Pension Fund Board agenda

Date: Wednesday 19 October 2022

Time: 10.00 am

Venue: MS Teams

Membership:

B Black (Scheme employer representative), P Dearden (Scheme member representative), R Ellis (Scheme employer representative) (Chairman), J McGovern (Scheme member representative), T Pearce (Scheme member representative), I Thompson (Scheme member representative) (Vice-Chairman), L Wheaton (Scheme employer representative) and J Whiteley (Scheme employer representative)

Manager, Buckinghamshire Council.

7	**Administration performance statistics** To be presented by Sam Price, Assistant Pensions Administration Manager, Buckinghamshire Council.	**To Follow**
8	**Funding Strategy Statement** To be presented by Julie Edwards, Head of Pensions, Buckinghamshire Council.	**37 - 68**
9	**Forward Plan** To be presented by Claire Lewis-Smith, Pensions Administration Manager, Buckinghamshire Council.	**69 - 70**
10	**Annual Benefit Statements - Administration Year End Update** To be presented by Sam Price, Assistant Pensions Administration Manager, Buckinghamshire Council.	**To Follow**
11	**Exclusion of Press and Public** To resolve to exclude the press and public as the following item is exempt by virtue of Paragraph 3 of Part 1 of Schedule 12a of the Local Government Act 1972 because it contains information relating to the financial or business affairs of any particular person (including the authority holding that information).	
12	**Annual Benefit Statements - Confidential Appendix** To be presented by Sam Price, Assistant Pensions Administration Manager, Buckinghamshire Council.	**To Follow**
13	**Confidential minutes of Pension Fund Board** To agree the confidential minutes of the meeting held 27 July 2022 as an accurate record.	**71 - 74**
14	**Confidential minutes of Pension Fund Committee** To note the confidential minutes of the Pension Fund Committee held on: - 7 July 2022 - 29 September 2022 (draft minutes to follow)	**75 - 78**
15	**Pension Fund Risk Register** To be presented by Julie Edwards, Head of Pensions, Buckinghamshire Council.	**79 - 98**
16	**Pension Fund Performance** To be presented by Julie Edwards, Head of Pensions, Buckinghamshire Council.	**99 - 150**

17 Date of next meeting

13 December 2022, 10am via MS Teams

If you would like to attend a meeting, but need extra help to do so, for example because of a disability, please contact us as early as possible, so that we can try to put the right support in place.

For further information please contact: Katherine Farooqi on 01895 837205, email democracy@buckinghamshire.gov.uk.

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Pension Fund Board minutes

Minutes of the meeting of the Pension Fund Board held on Wednesday 27 July 2022 in The Paralympic Room, The Gateway, Aylesbury, commencing at 10.00 am and concluding at 11.45 am.

Members present

B Black, P Dearden, R Ellis, I Thompson and L Wheaton

Others in attendance

J Edwards, K Farooqi, C Gray, C Lewis-Smith, M Preston and S Price

Apologies

J McGovern and T Pearce

Agenda Item

1 **Apologies / Declarations of interest**

Apologies were received from T Pearce and J McGovern.

A declaration of interest was reported from T Pearce who was potentially affected by the £95k exit cap.

2 **Minutes of the Pension Fund Board**

RESOLVED Members of the Board AGREED the minutes of the Pension Fund Board held 16 March 2022.

A member of the Board queried if Buckinghamshire Council's annual accounts had been formally signed off. It was advised the pension fund annual accounts audit had been completed however, there were no timescales currently for when they would be formally signed off due to the ongoing audit of the Council's accounts. It was noted the 2022 accounts were complete and would be formally signed off once the 2021 accounts had been signed off. It was advised queries related to the 2021 accounts were due to added complexities of the formation of Buckinghamshire unitary authority.

A member of the Board asked if members who attended either the CIPFA or Barnett Waddingham training could provide feedback on the training events. The Chairman advised the presentations from the events would be circulated to the Board and an item on training feedback could be included on the agenda for the next Board meeting.

3 Minutes of Pension Fund Committee

RESOLVED Members of the Board NOTED the minutes of the Pension Fund Committee held 21 March 2022.

4 Review of Buckinghamshire Pension Board Policies

C Lewis Smith, Pensions Administration Manager, Buckinghamshire Council referred to the Pension Board policies circulated with the agenda.

- There were no regulation changes to the Board policies. Date had been changed on the policies to reflect the change of year.
- The Conflict Policies had been amended to reflect that any conflicts would be reported at all Board meetings not annually as previously stated.
- The Knowledge and Understanding Framework policy had been updated to indicate a new module on pension scams had been added to the public sector online training toolkit.

