%
Wokingham BC	119	53	101	273	99.6329%
Academy/ School	362	191	2445	2998	91.2679%
Others	135	78	349	562	93.7534%
Totals	1709	952	2723	6384	96.1121%

NOTES: Table 1A above shows all transactions through i-Connect for the first quarter of 2019/20. Changes include hours/weeks updates, address amendments and basic details updates.

The benefits of i-Connect are:

- Pension records are maintained in 'real-time';
- Scheme members are presented with the most up to date and accurate information through *mypension* ONLINE (Member self-service);
- Pension administration data matches employer payroll data;
- Discrepancies are dealt with as they arise each month;
- Employers are not required to complete year end returns;
- Manual completion of forms and input of data onto systems is eradicated removing the risk of human error.

Exception report – less than 90% achieved

None

Table 1B Non i-Connect users Quarter 1 (1 April to 30 June 2019)						Trend	
Employer	Starters	Leavers	Total	This Quarter	Quarter <1	Quarter <2	Quarter <3
	In/Out	In/Out					
Bracknell	1/1	39/44	40/45	47.06%	38.84%	41.10%	38.05%
RBWM	0/0	19/69	19/69	21.59%	41.18%	51.13%	11.11%
Reading	0/0	21/199	21/199	9.55%	20.90%	6.01%	18.75%
Slough	0/0	8/36	8/36	18.18%	61.29%	56.32%	51.97%
W Berkshire	1/2	23/142	24/144	14.29%	14.55%	6.28%	24.62%
Wokingham	0/5	10/24	10/29	25.64%	71.05%	38.64%	19.64%
WBC Schs.	3/44	4/79	7/123	5.38%	13.49%	5.61%	6.29%
Academies	28/280	40/202	68/482	12.36%	23.32%	33.28%	18.35%
Colleges	4/12	3/17	7/29	19.44%	66.67%	37.84%	8.06%
Others	15/41	14/86	29/127	18.59%	51.20%	41.99%	27.78%
Totals	51/388	181/898	232/1286	15.28%	28.95%	27.30%	19.33%

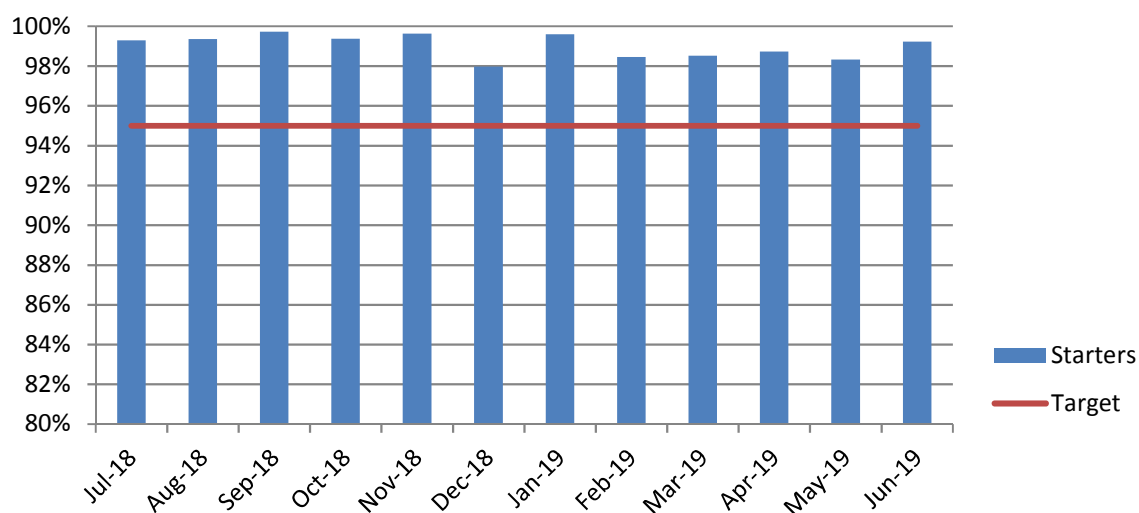
NOTES: Some employers listed in Table 8B above will also be listed in Table 8A. This is because not all employees of a scheme employer are paid through the scheme employer's payroll e.g. some non-teaching staff at Local Authority maintained schools may be paid via a third party payroll provider which is not an i-Connect user although those individuals are employees of the relevant Unitary Authority.

Details of starters and leavers only are recorded by the team. Other pension record changes may or may not have been received by the Pension Fund via payroll or from the scheme member direct. Experience tends to show that individuals may notify payroll of certain data changes but not always pensions and that payroll may not always forward information to the pension team.

Many missing data items are found through the year-end process which can be a long, labour intensive exercise for both the Pension Fund and the scheme employer. Employers using i-Connect do not have a year-end process to deal with as all data is uploaded and verified on a monthly basis.

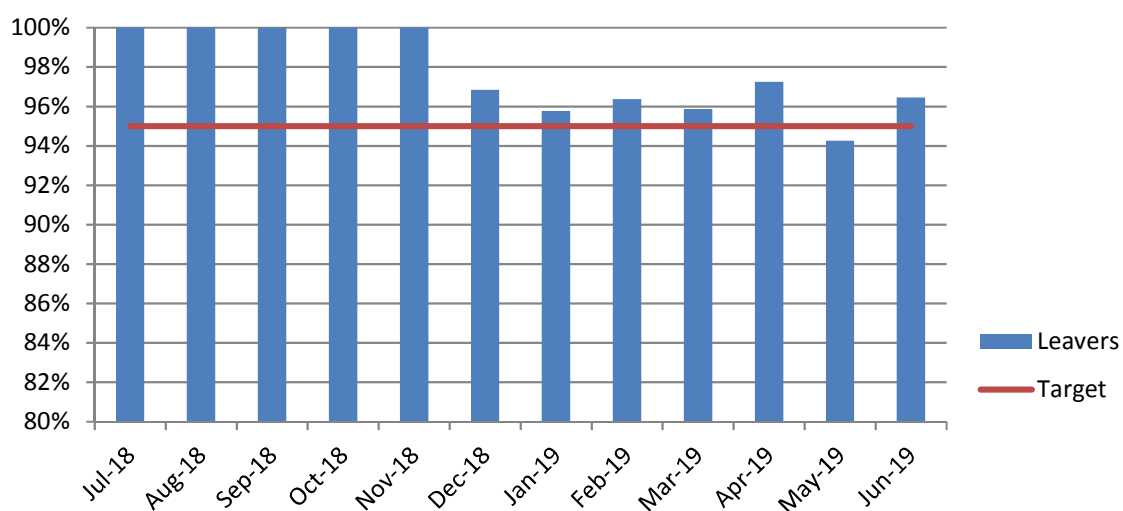
1.5 Key Performance Indicators

Chart 5A - KPI 1 - Starters processed within 20 working days



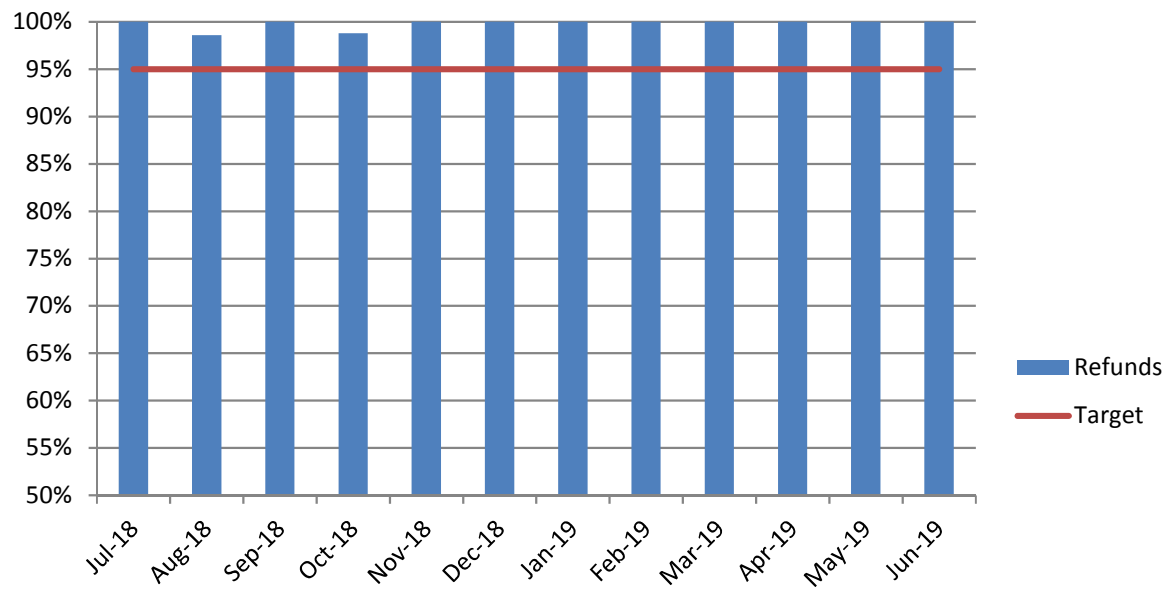
	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19
Starters	99.29	99.35	99.73	99.37	99.63	97.97	99.6	98.46	98.51	98.73	98.32	99.22
Target	95	95	95	95	95	95	95	95	95	95	95	95
Total	848	462	364	478	1072	345	756	456	537	642	832	723

Chart 5B - KPI 2 - Leavers processed within 15 working days



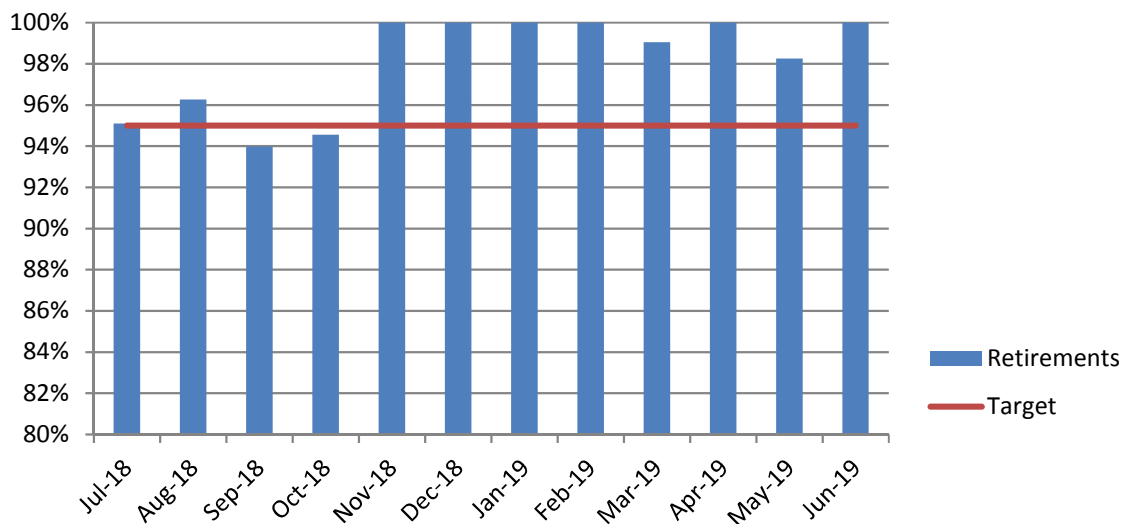
	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19
Leavers	100	100	100	100	100	96.83	95.76	96.37	95.86	97.24	94.26	96.45
Target	95	95	95	95	95	95	95	95	95	95	95	95
Total	458	548	635	566	428	379	637	606	652	673	694	582

Chart 5C - KPI 3 - Refunds processed within 10 working days



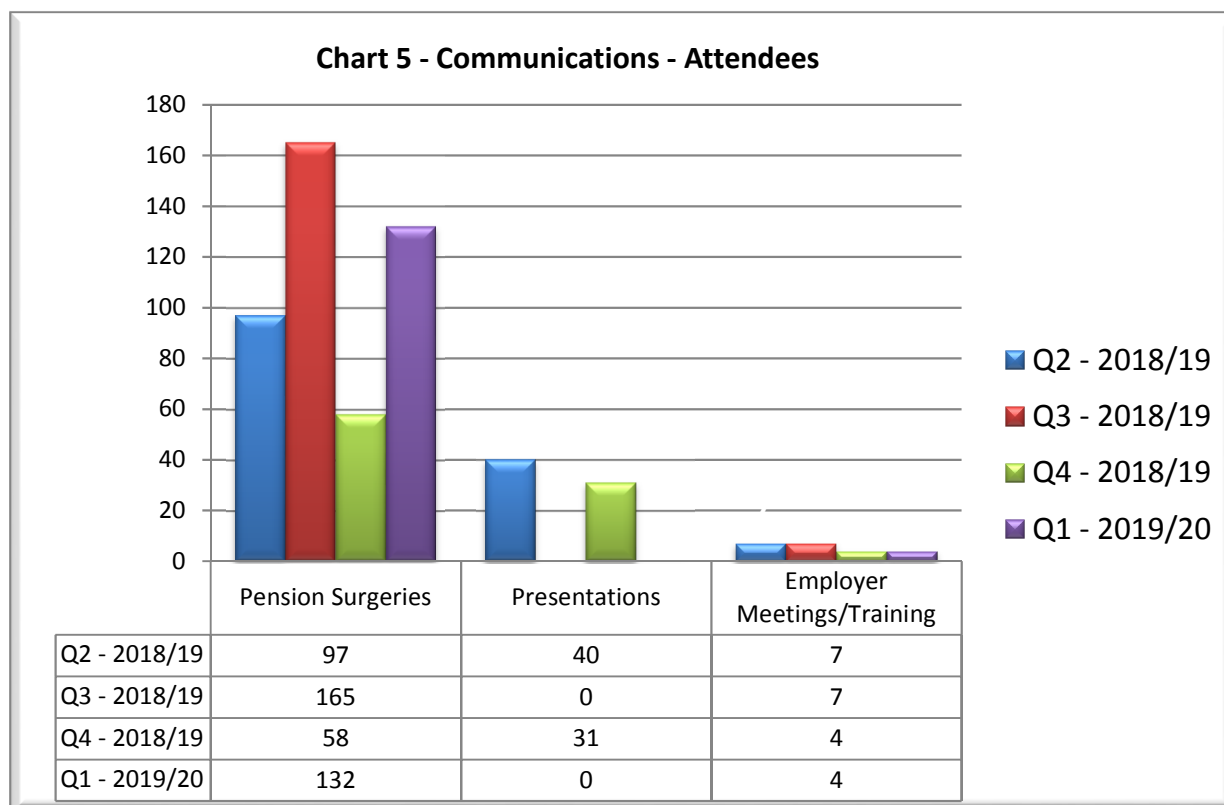
	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19
Refunds	100	98.59	100	98.78	100	100	100	100	100	100	100	100
Target	95	95	95	95	95	95	95	95	95	95	95	95

Chart 5D - KPI 4 - Retirements processed within 5 working days

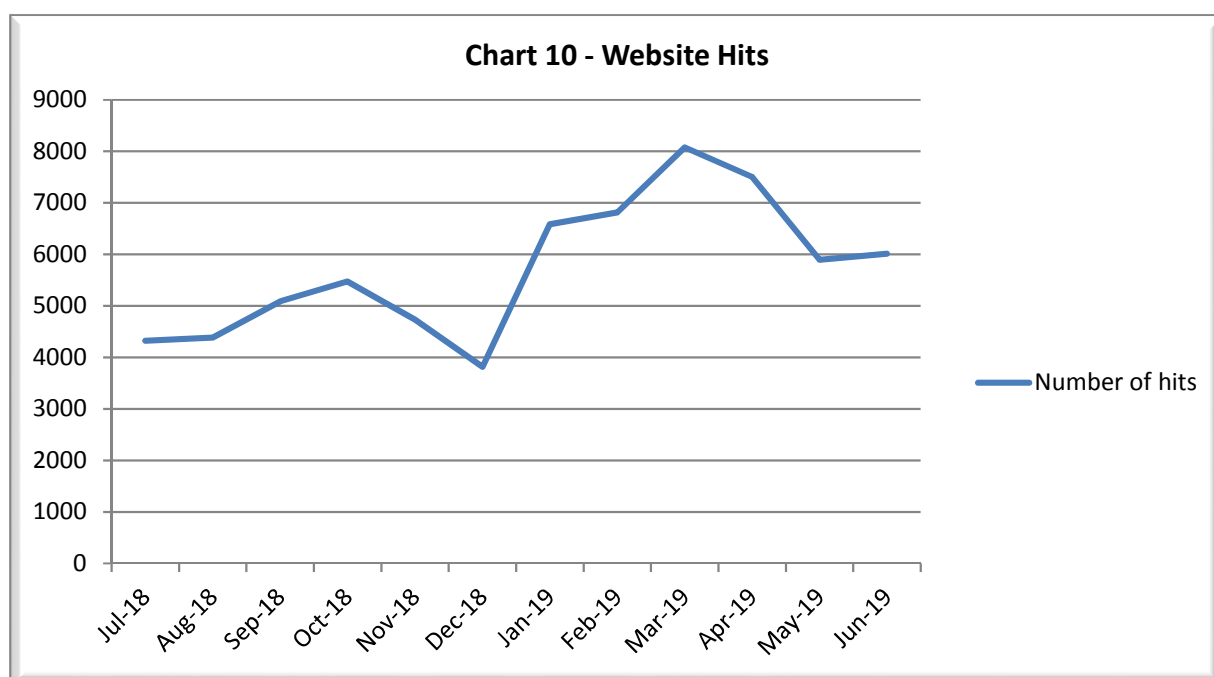


	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19
Retirements	95.1	96.26	93.97	94.55	100	100	100	100	99.04	100	98.25	100
Target	95	95	95	95	95	95	95	95	95	95	95	95
Total	102	107	116	110	116	68	84	115	104	125	114	98

1.6 Communications



1.7 Website Hits



1.8 Stakeholder Feedback

As part of the Pension Fund's aim to achieve Pension Administration Standards Association (PASA) accreditation it is a requirement to report to Members the comments and complaints received from scheme employers and their scheme members on a periodic basis.

There is no feedback to report.

2 SPECIAL PROJECTS

2.1 Year End 2019

Officers are pleased to report the reconciliation and issue of Annual Benefit Statements in respect of active contributors and deferred pensioners was completed ahead of the statutory deadline of 31 August 2019.

In total 275 scheme employers were required to provide Officers with a Year End File by 30 April 2019. This was achieved by 248 scheme employers with the remaining 27 scheme employers providing their file by no later than 23 May 2019.

Officers made available Annual Benefit Statements to all scheme members of the total 275 scheme employers by 4 July 2019. Annual Benefit Statements have been made available over one month earlier than during 2018 when they were made available by 14 August 2018. This is testament to the ever increasing popularity of i-connect among scheme employers which enables them to provide the Administration Team with scheme member data electronically on a monthly basis rather than a full 12 month reconciliation exercise immediately following the end of the scheme year.

2.2 Valuation 2019

Following the successful completion of Year End 2019, as described above, Officers were able to focus on producing the scheme member data extracts required by the Pension Fund's Actuary, Barnett Waddingham. These extracts will contribute towards the calculation of all scheme employer contributions rates payable for three scheme years beginning 1 April 2020. Following six provisional data runs, used by Officers to identify and correct errors, final data extracts were submitted on 27 June 2019.

The feedback received from the Actuary so far has been that the quality of data provided is of an excellent standard.

2.3 Data Quality Exercise

The Pensions Regulator (tPR) expects all UK pension schemes to measure the presence and accuracy of the data they hold, and put plans in place to resolve issues where they find them.

Since Officers received the results of the first data cleanse from heywood's, the provider of the Pension Fund's *altair* pension administration software, efforts have been on going to improve the results in respect of Common and Scheme Specific data in readiness for the next data cleanse.

The second data cleanse was scheduled for October 2019 but with the early completion of Year End 2019 and Valuation data already submitted to the Actuary, Officers asked heywood's to perform the second data cleanse during August 2019.

The results remain outstanding but a reminder of the respective scores received during the first data cleanse in October 2018 are shown below:

Data Item	Pass rate	Member records without a single failure
Common	98.85%	91.3%
Scheme Specific	97.58%	86.1%

Officers will report the results of the second data cleanse at the earliest available opportunity.

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Local Pension Board Workplan 2019-20

STANDING ITEMS:	08/10/2019	TBC Dec 2019	TBC Feb/Mar 2020	TBC May/Jun 2020
<i>Pension Panel meeting dates</i>	<i>23/09/2019</i>	<i>16/12/2019</i>	<i>23/03/2020</i>	<i>TBC</i>
Apologies for absence	1	1	1	1
Declaration of Interest	1	1	1	1
Review Pension Board Terms of Reference	x	x	1	x
Review Declarations of Interest	x	x	1	x
Minutes of last Board & matters arising not on agenda	1	1	1	1
Minutes of last Pension Panel meeting inc. Administration Report and Investment Performance Update	1	1	1	1
Action Tracker	1	1	1	1
Scheme Legal & Regulatory update	1	1	1	1
Risk Register exceptions	x	1	1	1
Training Item Overview of Scheme Governance and LGPS benefits - KT	Overview of Scheme Governance and LGPS benefits - KT	Actuarial update - attend annual meeting	Overview of legislative changes and future events - KT	TBC
RECURRING ITEMS:				
Pension Fund Annual Reports & Accounts	1			
Audit Reports	1			
Risk Management Policy	1			
Full Risk Assessment Register	1			
Actuarial Valuation Report		1		
Breaches of the Law		1		
SLA Between RBWM and RCBPF		1		
Pension Board Annual Training Plan		1		
Funding Strategy Statement			1	
Governance Compliance Statement			1	
Investment Strategy Statement			1	
Pension Fund Business Plan 2020/21			1	
Abatement Policy				1
Administering Authority Decisions Policy				1
Communications Strategy				1
Pension Administration Strategy				1
Total number of Agenda Items:	10	11	13	11

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LOCAL PENSION BOARD

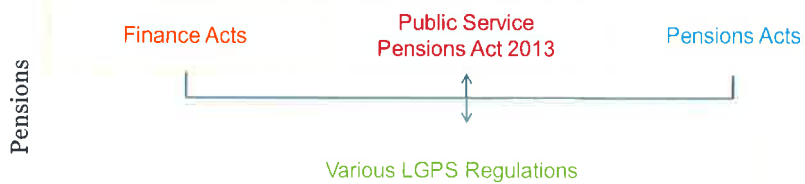
GOVERNANCE OVERVIEW

Kevin Taylor, Deputy Pension Fund Manager

8th October 2019



Pensions Legislative Framework



Impact of Enactments

Finance Acts
(HM Treasury)

- Tax relief on pension contributions
- Tax free cash lump sum
- Thresholds on total and annual pension savings
- No tax on investment growth
- Freedom and choice

Pensions Acts
(Dept Work & Pensions)

- Disclosure requirements
- Contracting out
- Governance eg dispute resolution, record keeping

Public Service
Pensions Act 2013

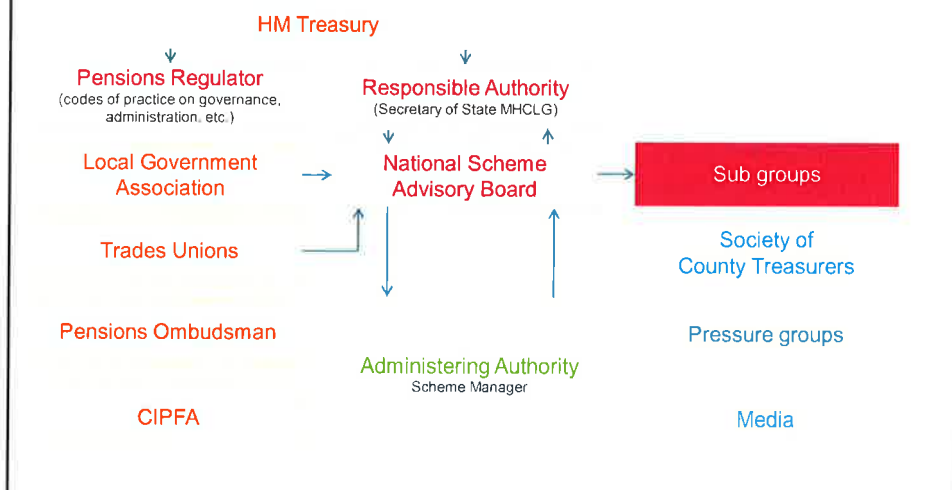
- Benefit structure (Career Average Revalued Earnings)
- Local Pension Boards
- Role of the Pensions Regulator
- Scheme Advisory Board

LOCAL GOVERNMENT PENSION SCHEME

Primary
Legislation

- Local Government Pension Scheme Regulations 2013 (as amended)
- Local Government (Transitional Provisions, Savings and Amendment) Regulations 2014
- Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 (as amended)
- Lots of saved former regulations (2008, 1997, 1995 etc etc)
- ...all subject to (numerous) amendments!

Who's Who at National Level



Who's Who at Fund Level



Berkshire Pension Fund Panel

Elected Members of RBWM:

Chairman: Cllr. Julian Sharpe
Vice-Chairman: Cllr. David Hilton
Other Members: Cllr. Simon Bond
Cllr. Wisdom Da Costa
Cllr. John Story

Officers:

Currently vacant (Head of Finance)
Mr Kevin Taylor (Deputy Pension Fund Manager)
Mr Philip Boyton (Pension Administration Manager)

Berkshire Pension Fund Advisory Panel

Unitary Authority Representatives:

Cllr. Ian Leake (Bracknell Forest)
Cllr. Alan Law (West Berkshire)
Cllr. Jo Lovelock (Reading)
Cllr. Balvinder S Bains (Slough)
Cllr. John Kaiser (Wokingham)

Other Employer Representatives:

Mr Kieron Finlay (University of West London)
Vacant

Independent Advisor:

Mr Andrew Harrison (Law Debenture)

Employee Representatives:

Mr Mark Butcher (Deferred Member)
Vacant

Pension Board

Reg. 106. - (1) Each administering authority shall no later than 1st April 2015 establish a pension board ("a local pension board") responsible for assisting it -

- a) to secure compliance with –
 - i. these Regulations,
 - ii. any other legislation relating to the governance and administration of the Scheme and any connected scheme(a), and
 - iii. any requirements imposed by the Pensions Regulator in relation to the Scheme and any connected scheme; and
- b) to ensure the effective and efficient governance and administration of the Scheme and any connected scheme.

The remit of the Pension Board...

- Being a critical friend
- Assisting with compliance eg the Regulator's requirements
- Ensuring due process has been followed
- Reviewing administration standards
- Reviewing published policies for compliance
- Input into consultation
- Produce an annual report – feedback to scheme members and employers

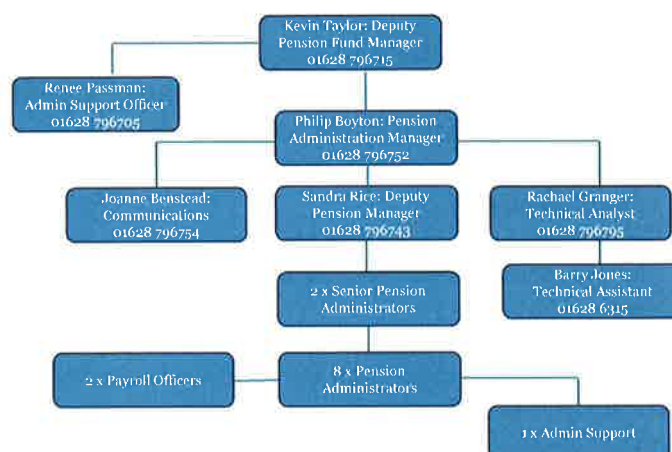
Not so much of this



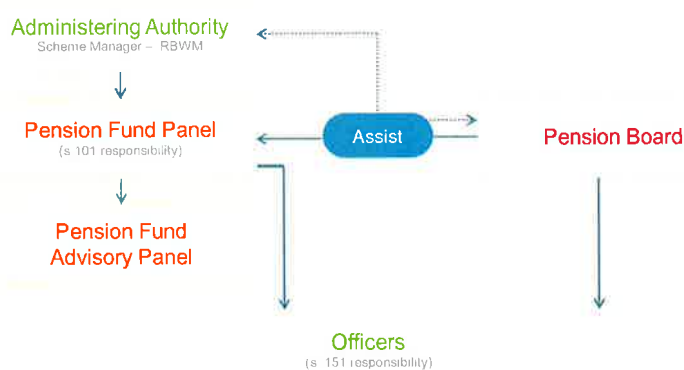
But more of this



Pension Fund Team



Local Governance Structure



Different legislation



The Pension Fund Panel

- Local Government Act 1972 - Section 101
- Local delegated function under council constitution
- Delegated **decision** making



The Pension Board

- Public Service Pensions Act 2013 – Regulation 5
- LGPS Regulations 2013 (amended 2015)
- **Assisting** with securing compliance

The Administering Authority should...

- Prepare and maintain a Funding Strategy Statement (FSS)
- Provide advice and guidance to employers
- Collect and properly account for contributions
- Manage the valuation process in consultation with the Fund's actuary
- Prepare and maintain an Investment Strategy Statement (ISS)
- Invest surplus monies in accordance with the ISS & LGPS Regulations
- Prepare and publish an Annual Report
- Prepare and maintain a Communications Strategy
- Calculate and pay pension benefits
- Ensure that cash is available to meet the liabilities as and when they fall due
- Agree Administering Authority discretions policy
- Administration strategy

What is the LGPS?

- Public Service
- Occupational
- Defined Benefit
- Registered
- Qualifying for Auto-enrolment purposes



Benefit Structure

Final Salary

1/80 pension
3/80 Lump sum

Final Salary

1/60 pension
Lump sum by
conversion

CARE

1/49 pension
Lump sum by
conversion



April 2008

April 2014

Royal County of Berkshire Pension Fund

Annual Report and Accounts



2018/2019



THE ROYAL COUNTY OF
BERKSHIRE
PENSION FUND

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PENSION FUND PANEL AND ADVISORY PANEL MEMBERS AND SCHEME ADVISORS

PENSION FUND PANEL

Chairman	Councillor John Lenton
Vice Chairman	Councillor David Hilton
Other members	Councillor Geoff Hill Councillor Richard Kellaway One vacancy

PENSION FUND ADVISORY PANEL

In addition to the 5 Pension Fund Panel members, the Advisory Panel consisted of:

Councillor David Worrall (Bracknell Forest Borough Council)
Councillor Tony Jones (Reading Borough Council)
Councillor Preston Brooker (Slough Borough Council)
Councillor Alan Law (West Berkshire Council)
Councillor Rob Stanton (Wokingham Borough Council)
Mr Engin Eryilmaz (University of West London)
UNISON - vacant
Asia Allison (GMB)
Mr Mark Butcher (deferred scheme member)

ADVISERS

Actuary	Barnett Waddingham LLP
Independent Investment Adviser	The Law Debenture Pension Trustee Corporation (Mr Andrew Harrison)
Independent Strategy Advisers (to the Investment Working Group)	Ms Aoifinn Devitt Mr Rohan Worrall

Global Custodian

JP Morgan Worldwide Securities Services

Additional Voluntary Contribution Provider

Prudential Assurance Company

Royal Borough of Windsor & Maidenhead Pension Fund Officers

Head of Finance	Rob Stubbs
Deputy Pension Fund Manager	Kevin Taylor
Pension Administration Manager	Philip Boyton

PENSION BOARD

In accordance with the provisions of the Public Service Pensions Act 2013 a Pension Board was constituted on 22 July 2015.