The Board were asked if a notice period for resignations from the Board should be included in the Terms of Reference policy. The Board agreed a three-month notice period except in exceptional circumstances would be added to Section 15 of the Terms of Reference.

Action C Lewis Smith to update.

The vacant Employer Representative position had been advertised in In-form the quarterly newsletter for Buckinghamshire Pension Fund employers and employees at Thames Valley Police had been contacted. The next stage would be to contact employers and an advert would be posted on the Buckinghamshire Council jobs page.

A member of the Board highlighted the Terms of Reference policy specified Board members would be appointed for a three-year term and queried if this was the maximum term Board members could serve. It was noted the policy did not specify a maximum number of terms and knowledgeable and experienced members were important to retain.

The Chairman highlighted as per the Terms of Reference Board members could attend the Pension Fund Committee as observers. Members were advised to contact Democratic Services if they wanted to attend in the future.

RESOLVED Members of the Board NOTED the update.

5 Pension Fund Annual Report 2021/22

Julie Edwards, Pensions and Investments Manager presented the report attached to the agenda.

The Chairman advised any observations relating to the report could be emailed to officers for amendment.

There was a discussion relating to forecasted management expenses. It was highlighted that management expenses were linked to the value of assets and fees would increase with the value of the fund. Additionally, the type of assets invested in including private markets could incur higher fees. It was anticipated the fees incurred would not be as high as reported however it was acknowledged there were challenges with estimating potential future fees.

There was a query relating to movement assets and liabilities, in particular how officers decide which overpayments to write off. It was confirmed there were limits on amounts written off and sign off from senior management was required over a certain amount. The likelihood of recovery of funds and economic benefit were considered, in certain instances small amounts were written off as the cost of recovery negated the amount to recover.

A member of the Board highlighted the interim valuation showed that the funding level had increased to 96% and queried if there was a long term intent to achieve 100%. It was advised the aim was to increase the valuation to 100% however, a cautionary note was added that these figures were based on the 2019 membership and the market had changed significantly since then. The actual figures would be clearer at the end of the calendar year.

The chairman advised the outcome of the triennial valuation would be available in December.

It was highlighted the training attendance for the Board required updating as members had attended training sessions.

Action: C Lewis Smith to update

There was a lengthy discussion regarding differences in the total membership figure throughout the report. The chairman requested a note was added to page 92 of the report to confirm the total membership number including or excluding certain membership categories i.e. leavers, refunds or undecided.

There was a query regarding transfer values of which on 31 March 2022 £2.899m had not been received. It was highlighted processing transfers was a lengthy process due to the lead in time for leavers joining new funds on the commencement of employment.

It was highlighted any missing information and minor changes in the report would be populated before the report was presented to the Pension Fund Committee in September.

RESOLVED Members of the Board NOTED the update.

6 **Annual Benefit Statements - Administration Year End Update**

S Price, Assistant Pensions Administration Manager, Buckinghamshire Council, referred the report circulated with the agenda.

The following points were highlighted:

- 98% of employers submitted annual returns by 30th April deadline. The outstanding returns were received in early May.
- 85% of the returns submitted by the 30th April deadline were accepted.
- The 15% remaining returns were sent back to employers and subsequently these were processed a few days later. Any returns with incorrect formatting or missing AVC contribution details were sent back to employers to be checked.
- The valuation data submission deadline was 30th June which meant all returns needed to be processed & queries raised. The team achieved this by the deadline.
- Returns from 250 employers were processed and had no outstanding queries relating to the 2021/22 return. These were ready for annual benefit statements to be issued.
- A further 35 returns from employers were processed and had 582 outstanding queries relating to the data provided. These queries had been sent to employers.
- Overall, a total of 1406 queries were raised with 824 already resolved. 98% of queries were resolved in the 10 working days' timeframe.
- Queries were reducing year on year and there was no backlog of outstanding queries. This was attributed to efficiency from the administration team and greater accuracy of data since employers moved to using i-Connect. There were monthly checks and data reconciliation which were previously undertaken annually.
- Annual benefit statements were being issued from the end of July. The largest scheme employer had no outstanding queries.
- The 356 statements for active scheme members who had opted out of the online service would be printed and posted by the end of August.
- The administration team were commended for their good work in dealing with queries proactively. The data being provided by employers was more accurate and of better quality than previous years.

It was confirmed scheme members who received paper annual benefit statements had actively elected to opt out of My Pension Online. All annual benefit statements were uploaded to My Pension Online whether scheme members had registered online or not. All employers were emailed to advise the annual benefit statements had been issued and employees should be updated accordingly.