Chairman

Mr Tony Pettitt

Vice-Chairman

Mr Alan Cross

Employer Representatives

Mr Alan Cross (Reading Borough Council)
Mr Neil Wilcox (Slough Borough Council)
Mrs Nikki Craig

Scheme Member Representatives

Mr Tony Pettitt (Retired Scheme member)
Mr Jeff Ford (Active Scheme member)
1 vacancy

CHAIRMAN'S INTRODUCTION

It gives me great pleasure as the newly appointed Chairman of the Pension Fund Panel and the Pension Fund Advisory Panel to present the Annual Report and Accounts for the financial year ended 31 March 2019 for the Royal County of Berkshire Pension Fund (the "Fund"). I would like to take this opportunity to thank former Cllr. John Lenton as the previous Chairman to the Panels for his hard work and dedication over 12 years involvement with the Pension Fund.

The Royal Borough of Windsor & Maidenhead (RBWM) administers the Fund on behalf of the 6 Berkshire Unitary Authorities and around 250 other public, and private, sector employers. I am most grateful to the administration team for the efficient service they have provided to all of our employers and their continued professionalism in maintaining the highest standards of service to our Scheme members

The Berkshire Pension Fund Panel has powers delegated to it under the Constitution of the Royal Borough of Windsor & Maidenhead. The Panel comprises of five Councillors from the Royal Borough of Windsor & Maidenhead and receives invaluable support from the Pension Fund Advisory Panel, which consists of representatives from the other 5 Berkshire Unitary Authorities, three other Scheme employer representatives, 2 Scheme member representatives and the trades unions. The Panels are additionally assisted by an independent advisor.

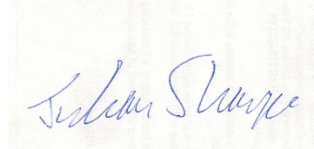
In practice decisions are taken at joint meetings of the two Panels. Investment decisions by the Pension Fund Panel are made after considering recommendations from the Investment Group (IG). The IG includes members nominated from both Panels together with our external Investment Strategy Advisers.

With effect from 1 June 2018 and as a result of the Government's initiative to pool Local Authority Pension Funds, The Royal County of Berkshire Pension Fund entered into a Management Agreement with the Local Pensions Partnership Investments Limited (LPPI) meaning that all of the Fund's assets are now managed by LPPI, although those assets remain the property of the Pension Fund. The Pension Fund Panel remains responsible for setting the Investment Strategy and Strategic Allocation of its assets and for monitoring investment performance.

In addition to taking investment decisions the Pension Fund Panels also have a statutory duty to ensure that the Local Government Pension Scheme (LGPS) is governed and administered in line with the LGPS Regulations and other associated legislation. I am grateful to members of our local Pension Board for their input in these areas and their assistance in ensuring that RBWM as the 'Scheme Manager' fulfils its statutory responsibilities.

The LGPS is under greater scrutiny than ever before. The Pensions Regulator issues Codes of Practice that Public Service Pension Schemes, including the LGPS, are expected to adhere to and has the power to intervene where necessary and issue improvement notices and even fines.

However, I have great confidence that the Pension Team will continue to provide a high quality service and excellent support to everyone connected with the Pension Fund as I move into my new role as the Chairman of the Pension Fund Panels.



Councillor Julian Sharpe
Chairman
Berkshire Pension Fund Panel
Berkshire Pension Fund Advisory Panel

PENSION BOARD STATEMENT: APRIL 2018 – MARCH 2019

The Pension Board was set up in 2015 in accordance with the requirements defined in the Public Sector Pensions Act 2013.

The Board has a statutory duty to:

- Ensure the Fund's compliance with legislation, regulation and guidance, along with the Pension Regulator's (TPR) requirements;
- Ensure that the Fund's governance and administration is effective and efficient.

The Board focusses mainly on governance and administration issues through the management of a clearly defined work programme of reviews, monitored through an action tracker. In addition, the Board has sought to deliver effective advice and assurance in line with the agreed Terms of Reference and the Administering Authority's Constitution.

The Board has continued the process of developing the knowledge and skills of the Board Members to enable them to undertake their duties with confidence. It has also given attention to the compliance of the Fund's administration, reviewing statutory documentation as it has been published throughout the year and building on the positive outcome of the internal audit of the Administering Authority's compliance with the TPR Code of Practice 14.

The Board remains apprised of the transfer of assets to the management of the Local Pensions Partnership Investments Limited (LPPI) and receives copies of all papers taken to meetings of the Pension Fund Panels which includes, but is not limited to, the Administering Authority's Investment Strategy and Funding Strategy Statements and all Investment Performance reports produced by LPPI. In addition the Board continues to keep under review the Pension Panels' work-plan offering whatever assistance it can give to the Administering Authority in fulfilling its statutory duties of governance and administration.

The last 18 to 24 months has been a period of transition for all Local Government Pension Funds including the Berkshire Fund. There is the ongoing transfer of assets to LPPI, amendments to scheme regulations and over-arching legislation to contend with and numerous and complex consultations by the Government concerning proposals on future changes to the LGPS to be considered, all of which has made for a demanding time for all connected with Local Government Pension Funds. Add to this the ever-increasing scrutiny of the Pensions Regulator and it is clear that the governance and administration of the scheme is more important than ever and a challenge to which the Berkshire Pension Fund has in the past and will in the future continue to meet.

There will always be room for improvement but the work of the Board helps to establish clear priorities for future activity.

PENSION BOARD 2018-19

Chairman: Tony Pettitt
Vice-Chairman: Alan Cross

Scheme Employer Representatives

Neil Wilcox (*Slough Borough Council*)
Nikki Craig (*RBWM*)
1 vacancy

Scheme Member Representatives

Tony Pettitt (*Retired Scheme Member*)
Alan Cross (*Deferred Scheme Member*)
Jeff Ford (*Active Scheme Member*)

Dates of meetings:

11 September 2018
20 February 2019

Attendance for 2018/19

Name	Number of meeting eligible to attend	Attended
Tony Pettitt	2	2
Alan Cross	2	2
Neil Wilcox	2	2
Jeff Ford	2	2
Nikki Craig	2	2

SCHEME ADMINISTRATION REPORT

Introduction

The Royal Borough of Windsor and Maidenhead acts as the administering authority for the Royal County of Berkshire Pension Fund – the pension fund for local government employees in the County of Berkshire. Benefits for members of the Fund are set by the Local Government Pension Scheme Regulations 2013 (as amended).

The Royal Borough has delegated its role as administering authority to the Pension Fund Panel. This Panel consists of five Royal Borough councillors and is assisted by the Pension Fund Advisory Panel. This latter panel includes the five Royal Borough councillors plus one councillor drawn from each of the other five unitary authorities in the Fund, one representative from the University of West London on behalf of the other employing bodies in the Fund, two Trade Union representatives (one each from Unison and GMB) acting for the active members of the Fund and one independent adviser.

The Pension Fund and Pension Fund Advisory Panels meet quarterly to receive and consider reports from the Pension Fund Manager and external advisors on the management of the Fund. Attendance to the Panel is noted below:

Name	Authority	Number of Meetings eligible to attend	Attended
Councillor Lenton (Chair)	RB Windsor & Maidenhead	6	6
Councillor Hilton (Vice Chair)	RB Windsor & Maidenhead	6	5
Councillor Hill	RB Windsor & Maidenhead	6	4
Councillor Kellaway	RB Windsor & Maidenhead	6	5
Vacancy	RB Windsor & Maidenhead	6	0
Councillor Brooker	Slough Borough Council	4	2
Councillor Sarfraz	Slough Borough Council	2	0
Councillor Law	West Berkshire Council	6	5
Councillor Stanton	Wokingham Borough Council	1	1
Councillor Jones	Reading Borough Council	6	1
Councillor Worrall	Bracknell Forest Council	6	5

Royal Borough councillors may delegate designated substitute members to attend a Panel meeting if they are unable to attend.

In addition to the invaluable support and advice offered by the Pension Fund Advisory Panel the Pension Fund Panel is assisted by a variety of advisers including Mr Inder Dhingra as an independent adviser and Mr Graeme Muir of Barnett Waddingham, the Actuary to the Fund. The Investment Working Group, a sub-group of the panels, is independently advised by Mr Rohan Worrall and Ms Aoifinn Devitt. Additional advice from other professional advisers is

sought as necessary. Many of the duties of the Panel are delegated to Officers in accordance with the Royal Borough's constitution.

Customer Satisfaction

The landscape of the Local Government Pension Scheme continues to evolve greatly resulting in the need for our administration team to continue using a variety of methods to understand our members and employers needs. Their needs, experiences of the service we provide and their perception of the Pension Fund help us to continually improve and become more efficient and effective.

The 1 April 2014 saw a significant change to the Local Government Pension Scheme with the introduction of a career average scheme, fundamentally different to the final salary scheme previously in place. This event undoubtedly made the Scheme more complex to administer with increased scrutiny from The Pensions Regulator.

During the last year the team has continued to communicate with members to ensure that they are aware of the impact the changes to the Scheme will make to their pension benefits and to ensure employers are fully educated and understand their responsibilities to provide timely and accurate information together with the consequences of their failure to do so.

There is no doubt our relationship and need to continue working with our scheme employers and their members is ever more important.

Compliance with Communications Policy Statement

Under Regulation 61 of the Local Government Pension Scheme Regulations 2013 (as amended) The Royal Borough of Windsor & Maidenhead, in its role as administering authority to The Royal County of Berkshire Pension Fund, is required to publish a statement of policy concerning communications.

This policy statement can be found at Appendix 1 and deals with the methods of communication between the administering authority, members and employers of the Pension Fund.

The administering authority keeps the policy statement under review. During the year the Fund undertook:

➤ Communication with Employers

Annual Employers Meeting

All employers were invited to attend a meeting on 7 March 2019. They were provided with details of the data they are required to submit to the administration team so that members' records are correct, an actuarial update of the Pension Fund, and a presentation by AVC Wise, regarding the savings scheme employers can realise by introducing Shared Cost AVCs and the options AVCs provide scheme members at retirement.

Training for Employers

The Administration Team continues to hold ad-hoc training sessions throughout the year on request. These sessions are designed to educate both new and current employers about the important role they play in helping the team administer the Scheme and the importance of holding clean and accurate data to process benefits quickly and efficiently. These sessions were well received with the team immediately seeing a more proactive approach towards the submission and quality of data by employers.

Regular Updates on the LGPS

"*The Inscribe*" bulletin is distributed to employers on a quarterly basis with other global emails distributed to employers when deemed necessary.

Pension Fund website

The Pension Fund website continues to prove a valuable source of information for our Scheme employers and their members.

The website contains sections dedicated to the following:

- Current members
- Deferred members
- Retired members
- Councillor members
- Employers

The site received over 64,500 visits from members and employers during the year, an increase of 4.1% when compared to the previous year, and has been described as easily accessible and having many links making navigation user friendly.

The administration team continue to review and remodel the website to ensure members are aware of the impact any changes to the Scheme will make to their pension benefits but also to ensure a point of reference for employers to help continually educate them and understand their responsibilities.

The website address is www.berkshirepensions.org.uk

Employer Self Service (ESS)

The Pension Fund launched ESS on 19 October 2017. ESS is accessible to all registered scheme employers and enables them to view and amend their own scheme members' pension data remotely and securely from the comfort of their workplace.

ESS also enables scheme employers to calculate quickly and efficiently the value of their scheme members benefits any respective strain cost payable thus avoiding the need to contact the administration team.

i-connect Software

The Pension Fund continues to build on the success it has experienced since February 2016 by seeing a further 25 employers start submitting data to the Fund on a monthly basis using i-connect Software during the year. A total of 63 scheme employers are now on board covering a little over 79% of the total active scheme membership.

This has saved the team a significant administration time by removing the need for manual input, but most importantly helping maintain the accuracy of member data. No doubt employers and the team will continue to benefit from this service throughout the next 12 months.

General Guidance and Assistance

The pension administration team can be contacted during normal office hours. There is a dedicated help-line 0845 602 7237 and a dedicated email help desk (info@berkshirepensions.org.uk).

Promotional Services

The Pension Fund continues to produce and publish scheme guides and factsheets relating to specific pension topics all of which are available for download from the Pension Fund website. These are constantly reviewed and updated to keep pace with the ever evolving Local Government Pension Scheme.

➤ **Communication with All Members**

Member Self Service - 'my pension ONLINE'

The Pension Fund's 'my pension ONLINE' service enables members to securely access and update your own pension details using not just their desktop PC but now using their laptop, tablet or smartphone.

The service continues to prove popular with over 15,500 members now registered, which represents 26% of the total membership the service is accessible to. Registered members' can quickly gain access to their own pension record to check their details are correct and calculate the current and future value of their own benefits and their dependants. This removes the need to contact the administration team and wait for an estimate to be sent to them.

Welcome Pack

With the implementation of 'my pension ONLINE' each new member receives a letter containing an activation code and guidance as to how to access their welcome pack online. If a member chooses not to register for 'my pension ONLINE' a paper version of the welcome pack will be sent to the member's home address upon request.

Annual Benefit Statements

Each active and deferred member of the pension scheme receives an annual benefit statement. With the availability of 'my pension ONLINE' these statements are available for viewing, downloading or printing on-line and means the Fund only issues a paper statement to approximately 3,700 or 6.25% of the membership by post.

The Annual Benefit Statement provides details of benefits built up to 31st March the previous year, benefits projected to Normal Pension Age, death in service benefits and details of the member's nominated beneficiaries.

Pension Surgeries

During the year two pension surgeries were held at each of the six Unitary Authorities with additional pension surgeries being held at other employer locations upon request. These pension surgeries provide an opportunity for members to discuss any aspect of their pension benefits. The administration team met with 539 scheme members across the pension surgeries held. To accompany these pension surgeries the administration team provide pre-retirement courses and presentations aimed at those members considering retirement in the near future.

Newsletters

The Pension Fund produces and distributes bi-annual newsletters. '*The Quill*' is issued to active and deferred members and '*The Scribe*' is issued to pensioner and dependant members. Both continue to be very well received by members. Since the implementation of 'my pension ONLINE' newsletters are available for viewing, downloading or printing on-line.

Annual Meeting

A meeting took place on 7 November 2018 held at the Town Hall in Maidenhead. At the same time, the pension team invited members to attend an open day at the same location. In attendance were members of the administration and payroll teams, representatives from Barnett Waddingham (the Pension Fund Actuary) and AVC Wise, regarding the benefits AVCs provide at retirement.

➤ **Communication with Pensioner and Dependant Members**

The Pension Fund has a dedicated payroll team dealing with former members now receiving payment of their pension benefits. As well as responding to their enquiries the payroll team are responsible for ensuring we meet our regulatory requirements.

Pension Payslips

The administration team has issued payslips in accordance with its 50 pence variance rule each month and before payment has been made. The Retired Members area of the Pension Fund website provides a detailed explanation of a payslip. Since the implementation of 'my pension ONLINE' payslips are available for viewing, downloading and printing on-line.

P60s

The administration team issued P60s to all pensioner and dependant members in April 2017 well in advance of the HMRC deadline. The Retirement Members area of the Pension Fund website provides a detailed explanation of a P60, which was also contained in our Spring edition of *'The Scribe'*. Since the implementation of 'my pension ONLINE' P60s are available for viewing, downloading and printing on-line in a format approved by HM Revenue & Customs.

Annual Pension Increase Notice

The administration team issued a notification to all pensioner and dependant members in April 2018 providing details of the 3% increase awarded from 9 April 2018 in line with the Consumer Price Index (CPI).

Tell Us Once (TUO)

A service designed to provide Funds with details of those members having died and their next of kin via the General Registry Office (GRO), the Fund was one of the first Local Government Pension Funds to on board and up load membership data and since going LIVE in March 2016 has received 568 notifications with 272 of these received between 1 April 2018 and 31 March 2019 alone.

This helped the Fund make contact with the next of kin more quickly and avoid any potential overpayment of benefits.

Management Performance

Key Administration Performance Indicators

The administration team monitor the time it takes to complete procedures. The key foundation to achieving the performance standards we set to complete procedures is by ensuring we maintain quality data.

Our key procedures reported to the Pension Fund Panel on a quarterly basis are:

- Inputting of new members;
- Processing of early leavers;
- Payment of retirement benefits;
- Payment of transfer values (to 30 June 2018);
- Payment of Refund of Contributions (from 1 July 2018).

Performance for these key procedures over the year was 98.69%, which is a decrease of 0.6% on the 2017/18 year. It is important to note there has been a significant increase in the number of cases processed across a team reduced in size, as highlighted over the page. A summary of achievement in each area is shown in the table below:

Administration Team Performance		2017/18			2018/19		
Case Type	Target (working days)	Number received	Number within target	% within target	Number received	Number within target	% within target
Inputting of new members	20	5424	5406	99.67	6538	6489	99.25
Processing of early leavers	20	4670	4644	99.44	6010	5897	98.12
Payment of retirement benefits	5	1115	1080	96.86	1159	1136	98.02
Payment of transfer values	15	54	53	98.15	7	7	100
Payment of Refund of Contributions	10	n/a	n/a	n/a	530	528	99.62

A further top five procedures in terms of cases completed are shown in the table below:

Administration Team Performance		2017/18			2018/19		
Case Type	Target (working days)	Number received	Number within target	% within target	Number received	Number within target	% within target
Employee estimate requests	7	1428	1192	83.47	2223	1828	82.23
Employer estimate requests	5	391	354	90.54	291	249	85.57
Changes to personal details	15	5977	5616	93.96	5340	4824	90.34
Issue of 'my pension ONLINE' Activation Keys	5	2247	2217	98.66	1569	1548	98.66
APC Quotes	20	213	100	97.87	205	203	99.02

Complaints

The administration team monitor the complaints received on a monthly basis and ensure we respond promptly having investigated thoroughly and learn from them to improve the service.

The complaints are monitored in two distinct ways:

- Complaints about our service and the way we apply the regulations; and
- Under the LGPS members can use a three stage Internal Dispute Resolution Procedure (IDRP) to settle any disagreement or complaint that they may have about decisions made under scheme rules.

The table below shows the number of complaints in each category. These represent a minimal percentage when compared to more than 41,500 procedures we carried out in 2018/19.

Administration Team Performance		2017/18			2018/19		
Case Type	Target (working days)	Number received	Number within target	% within target	Number received	Number within target	% within target
Service	10	0	n/a	n/a	0	n/a	n/a
IDRP	n/a	2	2	100%	0	n/a	n/a

Key Staffing and Membership Numbers

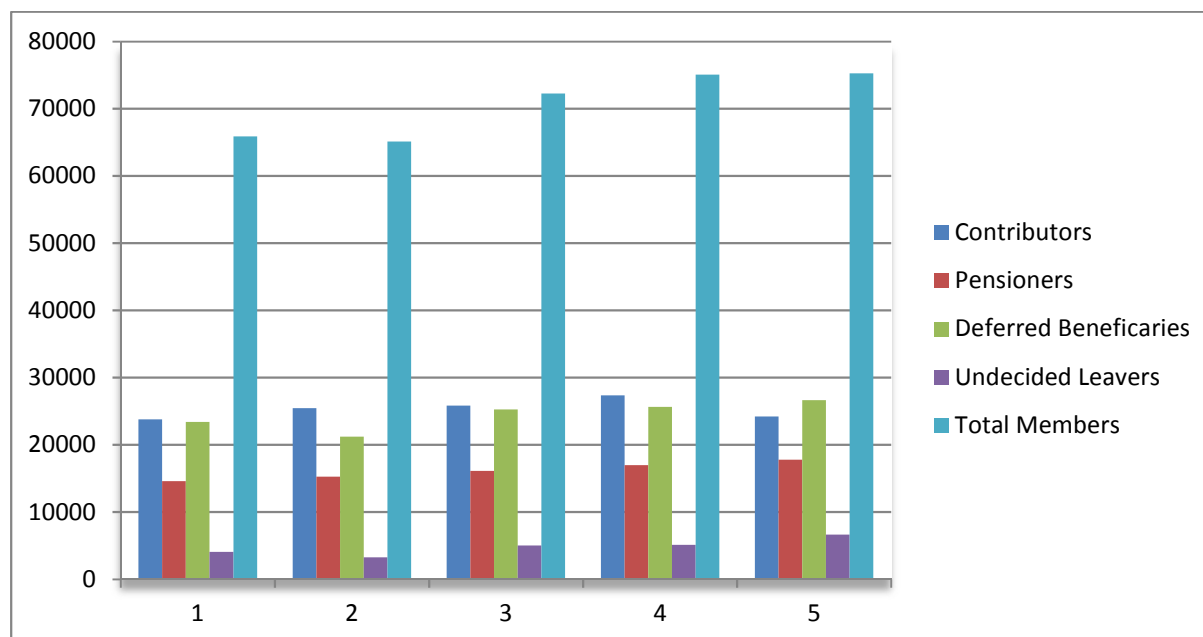
Staffing

The administration team is made up of the following members:

Year	2017/18	2018/19
Deputy Pension Fund Manager	1.0	1.0
Pension Administration Manager	1.0	1.0
Deputy Pension Administration Manager	1.0	1.0
Assistant Pension Manager (Communications)	1.0	1.0
Technical Analyst	1.0	1.0
Assistant Technical Analyst	n/a	1.0
Senior Pension Administrators	2.0	1.0
Pension Administrators	4.5	2.5
Trainee Pension Administrators	3.0	4.0
Payroll Supervisor	0.7	0.7
Pension & Payroll Administrator	1.0	1.0
Administration Support Officer	1.0	1.0
Clerical Support	0.6	0.6
Total	17.8	16.8

Membership

Membership of the Pension Fund continues to grow. The chart and table overleaf show the number of contributors, deferred beneficiaries and pensioners (including dependants) and Undecided Leaver member records (individuals may have more than one membership record) over the last five years to 31 March 2019.



	31 March 2015	31 March 2016	31 March 2017	31 March 2018	31 March 2019
Contributors	23,783	25,434	25,845	27,369	24,203
Pensioners	14,610	15,243	16,126	16,955	17,763
Deferred Beneficiaries	23,415	21,187	25,256	25,624	26,626
Undecided Leavers	4,083	3,271	5,015	5,127	6,650
Total Members	<u>65,891</u>	<u>65,135</u>	<u>72,242</u>	<u>75,075</u>	<u>75,242</u>

NOTES:

- Contributors are employees currently contributing to the Local Government Pension Scheme and include some employees who have more than one contract of employment, each contract being treated separately for administration purposes.
- Pensioner members are in receipt of a pension and include all dependants of former members.
- Deferred beneficiaries are former contributors who have elected to retain their rights in the Scheme until such time as they become payable.
- Undecided Leavers are former contributors who have an entitlement to receive a return of contributions paid less mandatory deductions.

The result is a large Pension Fund being administered by a small team. The administrator to scheme member ratio remains consistent with the previous year at 1:4478 with the

administration team continuing to provide a highly regarded and professional service across the entire membership.

Benchmarking

The Pension Fund has not taken part in any formal benchmarking exercise since 2006 but is always prepared to take the opportunity to compare ourselves against other Pension Funds of a comparable size in terms of membership.

Gathering Assurance and Data Quality

The Pension Fund recognises the importance of gathering assurance over the effective and efficient operation of the pension and payroll administration software used, *altair*. Provided by *heywood* Limited, both our teams utilise the workflow functionality afforded to us ensuring thorough checks are performed by senior members of the team in all areas of administration.

In addition it is fundamentally important to measure the presence and accuracy of both Common and Scheme Specific data held to administer benefits on behalf of scheme members and their beneficiaries and to have plans in place to resolve discrepancies where they are found. In consideration of the Pension Regulators (tPR) requirements in this area the Pension Fund entered into a three year agreement with *heywood* Limited during August 2018 with feedback received during November 2018 that our results were well above average.

The exercise of monitoring the accuracy of data will be performed annually and will demonstrate how serious the Pension Fund is with regard to holding accurate data on behalf of scheme members and their beneficiaries.

The Pension Fund is also proactive in responding to enquiries received from both internal (Royal Borough of Windsor & Maidenhead) and external (KPMG) auditors.

The Future

We remain committed and focus our efforts on communicating with both our scheme employers and their members. We will ensure that members understand and appreciate the value of the Scheme, which forms a significant part of the pay and reward package provided by their employer.

Ensuring the timely and accurate submission of data from employers is crucial to the administration team continuing to deliver a quality service to members. We will continue to endeavour to introduce further efficiencies and better ways of working to further improve on the systems that are currently in place.

These improvements will be delivered to not only ensure the quality of our members data is maintained to the standard required by the Pensions Regulator (tPR) but is also protected as required by Government Data Protection Regulation (GDPR).

Customer service will continue to be a priority as the next few years will be challenging for both members and employers. To demonstrate our commitment and ensure this continues we will ask for our members and employers opinion on our services in a variety of ways. We will continue to survey a sample of our active, deferred, pensioner and dependant members by post, at pension surgeries, presentations and on-line via our website.

INVESTMENT REPORT

In continuing with the UK Government's initiative for Local Government Pension Funds to take advantage of pooling their investments, the management of the Fund's assets has transferred to the Local Pensions Partnership (LPP). The assets remain the legal property of the Royal County of Berkshire Pension Fund.

LPP has set up and oversee the investment of seven pooled fund vehicles. The majority of the Fund's on balance assets have transferred into the pooled funds. LPP is in the process of setting up an eighth pooled fund vehicle for the asset class of Real Estate. The Fund's asset allocation can be seen the following table:

Asset Class	31-Mar-19			31-Mar-18	
	Actual weighting	Target Weighting		Actual Weighting	Target Weighting
Credit	12.5%	10.0%		12.0%	10.0%
Diversifying Strategies	3.6%	4.0%		4.0%	4.0%
Fixed Income	2.9%	3.0%		3.2%	3.0%
Infrastructure	9.0%	12.5%		6.2%	12.5%
Private Equity	12.9%	13.0%		12.6%	13.0%
Public Equity	38.3%	40.0%		33.6%	40.0%
Real Estate	13.3%	16.5%		13.1%	16.5%
Cash	7.5%	1.0%		15.3%	1.0%
	100.0%	100.0%		100.0%	100.0%

N.B. "Target Weighting" shown above represents the agreed Strategic Asset Allocation ('SSA').

Over the reporting period The Strategic Asset Allocation weightings / Target Weightings remained unaltered. The Fund is currently through an actuarial valuation (which occurs every three years) and the appropriateness of the SAA will be reviewed as part of establishing the funding level and determining longer term ambitions.

The Fund's exposure to Public Equities and Infrastructure increased over the reporting period (by circa 5% and 3% respectively) whilst the cash weighting reduced significantly.

How did the investments perform?

Over the twelve month period to the end of March 2019 the Fund generated a positive return of 6.7%. This represents an outperformance of 0.2% against the Policy Portfolio (the "Policy Portfolio" weightings are reflective of the Strategic Asset Allocation weighting). During this period the asset classes of Credit, Infrastructure and Real Estate added to the outperformance, whilst Diversifying Strategies and Public Equity underperformed.

Over a three year horizon to the end of Q1 2019, the Fund delivered an 8.8% annualised return outperforming its policy portfolio by 1.9%. Credit was the stellar performer over this period whilst Diversifying Strategies once again struggled.

Economic Update

The year through to March 2019 was a period of slowing global economic activity. The deceleration in global gross domestic product ("GDP") growth was relatively synchronised across the developed and emerging markets. Inflation, within the UK, Eurozone and United States, subsided from key central bank levels in the first quarter of 2019. GDP growth and inflation are two key macroeconomic variables that impact most asset classes (to varying degrees and over different time horizons). Amid this trend of lower growth and inflation, all the major central banks pivoted to a more "dovish" stance (i.e. accommodative policy) either through their forward guidance and/or

their monetary policy tools. For major developed and emerging market equity indices, Q4's market turbulence led to negative full-year returns for the first time since 2015. In a whipsaw move though, 2019 started strongly for all major equity and credit markets.

FINANCIAL PERFORMANCE REPORT

Movement in Net assets of the scheme

During the financial year, the value of the net assets of the scheme increased by £144.2 million.

Timeliness of Receipt of Contributions

	2018/19	2017/18	2016/17
Percentage of contributions received on or before the due date	98.75%	97.65%	98.43%

The option to levy interest on overdue contributions has not been exercised.

Administrative Costs Actual compared to Budget

	2018/19 Actual £000's	2018/19 Budget £000's
Staff	620	615
Supplies and Services	443	589
Unit Recharges	96	96
TOTAL	1,159	1,300

Income and Expenditure

	2018/19 Actual £000's	2018/19 Forecast £'000's
Employee/Employer Contributions	114,581	100,614
Transfer Values Received	8,130	6,600
Employer additional contributions for early retirements	2,409	1,800
Investment income via Custodian	39,032	34,700
Pensions Payable	-85,105	-85,902
Retirement Lump Sums and Death Grants	-17,730	-21,200
Transfer Values Paid and Refund of Contributions	-10,526	-6,500
Investment Management Expenses	-9,934	-7,363
Employee & Other costs	-1,159	-1,300
Net additions/(withdrawals) from dealing with members	39,698	21,449

RISK MANAGEMENT

The Royal Borough of Windsor and Maidenhead as the administering authority for The Royal County of Berkshire Pension Fund ("the Fund") places great emphasis on risk management. The Fund differentiates between operational and strategic risks in order to secure the effective governance and administration of the Local Government Pension Scheme (LGPS). The main internal controls for the Fund set out the arrangements and procedures to be followed in administration, governance and management of the Scheme and the systems required for ensuring those arrangements are met.

Operational risk

Operational risk covers such areas as administration of members' records and payment of benefits, receipt of contributions as well as such things as business continuity, disaster recovery and having staff with the appropriate skill sets.

The Fund participates in the National Fraud Initiative where National Insurance numbers of members receiving pensions and other benefits are matched against a national database of reported deaths. Any matches are thoroughly investigated.

A number of key operational risks and the action taken to mitigate them are detailed below:

Risk	Mitigating Action
Failure to comply with Scheme regulations and associated pension law.	Staff training, employer training and external guidance provided. Desk top procedures in place and systems software provider competent.
Payments of incorrect benefits.	Annually each active member's contributions and pay details are confirmed with their employer. On leaving employment an individual's scheme membership history and pay details will be confirmed with their employer. Pension Fund is moving toward an automated and secure method of data transfer between employers and the Fund.
Pension benefits not paid on time.	A schedule of payment dates is maintained and written procedures adopted. Sufficient cover is provided to ensure payments are made at the correct time.

Ongoing pension benefits paid to a deceased member.	The Fund undertakes a monthly mortality screening exercise and takes part in the biennial National Fraud Initiative (NFI)
Failure to maintain a high quality database.	<p>The Fund's preferred method of receiving data from scheme employers is through a secure electronic data transfer system called i-connect thereby maintaining member records in real-time.</p> <p>Pro-active data checks are undertaken before benefits are paid.</p> <p>Both members and employers have access to self-service systems enabling them to check data.</p>
Failure to hold data securely.	<p>Database is hosted off-site and backed-up in 2 separate locations.</p> <p>Access to systems is via dual-password and username.</p> <p>Data transferred between systems is encrypted.</p> <p>Compliant with General Data Protection Regulations (GDPR) and IT policies.</p>
Contribution payments received late from scheme employers.	<p>Receipt of contributions is monitored robustly with employers being reminded of their statutory duty if payments are received late.</p> <p>Procedures in place to issue notices of unsatisfactory performance to employers who fail to make payments on time and to report them to the Pensions Regulator where deemed materially significant.</p>
Failure to communicate properly with stakeholders.	<p>The Fund has a Communication Policy and a Communications Manager.</p> <p>The website is maintained to a high standard at all times.</p> <p>Newsletters and factsheets are issued to both scheme members and scheme employers.</p>

	Training is provided to scheme employers.
Loss of office premises	A comprehensive business continuity plan is in place. Systems are hosted and so can be accessed remotely from home or from an alternative office space.
Loss of funds through fraud.	The Fund is externally and internally audited annually to test that controls are adequate. The Fund participates on the biennial National Fraud Initiative (NFI)

Strategic risks

Strategic risks are those which whilst not affecting day to day operations of the Fund could, nevertheless, in the medium and/or long-term have significant impact. A number of key strategic risks and the action taken to mitigate them are detailed in the table below:

Risk	Mitigating Action
Funding level below 100%.	The Fund has issued a Funding Strategy Statement and Investment Strategy Statement. Deficit recovery plan is in place.
Unstable employer contributions.	The Fund aims to keep employer contribution rates stable by agreeing with scheme employers and the Actuary an appropriate deficit recovery plan.
Unsatisfactory investment performance.	The Fund has issued an Investment Strategy Statement and monitors closely the performance of its Investment Manager. An Investment Group meets quarterly with the Investment Manager to discuss investment performance and asset allocation.
Inappropriate funding targets.	The Fund has a broadly diversified portfolio with no one asset class dominating. Targets are reviewed quarterly with the Investment Manager.
Scheme employer covenants.	The Fund monitors closely the ability of scheme employers to meet their obligations.

	<p>A cessation valuation is undertaken by the Actuary when a scheme employer exits the Scheme.</p> <p>A funding report and covenant assessment is provided by the Actuary when an employer becomes a new admission body to the Fund.</p>
Governance of the Fund	<p>The Pension Fund is governed by the Pension Fund Panel and Pension Fund Advisory Panel.</p> <p>The Pension Board assists the Panels in fulfilling their statutory duties.</p> <p>Law Debenture have been appointed as an independent Governance Advisor to both Panels.</p> <p>Officers arrange training on specific matters as required during the year.</p>

Royal County of Berkshire Pension Fund

Actuary's Statement as at 31 March 2019

Barnett Waddingham LLP

6 September 2019

Introduction

The last full triennial valuation of the Royal County of Berkshire Pension Fund was carried out as at 31 March 2016 as required under Regulation 62 of the Local Government Pension Scheme Regulations 2013 (the Regulations) and in accordance with the Funding Strategy Statement of the Fund. The results were published in the triennial valuation report dated March 2017.

2016 valuation results

The results for the Fund at 31 March 2016 were as follows:

- The Fund as a whole had a funding level of 73% i.e. the assets were 73% 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 £597m which is higher than the deficit at the previous valuation in 2013.
- To cover the cost of new benefits and to also pay off the deficit over a period of 24 years, an average total employer contribution rate of 22.0% of pensionable salaries would be required.
- However, the contribution rate for each employer was set as the cost of new benefits accruing in future plus an adjustment (expressed either as a percentage of payroll or as a lump sum payment) required to fund their individual deficit over an appropriate period.

Assumptions

The assumptions used to value the liabilities at 31 March 2016 are summarised below:

Assumption	31 March 2016
Discount rate	Unitary employers - 5.7% p.a. Non unitary employers - 5.5% p.a.
Pension increases (CPI)	2.4% p.a.
Salary increases	In line with CPI until 31 March 2020 and 3.9% p.a. thereafter
Pension increases on GMP	Funds will pay limited increases for members that have reached SPA by 6 April 2016, with the Government providing the remainder of the inflationary increase. For members that reach SPA after this date, we have assumed that Funds will be required to pay the entire inflationary increases.
Mortality	S2PMA tables with a 95% multiplier for male and female members, a 115% multiplier for male dependants and the S2DFA tables for female dependants with an 80% multiplier, with projected improvements in line with the CMI 2015 model allowing for a long term rate of improvement of 1.5% p.a.
Retirement	Each member retires at a single age, weighted based on when each part of their pension is payable unreduced
Commutation	Members will convert 50% of the maximum possible amount of pension into cash

Further details of these assumptions can be found in the relevant actuarial valuation report.

Assets

At 31 March 2016, the market value of the assets was £1,656m.

The assumptions used to value the liabilities are smoothed based on market conditions around the valuation date and the asset value used at the valuation is adjusted in a consistent manner although the difference between the smoothed and market values was not significant.

Updated position since the 2016 valuation

Since 31 March 2016, investment returns have been higher than assumed at the 2016 triennial valuation. The value placed on the liabilities will, however, have also increased due to the accrual of new benefits as well as a decrease in the real discount rate underlying the valuation funding model. Overall, we estimate that the funding position as at 31 March 2019 has improved compared with the position as at 31 March 2016 although the primary rate has also increased due to changes in market conditions.

The next formal valuation will be carried out as at 31 March 2019 with new contribution rates set from 1 April 2020.

Barry McKay FFA
Partner, Barnett Waddingham LLP

AUDIT STATEMENT - to follow

Statement of Responsibilities for the Royal County of Berkshire Pension Fund Accounts

The Royal Borough of Windsor and Maidenhead's Responsibilities

The Royal Borough is required:

- To make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. The Pension Fund Manager is the officer fulfilling that responsibility;
- To manage its affairs so as to secure economic, efficient and effective use of resources and safeguard its assets;
- To approve the Fund's statement of accounts;

The Head of Finance's Responsibilities

The Head of Finance is responsible for the preparation of the Fund's statement of accounts in accordance with proper practices set out in the CIPFA Code of Practice on Local Authority Accounting.

In preparing this statement of accounts, the Head of Finance has:

- Selected suitable accounting policies and then applied them consistently;
- Made judgements and estimates that were reasonable and prudent;
- Complied with the Code of Practice on Local Authority Accounting;
- Kept proper accounting records which were up to date;
- Taken reasonable steps for the prevention and detection of fraud and other irregularities.



Rob Stubbs
Deputy Director and Head of Finance

PENSION FUND ACCOUNTS

The Royal County of Berkshire Pension Fund fund account

2017/18 £'000		Notes	2018/19 £'000
	Dealings with members, employers and others directly involved in the Fund		
(108,591)	Contributions	7	(116,990)
(13,403)	Transfers in from other pension funds	8	(8,130)
(121,994)			(125,120)
100,493	Benefits	9	102,835
10,184	Payments to and on account of leavers	10	10,526
110,677			113,361
(11,317)	Net (additions)/withdrawals from dealings with members		(11,759)
9,204	Management expenses	11	11,093
(2,113)	Net (additions)/withdrawals including fund management expenses		(666)
	Returns on investments		
(40,770)	Investment income	12	(43,766)
3,036	Taxes on income	13	4,734
(48,421)	Profits and losses on disposal of investments and changes in the market value of investments	14	(104,482)
(86,155)	Net return on investments		(143,514)
(88,268)	Net (increase)/decrease in the net assets available for benefits during the year		(144,180)
1,923,995	Opening net assets of the scheme		2,012,263
2,012,263	Closing net assets of the scheme		2,156,443

The Royal County of Berkshire Pension Fund net assets statement

2017/18 £'000		Notes	2018/19 £'000
2,082,344	Investment assets	14	2,219,285
(63,402)	Investment liabilities	14	(67,998)
2,018,942	Total net investments		2,151,287
9,048	Current assets	21	14,814
9,048			14,814
(15,727)	Current liabilities	22	(9,658)
2,012,263	Net assets of the fund available to fund benefits at the end of the reporting period		2,156,443

The fund's financial statements do not take account of liabilities to pay pensions and others benefits after the period end. The actuarial present value of promised retirement benefits is disclosed at Note 20.

PENSION FUND ACCOUNTS

Notes to the Royal County of Berkshire Pension Fund Accounts for the year ended 31 March 2019

1 Description of Fund

The Royal County of Berkshire Pension Fund (the 'fund') is part of the Local Government Pension Scheme and is administered by the Royal Borough of Windsor and Maidenhead.

a) General

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

- The Local Government Pension Scheme Regulations 2013 (as amended)
- The Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended)
- The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016.

It is a contributory defined benefit pension scheme administered by the Royal Borough of Windsor and Maidenhead to provide pensions and other benefits for pensionable employees of the 6 unitary local authorities in the geographical region of Berkshire, and a range of other scheduled and admitted bodies. Teachers, police officers and firefighters are not included as they come within other national pension schemes.

The fund is overseen by the Pension Fund Panel, which is a committee of the Royal Borough of Windsor and Maidenhead.

b) Membership

Membership of the LGPS is voluntary. Employees are automatically enrolled into the fund and are free to choose whether to remain in the fund, opt-out of the fund, or make their own personal arrangements outside the fund.

Organisations participating in the Royal County of Berkshire Pension Fund include:

- Scheduled bodies, which are local authorities and similar bodies whose staff are automatically entitled to be members of the fund.
- Admitted bodies, which are other organisations that participate in the fund under an admission agreement between the fund and the relevant organisation. Admitted bodies include voluntary, charitable and similar bodies or private contractors undertaking a local authority function following outsourcing to the private sector.

Membership details are set out below:

	31 March 2018	31 March 2019
The Royal County of Berkshire Pension Fund		
Number of employers with active members	186	204
Number of employees in scheme		
Administering authority	1,867	1,594
Unitary authorities	12,741	13,297
Other employers	12,990	11,008
Total	27,598	25,899
Number of pensioners		
Administering authority	1,792	1,878
Unitary authorities	8,822	9,354
Other employers	6,314	6,618
Total	16,928	17,850
Deferred pensioners		
Administering authority	3,635	3,564
Unitary authorities	15,332	15,601
Other employers	6,817	7,403
Total	25,784	26,568
Total number of members in pension scheme	70,310	70,317

PENSION FUND ACCOUNTS

c) Funding

Benefits are funded by contributions and investment earnings. Contributions are made by active members of the fund in accordance with the LGPS Scheme Regulations 2013 and range from 5.5% to 12.5% of pensionable pay for the financial year ending 31 March 2019. Employers' contributions are set based on triennial actuarial funding valuations. The last such valuation was at 31 March 2016. During 2018/19, employer contribution rates ranged from 10.1% to 31.3% of pensionable pay.

d) Benefits

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

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

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

There are a range of other benefits provided under the fund including early retirement, disability pensions and death benefits. For more details, please refer to the Royal County of Berkshire Pension Fund website.

2 Basis of preparation

The Statement of Accounts summarises the fund's transactions for the 2018/19 financial year and its position at year-end as at 31 March 2019. The accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2018/19 ('the code') which is based upon International Financial Reporting Standards (IFRS), as amended for the UK public sector.

Paragraph 3.3.1.2 of the Code requires disclosure of any accounting standards issued but not yet adopted. No such accounting standards have been identified for 2018/19.

The accounts summarise the transactions of the fund and report on the net assets available to pay pension benefits. The accounts do not take account of obligations to pay pensions and benefits which fall due after the end of the financial year.

3 Summary of significant accounting policies

Fund account - revenue recognition

a) Contribution income

Normal contributions, both from the members and from the employer, are accounted for on an accruals basis. Employee's contribution rates are set in accordance with LGPS regulations. Employer's contributions are set at the percentage rate recommended by the fund actuary.

Employer deficit funding contributions are accounted for on the due dates on which they are payable under the rates and adjustments certificate set by the fund actuary.

Additional employers' contributions in respect of ill-health and early retirements are accounted for in the period in which they are due. Any amount due in year but unpaid will be classed as a current financial asset. Amounts not due until future years are classed as long-term financial assets.

b) Transfers to and from other schemes

Transfers in and out relate to members who have either joined or left the fund.

PENSION FUND ACCOUNTS

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

Transfers in from members wishing to use the proceeds of their additional voluntary contributions (see note 3m) to purchase fund benefits are accounted for on a receipts basis and are included in transfers In (see Note 8).

Bulk (group) transfers are accounted for on an accruals basis in accordance with the terms of the transfer agreement.

c) Investment income

i) Interest income

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

ii) Dividend income

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

iii) Distributions from pooled funds

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

iv) Movement in the net market value of investments

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

Fund Account - expense items

d) Benefits payable

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

e) Taxation

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

f) Management expenses

The fund discloses its pension fund management expenses in accordance with the CIPFA guidance *Accounting for Local Government Pension Scheme Management Costs (2016)*. All items of expenditure are charged to the fund on an accruals basis as follows:

Administrative expenses

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

Oversight and governance costs

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

Investment management expenses

Fees of the external investment manager and custodian are agreed in the respective mandates governing their appointments. Most are based on the market value of the investments under their management and therefore increase or reduce as the value of these investments change, but there are a number of fixed price contracts with annual inflation related increases.

Net Assets Statement

g) Financial assets

Financial assets are included in the net assets statement on a fair value basis as at the reporting date. A financial asset is recognised in the net assets statement on the date the fund becomes party to the contractual acquisition of the asset. From this date, any gains or losses arising from changes in the fair value of the asset are recognised in the fund account.

The values of investments as shown in the net assets statement have been determined at fair value in accordance with the requirements of the Code and IFRS13 (see note 16). For the purposes of disclosing levels of fair value hierarchy, the fund has adopted the classification guidelines recommended in Practical Guidance on Investment Disclosures (PRAG/Investment Association, 2016).

h) Foreign currency transactions

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

i) Derivatives

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

j) Cash and cash equivalents

Cash comprises cash in hand and demand deposits and includes amounts held by the fund's external managers.

Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash and that are subject to minimal risk of changes in value.

k) Financial liabilities

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

l) Actuarial present value of promised retirement benefits

The actuarial present value of promised retirement benefits is assessed on a triennial basis by the fund actuary in accordance with the requirements of International Accounting Standards (IAS19) and relevant actuarial standards.

As permitted under the code, the fund has opted to disclose the actuarial present value of promised retirement benefits by way of a note to the net assets statement (Note 20).

m) Additional voluntary contributions

The Royal County of Berkshire Pension Fund provides an additional voluntary contributions (AVC) scheme for its members, the assets of which are invested separately from those of the pension fund.

AVCs are not included in the accounts in accordance with section 4(1)(b) of the LGPS (Management and Investment of Funds) Regulations 2016 but are disclosed as a note only (Note 23).

n) Contingent assets and contingent liabilities

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

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

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

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4 Critical judgements in applying accounting policies

Pension fund liability

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

This estimate is subject to significant variances based on changes to the underlying assumptions which are agreed with the actuary and have been summarised in Note 20.

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

5 Assumptions made about the future and other major sources of estimation uncertainty

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

The items in the financial statements and notes at 31 March 2019 for which there is a significant risk of material adjustment in the forthcoming financial year are as follows:

Item	Uncertainties	Effect if actual results differ from assumptions
Actuarial present value of promised retirement benefits	Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on pension fund assets. A firm of consulting actuaries is engaged to provide the fund with expert advice about the assumptions to be applied.	The effects on the net pension liability of changes in individual assumptions can be measured. For instance, a 0.1% increase in the discount rate assumption would result in a decrease in the pension liability of approximately £84.2 million. A 0.1% increase in the long term salary increases assumption would increase the value of liabilities by approximately £7.3 million, and a one-year increase in assumed life expectancy would increase the liability by approximately £157.5 million.
Private equity investments	Private equity investments are valued at fair value in accordance with the International Private Equity and Venture Capital Board guidelines. These investments are not publicly listed and as such there is a degree of estimation involved in the valuation.	The total private equity investments in the financial statements are £697 million. There is a risk that this investment may be under- or overstated in the accounts.

6 Events after the balance sheet date

There have been no events since 31 March 2019, and up to the date when these accounts were authorised, that require any adjustments to these accounts.

7 Contributions receivable

By category

2017/18 £'000		2018/19 £'000
26,650	Employees' contributions	27,654
	Employers' contributions	
61,089	Normal contributions	64,323
18,602	Deficit recovery contributions	22,604
2,250	Augmentation contributions	2,409
81,941	Total employer's contributions	89,336
108,591		116,990

PENSION FUND ACCOUNTS

By type of employer

2017/18		2018/19
£'000		£'000
98,681	Scheduled bodies	105,180
4,657	Admitted bodies	5,761
5,253	Transferee admission body	6,049
108,591		116,990

8 Transfers in from other pension funds

2017/18		2018/19
£'000		£'000
13,356	Individual transfers from other pension funds	8,055
47	AVC to purchase scheme benefits	75
13,403		8,130

9 Benefits payable

By category

2017/18		2018/19
£'000		£'000
80,065	Pensions	85,105
17,520	Commutation and lump sum retirement benefits	15,674
2,908	Lump sum death benefits	2,056
100,493		102,835

By type of employer

2017/18		2018/19
£'000		£'000
91,265	Scheduled bodies	93,126
6,554	Admitted bodies	6,987
2,674	Transferee admission body	2,722
100,493		102,835

10 Payments to and on account of leavers

2017/18		2018/19
£'000		£'000
478	Refunds to members leaving service	485
9,706	Individual transfers to other pension funds	10,041
10,184		10,526

11 Management expenses

2017/18		2018/19
£'000		£'000
1,342	Administrative costs	1,349
7,816	Investment management expenses	9,698
46	Oversight and governance costs	46
9,204		11,093

a) Investment management expenses

2017/18		2018/19
£'000		£'000
7,583	Management Fees	9,414
233	Custody Fees	284
7,816		9,698

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12 Investment income

2017/18 £'000		2018/19 £'000
19,090	Income from equities	14,080
2,348	Income from bonds	2,874
7,671	Private equity income	15,151
9,199	Pooled property investments	9,153
1,616	Pooled investments - unit trusts & other managed funds	733
846	Interest on cash deposits	1,775
40,770	Total before taxes	43,766

13 Other fund account disclosures

a) Taxes on income

2017/18 £'000		2018/19 £'000
1,064	Withholding tax - equities	583
1,342	Withholding tax - pooled property investments	175
630	Withholding tax - pooled investments	3,976
3,036		4,734

b) External audit costs

2017/18 £'000		2018/19 £'000
30	Payable in respect of external audit	21
30		21

14 Investments

Market value 31 March 2018 £'000		Market value 31 March 2019 £'000
	Investment assets	
100,456	Bonds	36,453
458,806	Equities	23,588
332,724	Pooled investments	997,973
295,208	Pooled liquidity funds	137,972
271,613	Pooled property investments	294,011
583,269	Private equity	696,663
	Derivative contracts:	
3,929	- Forward currency contracts	413
32,836	Cash deposits	29,819
3,503	Investment income due	2,393
-	- Amounts receivable for sales	-
2,082,344	Total investment assets	2,219,285
	Investment liabilities	
	Derivative contracts:	
(289)	- Forward currency contracts	(4,471)
(63,113)	- Longevity Insurance Policy	(63,527)
(63,402)	Total investment liabilities	(67,998)
2,018,942	Net investment assets	2,151,287

PENSION FUND ACCOUNTS

a) Reconciliation of movements in investments and derivatives

	Market value 1 April 2018	Purchases during the year and derivative payments	Sales during the year & derivative receipts	Change in market value during the year	Market value 31 March 2019
	£'000	£'000	£'000	£'000	£'000
Bonds	100,456	363	(65,709)	1,343	36,453
Equities	458,806	75,282	(500,474)	(10,026)	23,588
Pooled investments	332,724	646,906	(24,147)	42,490	997,973
Pooled liquidity funds	295,208	323,728	(482,068)	1,104	137,972
Pooled property investments	271,613	27,442	(20,338)	15,294	294,011
Private equity	583,269	138,288	(125,532)	100,638	696,663
	2,042,076	1,212,009	(1,218,268)	150,843	2,186,660
Derivative contracts:					
- Forward currency contracts	3,640	82,870	(49,600)	(40,968)	(4,058)
- Longevity insurance policy	(63,113)	6,760	-	(7,174)	(63,527)
	1,982,603	1,301,639	(1,267,868)	102,701	2,119,075
Other investment balances:					
- Cash deposits	32,836			1,781	29,819
- Amount receivable for sales of investments	-				-
- Investment income due	3,503				2,393
Net investment assets	2,018,942			104,482	2,151,287

	Market value 1 April 2017	Purchases during the year and derivative payments	Sales during the year & derivative receipts	Change in market value during the year	Market value 31 March 2018
	£'000	£'000	£'000	£'000	£'000
Bonds	84,320	20,347	-	(4,211)	100,456
Equities	471,187	77,408	(77,447)	(12,342)	458,806
Pooled investments	387,279	763	(44,218)	(11,100)	332,724
Pooled liquidity funds	81,518	320,537	(105,647)	(1,200)	295,208
Pooled property investments	259,548	25,283	(45,730)	32,512	271,613
Private equity	580,664	128,326	(128,686)	2,965	583,269
	1,864,516	572,664	(401,728)	6,624	2,042,076
Derivative contracts:					
- Forward currency contracts	20,606	28,105	(97,689)	52,618	3,640
- Longevity insurance policy	(64,200)	6,894	-	(5,807)	(63,113)
	1,820,922	607,663	(499,417)	53,435	1,982,603
Other investment balances:					
- Cash deposits	31,119			(5,014)	32,836
- Amount receivable for sales of investments	61,141				-
- Investment income due	3,120				3,503
Net investment assets	1,916,302			48,421	2,018,942

Purchases and sales of derivatives are recognised in note 14a above as follows:

Forward currency contracts - forward foreign exchange contracts settled during the period are reported on a gross basis as gross receipts and payments.

Longevity insurance policy - the payments or receipts under the contract are reported in the above reconciliation table.

PENSION FUND ACCOUNTS

b) Analysis of investments

31 March 2018 £'000		31 March 2019 £'000
	Investment assets	
	Bonds	
	Overseas	
100,456	Corporate quoted	36,453
100,456		36,453
	Equities	
	UK	
95,766	Quoted	23,588
	Overseas	
363,040	Quoted	-
458,806		23,588
	Pooled investments - additional analysis	
	UK	
221,673	Unit Trusts	935,447
	Overseas	
111,051	Unit Trusts	62,526
332,724		997,973
	Other investment assets	
295,208	Pooled liquidity funds	137,972
271,613	Pooled property investments	294,011
583,269	Private Equity	696,663
3,929	Derivative contracts - Forward Currency Contrac	413
32,836	Cash deposits	29,819
3,503	Investment income due	2,393
1,190,358		1,161,271
2,082,344	Total investment assets	2,219,285
	Investment liabilities	
	(289) Derivative contracts - Forward Currency Contrac	(4,471)
	(63,113) Derivative contracts - Longevity insurance policy	(63,527)
(63,402)	Total investment liabilities	(67,998)
2,018,942	Net investment assets	2,151,287

c) Investments analysed by fund manager

Market value 31 March 2018		Market value 31 March 2019	
£'000	%	£'000	%
-	-	2,151,287	100.0
1,342,739	66.5	-	-
221,659	11.0	-	-
242,880	12.0	-	-
207,192	10.3	-	-
4,472	0.2	-	-
2,018,942		2,151,287	

In June 2018 the fund transferred the management of all investment assets to Local Pensions Partnership (LPP) Investments as part of the government's LGPS pooling initiative.

All the above organisations are registered in the United Kingdom.

PENSION FUND ACCOUNTS

The following investments represent more than 5% of the net assets of the fund

Investment	Market value 31 March 2018 £'000	% of total fund	Market value 31 March 2019 £'000	% of total fund
Aviva Global Real Estate	153,161	7.6	167,515	7.8
LPPI Global Equities Fund	-	-	624,010	28.9

15 a) Analysis of derivatives

Objectives and policies for holding derivatives

Most of the holding in derivatives is to hedge liabilities or hedge exposures to reduce risk in the fund. Derivatives may be used to gain exposure to an asset more efficiently than holding the underlying asset. The use of derivatives is managed in line with the investment management agreement agreed between the fund and the various investment managers.

- Forward foreign currency

To maintain appropriate diversification and to take advantage of overseas investment returns, a significant proportion of the fund's portfolio is in overseas assets. To reduce the volatility associated with fluctuating currency rates, the fund has a passive currency programme in place with an external manager.

- Longevity Insurance Policy

In December 2009 the fund entered into an insurance contract with ReAssure Ltd to cover a closed group of pensioner members. The fund pays ReAssure a pre-determined fixed annual premium and ReAssure reimburses the fund for pensions paid to the insured members. The contract is valued by an external firm of actuaries by considering what adjustment to the discount rate assumption (based on the Merrill Lynch LIBOR swap curve) would be required if the contract had a zero value at the date of inception. A similar adjustment is then made to the discount rate assumption at the accounting date to calculate the updated value of the contract.

Open forward currency contracts

Settlement	Currency bought	Local value '000	Currency sold	Local value '000	Asset value £000	Liability value £000
One to six months	JPY	3,315,270	GBP	(22,792)	247	
One to six months	CHF	9,707	GBP	(7,379)	128	
One to six months	BRL	4,912	USD	(1,231)	19	
One to six months	INR	210,456	USD	(2,986)	13	
One to six months	SGD	4,295	USD	(3,170)	4	
One to six months	SGD	1,732	USD	(1,279)	1	
One to six months	CLP	854,185	USD	(1,254)	1	
One to six months	KRW	1,506,376	USD	(1,328)		(0)
One to six months	INR	103,530	USD	(1,479)		(1)
One to six months	MXN	22,268	USD	(1,136)		(2)
One to six months	MXN	64,035	USD	(3,267)		(6)
One to six months	KRW	3,521,028	USD	(3,125)		(17)
One to six months	TRY	7,841	USD	(1,331)		(28)
One to six months	CLP	2,100,764	USD	(3,144)		(43)
One to six months	BRL	12,080	USD	(3,148)		(47)
One to six months	GBP	12,845	AUD	(23,820)		(108)
One to six months	TRY	16,676	USD	(2,898)		(110)
One to six months	GBP	12,629	CAD	(22,228)		(114)
One to six months	GBP	12,341	NOK	(139,950)		(120)
One to six months	GBP	86,160	EUR	(100,042)		(284)
One to six months	GBP	643,950	USD	(847,108)		(3,591)
Open forward currency contracts at 31 March 2019					413	(4,471)
Net forward currency contracts at 31 March 2019						(4,058)
Prior year comparative						
Open forward currency contracts at 31 March 2018					3,929	(289)
Net forward currency contracts at 31 March 2018						3,640

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16 Fair value - Basis of valuation

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

Description of asset	Valuation hierarchy	Basis of valuation	Observable and unobservable inputs	Key sensitivities affecting the valuations provided
Market quoted investments	Level 1	Published bid market price ruling on the final day of the accounting period	Not required	Not required
Quoted bonds	Level 1	Fixed interest securities are valued at a market value based on current yields	Not required	Not required
Exchange traded pooled investments	Level 1	Closing bid values on published exchanges	Not required	Not required
Forward foreign exchange derivatives	Level 2	Market forward exchange rates at the year-end	Exchange rate risk	Not required
Pooled investments - overseas unit trusts and property funds	Level 2	Closing bid price where bid and offer prices are published Closing single price where single price published	NAV-based pricing set on a forward pricing basis	Not required
Unquoted equity	Level 3	Comparable valuation of similar companies in accordance with <i>International Private Equity and venture Capital Guidelines (2012)</i>	EBITDA multiple Revenue multiple Discount for lack of marketability Control premium	Valuations could be affected by material events occurring between the date of the financial statements provided and the pension fund's own reporting date, by changes to expected cash flows, and by any differences between audited and unaudited accounts

Sensitivity of assets valued at level 3

Having analysed historical data and current market trends the fund has determined that the valuation methods described above are likely to be accurate to within the following ranges, and has set out below the consequent potential impact on the closing value of investments held at 31 March 2019.

	Assessed valuation range (+/-)	Value at 31 March 2019	Value on increase	Value on decrease
		£'000	£'000	£'000
Private equity	4%	696,663	724,529	668,796
Total		696,663	724,529	668,796

a) Fair value hierarchy

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

Level 1

Assets and liabilities at level 1 are those where the fair values are derived from unadjusted quoted prices in active markets for

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identical assets or liabilities. Products classified as Level 1 comprise quoted equities, quoted fixed securities and quoted index linked securities.

Level 2

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

Level 3

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

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

	Quoted market price	Using observable inputs	With significant unobservable inputs	Total
Values at 31 March 2019	Level 1 £'000	Level 2 £'000	Level 3 £'000	£'000
Financial assets at fair value through profit and loss	951,316	245,083	990,674	2,187,073
Financial liabilities at fair value through profit and loss	(4,471)		(63,527)	(67,998)
Net investment assets	946,845	245,083	927,147	2,119,075

	Quoted market price	Using observable inputs	With significant unobservable inputs	Total
Values at 31 March 2018	Level 1 £'000	Level 2 £'000	Level 3 £'000	£'000
Financial assets at fair value through profit and loss	814,103	377,010	854,882	2,045,995
Financial liabilities at fair value through profit and loss	(279)		(63,113)	(63,392)
Net investment assets	813,824	377,010	791,769	1,982,603

b) Reconciliation of fair value measurements within level 3

	Market value 31 March 2018	Purchases during the year	Sales during the year	Unrealised gains/ (losses)	Realised gains/ (losses)	Market value 31 March 2019
	£'000	£'000	£'000	£'000	£'000	£'000
Private equity	583,269	138,288	(125,532)	65,188	35,450	696,663
	583,269	138,288	(125,532)	65,188	35,450	696,663

17 Financial instruments

a) Classification of financial instruments

The following table analyses the carrying amounts of financial assets and liabilities by category and net assets statement heading.

Fair value through profit and loss	Loans and receivables	Financial liabilities at amortised cost	Fair value through profit and loss	Loans and receivables	Financial liabilities at amortised cost
31 March 2018			31 March 2019		
£'000	£'000	£'000	£'000	£'000	£'000

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			Financial assets		
100,456			Bonds	36,453	
458,806			Equities	23,588	
332,724			Pooled investments	997,973	
295,208			Pooled liquidity funds	137,972	
271,613			Pooled property investments	294,011	
583,269			Private equity	696,663	
3,929			Derivative contracts	413	
	36,131		Cash		39,098
	3,503		Other investment balances		2,393
	5,753		Debtors		5,535
2,046,005	45,387	-		2,187,073	47,026
			Financial liabilities		
(63,402)			Derivative contracts	(67,998)	
		(15,727)	Creditors		(9,658)
(63,402)	-	(15,727)		(67,998)	-
1,982,603	45,387	(15,727)		2,119,075	47,026
					(9,658)

b) Net gains and losses on financial instruments

31 March 2018		31 March 2019
£'000		£'000
53,435	Fair value through profit and loss	102,701
(5,014)	Loans and receivables	1,781
48,421	Total	104,482

The authority has not entered into any financial guarantees that are required to be accounted for as financial instruments.