It was noted that 174 employers had annual benefit statements issued as of the 27th July.

RESOLVED Members of the Board NOTED the update.

7 Administration performance statistics

S Price, Assistant Pensions Administration Manager, Buckinghamshire Council, referred the report circulated with the agenda.

The following points were highlighted:

- Incoming communications were at a consistent level to previous quarters. There had been less post received and emails from individuals to the pensions general inbox had reduced. The majority of scheme members communicated through My Pension Online and employers were using i-Connect to upload employee documentation.
- The pensions inbox was monitored daily with 100% of queries dealt with on the same day. Queries were replied to directly by email or the necessary work flow was raised.
- The target average phone queue time was 40 seconds however, the team performed better than this target with averaged queue time of 18 seconds. In June it was noted the average time was 13 seconds. The team had four Member Liaison Officers to answer calls who were commended for their prompt responses.
- The priority target relating to work load was 95% of tasks completed within relevant turnaround times. The team achieved 97.2% this quarter with payments of benefits prioritised.
- The four benefit administration priority areas included retirements, deaths, AVC's at retirement and refunds. Three of the priority areas achieved 98% of tasks completed in the target turnaround time. The AVC's at retirement achieved 91% which was due to having to chase information from the AVC provider.
- The table showing other areas of benefit administration highlighted the team had on average dealt with 3300 new cases per month with no areas for concern or backlog of outstanding queries.
- Aggregation had a 72% achievement rate. It was noted the team were working to improve turnaround times. These cases were high volume and a lower priority for the team.
- It was noted the table showing open cases was for June 2022 not February 2022. There were 2829 open cases with 29% overdue. Cases were reviewed on a monthly basis with a notable reduction since April with 61% open cases.
- It was highlighted the overdue cases for Leavers was fairly high due to difficulties in receiving information from scheme employers. The team had reviewed these cases in detail assessing the information held and wrote to scheme members if required.
- Cases which were overdue for longer than three months were reviewed by the Senior Pensions Officer monthly. 78% of overdue cases were waiting for external partners to respond. 22% of overdue cases were either being dealt with by the team or were ready for checking.

It was highlighted discussions were ongoing with Aquila Heywood, the pensions administration software provider, to develop a new report to produce more in-depth data on overdue cases by employer. This data would be provided as a confidential appendix of the agenda in the future.

In response to a query it was confirmed when a user raises a question via My Pension Online this was automatically sent to the Pensions inbox for the necessary workflow to be created.

There was a request for future reports to include the relevant time periods above tables of case statistics and headers.

A member of the Board highlighted the issue of pension scams and scam awareness when dealing with account queries from scheme members. It was advised there was updated guidance for administrators on pension scams. There was a lengthy process of verifying and checking the identity of scheme members and financial advisor's credentials before discussing or paying funds.

It was explained that aggregation included an employee who had more than one period of membership in the Local Government Pension Scheme. There was in-house aggregation when an employee commences employment at another employer with the same pension fund. The employees' period of membership could be joined together unless specified and there were inter-fund transfers with other LGPS funds.

RESOLVED Members of the Board NOTED the update.

8 McCloud update

C Lewis Smith, Pensions Administration Manager, Buckinghamshire Council referred to the report circulated with the agenda.

The Department for Levelling Up and Communities were in the process of producing McCloud regulations by the late Autumn to early November. There had been no reported change to implementation of the regulations by 1st October 2023.

The team were in the process of uploading historical data for the data verification report before live data uploaded. There were 378 employers to provide data with 215 data sets returned. There were 2 employers yet to send historical data. The details as of 1st April 2014 would be compared to data held from end of March 2014 with data verification tools from providers available in the near future. The next update will be provided at the December 2022 Board meeting.

RESOLVED Members of the Board NOTED the update.

9 Forward Plan

Members of the board were requested to inform officers of any further reports to be added to the forward plan.

S Price advised there would be further information from the reporting tool Insights at the October Board meeting.

A member of the Board requested the results from the audit by Grant Thornton to be provided at the October Board meeting.

C Lewis Smith advised the employer covenant review by Barnett Waddingham would potentially be later than October.

RESOLVED Members of the Board NOTED the update.

10 Exclusion of Press and Public

RESOLVED To exclude the press and public as the following items are exempt by virtue of Paragraph 3 of Part 1 of Schedule 12a of the Local Government Act 1972 because they contain information relating to the financial or business affairs of any particular person (including the authority holding that information).

11 Confidential minutes of Pension Fund Board

Restricted.

12 Confidential minutes of Pension Fund Committee

Restricted.

13 AVC Review

Restricted.