18 Nature and extent of risks arising from financial instruments

Risk and risk management

The fund's primary long-term risk is that its assets will fall short of its liabilities (i.e. promised benefits payable to members). Therefore the aim of investment risk management is to minimise the risk of an overall reduction in the value of the fund and to maximise the opportunity for gains across the whole fund portfolio. The fund achieves this through asset diversification to reduce exposure to market risk (price risk, currency risk, and interest rate risk) and credit risk to an acceptable level. In addition, the fund manages its liquidity risk to ensure there is sufficient liquidity to meet the fund's forecast cash flows. The fund manages these investment risks as part of its overall pension fund risk management programme.

Responsibility for the fund's risk management strategy rests with the pension fund panel. Risk management policies are established to identify and analyse the risks faced by the pension fund's operations. Policies are reviewed regularly to reflect changes in activity and in market conditions.

a) Market risk

Market risk is the risk of loss from fluctuations in equity and commodity prices, interest and foreign exchange rates and credit spreads. The fund is exposed to market risk from its investment activities, particularly through its equity holdings. The level of risk exposure depends on market conditions, expectations of future price and yield movements and the asset mix.

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

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

The fund manages these risks in two ways:

- the exposure of the fund to market risk is monitored through a factor risk analysis, to ensure that risk remains within tolerable levels
- specific risk exposure is limited by applying risk-weighted maximum exposures to individual investments.

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

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Equity futures contracts and exchange traded option contracts on individual securities may also be used to manage market risk on specific aspects of market risk.

Other price risk

Other price risk represents the risk that the value of a financial instrument will fluctuate as a result of changes in market prices (other than those arising from interest rate risk or foreign exchange risk), whether those changes are caused by factors specific to the individual instrument or its issuer or factors affecting all such instruments in the market.

The fund is exposed to share and derivative price risk. This arises from investments held by the fund for which the future price is uncertain. All securities investments present a risk of loss of capital. Except for shares sold short, the maximum risk resulting from financial instruments is determined by the fair value of the financial instruments.

The fund mitigates this price risk through diversification and the selection of securities and other financial instruments is monitored to ensure it is within limits specified in the fund investment strategy.

Other price risk - sensitivity analysis

Following analysis of historical data and expected investment return during the financial year the council has determined that the following movements in market price risk are reasonably possible for the 2019/20 reporting period:

Asset type	Potential market movements (+/-)
Bonds	7.4%
Equities - listed	17.2%
Equities - unlisted	24.9%
Private Equity	24.9%
Private Equity - Credit	7.4%
Private Equity - Infrastructure	17.6%
Pooled investments - Equity	17.2%
Pooled investments - Bonds	6.3%
Pooled investments - Credit	7.4%
Pooled investments - Diversifying strategies	8.7%
Pooled Property Funds	18.8%

The potential price changes disclosed above are broadly consistent with a one-standard deviation movement in the value of the assets. This analysis assumes that all other variables, in particular foreign currency exchange rates and interest rates, remain the same.

Had the market price of the fund investments increased/decreased in line with the above, the change in the net assets available to pay benefits in the market price would have been as follows (with prior year comparator):

Asset type	Value as at 31 March 2019	Potential market movement	Value on increase	Value on decrease
	£'000	£'000	£'000	£'000
Investment portfolio assets:				
Bonds	36,453	2,698	39,150	33,755
Equities - listed	-	-	-	-
Equities - unlisted	23,588	5,874	29,462	17,715
Pooled investments - Equity	847,473	145,765	993,238	701,708
Pooled investments - Bonds	64,597	4,070	68,667	60,527
Pooled investments - Credit	6,979	516	7,495	6,463
Pooled investments - Div. strategies	78,924	6,866	85,790	72,057
Pooled liquidity funds	137,972	-	137,972	137,972
Pooled Property Funds	294,011	55,274	349,285	238,737
Private Equity	263,253	65,550	328,803	197,703
Private Equity - Credit	234,361	17,343	251,703	217,018
Private Equity - Infrastructure	199,049	35,033	234,081	164,016
Net derivative liabilities	(67,585)	-	(67,585)	(67,585)
Cash deposits	29,819	-	29,819	29,819
Investment income due	2,393	-	2,393	2,393
Current assets:				

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Debtors	5,536	-	5,536	5,536
Cash balances	9,279	-	9,279	9,279
Current liabilities	(9,658)	-	(9,658)	(9,658)
Total	2,156,443		2,495,432	1,817,456

Asset type	Value as at 31 March 2018	Potential market movement	Value on increase	Value on decrease
	£'000	£'000	£'000	£'000
Investment portfolio assets:				
Bonds	100,456	7,434	107,890	93,022
Equities - listed	447,612	76,989	524,602	370,623
Equities - unlisted	11,194	2,787	13,981	8,407
Pooled investments - Equity	239,977	41,276	281,253	198,701
Pooled investments - Bonds	-	-	-	-
Pooled investments - Credit	9,271	686	9,957	8,585
Pooled investments - Div. strategies	83,476	7,262	90,738	76,213
Pooled liquidity funds	295,208	-	295,208	295,208
Pooled Property Funds	271,613	51,063	322,676	220,549
Private Equity	250,203	62,301	312,504	187,902
Private Equity - Credit	204,089	15,103	219,192	188,986
Private Equity - Infrastructure	128,977	22,700	151,677	106,277
Net derivative liabilities	(59,473)	-	(59,473)	(59,473)
Cash deposits	32,836	-	32,836	32,836
Investment income due	3,503	-	3,503	3,503
Current assets:				
Debtors	5,753	-	5,753	5,753
Cash balances	3,295	-	3,295	3,295
Current liabilities	(15,727)	-	(15,727)	(15,727)
Total	2,012,263		2,299,866	1,724,660

Interest rate risk

The fund invests in financial assets for the primary purpose of obtaining a return on investments. These investments are subject to interest rate risks, which represent the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

The fund's direct exposure to interest rate movements as at 31 March 2019 and 31 March 2018 is set out below. These disclosures present interest rate risk based on the underlying financial assets at fair value.

Interest rate risk sensitivity analysis

The fund recognises that interest rates can vary and can affect both income to the fund and the value of the net assets available to pay benefits. A 100 basis point (BPS) movement in interest rates is consistent with the level of sensitivity applied as part of the fund's risk management strategy.

1 BPS is the movement of 0.01% between two percentages, for example from 0.50% to 0.51%. Therefore 100BPS is the movement of 1.00% between two percentages, for example from 0.50% to 1.50%.

The analysis that follows assumes that all other variables, in particular exchange rates, remain constant, and shows the effect in the year on the net assets available to pay benefits of a \pm 100 BPS change in interest rates:

Asset exposed to interest rate risk	Value as at 31 March 2019	Change in year in the net assets available to pay benefits	
		+ 100 BPS	- 100 BPS
	£'000	£'000	£'000
Investments - Pooled liquidity funds	137,972	-	-
Investments - Cash deposits	29,819	-	-
Current assets - Cash balances	9,279	-	-
Bonds	36,453	(1,094)	1,094

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Total change in assets available	213,523	(1,094)	1,094
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Asset exposed to interest rate risk	Value as at 31 March 2018	Change in year in the net assets available to pay benefits	
		+ 100 BPS	- 100 BPS
	£'000	£'000	£'000
Investments - Pooled liquidity funds	295,208	-	-
Investments - Cash deposits	32,836	-	-
Current assets - Cash balances	3,295	-	-
Bonds	100,456	(4,379)	4,379
Total change in assets available	431,795	(4,379)	4,379

Income exposed to interest rate risk	Amount receivable in year ending 31 March 2019	Effect on income values	
		+ 100 BPS	- 100 BPS
	£'000	£'000	£'000
Cash balances/cash and cash equivalents	1,775	1,678	(1,678)
Bonds	2,874	-	-
Total change in income receivable	4,649	1,678	(1,678)

Income exposed to interest rate risk	Amount receivable in year ending 31 March 2018	Effect on income values	
		+ 100 BPS	- 100 BPS
	£'000	£'000	£'000
Cash balances/cash and cash equivalents	846	3,280	(3,280)
Bonds	2,348	-	-
Total change in income receivable	3,194	3,280	(3,280)

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

Currency risk

Currency risk represents the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates. The fund is exposed to currency risk on financial instruments that are denominated in any currency other than the functional currency of the fund GBP. The fund holds both monetary and non-monetary assets denominated in currencies other than GBP.

Currency risk - sensitivity analysis

The table below shows the value of assets held by the fund in foreign currencies and the likely volatility associated with foreign exchange rate movements (as measured by one standard deviation).

This analysis assumes that all other variables, in particular interest rates, remain constant.

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Denominated currency	Value as at 31 March 2019 £'000	Potential volatility (+/-)	Value on increase £'000	Value on decrease £'000
AUD	16,617	9.2%	18,150	15,083
CAD	4	9.0%	4	3
CHF	395	7.8%	426	365
EUR	1,058	6.9%	1,131	985
JPY	28	9.1%	31	25
NOK	221	8.5%	240	202
NZD	19,937	9.2%	21,777	18,097
SEK	-	8.5%	-	-
USD	159,635	8.4%	173,092	146,177
Emerging markets	-	8.7%	-	-
Total	197,895		214,851	180,937

Denominated currency	Value as at 31 March 2018 £'000	Potential volatility (+/-)	Value on increase £'000	Value on decrease £'000
AUD	29,825	9.2%	32,578	27,073
CAD	2,618	9.0%	2,854	2,383
CHF	23,815	7.8%	25,668	21,963
EUR	77,374	6.9%	82,736	72,012
JPY	26,890	9.1%	29,340	24,441
NOK	13,221	8.5%	14,338	12,104
NZD	19,799	9.2%	21,626	17,971
SEK	5,317	8.5%	5,766	4,867
USD	353,067	8.4%	382,831	323,304
Emerging markets	23,806	8.7%	25,877	21,735
Total	575,732		623,614	527,853

b) Credit risk

Credit risk represents the risk that the counterparty to a transaction or a financial instrument will fail to discharge an obligation and cause the fund to incur a financial loss. The market values of investments generally reflect an assessment of credit in their pricing and consequently the risk of loss is implicitly provided for in the carrying value of the fund's financial assets and liabilities.

The selection of high quality counterparties, brokers and financial institutions minimises credit risk that may occur through the failure to settle a transaction in a timely manner.

Deposits are not made with banks and financial institutions unless they are rated independently and meet the funds's credit criteria. The fund has also set limits as to the maximum deposit placed with any one class of financial institution. In addition, the fund invests an agreed amount of its funds in the money markets to provide diversification.

The fund believes it has managed its exposure to credit risk, and has had no experience of default or uncollectable deposits over the past five financial years. The fund's cash holding under its treasury management arrangements at 31 March 2019 was £177.1m (31 March 2018: £331.3m). This was held with the following institutions:

	Rating	Balances as at 31 March 2018 £'000	Balances as at 31 March 2019 £'000
Money Market funds			
Aviva	AAA	41,090	17,286
JP Morgan	AAA	177,106	77,334
Legal & General	AAA	36,009	26,207
Northern Trust	AAA	41,002	17,146
Bank deposit accounts			
JP Morgan	AA-	32,836	29,819
Bank current accounts			
Lloyds	A+	3,295	9,279
Total		331,338	177,071

c) Liquidity risk

Liquidity risk represents the risk that the fund will not be able to meet its financial obligations as they fall due. The fund therefore takes steps to ensure that it has adequate cash resources to meet its commitments.

The fund defines liquid assets as assets that can be converted to cash within three months. Illiquid assets are those which will take longer than three months to convert to cash. As at 31 March 2019 the value of illiquid assets was £990.6m, which represented 45.9% of the total fund net assets (31 March 2018: £854.9m, which represented 42.5% of the total fund net assets).

Refinancing risk

The key risk is that the fund will be bound to replenish a significant proportion of its pension fund financial instruments at a time of unfavourable interest rates. The fund does not have any financial instruments that have a refinancing risk as part of its treasury management and investment strategies.

19 Funding arrangements

In line with the Local Government Pension Scheme Regulations 2013, the fund's actuary undertakes a funding valuation every three years for the purpose of setting employer contribution rates for the forthcoming triennial period. The last such valuation took place as at 31 March 2016. The next valuation will take place as at 31 March 2019.

The key elements of the funding policy are:

- to ensure the long-term solvency of the fund, i.e. that sufficient funds are available to meet all pension liabilities as they fall due for payment
- to ensure that employer contribution rates are as stable as possible
- to minimise the long-term cost of the fund by recognising the link between assets and liabilities and adopting an investment strategy that balances risk and return
- to reflect the different characteristics of employing bodies in determining contribution rates where the administering authority considers it reasonable to do so
- to use reasonable measures to reduce the risk to other employers and ultimately to the council tax payer from an employer defaulting on its pension obligations.

The aim is to achieve 100% solvency over a period of 24 years from the valuation date and to provide stability in employer contribution rates by spreading any increases in rates over a period of time. Solvency is achieved when the funds held, plus future expected investment returns and future contributions, are sufficient to meet expected future pension benefits payable.

At the 2016 actuarial valuation, the fund was assessed as 73% funded (75% at the March 2013 valuation). This corresponded to a deficit of 597 million (2013 valuation: 527 million) at that time.

At the 2016 actuarial valuation the average required employer contribution to restore the funding position to 100% over the next 24 years was 22.0% of pensionable pay.

The valuation of the fund has been undertaken using the projected unit method under which the salary increase for each member is assumed to increase until they leave active service by death, retirement or withdrawal from service. The principal assumptions were:

Financial assumptions

Discount Rate	5.7% per annum for unitary authorities, 5.5% for other employers
Pension and Deferred Pension Increases	2.4% per annum
Short term pay increases	CPI for period from 31 March 2016 to 31 March 2020
Long term pay increases	3.9% per annum

Mortality assumptions

Current mortality	95% of the S2PA tables
Mortality Projection	2015 CMI Model with a long-term rate of improvement of 1.5% p.a

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Commutation assumption

It is assumed that members at retirement will commute pension to provide a lump sum of 50% of the maximum allowed under HMRC rules and this will be at a rate of £12 lump sum of £1 of pension.

20 Actuarial present value of promised retirement benefits

In addition to the triennial funding valuation, the fund's actuary also undertakes a valuation of the pension fund liabilities, on an IAS 19 basis, using the same base data as the funding valuation rolled forward to the current financial year, taking account of changes in membership numbers and updating assumptions to the current year. This valuation is not carried out on the same basis as that used for setting fund contribution rates and the fund accounts do not take account of liabilities to pay pensions and other benefits in the future.

In order to assess the value of the benefits on this basis, the actuary has updated the actuarial assumptions (set out below) from those used for funding purposes (see Note 19). The actuary has also used valued ill health and death benefits in line with IAS 19.

Calculated on an IAS19 basis, the actuarial present value of promised retirement benefits at 31 March 2019 was £4,413 million (31 March 2018: £4,264 million). The net assets available to pay benefits as at 31 March 2019 was £2,156 million (31 March 2018: £2,010 million). The implied fund deficit as at March 2019 was therefore £2,258 million (31 March 2018: £2,254 million).

As noted above, the liabilities above are calculated on an IAS 19 basis and therefore differ from the results of the 2016 triennial funding valuation (see Note 19) because IAS 19 stipulates a discount rate rather than a rate which reflects market rates.

IAS19 assumptions used

Inflation/pension increase rate assumption	2.40%
Salary increase rate	3.90%
Discount rate	2.40%

21 Current assets

31 March 2018		31 March 2019
£'000		£'000
5,157	Contributions due	4,750
596	Sundry debtors	785
5,753	Debtors	5,535
3,295	Cash balances	9,279
9,048		14,814

Analysis of debtors

31 March 2018		31 March 2019
£'000		£'000
1,549	Other local authorities	2,138
4,204	Other entities & individuals	3,397
5,753		5,535

22 Current liabilities

31 March 2018		31 March 2019
£'000		£'000
(15,727)	Sundry creditors	(9,658)
(15,727)		(9,658)

Analysis of creditors

31 March 2018		31 March 2019
£'000		£'000
(902)	Central government bodies	(968)
(11,940)	Other local authorities	(5,051)
(2,885)	Other entities & individuals	(3,639)
(15,727)		(9,658)

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23 Additional voluntary contributions

Market value 31 March 2018 £'000		Market value 31 March 2019 £'000	
13,874	Prudential	13,861	
4	Equitable Life	4	
18	Clerical Medical	18	
13,896	Total	13,883	

AVC Contributions of £1.914 million were paid directly to Prudential during the year (2017/18: £2.051 million).

24 Related party transactions

The Royal Borough of Windsor and Maidenhead

The Royal County of Berkshire Pension Fund is administered by The Royal Borough of Windsor and Maidenhead. During the reporting period, The Royal Borough of Windsor and Maidenhead incurred costs of £1.349m (2017/18 £1.342m) in relation to the administration of the fund and was subsequently reimbursed by the fund for these expenses. The council is also the 6th largest employer in the pension fund (by contributions paid) and contributed £10.9m (2017/18 £9.7m).

Governance

No members of the pension fund panel are in receipt of pension benefits from The Royal County of Berkshire Pension Fund.

Each member of the pension fund panel is required to declare their interests at each meeting.

Key management personnel

The disclosures required by Regulation 7(2)-(4) of the Accounts and Audit (England) Regulations can be found in the main accounts of The Royal Borough of Windsor and Maidenhead.

25 Contingent liabilities and contractual commitments

Outstanding capital commitments (investments) at 31 March 2019 totalled £314.621m (31 March 2018: £321.046m).

These commitments relate to outstanding call payments due on unquoted limited partnership funds held in the private equity and infrastructure parts of the portfolio. The amounts "called" by these funds are irregular in both size and timing.

26 Contingent assets

Several admitted body employers in the Royal County of Berkshire Pension Fund hold insurance bonds to guard against the possibility of being unable to meet their pension obligations. These funds are drawn in favour of the pension fund and payment will only be triggered in the event of employer default.

Royal County of Berkshire Pension Fund

Pension accounting disclosure as at 31 March 2019
Prepared in accordance with IAS26

Barnett Waddingham LLP

23 May 2019

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Introduction

We have been instructed by the Royal Borough of Windsor and Maidenhead, the administering authority to the Royal County of Berkshire Pension Fund (the Fund), to undertake pension expense calculations in respect of pension benefits provided by the Local Government Pension Scheme (the LGPS) to members of the Fund as at 31 March 2019. We have taken account of current LGPS Regulations, as amended, as at the date of this report.

This report is addressed to the administering authority and its advisers; in particular, this report is likely to be of relevance to the Fund's auditor.

These figures are prepared in accordance with our understanding of IAS26. In calculating the disclosed numbers we have adopted methods and assumptions that are consistent with IAS19.

This advice complies with Technical Actuarial Standard 100: Principles for Technical Actuarial Work (TAS 100).

The LGPS is a defined benefit statutory scheme administered in accordance with the Local Government Pension Scheme Regulations 2013 and currently provides benefits based on career average revalued earnings.

Please note that no allowance has been made for the recent McCloud judgement which relates to age discrimination within the New Judicial Pension Scheme. It is currently unclear how this judgement may affect LGPS members' past or future service benefits. We continue to participate in discussions with the governing bodies of the LGPS to understand how this may affect mechanisms within the scheme, however, at the time of producing the report no guidance or indication of the likely impact of this ruling has been provided to funds.

Valuation data

Data sources

In completing our calculations for pension accounting purposes we have used the following items of data, which we received from the Royal Borough of Windsor and Maidenhead:

- The results of the valuation as at 31 March 2016 which was carried out for funding purposes and the results of the 31 March 2018 IAS26 report which was carried out for accounting purposes;
- Estimated whole Fund income and expenditure items for the period to 31 March 2019;
- Estimated Fund returns based on Fund asset statements provided (or estimated where necessary) as at 31 March 2016, 31 March 2018 and 31 March 2019; and
- Details of any new early retirements for the period to 31 March 2019 that have been paid out on an unreduced basis, which are not anticipated in the normal service cost.

Although some of these data items have been estimated, we do not believe that they are likely to have a material effect on the results of this report. Further, we are not aware of any material changes or events since we received the data. The data has been checked for reasonableness and we are happy that the data is sufficient for the purposes of this advice.

Fund membership statistics

The table below summarises the membership data, as at 31 March 2016.

Member data summary	Number	Salaries/Pensions	Average age
		£000s	
Actives	25,050	390,997	45
Deferred pensioners	29,817	36,630	46
Pensioners	15,269	71,952	71

Early retirements

We requested data on any early retirements in respect of the Fund from the administering authority for the year ending 31 March 2019.

We have been notified of 67 new early retirements during the year which were not allowed for at the previous accounting date. The total annual pension that came into payment was £635,500.

The capitalised cost of the additional benefits on IAS19 compliant assumptions is calculated at £3,175,000. This figure has been included within the service cost in the statement of profit or loss.

Assets

The return on the Fund (on a bid value to bid value basis) for the year to 31 March 2019 is estimated to be 7%. The actual return on Fund assets over the year may be different.

The estimated asset allocation for Royal County of Berkshire Pension Fund as at 31 March 2019 is as follows:

Asset breakdown	31 Mar 2019		31 Mar 2018	
	£000s	%	£000s	%
Equities	1,136,095	53%	934,720	46%
Other Bonds	289,758	13%	295,759	15%
Property	294,434	14%	271,613	14%
Cash	166,752	8%	326,541	16%
Target Return Portfolio	78,924	4%	80,293	4%
Commodities	53,112	2%	35,507	2%
Infrastructure	199,049	9%	128,977	6%
Longevity Insurance	-63,527	-3%	-63,113	-3%
Total	2,154,597	100%	2,010,297	100%

We have estimated the bid values where necessary. The final asset allocation of the Fund assets as at 31 March 2019 is likely to be different from that shown due to estimation techniques.

Unfunded benefits

We have excluded any unfunded benefits as these are liabilities of employers rather than the Fund.

Actuarial methods and assumptions

Valuation approach

To assess the value of the Fund's liabilities at 31 March 2019, we have rolled forward the value of Fund's liabilities calculated for the funding valuation as at 31 March 2016, using financial assumptions that comply with IAS19.

The full actuarial valuation involved projecting future cashflows to be paid from the Fund and placing a value on them. These cashflows include pensions currently being paid to members of the Fund as well as pensions (and lump sums) that may be payable in future to members of the Fund or their dependants. These pensions are linked to inflation and will normally be payable on retirement for the life of the member or a dependant following a member's death.

It is not possible to assess the accuracy of the estimated liability as at 31 March 2019 without completing a full valuation. However, we are satisfied that the approach of rolling forward the previous valuation data to 31 March 2019 should not introduce any material distortions in the results provided that the actual experience of the Fund has been broadly in line with the underlying assumptions, and that the structure of the liabilities is substantially the same as at the latest formal valuation. From the information we have received there appears to be no evidence that this approach is inappropriate.

The Fund entered into a longevity insurance contract in 2009 and this has been included in the assets. To value the longevity insurance contract we have considered what adjustment to the discount rate assumption (based on the Merrill Lynch LIBOR swap curve) would be required if the contract had a zero value at the date of inception. This is consistent with the approach taken last year. A similar adjustment is then made to the discount rate assumption at the accounting date to calculate the updated value of the contract. Further details on this can be provided on request.

Guaranteed Minimum Pension (GMP) Equalisation

As a result of the High Court's recent Lloyds ruling on the equalisation of GMPs between genders, a number of pension schemes have made adjustments to accounting disclosures to reflect the effect this ruling has on the value of pension liabilities. It is our understanding that HM Treasury have confirmed that the judgement "does not impact on the current method used to achieve equalisation and indexation in public service pension schemes". More information on the current method of equalisation of public service pension schemes can be found [here](#).

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

Our valuation assumption for GMP is that the Fund will pay limited increases for members that have reached SPA by 6 April 2016, with the Government providing the remainder of the inflationary increase. For members that reach SPA after this date, we have assumed that the Fund will be required to pay the entire inflationary increase. Therefore we do not believe we need to make any adjustments to the value placed on the liabilities as a result of the above outcome.

Demographic/Statistical assumptions

The demographic assumptions adopted were requested by the employer. The post retirement mortality tables adopted are the S2PA tables with a multiplier of 95%. These base tables are then projected using the CMI 2018 Model, allowing for a long-term rate of improvement of 1.5% p.a..

Although the post retirement mortality tables adopted are consistent with the previous accounting date, the mortality improvement projection has been updated to use the latest version of the Continuous Mortality Investigation's model, CMI_2018, which was released in March 2019. We have adopted the default smoothing parameter of 7.0 and have not applied an additional initial rate, while continuing to adopt a long term improvement rate of 1.5% p.a. At the last accounting date, the CMI_2015 Model was adopted. The effect of updating to the most recent model is reflected in the *Change in demographic assumptions* figure in Appendix 2.

The assumed life expectations from age 65 are:

Life expectancy from age 65 (years)		31 Mar 2019	31 Mar 2018
Retiring today			
	Males	22.0	23.1
	Females	24.0	25.2
Retiring in 20 years			
	Males	23.7	25.3
	Females	25.8	27.5

We have also assumed that:

- Members will exchange half of their commutable pension for cash at retirement;
- Members will retire at one retirement age for all tranches of benefit, which will be the pension weighted average tranche retirement age; and
- The proportion of the membership that had taken up the 50:50 option at the previous valuation date will remain the same.

Financial assumptions

The financial assumptions used to calculate the results in the Appendices are as follows:

Assumptions as at	31 Mar 2019	31 Mar 2018	31 Mar 2017
	% p.a.	% p.a.	% p.a.
Discount rate	2.40%	2.55%	2.80%
Pension increases	2.40%	2.30%	2.70%
Salary increases	3.90%	3.80%	4.20%

These assumptions are set with reference to market conditions at 31 March 2019.

Our estimate of the Fund's past service liability duration is 20 years.

An estimate of the Fund's future cashflows is made using notional cashflows based on the estimated duration above. These estimated cashflows are then used to derive a Single Equivalent Discount Rate (SEDR). The discount rate derived is such that the net present value of the notional cashflows, discounted at this single rate, equates to the net present value of the cashflows, discounted using the annualised Merrill Lynch AA rated corporate bond yield curve (where the spot curve is assumed to be flat beyond the 30 year point). This is consistent with the approach used at the previous accounting date.

Similar to the approach used to derive the discount rate, the Retail Prices Index (RPI) increase assumption is set using a Single Equivalent Inflation Rate (SEIR) approach, using the notional cashflows described above. The single inflation rate derived is that which gives the same net present value of the cashflows, discounted using the annualised Merrill Lynch AA rated corporate bond yield curve, as applying the BoE implied inflation curve. As above, the Merrill Lynch AA rated corporate bond yield spot curve is assumed to be flat beyond the 30 year point and the BoE implied inflation spot curve is assumed to be flat beyond the 40 year point. This is consistent with the approach used at the previous accounting date.

As future pension increases are expected to be based on the Consumer Prices Index (CPI) rather than RPI, we have made a further assumption about CPI which is that it will be 1.0% p.a. below RPI i.e. 2.4% p.a. We believe that this is a reasonable estimate for the future differences in the indices, based on the different calculation methods and recent independent forecasts. This is consistent with the approach used at the previous accounting date.

Salaries are assumed to increase at 1.5% p.a. above CPI in addition to a promotional scale. However, we have allowed for a short-term overlay from 31 March 2016 to 31 March 2020 for salaries to rise in line with CPI.

Results and disclosures

We estimate that the net liability as at 31 March 2019 is a liability of £2,258,182,000.

The results of our calculations for the year ended 31 March 2019 are set out in the appendices below:

- Appendix 1 sets out the Statement of financial position as at 31 March 2019;
- Appendix 2 details a reconciliation of assets and liabilities during the year; and
- Appendix 3 shows a sensitivity analysis on the major assumptions.

The figures presented in this report are prepared only for the purposes of IAS19. In particular, they are not relevant for calculations undertaken for funding purposes or for other statutory purposes under UK pensions legislation.

We would be pleased to answer any questions arising from this report.



Roisin McGuire FFA
Associate

Appendix 1 Statement of financial position as at 31 March 2019

Net pension asset as at	31 Mar 2019	31 Mar 2018	31 Mar 2017
	£000s	£000s	£000s
Present value of the defined benefit obligation	4,412,779	4,263,622	4,185,496
Fair value of Fund assets (bid value)	2,154,597	2,010,297	1,924,017
Net liability in balance sheet	2,258,182	2,253,325	2,261,479

*Present value of funded obligation consists of £4,296,997,000 in respect of vested obligation and £115,782,000 in respect of non-vested obligation.

Appendix 2 Asset and benefit obligation reconciliation for the year to 31 March 2019

Reconciliation of opening & closing balances of the present value of the defined benefit obligation	Year to	Year to
	31 Mar 2019	31 Mar 2018
	£000s	£000s
Opening defined benefit obligation	4,263,622	4,185,496
Current service cost	155,094	156,636
Interest cost	107,786	116,277
Change in financial assumptions	212,180	(127,915)
Change in demographic assumptions	(251,529)	-
Experience loss/(gain) on defined benefit obligation	-	-
Liabilities assumed / (extinguished) on settlements	-	-
Estimated benefits paid net of transfers in	(105,168)	(97,795)
Past service costs, including curtailments	3,175	4,467
Contributions by Scheme participants and other employers	27,619	26,456
Unfunded pension payments	-	-
Closing defined benefit obligation	4,412,779	4,263,622

Reconciliation of opening & closing balances of the fair value of Fund assets	Year to	Year to
	31 Mar 2019	31 Mar 2018
	£000s	£000s
Opening fair value of Fund assets	2,010,297	1,924,017
Interest on assets	51,414	53,936
Return on assets less interest	82,240	29,630
Other actuarial gains/(losses)	-	-
Administration expenses	(1,300)	(1,862)
Contributions by employer including unfunded	89,495	75,915
Contributions by Scheme participants and other employers	27,619	26,456
Estimated benefits paid plus unfunded net of transfers in	(105,168)	(97,795)
Settlement prices received / (paid)	-	-
Closing Fair value of Fund assets	2,154,597	2,010,297

The total return on the Fund's assets for the year to 31 March 2019 is £133,654,000.

Appendix 3 Sensitivity analysis

Sensitivity analysis (£000's)					
Present value of total obligation		4,412,779			
	Sensitivity to	+0.5%	+0.1%	-0.1%	-0.5%
	Discount rate	4,007,918	4,328,498	4,498,786	4,860,826
	Long term salary increase	4,449,955	4,420,111	4,405,499	4,376,882
	Pension increases and deferred revaluation	4,821,361	4,491,369	4,335,697	4,041,928
	Sensitivity to	+1 Year		- 1 Year	
	Life expectancy assumptions	4,570,277		4,260,722	



COMMUNICATIONS STRATEGY



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1.0 INTRODUCTION

This Communications Strategy ('the Strategy') is formulated by the Royal Borough of Windsor and Maidenhead in its role as the Administering Authority for the Royal County of Berkshire Pension Fund in accordance with Regulation 61 of the Local Government Pension Scheme Regulations 2013.



This Strategy deals with the communication of all aspects of the scheme to both Scheme employers and the individual LGPS members (or their representatives).

It should be noted for the purposes of clarification that the reference to 'member' in this statement means an individual who by virtue of his/her employment is an active contributor, deferred beneficiary or retired member of the Royal County of Berkshire Pension Fund.

The aim of the Strategy is to provide clear and consistent information to all Scheme members and employers and to communicate this information effectively and accurately.

This Strategy will be kept under review and amended following any material change as regards:

- i) The provision of information and publicity about the Scheme to members, representatives of members and Scheme employers;
- ii) The format, frequency and method of distributing such information or publicity; and
- iii) The promotion of the Scheme to prospective members.

Following any revision to the policy statement, the Administering Authority will publish the statement as revised.

The communication policy is sub-divided into four main areas:

- 1 - Communication with Scheme employers;
- 2 - Communication with individual Scheme members (or their representatives);
- 3 - Communication with prospective Scheme members; and
- 4 - Communication with prospective Scheme employers.



2.0 COMMUNICATION WITH SCHEME EMPLOYERS

The Royal County of Berkshire Pension Fund has many Scheme employers that satisfy the relevant membership conditions set out within the LGPS Regulations. These employers can be broadly split into 2 groups:

- Group 1: Scheduled Bodies (including Borough, District, Town and Parish Councils, Academies, Berkshire Fire & Rescue Service, Colleges and Housing Associations)
- Group 2 Admission Bodies (including employers previously defined as Community Admission Bodies and Transferee Admission Bodies).

2.1 Decision Making Process

The Policy Statement on Governance covers the involvement of Scheme employers within the decision making process but should also be seen as an element in the communication process with regard to Scheme employers other than the Royal Borough of Windsor & Maidenhead in its role as the Administering Authority for the Fund.

2.2 Scheme Employer Meetings

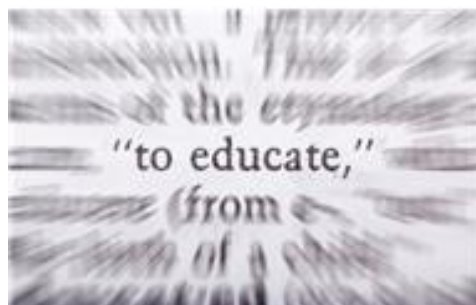
Meetings will be held between representatives of the 6 Berkshire Unitary Authorities and the Fund on a quarterly basis to discuss all current pension-related matters. An open invitation is also provided to other Scheme employers to meet with the Fund and discuss any element of pension procedures they wish.



An annual meeting is held with at least one representative of each Scheme employer being invited to attend. Representatives of various professional bodies employed by the Fund such as the Actuary will be present at the meeting to explain the details of any relevant topic and receive questions. The Chairman of the Berkshire Pension Fund Panel is expected to attend and chair the meeting. If possible the Chairman of the Pension Board will also attend. The date for this meeting may vary so as to take into account the timing of any specific issues that may arise such as the actuarial valuation results.

2.3 Training for Scheme Employers

Scheme administration guidance is available to all the Scheme employers within the Fund via the Pension Fund website. In addition training meetings may be arranged on an ad hoc basis with the relevant officers within the pension administration team and individual Scheme employers by way of supplementing the guidance provided via the website. These meetings are most applicable for HR and payroll staff of the Scheme employer.



2.4 Regular LGPS updates

Regular updates are sent to each Scheme employer by the pension administration team regarding any changes to the Local Government Pension Scheme. These are mainly in the form of Employer newsletters ('Inscribe') posted to the Employer section of the Royal County of Berkshire Pension Fund website but updates may also be provided in the form of letters or e-mails. Bulletins will be issued three or four times a year and will include details of any legislation changes and how the changes impact on Scheme employers.

The Royal County of Berkshire Pension Fund operates a Pension Fund website with sections specifically dedicated to active Scheme members, deferred beneficiaries, retired members, and Scheme employers.

Other details that can be found include:



Standard Fund documentation (guides, leaflets and forms)

Statement of Accounts for the Pension Fund

Investment Strategy Statement

Funding Strategy Statement

Governance Compliance Statement

Copies of Scheme Member newsletters

Links to other web sites

The Berkshire Pension Fund website address is www.berkshirepensions.org.uk.

2.5 General Guidance and Assistance

The pension administration team can be contacted during normal office hours and is always available to answer any questions raised by Scheme employers and can arrange for ad hoc meetings to be held for pension input into any specific tasks Scheme employers may have e.g. outsourcing of services. The pension administration team can be contacted by telephone on 0845 602 7237 or by email at info@berkshirepensions.org.uk

2.6 Promotional Services

Promotional guides, factsheets and leaflets are produced by the pension administration team and are available from the Pension Fund website. The pension administration team will also commit to attending any events held by the Scheme employer where their input would be seen to be of value.

2.7 Scheme Member Data

The Administering Authority's 'Pension Administration Strategy' is to accept data from Scheme employers via i-Connect, a secure electronic data transfer interface between the Scheme employer's payroll system and the Scheme Administrator's pension administration system. The reasons for this are many but in particular because the data transfer is encrypted providing greater data security, pension information is uploaded in real time meaning that Scheme members have access to the most up to date membership information via 'mypension ONLINE', keying and data errors are eliminated and scheme administration is maintained to the highest standards possible.



The Administering Authority will continue to work with Scheme employers in implementing i-Connect but until such time as a Scheme Employer contracts into using i-Connect the Scheme Administrator will continue to receive pension data from a Scheme employer via either a pre-formatted excel spreadsheet or by the completion of standard forms as made available from the Scheme employers' section of the Pension Fund website in both pdf and Word formats.

With the exception of Scheme employers who use i-Connect, all other Scheme employers are required to supply a 'year end' return (31st March) to the Administering Authority by 30th April in a specified

format to enable annual benefits statements to be produced and supplied to active and deferred members within the statutory deadlines set out in Scheme regulations.

2.8 General Data Protection Regulations (GDPR)

GDPR came into force on 25 May 2018 and requires Privacy Notices to be published showing transparency on how personal data is used. The Administering Authority has produced and published on the Berkshire Pension Fund website a Privacy Notice explaining how the Pension Fund collects personal data, what that data is used for, with whom that data is shared and the rights of individuals with regard to their data.

In addition a Memorandum of Understanding regarding compliance with Data Protection law has been produced and published on the website and Scheme employers and Members have been advised through their respective newsletters.

2.9 Employer Factsheets

A suite of topical factsheets (known as "**Pension Pointers**") is available to assist employers with the administration of the LGPS.

2.10 Employer Self-Service (ESS)

The Administering Authority makes available to each Scheme employer the facility to access member data in respect of their own current and former Scheme members through a secure link to the pension administration software.

3.0 COMMUNICATION WITH INDIVIDUAL SCHEME MEMBERS

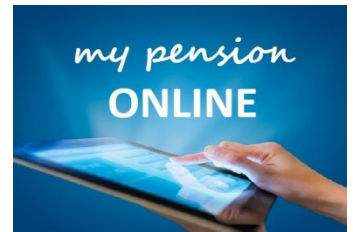
Membership of the Royal County of Berkshire Pension Fund covers the active contributors, those members who have left the Fund but still have a deferred pension awaiting payment from normal retirement age and retired members and their dependants.

The preferred method of communication with Scheme members is via *mypension* ONLINE a secure member self-service facility provided as part of the pension administration software. *mypension* ONLINE is available to all member types and enables the member to update certain personal details online and provides each member type with access to their annual benefit statements, membership certificates and guides/leaflets relevant to their membership type. Where a member requests that information should be supplied in a paper format the Scheme Administrator will make arrangements for this information to be sent to the member's home address.

3.1 Welcome Pack

Upon receipt of a new starter notification from a Scheme employer, a *mypension* ONLINE activation key is sent, by the pension administration team, to the home address of the new active member. Access to the pension system provides a new Scheme member with:

- A membership certificate of entry into the scheme
- An employee guide to the scheme
- A guide to increasing pension benefits
- A guide to making a transfer of pension rights from a previous pension scheme;
- A guide to protections for the family
- An expression of wish form for payment of a death grant
- A guide to civil partnerships
- A guide to working part-time
- A copy of the Pension Fund's Service Standards
- A guide to keeping records up to date
- A guide to making contributions following a period of absence



If a Scheme member prefers not to use *mypension* ONLINE, they can request a full welcome pack to be sent to their home address.

3.2 Annual Benefit Statements

Each active contributor and deferred beneficiary has an Annual Benefit Statement made available via *mypension* ONLINE which includes details of:

- Accrued benefits within the scheme as at the 31st March last
- An estimate of benefits to Normal Pension Age
- The value of the death grant payable from the Scheme
- The member's nominated beneficiaries for receipt of any death grant

If a Scheme member prefers, a paper copy of their annual benefit statement will be sent to their home address upon request.

3.3 Pension Surgeries

One to one meetings are available at the Pension Fund offices for any member of the Fund and formal Pension Surgeries are held twice yearly at the offices of the six Unitary Authorities and on an ad hoc basis at the offices of other Scheme employers as arranged by the employer.

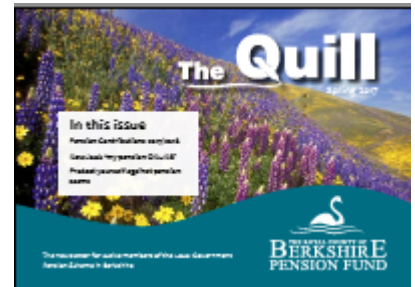
3.4 Newsletters



Newsletters are produced bi-annually for active and retired members and annually for deferred members. These newsletters are available via *mypension* ONLINE or the Pension Fund website although they can be sent out to individual addresses if requested.

The newsletters are tailored to the recipient according to their membership status and contain an update of all matters relating to the LGPS and the Berkshire Pension Fund. Retired members receive “The Scribe”.

Active members receive “The Quill” as do deferred members although two different versions of the autumn edition are provided to cater for the differences in the specific member types.



3.5 Pre-Retirement Courses

Where pre-retirement courses are run by Scheme employers, a member of the pension administration team will be available to attend to explain the details of Scheme benefits and how and when pension payments will be made.

3.6 Pension Fund Website

Individual members of the Fund have access to the Pension Fund website which is continually reviewed and updated. Specific sections of the website have been designed for each membership type with downloadable forms, guides, online flipbooks and modellers made available. Access to *mypension* ONLINE is gained via the Pension Fund website www.berkshirerensions.org.uk



3.7 Pension Payslips

Pension payslips are available via *mypension* ONLINE. If a member requires a pay advice slip to be sent to their home address it is the practice of the administering authority to only send out pay advice slips when there is a variation of 50 pence or more in net pay between consecutive months. A detailed description of a payslip is available on the retired members section of the Pension Fund website.

3.8 P60s

P60s are available via *mypension* ONLINE but will be sent out to members' home addresses as a matter of course. Every retired member and/or their dependants will receive a P60 each year before the HMRC deadline of 31st May. A detailed description of a P60 is available on the retired members section of the Pension Fund website.

3.9 Annual Pension Increase Letter

Annual Pension Increase letters are available via *mypension* ONLINE but will also be sent out to members' home addresses. Retired members will receive a pension increase booklet every April containing their individual increase on their pension (where an increase is to be applied). This letter will include details of the monetary value of their revised pension and details of the amount to be paid in April.

3.10 Annual Meeting

An Annual Meeting of the Royal County of Berkshire Pension Fund is held with all Scheme members receiving an invite. A restricted number of members will be able to attend on a first come first served basis. The main purpose of the meeting is to communicate details of the Fund's Annual Report & Accounts, Investment Strategy and any other specific matters relating to the LGPS Regulations. The date for this meeting may vary so as to take into account certain regulatory matters that may arise.



3.11 Ad Hoc Meetings

Ad hoc meetings will be held from time to time for various groups of members. These may be defined by type of member (active or retired) or location (for a specific employer or group of employers). The timing of these meetings will be dictated by either requests from employers or the need to consult and notify members of any changes that occur.

4.0 COMMUNICATION WITH PROSPECTIVE SCHEME MEMBERS

A brief guide to the Scheme is available to all prospective Scheme members and should be provided to all new employees by their Scheme employer as part of their contract of employment details. The brief guide is available from the Pension Fund website in both pdf and Word formats and is kept up to date with current regulations at all times.

The Berkshire Pension Fund website has a dedicated area for employees considering opting into the LGPS.

5.0 COMMUNICATION WITH PROSPECTIVE SCHEME EMPLOYERS

A guide for admission bodies is available on the Pension Fund website for all prospective employers considering admission to the Berkshire Pension Fund and is available as a hard copy upon request.

A template admission agreement has been produced and is available either via the Pension Fund website or as a hard copy upon request.

The administering authority has the power to accept various types of Scheme employer into the Pension Fund but will only do so subject to a full and open discussion taking place between the parties to any admission agreement and that the final admission agreement has been completed in advance of the agreed admission date.

Approved by the Berkshire Pension Fund Panel: 17 September 2018

Next review date: September 2019



GOVERNANCE

COMPLIANCE

STATEMENT



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INTRODUCTION

This document details the compliance of the Royal Borough of Windsor and Maidenhead, as the administering authority of the Royal County of Berkshire Pension Fund, with the guidance issued for governance of the Local Government Pension Scheme by the Secretary of State for Housing, Communities and Local Government. It has been prepared as required by Regulation 55 of the Local Government Pension Scheme Regulations 2013.

The Regulations require the administering authority to prepare this written statement setting out whether or not it delegates its functions or part of its functions to a committee, a sub-committee or an officer of the authority.

Where the administering authority does delegate all or part of its functions the statement must include the terms, structure and operational procedures of the delegation, the frequency of any committee or sub-committee meetings and whether such a committee or sub-committee includes representatives of Scheme employers and members, and if so, whether those representatives have voting rights.

In addition, the administering authority must state the extent to which a delegation, or the absence of a delegation, complies with guidance given by the Secretary of State and, to the extent that it does not comply, the reasons for not complying.

The administering authority must also set out details of the terms, structure and operational procedures relating to the local pension board established under regulation 106 of the Local Government Pension Scheme Regulations 2013 as inserted by the Local Government Pension Scheme (Amendment) (Governance) Regulations 2015.

This governance compliance statement must be published by the administering authority, kept under review and amended following any material change to any matters included within, once any consultation has been concluded.

STRUCTURE

The Royal Borough of Windsor & Maidenhead (RBWM) has been designated as the administering authority to the Royal County of Berkshire Pension Fund in accordance with Part 1 of Schedule 3 of the Local Government Pension Scheme Regulations 2013.

For the purposes of managing the Pension Fund, RBWM delegates its powers under the Constitution of the Council where it sets out the functions of the Royal County of Berkshire Pension Fund Panel (hereinafter referred to as 'the Main Panel'), the Royal County of Berkshire Pension Fund Advisory Panel (hereinafter referred to as 'the Advisory Panel') and the Berkshire Pension Board (hereinafter referred to as 'the Pension Board'). As such several principles have been set out to ensure compliance with the scheme regulations.

i) The management of the administration of benefits and strategic allocation of fund assets.

Compliant – The Constitution of the Council defines the responsibilities of 'the Main Panel' to manage the Pension Fund.

ii) Representatives of Scheme employers and Scheme members should sit on 'the Advisory Panel' to underpin the work of 'the Main Panel'.

Compliant – Membership of ‘the Advisory Panel’ includes five Elected Members from RBWM, one Elected Member from each of the other five Berkshire Unitary Authorities, three other Scheme employer representatives, two union representatives, and two members to represent the active, deferred and retired Scheme members.

iii) The structure of ‘the Main Panel’ and ‘the Advisory Panel’ should ensure effective communication across both levels.

Compliant – ‘The Advisory Panel’ meets concurrently with ‘the Main Panel’ with both Panels receiving the same information.

iv) At least one seat on ‘the Main Panel’ should be allocated for a member of ‘the Advisory Panel’.

Complaint – All five seats on ‘the Main Panel’ are allocated to the five RBWM members of ‘the Advisory Panel’.

v) The structure of ‘the Pension Board’ must consist of an equal number of Scheme member and Scheme employer representatives all of whom have voting rights.

Compliant – Membership of ‘the Pension Board’ consists of three Scheme member representatives and three Scheme employer representatives.

REPRESENTATION

All key stakeholders should be afforded the opportunity to be represented with ‘the Main Panel’, ‘the Advisory Panel’ and ‘the Pension Board’. To ensure compliance a number of principles have been identified.

The key stakeholders are:

i) Scheme employers.

Compliant – The six Berkshire Unitary Authorities and up to three of the other Scheme employers are represented on ‘the Advisory Panel’. In addition three Scheme employer representatives make up membership of ‘the Pension Board’

ii) Scheme members (including deferred and retired members).

Compliant – ‘The Advisory Panel’ has two representatives from the major trades unions and makes provision to have two representatives from the active, deferred or retired Scheme membership. In addition 3 Scheme member representatives sit on ‘the Pension Board’

iii) Independent Professional Observers.

Compliant – An Independent Adviser attends each meeting of ‘the Main Panel’ and ‘the Advisory Panel’. Independent Advisers are also required to attend meetings of ‘the Pension Board’ as may be requested.

iv) Expert advisers (on an ad-hoc basis)

Compliant – Expert advisers are invited to meetings of ‘the Main Panel’ and ‘the Advisory Panel’ as required. Independent Strategy Advisers attend meetings of the Investment Group. In addition expert advisers are required to attend meetings of ‘the Pension Board’ as may be requested.

v) Where lay members sit on either ‘the Main Panel’ or ‘the Advisory Panel’ they are treated equally in terms of access to papers, meetings and training and are given full opportunity to contribute to the decision making process with or without voting rights. No lay members sit on ‘the Pension Board’.

Compliant – Members of both ‘the Main Panel’, ‘the Advisory Panel’ and ‘the Pension Board’ are treated equally in respect of access to papers, meetings and training. All members are given full opportunity to contribute to the decision making process although only members of ‘the Main Panel’ have voting rights.

SELECTION AND ROLE OF LAY MEMBERS

Members of ‘the Main Panel’, ‘the Advisory Panel’ and ‘the Pension Board’ need to be fully aware of the status, role and function that they are required to perform.

Compliant – Bodies nominating individuals for membership of ‘the Main Panel’, ‘the Advisory Panel’ or ‘the Pension Board’ are periodically reminded that it is their responsibility to ensure that all members are aware of their responsibilities. The Chair of ‘the Main Panel’ will remind members of both ‘the Main Panel’ and ‘the Advisory Panel’ of their responsibilities as required. The Chair of ‘the Pension Board’ will remind members of ‘the Pension Board’ of their responsibilities as required. Each set of papers for every Panel/Board meeting contains a reminder to members of their duty in respect to potential conflicts of interest. Members are expected to declare conflicts of interest and abide by RBWM’s rules on conflicts of interest.

VOTING

The policy of the administering authority on voting rights must be clear and transparent and include justification for not extending voting rights to each body or group represented on ‘the Main Panel’, ‘the Advisory Panel’ or ‘the Pension Board’.

Compliant – The Constitution of RBWM sets out the terms of reference and voting rights of ‘the Main Panel’, ‘the Advisory Panel’ and ‘the Pension Board’.

TRAINING / FACILITY TIME / EXPENSES

i) In relation to the way in which statutory and related decisions are taken by RBWM, a clear policy on training, facility time and reimbursement of expenses in respect of members involved in that decision making process must be made.

Compliant – All members of ‘the Main Panel’ and ‘the Advisory Panel’ are entitled to attend or request training. Members of ‘the Pension Board’ are required to have a working knowledge of the LGPS regulations and other associated legislation as it relates to the governance and administration of the Scheme and so must commit to undertaking the relevant training in order to achieve this requirement. All members of ‘the Main Panel’, ‘the Advisory Panel’ and ‘the Board’ are entitled to request the use of facilities belonging to RBWM in respect of their respective duties and reasonable expenses incurred will be reimbursed upon request.

ii) Any policy must apply equally to all members of the Panels/Board.

Compliant – No distinction is made between members of ‘the Main Panel’, ‘the Advisory Panel’ or ‘the Board’.

MEETINGS (frequency/Quorum)

i) RBWM will hold meetings of ‘the Main Panel’ at least quarterly.

Compliant – Meetings are held quarterly. To be quorate two members are required to attend.

ii) RBWM will hold meetings with ‘the Advisory Panel’ at least twice a year synchronised with the dates for meetings of ‘the Main Panel’.

Compliant – Both Panels meet concurrently

iii) RBWM will hold meetings of ‘the Pension Board’ ahead of each meeting of ‘the Main Panel’ and ‘the Advisory Panel’.

Compliant – ‘The Pension Board’ meets quarterly at a satisfactorily and mutually agreed date ahead of each meeting of ‘the Main Panel’ and ‘the Advisory Panel’. To be quorate at least 50% of the Scheme Member representatives and Scheme Employer Representatives must attend with at least one member being present from each group.

iv) Where lay members are included in the formal governance arrangements RBWM will provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.

Compliant – ‘The Advisory Panel’ has four lay members. An annual Scheme employer meeting is held in March/April with an annual Scheme member meeting being held in November. In addition pension surgeries and employer training events are held throughout the year.

ACCESS

Subject to any rules in RBWM’s Constitution, all members of ‘the Main Panel’, ‘the Advisory Panel’ and ‘the Pension Board’ will have equal access to committee papers, documents and advice that falls to be considered at meetings of the Panels/Board.

Compliant – All members of ‘the Main Panel’, ‘the Advisory Panel’ and ‘the Pension Board’ have equal access to Panel/Board papers, documents and advice that falls to be considered at Panel/Board meetings.

SCOPE

RBWM will take steps to bring wider Scheme issues within the scope of their governance arrangements.

Compliant – Wider Scheme issues are considered by ‘the Main Panel’, ‘the Advisory Panel’ and ‘the Pension Board’ on a regular basis.

PUBLICITY

RBWM will publish details of their governance arrangements in such a way that interested stakeholders can express their interest in wanting to be part of those arrangements.

Compliant – The Governance Policy Statement is published on the Royal County of Berkshire Pension Fund website (www.berkshirerpensions.org.uk) and is available on request from the Pension Fund.

Approved by The Berkshire Pension Fund Panel on 14 January 2019



FUNDING STRATEGY STATEMENT

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1 INTRODUCTION

1.1 This is the Funding Strategy Statement ("FSS") for the Royal County of Berkshire Pension Fund ("the Fund") which is administered by The Royal Borough of Windsor and Maidenhead ("the Administering Authority"). It has been prepared in accordance with Regulation 58 of the Local Government Pension Scheme Regulations 2013.

1.2 This statement should be read in conjunction with the Fund's Investment Strategy Statement ("ISS")

Purpose of the Funding Strategy Statement

1.3 The purpose of the FSS is to explain the Fund's approach to meeting the employer's pension liabilities and in particular:

- To establish a clear and transparent Fund-specific strategy which will identify how employers' pension liabilities are best met going forward;
- To take a prudent longer-term view of funding those liabilities; and
- To support the regulatory framework to ensure the solvency of the Fund and the long-term cost efficiency of the Scheme, and where possible to maintain as nearly constant Scheme employer contribution rates as possible.

1.4 The purpose of the Fund is to:

- Collect monies in respect of employee and employer contributions, transfer values and investment income;
- Facilitate payment of Local Government Pension Scheme (LGPS) benefits, transfer values, costs, charges and expenses; and
- Accumulate and invest money received and facilitate the management of this.



Funding Objectives

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

1.6 The funding objectives are to

- Set levels of employer contributions that will build up a fund of assets that will be sufficient to meet all future benefit payments from the Fund and ensure the solvency of the Fund;
- Set contributions which maximise the long-term cost efficiency. Broadly, this means that paying contributions as soon as possible so that any deficit is addressed quickly is preferable;

- Build up the required assets in such a way that produces levels of employer contributions that are as stable as possible;
- Minimise the risk of employers leaving with unpaid deficits, which then fall to the other employers;
- Ensure effective and efficient management of employer liabilities; and
- Allow the return from investments to be maximised within reasonable risk parameters.

2 KEY PARTIES

- 2.1 The parties directly concerned with the funding aspect of the Pension Fund are contained in this section of the FSS. A number of other key parties, including investment managers and external auditors also have responsibilities to the Fund but are not key parties in determining funding strategy.

The Administering Authority



The Administering Authority for the Royal County Berkshire Pension Fund is the Royal Borough of Windsor & Maidenhead. The main responsibilities of the Administering Authority are as follows:

- Collect and account for employee and employer contributions;
- Pay the benefits to Scheme members and their dependants as they fall due;
- Invest the Fund's assets ensuring sufficient cash is available to meet the liabilities as and when they become due;
- Take measures as set out in the regulations to safeguard the Fund against the consequences of employer default;
- Manage the Actuarial valuation process in conjunction with the Fund Actuary;
- Prepare and maintain the FSS and also the ISS (Investment Strategy Statement) and after consultation with other interested parties;
- Monitor all aspects of the Fund's performance and funding to ensure that the FSS and the ISS are updated as necessary; and
- Effectively manage any potential conflicts of interest arising from its dual role as both Fund administrator and Scheme employer.

Scheme employers

- 2.3 The responsibilities of each individual Scheme employer which participates in the Fund, including the Administering Authority in its capacity as a Scheme employer, are as follows:

- Collect employee contributions and pay these together with their own employer contributions as certified by the Fund Actuary within the statutory timescales;
- Promptly notify the Administering Authority of any new Scheme members and any other membership changes in accordance with the pension administration service level agreement;
- Promptly notify the Administering Authority of any Scheme member who leaves or retires from their employment in accordance with the pension administration service level agreement;
- Promptly notify the Administering Authority of all Scheme member data and information required by the Administering Authority in accordance with the pension administration service level agreement so that the Administering Authority is able to accurately calculate the value of benefits payable to each Scheme member;
- Exercise any discretions permitted under the Scheme Regulations and to produce, maintain and publish a policy statement with regard to the exercise of those discretions;
- Meet the costs of any augmentations or other additional costs such as Pension Fund strain costs resulting from decisions to release early Scheme members' retirement benefits in accordance with Scheme regulations and agreed policies and procedures;
- Provide any information as requested to facilitate the Actuarial valuation process.



Fund Actuary

2.4 The Fund Actuary for the Royal County of Berkshire Pension Fund is Barnett Waddingham LLP. The main responsibilities of the Fund Actuary are to:

- Prepare the Actuarial Valuation having regard to the FSS and the Scheme Regulations;
- Prepare annual FRS102/IAS19 (accounting standards) reports for all Scheme employers requiring such a report for their annual report and accounts;
- Advise interested parties on funding strategy and completion of Actuarial valuations in accordance with the FSS and the Scheme Regulations;
- Advise on other actuarial matters affecting the financial position of the Fund.



3 FUNDING STRATEGY

- 3.1 The funding strategy seeks to achieve (via employee and employer contributions and investment returns) two key objectives:
- A funding level of 100% as assessed by the Fund's appointed Actuary, triennially, in accordance with the Scheme Regulations;
 - As stable an employer contribution rate as is practical.
- 3.2 The funding strategy recognises that the funding level will fluctuate with changing levels of employment, retirements, actuarial assumptions and investment returns and that the employer contribution has to be adjusted to a level sufficient to maintain the Pension Fund's solvency and to achieve a funding level of 100% over the longer term.
- 3.3 The Actuarial valuation process is essentially a projection of future cash-flows to and from the Fund. The main purpose of the triennial valuation is to determine the level of employers' contributions that should be paid over an agreed period to ensure that the existing assets and future contributions will be sufficient to meet all future benefit payments from the Fund.
- 3.4 The last Actuarial valuation was carried out as at 31st March 2016 with the assets of the Fund found to be 73% of the accrued liabilities for the Fund.

Funding Method

- 3.5 The funding target is to have sufficient assets to meet the accrued liabilities for each Scheme employer in the Fund. The funding target may, however, also depend on certain Scheme employer circumstances and will, in particular, have regard to whether a Scheme employer is an "open" employer (which allows new recruits access to the Fund) or a "closed" employer (which no longer permits new employees access to the Fund). The expected period of participation by a Scheme employer in the Fund may also affect the chosen funding target.
- 3.6 For all Scheme employers the Actuarial funding method adopted 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 after making allowance for future increases to members' pay and pensions in payment. A funding level in excess of 100% indicates a surplus of assets over liabilities whereas a funding level of less than 100% indicates a deficit.
 - The future funding rate i.e. the level of contributions required from the individual Scheme employers which together with employee contributions are expected to support the cost of benefits accruing in the future.
- 3.7 For "open" Scheme employers, the Projected Unit method is used which, for the future service rate, assesses the cost of one year's benefit accrual.
- 3.8 For "closed" Scheme employers the funding method adopted is known as the Attained Age Method. This gives the same results for the past service funding level as the Projected Unit Method but for the future cost it assesses the average cost of the benefits that will accrue over the remaining working lifetime of the active Scheme members.

Valuation Assumptions and Funding Model

- 3.9 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 etc.
- 3.10 The assumptions adopted at the valuation can therefore be considered as:
- The statistical assumptions which generally speaking are estimates of the likelihood of benefits and contributions being paid; and
 - The financial assumptions which generally speaking will determine the estimates of the amount of benefits and contributions payable and their current or present value.

Future Price Inflation

- 3.11 The base assumption in any triennial valuation is the future level of price inflation. This is derived by considering the average difference in yields from conventional and index linked gilts during the 6 months straddling the valuation date using a point from the Bank of England RPI Inflation Curve. This gives an assumption for Retail Prices Index (RPI) inflation, which is then adjusted to get an assumption for Consumer Prices Index (CPI) inflation. At the 2016 valuation, CPI was assumed to be 0.9% per annum lower than RPI, giving a CPI inflation assumption of 2.4% per annum.



Future Pay Inflation

3.12 As benefits accrued before 1st April 2014 (and in the case of some protected members after 31st March 2014) are linked to pay levels at retirement it is necessary to make an assumption as to future levels of pay inflation. The assumption adopted in the 2016 valuation is that pay increases will, on average over the longer term, exceed CPI by 1.5% per annum. In the short term in anticipation of Government policy, it has been assumed that pay increases for the 4 year period to 31 March 2020 would be limited to CPI.

Future Pension Increases

- 3.13 Pension increases are assumed to be linked to CPI.

Future Investment Returns/Discount Rate

- 3.14 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.
- 3.15 The discount rate adopted depends on the funding level target adopted for each Scheme employer.



- 3.16 For “open” Scheme employers the discount rate 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 and indicators in the 6 months straddling the valuation date. This discount rate so determined may be referred to as the “ongoing” discount rate.

The level of prudence at the 2016 valuation differed between the major councils and the remaining employers, to reflect the difference in covenant strength. This gave a discount rate of 5.7% per annum for the unitary authorities (and the employers pooled with them) and of 5.5% per annum for the other employers.

- 3.17 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 Scheme employer either wishes to leave the Fund or the terms of their admission requires it.
- 3.18 The Fund Actuary will incorporate such an adjustment after consultation with the Administering Authority.
- 3.19 The adjustment to the discount rate is essentially 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 to minimise the risk of deficits arising after the termination.

Asset Valuation

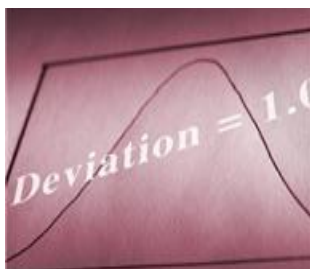
- 3.20 The asset valuation is a market value of the accumulated Fund at the triennial valuation date adjusted to reflect average market conditions during the 6 months straddling the triennial valuation date.

Statistical Assumptions

- 3.21 The statistical assumptions incorporated into the triennial valuation such as future rates of mortality etc are based on national statistics but then adjusted where deemed appropriate to reflect the individual circumstances of the Fund and/or individual Scheme employers. For the 2016 valuation, the Fund received a bespoke analysis of the pensioner mortality and the results of this analysis were used to aid in setting a suitable assumption for the Fund.

Deficit Recovery/Surplus Amortisation Periods

- 3.22 Whilst one of the funding objectives is to build up sufficient assets to meet the cost of benefits as they accrue it is recognised that at any particular point in time, the value of the accumulated assets will be different to the value of accrued liabilities depending on how the actual experience of the Fund differs to the actuarial assumptions. Accordingly the Fund will normally either be in surplus or in deficit.



- 3.23 Where the Actuarial valuation discloses a significant surplus or deficit then the levels of required Scheme employers' contributions will include an adjustment to either amortise the surplus or fund the deficit over a period of years. At the 2016 valuation, a

deficit was revealed and contributions were set to recover this deficit over a period no longer than 24 years.

3.24 The period that is adopted for any particular Scheme employer will depend upon:

- The significance of the surplus or deficit relative to that Scheme employer's liabilities;
- The covenant of the individual Scheme employer and any limited period of participation in the Fund; and
- The implications in terms of stability of future levels of Scheme employers' contributions.

3.25 At the 2016 triennial valuation the period adopted to recover the deficit was:

Type of Scheme Employer	Maximum Length of Recovery Period
Unitary Authorities and Associated Employers	24 years
Housing Associations	14 years
Colleges (excluding the University of West London)*	14 years
Academies	17 years
Community Admission Bodies	14 years
Transferee Admission Bodies	Future working life of current employees or contract period whichever is the shorter period

3.26 Where a Scheme employer's contribution has to increase significantly then the increase may be phased in over a period not exceeding 6 years although this may only be allowed for some Scheme employer types or if the increase in contributions would increase the risk of an employer insolvency, leaving an unpaid deficit and adversely affecting other employers' contributions and the solvency of the Fund as a whole.

Pooling of Individual Scheme employers

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

3.28 However, certain groups of individual Scheme employers may be pooled for the purposes of determining contribution rates to recognise common characteristics or where the number of Scheme members is small.

3.29 Currently, other than Scheme employers that are already legally connected, there are the following pools:

- Colleges (with the exception of the University of West London)*
- Academies
- 'Community' Admission Bodies
- Housing Associations



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

*The University of West London is a closed employer whose membership and liability profile no longer makes it a viable employer for inclusion within the college pool.

Cessation Valuations

- 3.31 On the cessation of a Scheme employer's participation in the Fund, the Actuary will be asked to make a termination assessment. Any deficit in the Fund in respect of the Scheme 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 Scheme employer will transfer within the Fund to another participating Scheme employer.
- 3.32 In assessing the deficit on termination, the Actuary may adopt a discount rate based on gilt yields or other lower risk assets and adopt different assumptions to those used at the previous triennial valuation to protect the other Scheme employers in the Fund from having to fund any future deficits from the liabilities that will remain in the Fund.

Early Retirement Costs

- 3.33 The Actuary's funding basis makes no allowance for premature retirement except on grounds of permanent ill health. Scheme employers are required to pay additional contributions whenever an employee retires before attaining the age at which the triennial valuation assumes that benefits are payable. The calculation of these costs is carried out with reference to a calculation approved by the Actuary to the Fund.



- 3.34 The Fund monitors each Scheme employer's ill health experience on an ongoing basis. If the cumulative number of ill health retirements in any financial year exceeds the allowance at the previous triennial valuation by a statistically significant amount, the Scheme employer may be charged additional contributions on the same basis as apply for non-ill health cases.

Triennial Valuation

- 3.35 The next triennial valuation is due as at 31st March 2019.

4 LINKS WITH THE INVESTMENT STRATEGY STATEMENT (ISS)

- 4.1 The main link between the FSS and the ISS relates to the discount rate that underlies the funding strategy as set out in the FSS and the expected rate of investment return which is expected to be achieved by the underlying investment strategy as set out in the ISS.

- 4.2 As explained above the ongoing discount rate adopted in the Actuarial valuation is derived by considering the expected return from the underlying investment strategy and so there is consistency between the funding strategy and the investment strategy.

5 RISKS AND COUNTER MEASURES

- 5.1 Whilst the funding strategy attempts to satisfy the funding objectives of ensuring sufficient assets to meet pension liabilities and stable levels of Scheme employer contributions, it is recognised that there are a number of risks that may impact on the funding strategy and hence the ability of the strategy to meet the funding objectives.
- 5.2 The major risks for the funding strategy are financial risks although there are external factors including demographic risks, regulatory risks and governance risks.

Financial Risks

- 5.3 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 chosen fund managers who are employed to implement the chosen investment strategy failing to achieve their performance targets. The triennial valuation results are most sensitive to the real discount rate. Broadly speaking an increase/decrease of 0.1% per annum in the real discount rate will decrease/increase the liabilities by 2% and decrease/increase the required Scheme employer contribution by around 1.0% of payroll.
- 5.4 The Pension Fund Panel regularly monitor the investment returns achieved by the fund managers and seek advice from Officers and independent advisors on investment strategy. In the inter-valuation period 2013 to 2016 such monitoring activity saw investment returns slightly lower than assumed in the 2013 valuation.
- 5.5 In addition the Fund Actuary provides monthly funding updates between triennial valuations to check whether the funding strategy continues to meet the funding objectives.



Demographic Risks

- 5.6 Allowance is made in the funding strategy via the actuarial assumptions of continuing improvement in life expectancy. However, the main risk to the funding strategy is that it might underestimate the continuing improvement in mortality. For example an increase in 1 year to life expectancy of all members in the Fund will reduce the funding level by around 2%.
- 5.7 The actual mortality of retired members in the Fund is, however, monitored by the Fund Actuary at each Actuarial valuation and assumptions kept under review.
- 5.8 The liabilities of the Fund can also increase by more than has been planned as a result of early retirements (including redundancies).

- 5.9 However, the Administering Authority monitors the incidence of early retirements and procedures are in place that require individual Scheme employers to pay additional amounts to the Fund to meet any additional costs arising from early retirements thereby avoiding unnecessary strain on the Fund.

Regulatory Risks

- 5.10 The benefits provided by the Scheme and employee contribution levels are set out in Statutory Regulations as determined by central Government. The tax status of the invested assets is also determined by central Government.
- 5.11 The funding strategy is therefore exposed to the risks of changes in the Statutory Regulations governing the Scheme and changes to the tax regime which increase the cost to individual Scheme employers of participating in the Scheme.
- 5.12 The Administering Authority actively participates in any consultation process of any change in Regulations and seeks advice from the Fund Actuary on the financial implications of any proposed changes.

Governance

- 5.13 Several different Scheme employers participate in the Fund. Accordingly it is recognised that a number of Scheme employer specific events could impact on the funding strategy including:
- Structural changes in an individual Scheme employer's membership;
 - An individual Scheme employer deciding to close the Scheme to new employees;
 - A Scheme employer ceasing to exist without having fully funded their pension liabilities; and
 - New Scheme employers being created out of existing Scheme employers.
- 5.14 The Administering Authority monitors the position of Scheme employers participating in the Fund particularly those that may be susceptible to the aforementioned events and takes advice from the Fund Actuary when required.
- 5.15 In addition the Administering Authority keeps in close touch with all individual Scheme employers participating in the Fund and regularly holds meetings with Scheme employers to ensure that, as Administering Authority, it has the most up to date information available on individual Scheme employer situations and also to keep individual Scheme employers fully briefed on funding and related issues.

6 MONITORING AND REVIEW

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

Approved by the Berkshire Pension Fund Panel: 11 March 2019

Next Review date: March 2020

Appendix 3 Rates and Adjustment Certificate

Regulatory background

In accordance with Regulation 62 of the Local Government Pension Scheme Regulations we have made an assessment of the contributions that should be paid into the Fund by participating employers for the period 1 April 2017 to 31 March 2020.

The method and assumptions used to calculate the contributions set out in the Rates and Adjustments certificate are detailed in the Funding Strategy Statement and this report.

The primary rate of contribution as defined by Regulation 62(5) for each employer for the period 1 April 2017 to 31 March 2020 is set out in the table overleaf. The primary rate is the employer's share of the cost of benefits accruing in each of the three years beginning 1 April 2017. In addition each employer pays a secondary contribution as required under Regulation 62(7) that when combined with the primary rate results in the minimum total contributions as set out below. This secondary rate is based on their particular circumstances and so individual adjustments are made for each employer.

Primary and secondary rate summary

The primary rate for the whole Fund is the weighted average (by payroll) of the individual employers' primary rates, and is 14.3% of payroll.

177 The secondary rates across the entire Fund (as a percentage of projected payroll and as an equivalent monetary amount) in each of the three years in the period 1 April 2017 to 31 March 2020 is set out in the table below.

Secondary contributions	2017/18	2018/19	2019/20
Average as a % of payroll	5.3%	6.7%	8.2%
Total monetary amounts	£21,017,000	£27,468,000	£34,075,000

The above table assumes that the small number of employers that have not had their contributions finalised for the entire valuation period will continue to pay consistent levels of deficit contributions.

General notes

Employers may pay further amounts at any time and future periodic contributions, or the timing of contributions, may be adjusted on a basis approved by us as the Fund Actuary. The Administering Authority, with the advice from us as the Fund Actuary may allow some or all of these contributions to be treated as a prepayment and offset against future certified contributions.

The certified contributions include an allowance for expenses and the expected cost of lump sum death benefits but exclude early retirement strain and augmentation costs which are payable by participating employers in addition.

The monetary amounts are payable in 12 monthly instalments throughout the relevant year unless agreed by the Administering Authority and an individual employer.

If contributions set out in the certificate are adjusted for any such agreements in place relating to the timing of contribution payments these are noted in the end column and detailed in specific notes at the end of the certificate.

Code	Employer name	Primary rate (% pay)	Secondary rate (% pay plus monetary adjustment)			Total contributions (% pay plus monetary adjustment)			Specific notes
			2017/18	2018/19	2019/20	2017/18	2018/19	2019/20	
2	Bracknell Forest Council	14.3%	£2,083,000	£2,489,000	£2,914,000	14.3% plus £2,083,000	14.3% plus £2,489,000	14.3% plus £2,914,000	B
49	Binfield Parish Council	14.3%	4.1%	4.7%	5.4%	18.4%	19.1%	19.8%	
9	Bracknell Town Council	14.3%	4.1%	4.7%	5.4%	18.4%	19.1%	19.8%	
125	Crowthorne Parish Council	14.3%	4.1%	4.7%	5.4%	18.4%	19.1%	19.8%	
137	Sandhurst Town Council	14.3%	4.1%	4.7%	5.4%	18.4%	19.1%	19.8%	
39	South Hill Park Trust	14.3%	4.1%	4.7%	5.4%	18.4%	19.1%	19.8%	
190	Warfield Parish Council	14.3%	4.1%	4.7%	5.4%	18.4%	19.1%	19.8%	
42	Winkfield Parish Council	14.3%	4.1%	4.7%	5.4%	18.4%	19.1%	19.8%	
3	RBWM (non-schools)	14.3%	£2,371,000	£3,176,000	£4,017,000	14.3% plus £2,371,000	14.3% plus £3,176,000	14.3% plus £4,017,000	B
	RBWM (schools)	14.3%	8.0%	10.5%	12.9%	22.3%	24.8%	27.2%	
118	Bray Parish Council	14.3%	8.0%	10.5%	12.9%	22.3%	24.8%	27.2%	
51	Cox Green Parish Council	14.3%	8.0%	10.5%	12.9%	22.3%	24.8%	27.2%	
45	Eton Town Council	14.3%	8.0%	10.5%	12.9%	22.3%	24.8%	27.2%	
143	Hurley Parish Council	14.3%	8.0%	10.5%	12.9%	22.3%	24.8%	27.2%	
18	Sunningdale Parish Council	14.3%	8.0%	10.5%	12.9%	22.3%	24.8%	27.2%	
19	Sunninghill & Ascot Parish Council	14.3%	8.0%	10.5%	12.9%	22.3%	24.8%	27.2%	
127	White Waltham Parish Council	14.3%	8.0%	10.5%	12.9%	22.3%	24.8%	27.2%	
4	West Berkshire Council	14.3%	£2,631,000	£3,693,000	£4,774,000	14.3% plus £2,631,000	14.3% plus £3,693,000	14.3% plus £4,774,000	B
147	Burghfield Parish Council	14.3%	4.8%	6.5%	8.2%	19.1%	20.8%	22.5%	
216	Chieveley Parish Council	14.3%	4.8%	6.5%	8.2%	19.1%	20.8%	22.5%	
249	Holybrook Parish Council	14.3%	4.8%	6.5%	8.2%	19.1%	20.8%	22.5%	
136	Hungerford Town Council	14.3%	4.8%	6.5%	8.2%	19.1%	20.8%	22.5%	
88	Newbury Town Council	14.3%	4.8%	6.5%	8.2%	19.1%	20.8%	22.5%	
250	Purley on Thames Parish Council	14.3%	4.8%	6.5%	8.2%	19.1%	20.8%	22.5%	
11	Thatcham Town Council	14.3%	4.8%	6.5%	8.2%	19.1%	20.8%	22.5%	
75	The Downs School	14.3%	4.8%	6.5%	8.2%	19.1%	20.8%	22.5%	
47	Theale Parish Council	14.3%	4.8%	6.5%	8.2%	19.1%	20.8%	22.5%	
20	Tilehurst Parish Council	14.3%	4.8%	6.5%	8.2%	19.1%	20.8%	22.5%	
5	Reading Borough Council	13.4%	£5,829,000	£5,969,000	£6,112,000	13.4% plus £5,829,000	13.4% plus £5,969,000	13.4% plus £6,112,000	A
68	Reading Girls School	13.4%	8.5%	8.5%	8.5%	21.9%	21.9%	21.9%	

Code	Employer name	Primary rate (% pay)	Secondary rate (% pay plus monetary adjustment)			Total contributions (% pay plus monetary adjustment)			Specific notes
			2017/18	2018/19	2019/20	2017/18	2018/19	2019/20	
66	The Blessed Hugh Faringdon School	13.4%	8.5%	8.5%	8.5%	21.9%	21.9%	21.9%	
6	Slough Borough Council	13.6%	£2,719,000	£3,012,000	£3,318,000	13.6% plus £2,719,000	13.6% plus £3,012,000	13.6% plus £3,318,000	B
61	Holy Family School	13.6%	8.5%	9.2%	9.9%	22.1%	22.8%	23.5%	
119	Pippins School - Slough	13.6%	8.5%	9.2%	9.9%	22.1%	22.8%	23.5%	
62	Priory School	13.6%	8.5%	9.2%	9.9%	22.1%	22.8%	23.5%	
122	Wexham Court Parish Council	13.6%	8.5%	9.2%	9.9%	22.1%	22.8%	23.5%	
7	Wokingham Borough Council	14.2%	£1,443,000	£2,061,000	£2,692,000	14.2% plus £1,443,000	14.2% plus £2,061,000	14.2% plus £2,692,000	B
73	All Saints CE (Aided) Primary School	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
97	Barkham Parish Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
251	Charvil Parish Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
10	Earley Town Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
117	Finchampstead Parish Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
258	Ruscombe Parish Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
96	Shinfield Parish Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
52	Swallowfield Parish Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
159	Twyford Parish Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
129	Winnersh Parish Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
70000	Wokingham Borough Council (Schools)	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
12	Wokingham Town Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
227	Wokingham Without Parish Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
21	Woodley Town Council	14.2%	6.2%	7.9%	9.6%	20.4%	22.1%	23.8%	
Colleges									
58	Berkshire College Of Agriculture	13.9%	8.4%	Tbc	Tbc	22.3%	Tbc	Tbc	
55	Bracknell & Wokingham College	17.3%	6.9%	Tbc	Tbc	24.2%	Tbc	Tbc	
57	East Berkshire College	15.0%	7.3%	Tbc	Tbc	22.3%	Tbc	Tbc	
53	Newbury College	15.8%	6.8%	Tbc	Tbc	22.6%	Tbc	Tbc	
156	University of West London	15.8%	7.7%	Tbc	Tbc	23.5%	Tbc	Tbc	
Housing Associations									
132	Bracknell Forest Homes	19.6%	2.4%	2.4% plus £264,000	2.4% plus £541,000	22.0%	22.0% plus £264,000	22.0% plus £541,000	

Code	Employer name	Primary rate (% pay)	Secondary rate (% pay plus monetary adjustment)			Total contributions (% pay plus monetary adjustment)			Specific notes
			2017/18	2018/19	2019/20	2017/18	2018/19	2019/20	
83	Dimensions UK Ltd	17.9%	4.8%	4.8% plus £5,000	4.8% plus £10,000	22.7%	22.7% plus £5,000	22.7% plus £10,000	
104/79	Housing Solutions Ltd	15.6%	2.6%	2.6% plus £213,000	2.6% plus £438,000	18.2%	18.2% plus £213,000	18.2% plus £438,000	
80	Windsor Housing	23.1%	2.6%	2.6% plus £6,000	2.6% plus £13,000	25.7%	25.7% plus £6,000	25.7% plus £13,000	
Admission Bodies - Pooled									
26	Age UK Berkshire	24.1%	-1.9%	-1.9% plus £5,000	-1.9% plus £10,000	22.2%	22.2% plus £5,000	22.2% plus £10,000	
38	AOSEC	24.9%	-5.4%	-5.4% plus £3,000	-5.4% plus £5,000	19.5%	19.5% plus £3,000	19.5% plus £5,000	
95	Berkshire Maestros	17.3%	0.8%	0.8% plus £15,000	0.8% plus £31,000	18.1%	18.1% plus £15,000	18.1% plus £31,000	
30	Mary Hare Grammar School	16.4%	1.9%	1.9% plus £86,000	1.9% plus £177,000	18.3%	18.3% plus £86,000	18.3% plus £177,000	
105	PACT	22.1%	-3.8%	-3.8% plus £14,000	-3.8% plus £29,000	18.3%	18.3% plus £14,000	18.3% plus £29,000	
40	Reading Voluntary Action	22.1%	-0.3%	-0.3% plus £3,000	-0.3% plus £6,000	21.8%	21.8% plus £3,000	21.8% plus £6,000	
35	School of St Helen & St Katharine	20.0%	0.9%	0.9% plus £11,000	0.9% plus £23,000	20.9%	20.9% plus £11,000	20.9% plus £23,000	
121	SECBE	17.5%	-1.2%	-1.2% plus £5,000	-1.2% plus £10,000	16.3%	16.3% plus £5,000	16.3% plus £10,000	
37	Slough Council For Voluntary Service	18.7%	1.6%	1.6% plus £3,000	1.6% plus £5,000	20.3%	20.3% plus £3,000	20.3% plus £5,000	
Admission Bodies - Individual									
193	Adviza	15.5%	-0.3%	4.0%	8.2%	15.2%	19.5%	23.7%	
184	Arvato	16.1%	-3.2%	-1.6%	-	12.9%	14.5%	16.1%	
226	Berks Bucks & Oxon Wildlife Trust	18.6%	0.8%	0.8%	0.8%	19.4%	19.4%	19.4%	
90	Berkshire Fire & Rescue Service	15.2%	-1.5% plus £158,000	£198,000	£239,000	13.7% plus £158,000	15.2% plus £198,000	15.2% plus £239,000	
150	Busy Bee Cleaning Services Ltd	27.6%	-7.9%	-3.9%	-	19.7%	23.7%	27.6%	
247	Busy Bee Cleaning Services Ltd (Wexham School)	24.9%	-8.5%	-4.3%	-	16.4%	20.6%	24.9%	
140	Care UK	20.8%	-0.4%	-0.1%	0.1%	20.4%	20.7%	20.9%	
59	CfBT Berks Careers Guidance	19.8%	£160,000	£216,000	£275,000	19.8% plus £160,000	19.8% plus £216,000	19.8% plus £275,000	
242	Continental Landscapes Ltd	17.4%	-1.8%	1.2%	4.3%	15.6%	18.6%	21.7%	
100	Corn Exchange Trust	25.8%	-6.4% plus £300	£2,000	£5,000	19.4% plus £300	25.8% plus £2,000	25.8% plus £5,000	
241	Cranstoun	19.2%	-3.0%	-0.2%	2.5%	16.2%	19.0%	21.7%	
261	Creative Support (Slough Extra Care)	21.0%	-7.1%	-7.1%	-7.1%	13.9%	13.9%	13.9%	
211	Creative Support Limited	18.9%	-2.7%	2.1%	6.9%	16.2%	21.0%	25.8%	
255	C-Salt (1Life Management Solutions)	17.4%	-6.1%	-2.7%	0.7%	11.3%	14.7%	18.1%	
204	Elior UK plc	23.4%	-9.7%	-4.9%	-	13.7%	18.5%	23.4%	
28	Elizabeth Fry Charity	10.1%	22,000	23,000	24,000	10.1% plus £22,000	10.1% plus £23,000	10.1% plus £24,000	
282	Energy Kidz	10.9%	-	-	-	10.9%	10.9%	10.9%	

Code	Employer name	Primary rate (% pay)	Secondary rate (% pay plus monetary adjustment)			Total contributions (% pay plus monetary adjustment)			Specific notes
			2017/18	2018/19	2019/20	2017/18	2018/19	2019/20	
281	Get Active Sports	17.5%	-3.4%	-1.7%	-	14.1%	15.8%	17.5%	
128	Greenwich Leisure Ltd	17.2%	-5.2% plus £8,000	£10,000	£23,000	12.0% plus £8,000	17.2% plus £10,000	17.2% plus £23,000	
114	Holroyd Howe Ltd	29.0%	-4.2% plus £4,000	£7,000	£10,000	24.8% plus £4,000	29.0% plus £7,000	29.0% plus £10,000	
237	Innovate Services Ltd (Baylis Court)	20.7%	-2.9%	-1.4%	-	17.8%	19.3%	20.7%	
107	Interserve (Facilities Services Slough) Ltd	19.3%	-4.3% plus £64,000	£84,000	£150,000	15.0% plus £64,000	19.3% plus £84,000	19.3% plus £150,000	
188	KGB Cleaning Ltd	25.5%	-4.0%	-2.0%	-	21.5%	23.5%	25.5%	
248	Legacy Leisure Limited	18.7%	-6.6%	-3.3%	-	12.1%	15.4%	18.7%	
115	MITIE	18.2%	-5.2% plus £10,000	£12,000	£13,000	13.0% plus £10,000	18.2% plus £12,000	18.2% plus £13,000	
178	Northgate Information Solutions	20.1%	-4.6%	-0.2%	4.2%	15.5%	19.9%	24.3%	
113	Northgate Ltd	18.5%	-5.4% plus £7,000	£9,000	£13,000	13.1% plus £7,000	18.5% plus £9,000	18.5% plus £13,000	
267	Olive Dining Ltd	18.7%	-1.8%	-0.9%	-	16.9%	17.8%	18.7%	
160	Optalis Limited	21.2%	-7.2%	-3.6%	-	14.0%	17.6%	21.2%	
44	Reading Transport Ltd	21.5%	-1.3% plus £374,000	£487,000	£604,000	20.2% plus £374,000	21.5% plus £487,000	21.5% plus £604,000	
260	Slough Children's Services Trust	14.2%	-2.2%	-0.5%	1.3%	12.0%	13.7%	15.5%	
103	Slough Community Leisure	12.2%	3.4%	6.8%	10.1%	15.6%	19.0%	22.3%	
110	Slough Enterprise Ltd	18.1%	-0.1%	2.3%	4.7%	18.0%	20.4%	22.8%	
48	Sovereign Housing Association	24.7%	-2.8% plus £412,000	£438,000	£465,000	21.9% plus £412,000	24.7% plus £438,000	24.7% plus £465,000	
252	The Windsor Club Day Nursery Ltd	19.5%	-5.2%	-1.8%	1.5%	14.3%	17.7%	21.0%	
155	Vinci Park Services Ltd (Bracknell)	17.8%	-8.7%	-4.3%	-	9.1%	13.5%	17.8%	
139	VolkerWessels Ltd	27.1%	-2.7%	-2.7%	-2.7%	24.4%	24.4%	24.4%	
256	Ways Into Work	15.2%	-1.0%	0.7%	2.4%	14.2%	15.9%	17.6%	
Academies - Individual									
126	John Madejski Academy	14.5%	-2.0%	-0.3%	1.4%	12.5%	14.2%	15.9%	
135	Langley Academy	14.3%	-2.2%	-0.6%	0.9%	12.1%	13.7%	15.2%	
Academies - Pooled									
	Academies Pooled	15.3%	2.3%	3.3%	4.3%	17.6%	18.6%	19.6%	
171	Prospect School Reading	15.3%	2.3% plus £1,280	3.3% plus £1,330	4.3% plus £570	17.6% plus £1,280	18.6% plus £1,330	19.6% plus £570	

Below is a table outlining all of the academies paying the pooled rate included in the table above.

Code	Employer name	Code	Employer name	Code	Employer name	Code	Employer name	Code	Employer name
181	All Saints Junior School Reading	191	Altwood School	206	Battle Primary Academy	163	Baylis Court School	271	Bellevue Place Education Trust
246	Braywick Court School	245	Burchetts Green Infants School	199	Castlevew School	200	Charters School	146	Churchend Academy
186	Cippenham Infants School	185	Cippenham Primary School	262	Civitas Academy (Free School)	210	Colnbrook School	175	Cox Green School
179	Datchet St Mary's C of E Primary School	180	Denefield School	201	Desborough School	230	Ditton Park Academy	278	Eton Porny CofE First School
233	Evendons Primary School	208	Fir Tree Academy Trust	264	Forest Bridge School (Free School)	225	Foxborough School	176	Furze Platt Senior School
198	Godolphin Infant School	197	Godolphin Junior School	275	Halley House School	182	Herschel Grammar School	144	Highdown School and 6 th Form Centre
229	Holyport College	215	James Elliman School	168	Kendrick School	148	Kennet Academy	274	Kilburn Grange School
236	Knowl Hill CE Academy	169	Langley Grammar School	167	Langley Hall Primary Academy	152	Lowbrook Academy Trust	257	Lynch Hill Enterprise Academy
170	Lynch Hill School Primary Academy	153	Maiden Erlegh School	280	Maiden Erlegh School Reading	187	Marish Primary School	203	Meadow Park Academy
224	Montem School	221	National Autistic Society (NAS) Academy Trust	269	Newlands Girls' School	189	Oakbank Free School	157	Park House School Newbury
235	Parlaunt Park Academy	166	Ranelagh School	266	Ranikhet Primary School	173	Reading School	272	Rutherford House School
266	Ranikhet Primary School	164	Slough & Eton C of E School	174	St Bartholomew's School	263	St Francis School	244	St Lukes Church of England Primary School
270	St Margaret Clitherow School	213	St Mary's Catholic Primary School	243	St Peters Church of England Middle	165	The Avenue Academy	214	The Forest School
232	The Heights Primary School	161	The Holt School	268	The Langley Academy Primary	217	The Palmer Academy	158	The Piggott C of E Academy
218	The Specialist Education Trust (Haybrook College)	240	The Specialist Education Trust (Littledown Primary School)	265	The Wren School (Free School)	219	Theale Green School	194	Trinity School
234	Upton Court Grammar School	231	UTC Reading	259	Waingels Academy	276	Watling Park School	238	Western House Academy
183	Westgate School	239	Wheatfield School	196	White Waltham School	273	Whitehall Park Primary School	223	Whitelands Park School
207	Willow Primary School	228	Windmill School	253	Windsor Boys School Academy	254	Windsor Girls School Academy		

Notes

The notes below detail what the specific notes refer to in the table above:

- A We understand that employers with this note have agreed with the administering authority that they will prepay an element of their certified contributions by making a single lump payment in April 2017. This lump sum payment will receive an actuarially equivalent discount and the employer has been notified of the required amount separately. If they do not make the lump sum payment by 30 April 2017, the above contributions in the table will apply as normal.
- B We understand that employers with this note have agreed with the administering authority that they will prepay an element of their certified contributions by making lump sum payments at the start of each year (i.e. in April 2017, April 2018 and April 2019). This lump sum payment will receive an actuarially equivalent discount and the employer has been notified of the required amount separately. If they do not make the lump sum payments by 30 April in the period they are due, the above contributions in the table will apply as normal.

Post valuation employers

A number of employers joined the Fund on or after 1 April 2016 and their rates were certified at their date of joining and have been reviewed as part of the 2016 valuation process. The table summarises the start dates and contributions required from these employers where known.

Employer Code	Employer name	Transfer date	Total contributions (% pay)		
			2017/18	2018/19	2019/20
279	Wraysbury Parish Council	01/09/2016	22.1%	22.8%	23.5%
283	Rapid Clean	01/04/2016	24.3%	24.3%	24.3%
284	Brakenhale School	01/04/2016	17.6%	18.6%	19.6%
285	Dedworth Middle School	01/05/2016	17.6%	18.6%	19.6%
286	Dedworth Green First School	01/05/2016	17.6%	18.6%	19.6%
287	St John's CE Primary School	01/06/2016	17.6%	18.6%	19.6%
288	Compton Parish Council	01/05/2016	19.1%	20.8%	22.5%
289	Holyport CE Primary	01/06/2016	17.6%	18.6%	19.6%
290	Rapid Clean	25/04/2016	24.0%	24.0%	24.0%
291	New Town School	01/06/2016	17.6%	18.6%	19.6%
292	Get Active	01/09/2016	12.0%	12.0%	12.0%
293	Innovate Cleaning Services Ltd	01/09/2016	18.7%	18.7%	18.7%
294	Floreat Montague Park Primary School	01/09/2016	17.6%	18.6%	19.6%
296	Bohunt School	01/06/2016	17.6%	18.6%	19.6%
297	John O'Gaunt School	01/10/2016	17.6%	18.6%	19.6%
298	Beechwood School	01/09/2016	17.6%	18.6%	19.6%
299	Trevelyan Middle School	01/11/2016	17.6%	18.6%	19.6%
300	Lambourn Parish Council	01/01/2017	19.1%	20.8%	22.5%
308	St Anthony's Primary School and Nursery	01/12/2016	17.6%	18.6%	19.6%
309	St Ethelbert's Catholic High School	01/12/2016	17.6%	18.6%	19.6%
310	St Joseph's High School	01/12/2016	17.6%	18.6%	19.6%
311	Northern House Academy Wokingham	01/01/2017	17.6%	18.6%	19.6%
312	Speenhamland Primary School	01/02/2017	17.6%	18.6%	19.6%

APPENDIX 4 - INVESTMENT STRATEGY STATEMENT

The Royal Borough of Windsor & Maidenhead (“RBWM”) acting as the administering authority for The Royal County of Berkshire Pension Fund, a constituent member of The Local Government Pension Scheme in England & Wales, is required by Section 7 of The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 to publish an Investment Strategy Statement.

This is the second such statement published by the Royal Borough and in accordance with the Regulations it will be reviewed regularly and at no more than 3 year intervals.

The Regulations require the administering authority to outline how it meets each of 6 objectives:

1. A requirement to invest fund money in a wide range of instruments.

RBWM’s policy is that the Pension Fund (the “Fund”) should have a highly diversified investment portfolio spread across different asset classes and different asset managers using differing approaches as appropriate. This ensures that the fund money is invested in a wide range of instruments.

RBWM’s Pension Fund Panel has established an Investment Group which meets at least quarterly to review the Fund’s performance, asset allocation and ability to meet its target return. In addition the Investment Group reviews potential new investment ideas and products offered by its investment manager, Local Pensions Partnership Investments Limited (the “Investment Manager” (LPPI)) and opines whether such ideas are consistent with the investment strategy of the Fund and a suitable investment.

The Investment Group receives advice from suitably qualified Officers and Independent Advisers. It also makes use of information derived from the Investment Manager. It will commission specialist work from an external adviser when it believes that neither Officers nor the Independent Advisers have sufficient experience or expertise in a particular field.

To achieve sufficient diversification the Fund divides assets across 4 broad categories: equities, bonds, real assets and absolute return strategies. The size of each bucket will vary depending on investment conditions but each bucket will itself be diversified.

Any investment strategy will have associated risks, including primarily that of not meeting the returns required to ensure the long-term ability of the Fund to pay benefits as they fall due. To mitigate these risks the Investment Group regularly reviews both the performance and the expected returns from the portfolio to measure whether it has met and is likely to continue to meet its return objective.

In addition the Investment Group notes that there will be an increasing gap between contributions received and benefits – i.e. that the Fund will become cash-flow negative. The Pension Fund Panel does not wish the Fund to sell assets to pay benefits. Consequently, it has resolved that a secondary objective of the investment strategy of the Fund should be to ensure that there is sufficient investment income generated from the Fund's investments to meet any cash-flow shortfall. This has been formalised as a medium term objective to generate a 2% income return across the investment portfolio (i.e. investment income should be at least equivalent to 2% of the Fund's assets).

2. The authority's assessment of the suitability of particular investments and types of investments.

In assessing the suitability of investments RBWM relies on the Investment Manager to take into account relevant factors including, but not limited to, prospective return, risks, concentration or diversification of risk as well as geographic and currency exposures, as well as possible interactions with other investments in the portfolio.

Performance benchmarks are set for the Fund as a whole (target return UK CPI+4.5%) as well as for individual allocations. The Fund's target return is greater than the actuarial discount rate used to value liabilities and has been set at a level sufficient to assist in meeting the funding gap whilst not taking excessive investment risk. Furthermore the Pension Fund Panel has agreed that the Fund should aim to achieve its target return with a low level of volatility in those returns. Whilst the Fund as a whole has an absolute return target, RBWM recognises that for measuring the performance of individual asset classes relative to specific benchmarks may be more appropriate.

In ensuring the suitability of investments RBWM expects the Investment Manager (LPPI) to pay regard to both the potential returns and risk (including possible interactions with other investments in the portfolio). RBWM will also consider the reputational risk of being connected with or investing in any investment proposal made by the Investment Manager. RBWM expects its managers to take into account Environmental, Social and Governance (ESG) issues when making an investment.

RBWM measures the returns and the volatility of those returns on a quarterly basis and publishes the results relative to a global group of investment funds with a similar diversified approach to investment on the Fund web-site.

3. The authority's approach to risk, including the ways in which risks are to be measured and managed

There are a variety of risks to be addressed when managing a Pension Fund with investment risk being just one of them. In 2016, in accordance with the principles of Pensions Regulator guidance, RBWM commissioned Lincoln Pensions to undertake an Integrated Risk Management ("IRM") study of the Fund. This study looked at the interaction of employer covenant risk – the ability of the employers to meet future contributions, support the investment risk (volatility of returns) and underwrite funding risk (volatility of actuarial deficit). The study concluded that:

- The future contributions estimated by the Fund's Actuary (on the GAD's funding test, i.e. aimed at removing an actuarial deficit over 20 years) are likely to be affordable across the Fund's employers over the next 10 years.
- Some of the Fund's larger employers, notably unitary authorities, do face a number of challenges in the near term which could constrain affordability of future contributions, particularly given their statutory duties to provide adequate services.

In reaching these conclusions, the Fund's assets, liabilities, and its participating employers have been subjected to a number of adverse stress scenarios to assess resilience, which serve to test and constrain affordability. Where employers find themselves under stress, they would be required to identify and utilise financial levers in order to maintain contributions at the level required. Such levers could include support from central Government or other employers, increases in council tax rates, increasing borrowings (subject to restrictions) and pledging assets to the Fund.

Early in 2019 the Pension Fund Panel agreed to enter into a 12-month contract with LPPI to undertake further work concerning employer covenants with a view to identifying those employers most at risk of not being able to underwrite their liabilities in the future. The Panel will consider the findings of this work over the coming months and determine action might be necessary to safeguard the Fund against the risks associated with employers exiting the Pension Scheme.

Looking specifically at investment risk RBWM is of the view that the diversification of the Fund investment portfolio is so broad that investment risk (volatility of returns) is low and will continue to be low. Ex ante volatility estimates require forecasts by asset class of volatility and correlation and whilst historic data can be used to estimate volatility for listed assets, it is much more difficult for unlisted (e.g. private equity, infrastructure, real estate) assets. Furthermore RBWM notes that correlations continually change and in times of financial stress all risk assets trend to a correlation with each other of 1. This "tail risk" means that most risk models either understate risk in times of stress or conservatively over-estimate volatility in normal markets.

The Fund targets a long-term return of UK CPI+4.5%; this is sufficient for it to meet its long-term liabilities. In setting the investment strategy, the Pension Fund Panel decided that this return should be achieved with a low degree of volatility – currently the Fund targets volatility below 10% per annum over the medium term.

As a patient long-term investor the Fund is prepared to ride-out short term volatility in investment markets and may, if suitable opportunities arise, adapt its investment strategy accordingly. At each review of the Investment Strategy Statement the assumptions on risk and return and their impact on asset allocation will be reviewed.

4. The authority's approach to pooling investments, including the use of collective investment vehicles.

RBWM has broad experience of investing in pooled vehicles be they collective investment vehicles or other “collectives” such as multi-partner Limited Partnerships.

When deciding whether to invest in a collective scheme or to seek a segregated account RBWM, will pay close attention to:

- The relative costs between a collective investment scheme and a segregated account with a focus on the Total Cost of Ownership
- The suitability and ability of a collective investment scheme to meet the mandate requirements of RBWM.

In recognition of the government's requirement for LGPS funds to pool their investments RBWM became an Investment Client of the Local Pensions Partnership Investments Limited with effect from 1 June 2018 and the pooling of assets has commenced.

5. The authority's policy on how social, environmental or corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments.

RBWM accepts that stakeholders will have differing views on how social, environmental and corporate governance considerations should be taken into account and believes that no “one-size fits all” policy can possibly be implemented across such a diverse portfolio such as that of the Fund. Nevertheless RBWM seeks to protect its reputation as an institutional investor and ensures that the Investment Manager (LPPI) takes into account these issues when selecting investments for purchase, retention or sale. RBWM will not place social, environmental or corporate governance restrictions on the Investment Manager but relies on it to adhere to best practices in the jurisdictions in which they are based, operates and invests.

Furthermore RBWM has implemented three investment theses under “ESG” principles: investment in the food chain, housing and infrastructure. Specifically RBWM has made private equity investments in a “food and water” segregated account within its private equity portfolio, two farmland funds in its property portfolio, a number of infrastructure fund investments both globally and in the UK (in particular it was the seed investor in the Gresham House British strategic Investment Fund focussed on small scale infrastructure and Housing projects) as well as investments to support house builders via the purchase of residual shared equity loan books and a fund specialising in acquiring brownfield land for residential developments.

6. The authority’s policy on the exercising of the rights (including voting rights) attaching to investments.

RBWM expects the Investment Manager to exercise all rights attaching to investments including voting in accordance with recognised responsible investment guidelines. RBWM expects the Investment Manager to comply with the principles of the UK Stewardship Code.

RBWM confirms that the Berkshire Pension Fund has no investments in entities that are connected with the authority but if in future it does these will be limited to no more than 5% of the Fund’s assets.

Table one sets out the asset class limits as agreed by the Berkshire Pension Fund Panel on 11 March 2019

Table one: Asset Class Limits

Asset Class	Policy Portfolio Benchmark	Tolerance Range	Relevant LPPI pool	Investment Objective
Credit	10%	5-15%	LPP I Credit Investment LP	GBP LIBOR plus 3-5%
Fixed Income	3%	0-6%	LPP I Fixed Income Fund	Barclays Global Aggregate Index GBP Hedged plus 0.5%
Global Equities (*)	40%	30-50%	LPP I Global Equities Fund	MSCI All Country World GBP Index (net dividends reinvested) plus 2%
Private Equity	13%	8-18%	LPP I PE Investments (No. 3) LP	MSCI All Country World GBP Index (net dividends reinvested) plus 4-6%
Total Return	4%	0-10%	LPP I Total Return	1 month GBP LIBOR plus 2-4%
Infrastructure	12.5%	8-16%	LPP I Infrastructure Investment LP	UK CPI plus 4-6%
Real Estate	16.5%	10-20%	LPP I Property Pool	UK CPI plus 4-6%
Cash	1%	0-5%		

Approved by the Berkshire Pension Fund Panel: 11 March 2019
Next review date: March 2020

APPENDIX 5



**SERVICE LEVEL AGREEMENT BETWEEN THE
ROYAL BOROUGH OF WINDSOR & MAIDENHEAD
AS ADMINISTERING AUTHORITY AND THE
THE PENSION ADMINISTRATION TEAM**

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INTRODUCTION

The Royal Borough of Windsor & Maidenhead (RBWM) is the administering authority for the Royal County of Berkshire Pension Fund. As such, RBWM has certain statutory responsibilities for the administration of the Local Government Pension Scheme (LGPS) in Berkshire. This includes the six Unitary Authorities (of which RBWM is one) and around 250 other associated employers who make up the membership of the Pension Fund.

The administering authority has ultimate responsibility for interpreting and implementing statutory LGPS regulations, which includes setting an investment strategy, for receiving monies due to and paying monies owing from the Fund and for making sure that it has robust systems and processes in place to ensure that the scheme is administered in line with scheme regulations and within prescribed levels of performance.

STATUTORY INSTRUMENTS	
2013 No. 2356	
PUBLIC SERVICE PENSIONS, ENGLAND AND WALES	
The Local Government Pension Scheme Regulations 2013	
Made: 2013	
Laid before Parliament: 2013	
Coming into force: 2013	
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PART I	
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100. General provisions	1

This document has been prepared as a service level agreement between the administering authority and the pension administration team and sets out service standards or 'promises' of the level of service that the team will provide to ensure that the administering authority achieves its statutory responsibilities.

1.0 ADMINISTRATION OF THE LGPS

The pension administration team will:

- 1.1 Maintain a member database of all current, deferred and retired members (including their dependants) of the scheme along with historical data relating to former scheme members who have a right to claim a refund of contributions but have not elected to do so (frozen refunds), former members who no longer have a liability within the Fund (benefits transferred out of the scheme) and employees who have opted out of the Scheme for whom an opting out form must be retained.
- 1.2 Provide an efficient, effective and courteous administration service.



- 1.3 Calculate member benefits in accordance with Scheme regulations.
- 1.4 Provide a pension payroll service to all retired Scheme members and their dependants.
- 1.5 Ensure that pension payments are made on the correct date and that all lump sum payments are made as soon as possible following the retirement of the Scheme member.
- 1.6 Provide current and deferred members with an annual benefit statement.

- 1.7 Ensure that all new Scheme members receive access key to 'my pension ONLINE' with details of how to access a formal notification of membership and other relevant Scheme information.
- 1.8 Notify all retired scheme members of the annual increase to their pension.
- 1.9 Provide a payslip to retired members of the Scheme in April every year and any subsequent month where there is 50 pence variance in net pay.
- 1.10 Provide a P60 to every retired Scheme member within HMRC deadlines.
- 1.11 Perform other administrative tasks in line with the service standards laid down in a service level agreement with Scheme employers.

2.0 SCHEME COMMUNICATIONS

The pension administration team will:

The Royal County of Berkshire Pension Fund

The pages of this website contain information about the Local Government Pension Scheme and how it is administered in Berkshire. It sets out details about your membership of the scheme and the benefits of contributing to a highly regarded, final-salary occupational pension scheme.



2.1 Maintain and update a website for all members of the LGPS and provide a dedicated area for Scheme employers to assist them in administering the scheme on behalf of their employees.

2.2 Inform all scheme members of significant changes to the LGPS by way of a bi-annual newsletter.

2.3 Produce, publish and maintain a suite of scheme guides and fact-sheets to assist scheme members in understanding their pension rights and options.

2.4 Offer pension surgeries, presentations and open days to be held across the County of Berkshire.

2.5 Respond to letters and emails within 10 working days.

3.0 COMPLAINTS PROCEDURE

- 3.1 The pension administration team has a commitment to put things right if they go wrong and will investigate any complaint received within 10 working days.
- 3.2 If the team are unable to resolve a complaint the member has a right to appeal under the Internal Disputes Resolution Procedure (IDRP) which is a 3-stage appeal process set out in the regulations.

4.0 GENERAL

The pension administration team will:

- 4.1 Deal with member enquiries in a professional, polite and friendly way and offer guidance to scheme members as appropriate without giving financial advice.
- 4.2 Make available confidential interview facilities as required.
- 4.3 Maintain and report on performance statistics.
- 4.4 Provide information for completion of an administration report to be presented to members of the for the Pension Fund Panel, Pension Fund Advisory Panel and Pension Board.
- 4.5 Provide information for the Annual Report and Accounts of the Pension Fund.
- 4.6 Maintain the member database in accordance with the General Data Protection Regulations 2018 and issue a Privacy Notice explaining how the Pension Fund collects data, what the data is used you, with whom the data is shared and the rights of individuals with regard to their data.

Approved by the Pension Fund Panel: 17 September 2018

Next review date: September 2019

Appendix 6 – List of Scheme Employers and Contributions Received 2018/19

Employer	Employee £'000	Employer £'000
Absolutely Leisure Limited	29	78
Accent Catering Services Ltd	1	4
Achievement for All Education Trust	24	77
Activate Learning Education Trust	62	185
Age Concern Berkshire	4	17
ALET (B&W College)	33	146
Altwood School (Academy Status)	29	94
Arvato	201	433
Ashley Hill Schools Trust	23	74
Association of SE Colleges	2	10
Baylis Court Trust	83	265
Bellevue Place Education Trust	100	287
Berks, Bucks & Oxfordshire Wildlife Trust	7	22
Berkshire College Of Agriculture	199	745
Berkshire Fire & Rescue Service	367	1,018
Berkshire Maestros	32	110
Binfield Parish Council	4	13
Bohunt Education Trust	19	61
Bonitas Multi Academy Trust Limited	78	188
Bouygues E&S UK Ltd	4	18
Bracknell & Wokingham College	113	495
Bracknell Forest BC	3,027	9,133
Bracknell Forest Homes	141	694
Bracknell Town Council	41	122
Bray Parish Council	3	11
Brighter Futures for Children	259	499
Bucklebury Parish Council	0	0
Burghfield Parish Council	5	12
Busy Bee Cleaning Services Ltd	1	3
Care UK	5	16
Castleview School (Academy Status)	51	163
Caterlink	1	4
CfBT Schools Trust	69	191
Charters School (Academy Status)	72	212
Charvil Parish Council	1	5
Chieveley Parish Council	0	2
Churchend Academy	32	100
Cippenham Middle School	0	0
Compton Parish Council	0	2
Connexions Thames Valley	96	281
Continental Landscapes Ltd	14	43

Cookham Parish Council	2	8
Corn Exchange Trust	2	11
Cox Green Parish Council	4	15
Cox Green School (Academy Status)	54	157
Cranstoun	4	12
Creative Support Extra Care	19	41
Creative Support Ltd (Altair 00211)	11	36
Crowthorne Parish Council	5	17
Denefield School (Academy Status)	54	154
Desborough School (Academy Status)	21	60
Dimensions UK Ltd	8	35
Earley Town Council	26	95
East Berkshire College Ext 3302	250	836
Elior UK plc	1	4
Elizabeth Fry Hostel	8	34
Energy Kidz	0	0
Eton Town Council	1	4
Evendons Primary School	16	54
Excalibur Academies Trust	31	100
Finchampstead Parish Council	3	10
Floreat Education Academies Trust	13	40
Forest Bridge School	42	130
Frassati Catholic Academy Trust	85	274
Furze Platt Senior School (Academy Status)	78	243
Glyn Learning Foundation	17	56
Greenham Parish Council	1	3
Greenshaw Learning Trust	100	320
Greenwich Leisure Ltd ext 4076	8	33
Hampstead Norreys Parish Council	0	1
Haybrook College Trust	70	208
Hayward Services Ltd (Cox G)	1	5
Hayward Services Ltd (Wex)	1	7
Highdown School	54	163
Holroyd Howe Ltd	1	12
Holt School (Academy Status)	46	138
Holy Family School	29	116
Holybrook Parish Council	2	7
Holyport College	45	133
Housing Solutions Ltd	162	617
Hungerford Town Council	4	14
Hurley Parish Council	1	3
Innovate Services (Emmbrook)	1	2
Innovate Services (Prospect)	6	18
Innovate Services Ltd	2	6
John Madejski Academy	36	81
Kendrick School (Academy Status)	30	91

Kennet School Academies Trust	97	300
Keys Multi-Academy Trust	53	165
KGB Cleaning Ltd	0	0
KGB Cleaning Ltd – Denefield	0	0
King's Academy Binfield	6	17
Lambourn Parish Council	2	7
Langley Academy	84	183
Langley Academy Trust	62	198
Langley Grammar School (Academy Status)	50	184
Langley Hall Primary Academy	40	122
Learning Alliance Trust	42	138
Legacy Leisure Limited	23	60
Lowbrook Academy Trust	14	45
Maiden Erlegh Schools Trust	175	528
Marish Academy Trust	104	329
Mary Hare Grammar School	254	731
MITIE	1	16
NET Academies Trust	35	91
Newbury Academy Trust	82	254
Newbury College	108	423
Newbury Town Council	20	62
Newlands Girls School	51	154
Northern House School Wokingham	23	71
Northgate UK Ltd (Altair Code 00113)	4	24
Northgate UK Ltd (Altair Code 00178)	11	33
NSL Ltd	25	85
Olive Dining Ltd	1	0
Optalis Limited	59	175
Optalis Limited (RBWM)	274	910
Orchard Hill College & Academy Trust	67	213
Osborne Property Services Limited	46	432
Oxford Diocesan Schools Trust	69	219
Pabulum Ltd	3	13
Pact	21	65
Pangbourne Parish Council	2	7
Park Federation Academy Trust	173	537
Park House School Newbury	17	53
Priory School	87	327
Project Centre Ltd	16	42
Project Centre Ltd 2	13	27
Prospect School Reading (Academy Status)	72	213
Purley on Thames Parish Council	2	6
Rapid Commercial Cleaning Services Ltd	0	2
Rapid Commercial Cleaning Services Ltd 2	1	3
RBWM	1,948	8,733
RBWM Property Company Ltd	30	34

Reach2 Thames Valley Academy Trust	55	168
Readibus Limited	2	38
Reading Borough Council	4,429	14,527
Reading School (Academy Status)	45	133
Reading Transport Ltd	48	629
Reading Voluntary Action	2	11
Royal County of Berkshire Schools Trust	54	176
Ryvers School (Academy Status)	40	109
S.E.Centre for the Built Environment Ltd	11	25
Sandhurst Parish Council	4	9
SASH Education Trust	59	183
Schelwood Academy Trust	76	220
School of St Helen & St Katharine	22	77
Shinfield Parish Council	3	11
SLM Charitable Trust 2	100	274
SLM Fitness & Health	9	30
SLM Food & Beverage	17	54
Slough Borough Council	2,735	8,475
Slough Children's Services Trust	631	1,120
Slough Community & Leisure Ltd	0	40
Slough Council For Voluntary Service	5	14
South Hill Park Trust	9	16
Sovereign Housing Association	14	554
Specialist Education Trust	35	105
St Bartholomew's School (Academy Status)	65	206
St Peter Catholic Academies Trust	97	306
Sunningdale Parish Council	3	11
Sunninghill & Ascot Parish Council	2	8
Swallowfield Parish Council	3	11
Thatcham Town Council	13	43
The Avenue Academy	111	356
The Beehive (Wokingham) Limited	1	2
The Blessed Hugh Farringdon School	40	150
The Cippenham Schools' Trust	69	217
The Circle Trust	83	222
The Corvus Learning Trust	95	301
The Downs School	83	260
The Education Fellowship	25	43
The Forest School Academy Trust	42	112
The Heights Free School	13	42
The National Autistic Society Academy Trust	52	165
The Piggott C of E Academy	51	159
The Slough and East Berkshire MAT	125	373
The Windsor Day Club Nursery	0	1
The Wren Free School	18	54
Theale Green School (Academy Status)	0	68

Theale Parish Council	1	3
Tilehurst Parish Council	6	19
Twyford Parish Council	1	6
University of West London	63	580
Upton Court Education Trust	101	327
Volkerhighways Ltd	28	102
Waingels College	54	139
Warfield Parish Council	2	6
Ways Into Work CIC	8	19
West Berkshire DC	3,724	11,587
Westgate School (Academy Status)	67	205
Wexham Court Parish Council	1	3
White Horse Federartion Trust	10	38
White Waltham Parish Council	4	13
Whitelocke Infant	26	99
Windsor Housing	2	15
Windsor Learning Partnership	116	352
Winkfield Parish Council	15	44
Winnersh Parish Council	4	14
Wokingham Borough Council	3,095	8,955
Wokingham Town Council	35	71
Wokingham Without Parish Council	8	26
Woodley Town Council	36	132
Wraysbury Parish Council	1	2
Yattendon Parish Council	0	0

Appendix 7 - AVC Arrangements

There are a number of investment choices available to members of the Royal County of Berkshire Pension Fund who elect to pay Additional Voluntary Contributions (AVCs). Members can choose to switch AVC Funds at any time subject to the terms and conditions of each vehicle. At retirement, the accumulated value of a member's AVC Fund can be used to provide a tax-free lump sum payment (subject to HMRC limits), to purchase an annuity on the open market or, in certain circumstances, buy additional membership of the Local Government Pension Scheme. The following table sets out the available Funds and the level of investment risk attached to each of those Funds:

Provider	Fund Type	Level of Risk
Prudential Assurance Company	Deposit	Minimal
	Cash	Minimal
	Fixed Interest	Lower
	Index Linked Gilts	Lower
	Retirement Protection	Lower
	With Profits	Lower to Medium
	Discretionary	Medium
	Property	Medium
	International Equity	Medium to Higher
	Global Equity	Medium to Higher
	Equity	Higher
	UK Equity Passive	Higher
	Socially Responsible	Higher

Many members choose to invest in the With Profits Fund that is designed to provide smoothed medium to long-term growth by investing in a range of assets including equities and property. The investment returns are distributed by way of reversionary and terminal bonuses.

Lifestyling

Lifestyling is a convenient way for members of AVC schemes to stay invested in assets with the potential for long-term growth throughout their working lives whilst gaining an element of protection through automatic switching into funds with lower risk as retirement approaches.

INTERNAL AUDIT REPORT

Pensions Payroll and Administration 2018/19

Managing Director's Directorate

Report Distribution

Name	Title
Kevin Taylor	Deputy Pension Fund Manager
Philip Boyton	Pension Administration Manager
Duncan Sharkey	Managing Director
Rob Stubbs	Deputy Director and Head of Finance (& Section 151 Officer)
Steve Mappley	Insurance & Risk Manager
Deloitte LLP	External Audit

Auditor

Sheldon Hall, Audit and Investigation Specialist

Report Approved by

Catherine Hickman, Lead Specialist – Audit and Investigation

1. INTRODUCTION

1.1 This audit has been undertaken as part of the approved Annual Internal Audit Plan 2018/19, in accordance with the:

- Audit Charter
- Audit Protocol
- Agreed Terms of Reference previously issued

1.2 The format of this report is based on the Lean Systems Thinking Methodology. Management is asked to specify and explain which type of countermeasure chosen (treat, tolerate, transfer or terminate) against each of the concerns (risks) raised as detailed in the Management Action Plan. Descriptions of the type of countermeasures can be found in the Internal Audit Protocol.

2. EXECUTIVE SUMMARY & CONCLUSIONS

AUDIT OPINION

Based upon our review of the controls in place within Pension Payroll and Administration, we have concluded that controls are:

Complete and Effective

- All necessary Treatment Measures are in place and are operating effectively.
- Residual risks have been reduced to an acceptable level
- There are no unacceptable financial implications.
- Concerns reported are minor.

(Risk management processes are strong and controls are adequate and effective).

- 2.1 The principal objective of this Audit was to conclude whether controls in place for Pensions Payroll and Administration are operating effectively and risks are minimised through proper and adequate control measures.
- 2.2 The Pension Payroll and Administration is well controlled by the administering authority (RBWM). The controls between the administration and payroll processes are sound, payments to beneficiaries are properly authorised and the reconciliation between the pension administration and payroll is undertaken in accordance with expected key controls.
- 2.3 Areas where there are opportunities to improve include:- Reconciliation between the pensions payroll and the general ledger, late payment charges, written procedure notes, automatic task generation and user access levels within the PTX payment system. It should be noted that there is one concern raised within this report which is the responsibility of the Financial Control Team and not the Pension Payroll and Administration Service.
- 2.4 There are 5 concerns identified in this Audit Report, all of which are classified as being moderate concerns of which 4 have been addressed between draft report stage and final report stage. This has resulted in the audit opinion being re-assessed to the

highest category. There are no extreme or major concerns and 3 minor concerns were discussed at the exit meeting.

Audit Opinion

The opinion stated in the audit report provides management with a brief objective assessment of the status of current Treatment Measures which have been put in place to reduce identified risks to the operation or strategy under review. It is not a statement of fact.

In reaching the Audit Opinion for this audit, the majority of the criteria for the relevant definition apply.

AUDIT OPINION DEFINITIONS
<p>Complete and Effective</p> <ul style="list-style-type: none"> • All necessary Treatment Measures are in place and are operating effectively. • Residual risks have been reduced to an acceptable level • There are no unacceptable financial implications. • Concerns reported are minor. <p>(Risk management processes are strong and controls are adequate and effective).</p>
<p>Substantially Complete and Generally Effective</p> <ul style="list-style-type: none"> • Most key Treatment Measures are in place and these operate effectively. • The majority of residual risks have been reduced to an acceptable level. • There are a small number of unacceptable financial implications. • The majority of concerns are of a predominately moderate impact/likelihood. <p>(Risk management processes are good and controls are adequate although only partially effective).</p>
<p>Range of Risk Mitigation Controls is incomplete and risks are not effectively mitigated</p> <ul style="list-style-type: none"> • Not all key Treatment Measures are in place and / or do not operate effectively • Residual risks have not all been reduced to an acceptable level • There are some unacceptable financial implications associated with more than one risk mitigation control or because of a lack of risk mitigation control. • There are a number of concerns that are predominantly of a major impact/likelihood. <p>(Risk management processes and controls are adequate but not effective in mitigating the identified risks).</p>
<p>There is no effective Risk Management process in place</p> <ul style="list-style-type: none"> • There are no appropriate Treatment Measures in place. • Residual risks remain at an unacceptable level • Reported concerns are predominantly of a catastrophic or major impact/likelihood. <p>(Risk management processes and controls are weak).</p>

Management Action Plan

Pensions Payroll and Administration – 2018-19

				COUNTER MEASURE						
Ref.	Concern	Risk	Finding	Treat	Tolerate	Transfer	Terminat	Counter Measure Action / Explanation	Responsible Officer	Target Date
1	Governance is weakened and staff may follow out of date written procedures if they are not updated accordingly.	Moderate	The vast majority of desktop procedures are fully written and up to date with those outstanding nearing completion.	X				It is an ongoing exercise for the Administration Team to obtain PASA Accreditation. Many desktop procedures are already in place and up to date and used on a daily basis mainly by (Trainee) Pension Administrators in their learning and development and successfully fulfilling areas of administration.	Philip Boyton, Pension Administration Manager	31/03/21
2	The preventative control could be circumvented if a task is not automatically set up.	Moderate	When a change has to be made to the Altair system records, a task entry has to be entered manually on to the system rather than the system automatically setting up a task and therefore an automatic process to push a transaction/change through to a checking task (i.e. a second person). This means that a change to an account can be made without the necessary following check being made.	X				With immediate effect a robust system will be introduced whereby the 'Approver' of the weekly IP run will check the payee account details, of payments listed on the respective run, that are equal to or greater than £35,000.	Philip Boyton, Pension Administration Manager	01/05/19

3	The elements within the key control of reconciliations will not be undertaken, such as signed by the preparer and reviewer.	Moderate	There is an informal reconciliation undertaken by the Corporate Accountant. This was introduced by the Corporate Accountant but it is not officially signed by the preparer and an independent approver, checked that it casts and that the brought forward and carry forward figures are correct and to confirm that any material variances are investigated. In addition, the latest reconciliation (February 2019) contained variances that require investigation and clearing.	X				The Deputy Pension Fund Manager has met with the Corporate Accountant and a process of investigation followed by preparer and approver signatories being applied has been adopted.	Kevin Taylor, Deputy Pension Fund Manager	16/05/19
4	Governance is weakened if appropriate approval for a change in process is not obtained.	Moderate	The methodology of not charging organisations late payment fees has not been approved by the S151 Officer.	X				The s151 officer has been advised of the processes and procedures adopted by the Pension Fund and in an email dated 08/05/19 has approved the methodology as set out.	Kevin Taylor, Deputy Pension Fund Manager	08/05/19
5	The fundamental internal control of separation of duties which reduces the risk of fraud and error is not in place.	Moderate	The PTX system, which makes the BACS payments, was reviewed with the Financial Control Team and it was established that the officers who are included within the Pensions user group have the facility to create payments and authorise payments.	X				Evidence has been received by Internal Audit from the Financial Control Team that access has been amended and is appropriate to mitigate the risk.		05/05/19

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MANAGING RISKS



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1 INTRODUCTION

A Scheme Manager (Administering Authority) of a public service pension scheme must establish and operate internal controls which must be adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules and with the requirements of the law. The Royal Borough of Windsor & Maidenhead, as the Administering Authority to the Royal County of Berkshire Pension Fund, has a risk management policy and strategy and the Fund's operational and strategic risks are integrated into, and have a direct correlation with, the Royal Borough's risk management framework. Great emphasis is placed on risk management and the reason why the Pension Fund differentiates between operational and strategic risks is to secure the effective governance and administration of the Local Government Pension Scheme.

Risk can be identified as *"the chance of something happening which may have an impact on the achievement of an organisation's objectives"*. The difference between a risk and an issue is one of timing:

- A risk event has not happened yet;
- An issue is a result of an event that is happening right now or has already happened;
- As the risk event is a future event, the task is to assess its probability of occurring and estimate the impact that would be caused if it did occur;
- An issue event has already happened so there is no need to assess its probability but what must be taken into account is the impact and what reaction is required to deal with it;
- There is a possibility for a risk to turn into an issue when it is realised.



The main internal controls for the Pension Fund are:

- Arrangements and procedures to be followed in administration, governance and management of the scheme;
- Systems and arrangements for monitoring that administration, governance and management; and
- Arrangements and procedures to be followed for the safe custody and security of the assets of the scheme.

2 RISK MANAGEMENT POLICY

Risk management decisions and practices will be in accordance with appropriate codes of best practice, ethical standards and values applicable to the governance and administration of the LGPS and as applied to the officers of the Pension Fund.


To deliver this policy it is necessary for Pension Fund staff, Elected Members of the Pension Fund Panel, members of the Pension Fund Advisory Panel and members of the Pension Board to adopt a consistent and systematic approach to managing risks. The way in which risk is managed can have a major impact on the Pension Fund's key objectives and service delivery to its stakeholders.

The foundations of this policy are based upon a common understanding and application of the following principles:

- The informed acceptance of risk is an essential element of good business strategy;
- Risk management is an effective means to enhance and protect the Pension Fund over time;
- Common definition and understanding of risks is necessary in order to better manage those risks and make more consistent and informed business decisions;
- All risks are to be identified, assessed, measured, monitored and reported on in accordance with the Administering Authority's risk management strategy;
- All business activities are to adhere to risk management practices which reflect effective and appropriate internal controls.

3 PENSION FUND OBJECTIVES

Operational objectives

- To manage the scheme in accordance with scheme regulations and associated pension law;
 - To ensure that the appropriate knowledge and experience is maintained within the Pension Fund so that all duties are discharged properly;
 - To maintain a high quality pension member database;
 - To ensure that all pension payments are made on the correct pay date;
- 
- To ensure that payments do not continue to be made to deceased members of the scheme;
 - To have continuous access to the pension administration software during normal working hours and extended hours as required;
 - To ensure that pension contributions are received from Scheme employers by the Pension Fund within required timescales;
 - To maintain an appropriate level of staff to administer the scheme effectively and efficiently;
 - To maintain a pension administration strategy and service level agreement and ensure that key performance indicators are achieved and reported to the Pension Fund Panel, Pension Fund Advisory Panel and Pension Board;
 - To communicate effectively and efficiently with all scheme members;
 - To ensure that third party operations are controlled and operate effectively and cost efficiently;

- To monitor and review the performance of the Local Pensions Partnership Investment Limited as the Investment Fund Manager to ensure maximum benefit for the Pension Fund.

Strategic objectives

- To achieve a funding level of 100%;
- To achieve stable employer contribution rates;
- To set the strategic asset allocation;
- To monitor and review investment performance in line with the strategic asset allocation;



- To ensure employer covenants are sufficient to meet employer obligations;
- To maintain a high level of governance of the Pension Fund in line with the Local Government Pension Scheme Regulations and associated pension legislation.

4 PENSION FUND RISKS

If risk is not properly managed it can have a significant impact on the Pension Fund. The effective management of risk is a critical part of the Pension Fund's approach to delivering sound governance and administration performance that provides better outcomes for all of its stakeholders. The Pension Fund identifies the operational and strategic risks associated with its operational and strategic objectives.

The objective of risk management is not to completely eliminate all possible risks but to recognise risks and deal with them appropriately. Everyone connected to the Pension Fund should understand the nature of risk and systemically identify, analyse, treat, monitor and review those risks.

Risk management requires:

- A consistent management framework for making decisions on how best to manage risk;
- Relevant legislative requirements to be taken into account in managing risks;
- Integration of risk management with existing planning and operational processes;
- Leadership to empower staff in the management of risk;

- Good quality information.

Operational risks

Key operational risk covers such areas as:

- Administration of member records;
- Payments of member benefits;
- Management of the Pension Fund's cash;
- Monitoring and reviewing investment performance;
- Receipt of employee and employer contributions;
- Business continuity and disaster recovery;
- Lack of knowledge and expertise; and
- Staff shortages.

Strategic risks

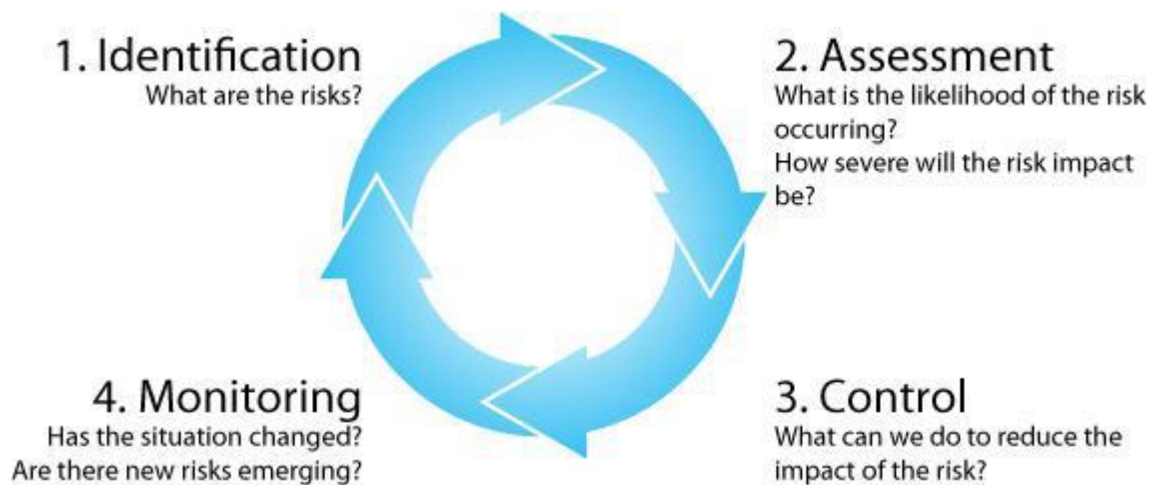
Key strategic risk, whilst not affecting day to day operations of the Fund, could in the medium or long-term, have significant impact and covers such areas as:

- The Pension Fund being less than 100% funded;
- Volatility of employer contribution rates;
- Investment performance;
- Failure to meet funding targets
- Longevity risk;
- Employer covenants.

The Pension Fund's risk assessment and register sets out all of the operational and strategic risks.

5 RISK MANAGEMENT PROCESS

The Pension Fund has adopted the Administering Authority's approach to risk management which follows a four-stage process that involves the Fund's objectives being risk profiled.



Stage 1 – Identification

This involves identifying the Pension Fund's objectives from its core business processes.

Stage 2 - Assessment

This stage identifies those circumstances (risks) that might prevent those objectives being reached and evaluates the likelihood, impact and significance of each risk.

Impacts are scored from 1 to 4 where 1 represents a minor risk and 4 represents a high risk. The likelihood of the risk occurring is also scored from 1 to 4 where 1 represents very unlikely and 4 very likely.

Multiplying these likelihood and impact scores together gives a result that is assessed as "high risk" (a value over 10), "high/medium risk" (a value above 8 and below 11), "medium risk" (a value above 4 and below 9) and "low risk" (a value below 5). Key risks are those identified as high risk and those where the implications of failure carry the most damaging consequences.

In terms of assessing each risk the assessment is detailed in three situations for all risks with a further dimension of risk appetite assessment to the key risks:

- Uncontrolled: the inherent risk without any controls whatsoever;
- Current: how the risk stands at the present time;
- Controlled: how the risk would look once all treatment measures are implemented.

An impact/likelihood matrix as follows shows how each risk once assessed against both criteria will identify the risk profile of each objective.

I M P A C T	High	4	8	12	16
	Medium/High	3	6	9	12
	Medium	2	4	6	8
	Low	1	2	3	4
		Low	Medium	Medium/High	High
	LIKELIHOOD VALUES				

Stage 3 - Control

This stage treats the risks in order of priority. Treatment measures address whether the likelihood and/or impact can be reduced or the consequences changed. Contingencies can be devised to respond should the risk occur.

Stage 4 - Monitoring

This stage sets out a process for reviewing and monitoring actions previously taken. Each risk must clearly indicate all consequences, countermeasures and contingencies along with the risk owner.

This process adds scrutiny to ensure:

- Correct risks are being identified;
- Treatment measures identified are legitimate;
- Correct individuals are assigned as risk owners;
- There are challenges made to what is known to ensure that the most up to date knowledge is being utilised;
- There are early warning systems so that information can filter up quickly and easily.

6 RISK APPETITE

Risk appetite is the phrase used to describe where the Pension Fund considers itself to be on the spectrum ranging from willingness to take or accept risks through to an unwillingness or aversion to taking risks.

The Administering Authority provides a diverse range of services where its risk appetite may vary from one service to another. The Pension Fund has a set of core objectives and so its risk appetite can be set within appropriate limits.

A defined risk appetite reduces the likelihood of unpleasant surprises and considers:

- Risk capacity: the actual physical resources available and physical capability of the Pension Fund. The Fund's capacity will have limits and therefore its capacity is finite and breaching those limits may cause the Pension Fund problems that it cannot deal with;
- Risk tolerance: the factors that the Pension Fund can determine, can change and is prepared to bear. Risks falling within the Fund's tolerances for governance and administration services can be accepted.

7 RISK MANAGEMENT ROLES AND RESPONSIBILITIES

This section has been lifted directly from the Administering Authority's risk management policy and strategy and has been included for the purposes of providing guidance on how the Pension Fund, as managed by The Royal Borough of Windsor & Maidenhead, is held accountable to the management structure of the Borough.

Managing director

The MD takes overall responsibility for the council's risk management performance and in particular ensures that:

- decision-making is in line with council policy and procedures for management of risk;
- adequate resources are made available for the management of risk;
- there is an understanding of the risks facing the council.

Cabinet members

- Take reasonable steps to consider the risks involved in the decisions taken by them;
- Have an understanding of the key council risks falling within their portfolio.

Audit and Performance Review Panel

- Consider and approve the risk management strategy annually and communicate it to other elected members;
- Receive an annual report on risk management and monitor the effective development and operation and corporate governance in the council;
- Receive quarterly reports on the management of the key operational and strategic risks facing the council to allow their scrutiny and challenge;
- Oversee the governance process to ensure that strategic risks are being reviewed at CMT and across each directorate;
- Oversee a comprehensive, inclusive and risk management approach to the annual governance statement process;
- Review an annual report on corporate governance (annual governance statement).

Head of finance

- Ensure that a risk management policy and strategy is developed and reviewed annually to reflect the changing nature of the council;
- Champion the process of risk management as good management practice and a valuable management tool.

Senior Leadership Team (SLT)

- Ensure that the council manages risk effectively through the development of an all-encompassing strategy and monthly updates from the risk manager;
- Approve the corporate risk management strategy;
- Challenge the contents of the corporate risk register to ensure, in particular, that it reflects any significant new risks emerging and that monitoring systems are suitably robust;
- Support and promote risk management throughout the council;
- Ensure that, where appropriate, key decision reports include a section demonstrating that arrangements are in place to manage identified risks.
- Identify and manage the strategic and SLT risk registers on a quarterly basis.

Directorate Management Team (DMT)

- Ensure that risk is managed effectively in each service area within the agreed corporate strategy;
- Identify any service specific issues relating to risk management which have not been explicitly addressed in the corporate strategy;
- Identify and manage the directorate risk register on a quarterly basis;
- Disseminate the detail of the strategy and allocate responsibilities for implementation to service managers and staff;
- Establish the training requirements of managers and staff with regard to strategy implementation;
- Have an understanding of the risks facing the council.

Insurance and risk management team

- Develop the strategy and oversee its implementation across the council;
- Share experience and good practice on risk and risk management;
- Develop and recommend the strategy to the Audit and Performance Review Panel and CMT;
- Provide a clear and concise system for reporting risks to elected members.

Internal audit

- Take the content of the key risk registers into account when setting the internal audit programme;
- Undertake audits to assess the effectiveness of the risk mitigation measures;
- Feed back audit opinions into the risk register.

Heads of service/managers

- Take primary responsibility for identifying and managing significant strategic and operational risks arising from their service activities;
- Recommend the necessary training for employees on risk management;
- Maintain a risk management portfolio for their service area;
- Ensure that all employees are aware of the risk assessments appropriate to their activity;
- Be responsible for production, testing and maintenance of business continuity plans.

All staff

- Identify new or changing risks in their job and feed these back to their line manager;
- Support continuous service delivery and any emergency response.

8 CORPORATE RISK FINANCING STRATEGY

This section has also been lifted directly from the Administering Authority's risk management policy and strategy and has been included for the purposes of providing guidance on how the Pension Fund, as managed by The Royal Borough of Windsor & Maidenhead, is held accountable to the management structure of the Borough.

The council uses its risk financing arrangements to protect itself from the financial implications of unexpected accidental events affecting its staff and property, which helps in providing continuous services in the event of serious losses.

The level of cover bought and excesses applied will depend on the council's appetite for risk, based on its financial security i.e. ability to self fund claims and the strength of its risk management.

The council is exempt from the majority of requirements regarding compulsory insurance. The only insurable aspect of the council's operations it is obliged to make specific financial provision for is fidelity guarantee (fraud by staff).

Nevertheless, most public sector organisations including the council, choose to purchase external insurance for the majority of their risks. This is because without external insurance, the council will be obliged to fund all such exposures from its resources.

If the council were to insure against most of the risks that it faced then this would incur a significant amount of annual expenditure in premiums.

Having strong risk management arrangements across the council allows us to retain some risks either by deciding to self insure these risks in their entirety or by purchasing insurance cover for losses that arise over a certain value.

Objectives

- Provide financial protection to the council's assets, resources, services and employees;
- Maintain an appropriate balance between external insurance and internal risk retention;
- Reduce the cost of external insurance premium spend;
- Ensure the internal insurance fund is maintained at an appropriate level;
- Ensure resilient claims handling arrangements and insurance fraud detection;
- Comply with any statutory requirements to have in place particular policies of insurance and associated inspection systems.

Achieved by:

- Using claims modelling and other risk assessments to determine risk exposures;
- Continually monitoring changes in legislation, civil justice protocols and relevant case law;
- Comparing the council's insurance programme and claims experience through suitable benchmarking;
- Maintaining claims handling protocols in line with statutory requirements;
- Undertaking periodic actuarial fund reviews.

Procurement of insurance

All insurance procurement complies with the relevant EU procurement rules.

Hard copies of policies are retained indefinitely with more recent policy documentation stored electronically.

Approved by the Pension Panel: 12 November 2018

Next review date: October 2019

Royal County of Berkshire Pension Fund – Risk Assessment Register

Ref	Risk	Risk Category	Cause	Impact	Risk owner	Controls in place to manage the risk	Current risk rating				Further actions necessary to manage the risk	Risk action owner	Date Complete	Target risk rating				Next Review Date
							Imp	Likelihood	Score	Level of risk				Imp	Likelihood	Score	Level of risk	
PEN 001	Failure to comply with Scheme regulations and associated pension law.	Operational	Lack of technical expertise / staff resources to research regulations, IT systems not kept up to date with regulations.	Incorrect pension payments made or estimates given. Unhappy customers, employers, risks of fines, adverse audit reports, breaches of the law.	Rob Stubbs	Sufficient staffing. Training and regulatory updates for all individuals associated with the Fund. Competent software provider and external consultants.	2	2	4	Low	Work continues to ensure that the Fund complies fully with all governance and administration requirements.	Kevin Taylor Philip Boyton	Ongoing	2	2	4	Low	July 2019
PEN 002	Late issue of Scheme regulation amendments.	Operational	MHCLG do not issue changes to regulations well in advance of effective date.	Resource issues for Fund. Administering Authority has a duty to ensure that all stakeholders receive and have access to most up to date information.	Rob Stubbs	Required actions to be considered in view of draft regulations. Senior managers to consider appropriate requirements and prioritise communications accordingly.	4	1	4	Low	Details to be included on welcome page of website and information to be distributed to Scheme employers for dissemination to scheme members via intranet and email.	Kevin Taylor Philip Boyton	N/A	4	1	4	Low	July 2019
PEN 003	The appropriate knowledge and understanding is not maintained by the Administering Authority.	Operational	Lack of technical expertise, training, professional development and continuous self-assessment to identify gaps in knowledge.	Failure to secure compliance with statutory obligations and tPR requirements leading to poor governance and administration of the Scheme. Dissatisfied customers, adverse audit reports, risk of fine.	Rob Stubbs	Training plans in place for officers and Members of the Pension Fund Panel, Pension Fund Advisory Panel and Pension Board. Members of Pension Board to assist Administering Authority in ensuring compliance.	4	1	4	Low	Continual review of training needs and staff levels with succession plans developed.	Kevin Taylor Philip Boyton	Ongoing	4	1	4	Low	July 2019
PEN 004	Failure to maintain a high quality member database.	Operational	Poor or non-existent notification of member data by Scheme employers.	Incorrect records, incorrect benefit estimates, potentially incorrect pension benefits being paid. Scheme members access wrong information via self-service. Loss of reputation, more complaints, poor performance.	Rob Stubbs	Fund continues to work with employers to improve data quality. Pro-active checks when benefits are calculated. Membership information is checked as part of year-end processing	4	2	8	Medium	Key aim of the Pension Administration Strategy is to engage employers in the use of i-Connect.	Kevin Taylor Philip Boyton	March 2021	4	1	4	Low	July 2019

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							Imp	Likelihood	Score	Level of risk				Imp	Likelihood	Score	Level of risk	
PEN 005	Failure to hold personal data securely.	Operational	Poor procedures for data transfer to and from partner organisations, poor security of systems, poor data retention and disposal, poor backup and recovery of data.	Poor data, lost or compromised. Risk of fines, adverse audit reports, breaches of the law.	Rob Stubbs	Database hosted off-site and backed up in 2 separate locations. Access to systems is available to a limited number of users via dual password and user identification. Data transferred is encrypted. Compliant with RBWM data protection and IT policies. No paper files all managed via image and system document generation. Confidential waste disposed of in line with RBWM policy.	4	1	4	Low	Annual audit undertaken. Staff undertake annual data protection training in line with RBWM policy.	Kevin Taylor Philip Boyton	Ongoing	4	1	4	Low	July 2019
PEN 006	Failure to make pension payments on time.	Operational	Systems not in place to ensure payments made on time.	Payments paid late and in some cases after statutory deadline. Fund open to criticism and possible fine.	Rob Stubbs	Schedule of payment dates is maintained and written procedures adopted. Sufficient cover is provided to ensure payments can be made on time.	4	1	4	Low	Continual review of training needs and staff levels with succession plans developed.	Philip Boyton	Ongoing	4	1	4	Low	July 2019
PEN 007	Continue making payments to deceased members.	Operational	Systems not in place to ensure that payments stop at appropriate time. Fund not advised of member's death.	Payments continue to be made incorrectly at a potential cost to the Pension Fund. Distress caused to dependants.	Rob Stubbs	The Fund undertakes a monthly mortality screening exercise and participates in the biennial National Fraud Initiative (NFI).	2	2	4	Low	Fund has signed up to the Information Sharing Agreement hosted by WYPF and the DWP 'Tell Us Once' service.	Philip Boyton	Ongoing	2	2	4	Low	July 2019
PEN 008	Unable to access pension software during normal office hours or extended hours where required.	Operational	Links to system not working, internet access denied.	Unable to carry out administrative duties for duration of outage.	Rob Stubbs	Procedures in place to contact software provider's helpdesk and action plan implemented. Outage times recorded / reported.	4	1	4	Low	As part of contract consideration needs to be given to means of compensation for loss of service.	Philip Boyton	Ongoing	4	1	4	Low	July 2019

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							Imp	Likelihood	Score	Level of risk				Imp	Likelihood	Score	Level of risk	
PEN 009	Late or non-receipt of pension contributions from Scheme employer.	Operational	Scheme employers fail to make payment of employee and employer contributions to Pension Fund within statutory deadlines.	Loss of pension investment. Employer at risk of being reported to tPR with action and fines being imposed if considered to be of material significance.	Rob Stubbs	Receipt of contributions is monitored very closely. Employers chased and reminded of their statutory duties. All occurrences recorded in administration report. Guidance issued to scheme employers.	2	1	3	Low	Scheme employers engaging with i-Connect will automatically upload contributions to member records monthly improving reconciliation processes.	Kevin Taylor	Ongoing	2	2	4	Low	July 2019
PEN 010	Increased liabilities as a result of large number of early retirement cases.	Operational	Scheme employer early retirement policies.	Potential for unfunded liabilities through strain costs. Financial loss to the Fund.	Rob Stubbs	The Fund monitors the incidences of early retirements closely and procedures are in place to ensure that Scheme employers are invoiced for any strain costs that arise.	1	1	2	Low	Settlement of invoices required within 21 days of issue with failures resulting in the issue of a notice of unsatisfactory performance to employer.	Kevin Taylor	Ongoing	2	2	4	Low	July 2019
PEN 011	Loss of key staff.	Operational	The specialist nature of the work means some staff have become experts in the LGPS regulations and investment policies.	If someone leaves or becomes ill a big knowledge gap is left behind.	Rob Stubbs	In the event of a knowledge gap external consultants and independent advisors can help in the short-term.	4	2	8	Medium	Loss of key staff in 2023 has been highlighted at an early stage in order to consider appropriate succession planning.	Rob Stubbs	Ongoing	2	2	4	Low	July 2019
PEN 012	Failure to communicate properly with stakeholders	Operational	Lack of clear communications policy and action particularly with Scheme members and employers.	Scheme members unaware of the rights and privileges the Scheme provides so make bad decisions. Employers are not aware of the regulations and their responsibilities and so data flow is poor.	Rob Stubbs	The Fund has a Communication Manager and a Communications Policy. The website is maintained to a high standard and all guides, factsheets and training notes are published.	4	1	4	Low	The Communication Policy continues to evolve.	Kevin Taylor	Ongoing	4	1	4	Low	July 2019
PEN 013	Loss of office premises	Operational	Fire, bomb, flood etc.	Temporary loss of service.	Rob Stubbs	A business continuity plan is in place. Systems hosted, staff can work at home.	4	1	4	Low	N/A	Kevin Taylor	Ongoing	4	1	4	Low	July 2019

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PEN 014	Loss of funds through fraud.	Operational	Fraud or misappropriation of funds by an employer, agent or contractor.	Financial loss to the Fund.	Rob Stubbs	The Fund is internally and externally audited to test that controls are adequate. Regulatory control reports from investment managers, custodian. Fund participates in biennial National Fraud Initiative (NFI).	4	1	4	Low	Monthly spot checks are undertaken as requested by internal audit to ensure that no 'ghost' members have been added to payroll and that all payment runs have been processed appropriately.	Rob Stubbs	Ongoing	4	1	4	Low	July 2019
PEN 015	Poor management of cashflows.	Operational	Day to day cashflows not monitored effectively.	Funds not available to make pension payments.	Rob Stubbs	Officers of the Pension Fund monitor cashflows on a daily basis and are aware of the payment schedules produced by payroll.	4	1	4	Low	N/A	Kevin Taylor	Ongoing	4	1	4	Low	July 2019
PEN 016	Failure to delegate duties appropriately.	Operational	Delegation of duties not understood.	Officers fail to fulfil their delegated duties resulting in poor performance and potential loss of reputation.	Rob Stubbs	Officers carry out their duties in accordance with the Administering Authority's Schedule of Delegations as contained in the Council's Constitution.	3	2	6	Low	Schedules of delegation to be reviewed for all aspects of the Pension Fund's duties.	Rob Stubbs	March 2016	4	1	4	Low	July 2019
PEN 017	Funding Level below 100%.	Strategic	Lack of proper strategy to achieve 100% funding level. Actual investment returns fail to meet expected returns.	Fund remains underfunded and employer contribution rates increase.	Rob Stubbs	Fund has published Funding Strategy Statement. Deficit recovery plan implemented following 2010 valuation. Fund regularly monitors investment returns and the Actuary provides a funding update each month.	4	2	8	Medium	Regular performance updates received from LPP I Ltd.	Rob Stubbs	Ongoing	4	1	4	Low	July 2019

Royal County of Berkshire Pension Fund – Risk Assessment Register

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PEN 018	Unstable employer contribution rates.	Strategic	Actual investment returns fail to meet expected returns.	Volatile employer contribution rates leading to Scheme employers having difficulties in setting budgets.	Rob Stubbs	The Fund aims to keep employer contribution rates stable in agreement with employers and the Actuary with appropriate deficit recovery plan in place.	4	1	4	Low	Funding level monitored closely.	Rob Stubbs	Ongoing	4	1	4	Low	July 2019
PEN 019	Inappropriate funding targets.	Strategic	Failure of investment strategy to deliver adequate returns.	Immediate cash injections required from employers. Increase in employer contributions.	Rob Stubbs	The Fund has issued a Funding Strategy statement and Investment Strategy Statement. .	3	1	3	Low	Regular performance updates received from LPP I Ltd.	Rob Stubbs	Ongoing	4	1	4	Low	July 2019
23 PEN 020	Unsatisfactory investment performance	Strategic	Poor economic conditions, wrong investment strategy, poor selection of investment managers.	Poor / negative investment return, employer contribution rates increase, funding level falls, pressure on Council tax and employer costs.	Rob Stubbs	Use of expert consultants in the selection of investment strategy. Regular review via Investment Group.	2	2	4	Low	Regular performance updates to be received from LPP I Ltd.	Rob Stubbs	Ongoing	4	1	4	Low	July 2019
PEN 021	Life Expectancy risk.	Strategic	As life expectancy rises liabilities increase disproportionately.	Employer contributions rise causing upward pressure on Council Tax and employer costs.	Rob Stubbs	In December 2009 the Fund entered into a longevity insurance SWAP covering its liabilities for pensioners as at 31 July 2009.	3	1	3	Low	The Pension Fund Panel continues to investigate how to protect the Fund against increasing longevity. Reviews the cost of insuring longevity risk of pensioners retired since July 2009.	Rob Stubbs	Ongoing	3	1	3	Low	July 2019
PEN 022	Currency risk.	Strategic	Values of investments overseas are affected by unrelated changes in foreign exchange rates.	Investment returns become volatile in the medium to long-term.	Rob Stubbs	In April 2012 the Fund's currency hedging policy was amended so currency exposures are managed against a strategic currency benchmark	3	1	3	Low	Regular performance updates to be received from LPP I Ltd.	Rob Stubbs	Ongoing	3	1	3	Low	July 2019

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							I m p a c t	L i k e l i h o o d	S c o r e	Level of risk				I m p a c t	L i k e l i h o o d	S c o r e	Level of risk	
PEN 023	Interest rate risk.	Strategic	Changes in long-term interest rates affect the net present value of the Fund's liabilities.	Investment returns become volatile in the medium to long-term.	Rob Stubbs	The Pension Fund Panel has considered how long-term interest rate risk can be hedged and authorised officers to investigate how this can be achieved within the constraints of the LGPS regulations.	3	1	3	Low	Regular performance updates to be received from LPP I Ltd.	Rob Stubbs	Ongoing	3	1	3	Low	July 2019
PEN 024	Inflation risk.	Strategic	Benefits paid to Scheme members are linked (upwards only) to Consumer Price Index (CPI).	Liabilities increase disproportionately at times of high inflation.	Rob Stubbs	The Pension Fund Panel has considered how long-term inflation risk can be hedged and authorised officers to investigate how this can be achieved within the constraints of the LGPS regulations.	2	1	2	Low	Regular performance updates to be received from LPP I Ltd	Rob Stubbs	Ongoing	4	1	4	Low	July 2019
PEN 025	Inability of Scheme employers to meet their obligations.	Strategic	When a Scheme employer no longer has any active members a cessation valuation is triggered and an exit payment required if a funding deficit exists to meet future liabilities.	Failure to collect cessation payments means the cost of funding future liabilities will fall to the Fund and therefore all Scheme employers that remain in it meaning a potential increase in employer contributions.	Rob Stubbs	The Pension Fund Panel has authorised officers to take appropriate steps to review employer covenants and take the necessary action to mitigate the impact that the failure of one Scheme employer can have on all other Scheme employers.	3	2	6	Medium	LPP I Ltd assessing risks.	Rob Stubbs	Ongoing	3	1	3	Low	July 2019

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							Imp	Likelihood	Score	Level of risk				Imp	Likelihood	Score	Level of risk	
PEN 027	Ability to implement the Public Sector exit cap.	Operational	Introduction of exit cap will place an additional burden of the administration team.	Changes need to be communicated to individuals and Scheme employers. Systems will need to be adapted once revised regulations have been issued.	Rob Stubbs	Currently monitoring the progress and briefings being communicated.	1	4	4	Low	Awaiting issue of regulations in order to formulate action plan.	Kevin Taylor Philip Boyton	Ongoing	1	4	4	Low	July 2019
PEN 028	Reconciliation of GMP records	Operational	From 6 April 2016 changes to the State Pension Scheme remove the contracting-out nature of the LGPS.	GMPs no longer provided by HMRC. GMP information held by Fund could be wrong resulting in potential for liabilities being paid by Fund.	Rob Stubbs	Data analysis carried out and action taken to reconcile and adjust pensions paid to retired members.	1	4	4	Low	To review GMP amounts allocated to active and deferred members.	Philip Boyton	Ongoing	1	3	3	Low	July 2019
PEN 029	Failure by Pension Board members to fulfil their Terms of Reference and associated protocols	Operational	Members of the Pension Board so not fulfil their statutory obligations set out in their Terms of Reference.	Failure by Pension Board members to assist the Administering Authority in securing compliance with pension legislation and requirements set out by the Pensions Regulator leading to poor governance and administration of the scheme. Dissatisfied customers, loss of reputation, risk of fine.	Rob Stubbs	Training plans in place for Pension Board members.	4	1	4	Low	Annual review of Terms of Reference and regular review of training needs.	Kevin Taylor	Ongoing	4	1	4	Low	July 2019

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