14 Pension Fund Performance

Restricted.

15 Date of next meeting / AOB

Any other business

It was confirmed the cybercrime scorecard tool would be issued late June. An item on this would be added to the December Board meeting agenda.

A member queried if there was a cyber-incident response plan. It was advised the team followed the Council's main cyber security policy however, a separate policy relating to pensions specifically could be created if necessary.

It was highlighted the pensions cost cap breach had resulted in a challenge against the government due to McCloud costs. There was currently no requirement to backdate however, benefits could potentially be backdated to April 2019. Barnett-Waddingham had confirmed if the breach is confirmed it would have a negligible effect on value although the administration process could change.

The decision on higher education institutions and academies being classed as public sector bodies and therefore offering LGPS would likely be announced in September. Barnett-Waddingham were aware of this and valuation assumptions could be affected.

The implementation of the pension single code of practice was delayed until autumn. The procurement for the pension administration system was underway with tender documentation issued and bids submitted. The contract would be awarded with the system going live by September 2023. The process was underwritten by Norfolk LGPS framework with three providers able to bid for the contract.

Date of next meeting: 19 October 10am via MS Teams

Buckinghamshire Council

Pension Fund Committee

Minutes

MINUTES OF THE MEETING OF THE PENSION FUND COMMITTEE HELD ON THURSDAY 7 JULY 2022 IN JUBILEE ROOM, THE GATEWAY, AYLESBURY HP19 8FF, COMMENCING AT 2.00 PM AND CONCLUDING AT 4.14 PM

MEMBERS PRESENT

T Butcher (Chairman), R Bagge (Vice-Chairman), A Collingwood, E Gemmell and I Macpherson

OTHERS IN ATTENDANCE

G Muir, E Murray (Barnett-Waddingham), T English, M Passey (Mercer) C Dobson (Independent Advisor), J Edwards, C Lewis-Smith and L Ashton (Buckinghamshire Council)

Agenda Item

1 APPOINTMENT OF VICE-CHAIRMAN

Resolved: That Ralph Bagge be appointed as Vice-Chairman of the Pension Fund Committee for the ensuing year.

2 APOLOGIES

Apologies for absence had been received from Committee Members Councillors P Marland (Milton Keynes Council) and M Walsh (Buckinghamshire Council). Apologies had also been received from Roona Ellis (Chairman of the Buckinghamshire Pension Board) and Mark Preston (Head of Projects and Pensions, Buckinghamshire Council).

The Chairman placed on record his thanks to Anne-Marie Kenward, the previous Committee Clerk, for her support to the Committee over recent years.

3 DECLARATIONS OF INTEREST

There were no declarations of interest.

4 MINUTES OF LAST MEETING

Resolved: That the Minutes of the meetings held on 21 March and 18 May 2022, be approved as correct records.

The Committee was advised that the Buckinghamshire Council Statement of Accounts for 2020/21 had yet to be signed off. An update was provided to the Audit and Governance Committee at its meeting held in May where it was explained that a number of issues had been identified which officers were working on addressing. The External Auditors were then due to assess the further data and it was expected that this work would not be completed until September 2022 at the earliest.

5 BUCKINGHAMSHIRE PENSION BOARD DRAFT MINUTES

Resolved: That the Minutes of the Buckinghamshire Pension Board meeting held on 16 March 2022, be noted.

6 DRAFT PENSION FUND ACCOUNTS

The Committee received a report which contained the draft unaudited Statement of Accounts for the Buckinghamshire Pension Fund for the year ended 31 March 2022, presented by J Edwards, Head of Pensions, and held a discussion on their contents. The Pension Fund Account and Net Asset Statement show that in the year to 31st March 2022 the value of the Pension Fund increased by £275m to £3.913bn.

A further report, incorporating the findings of the Council's external auditors, Grant Thornton would be brought to this Committee at its meeting in September 2022; representatives from Grant Thornton would be in attendance at that meeting. The finalised Statement of Accounts was due to be approved by the Chairman of the Audit and Governance Committee and the Section 151 Officer following the audit and consideration of the Auditors report at the Audit and Governance Committee on the 27th September 2022. However due to Grant Thornton, the Council's external auditors, having confirmed that the Buckinghamshire Council 2020/21 accounts would not be able to be approved and signed off by the September 2022 deadline, the Pension Fund accounts were unable to be signed until the Council accounts were signed.

The Pension Fund Account and Net Asset Statement showed that in the year to 31st March 2022 the value of the Pension Fund increased by £275m to £3.913bn. This was the net result of the contributions made (£169m) including transfers in from other pension schemes, employers and employees contributions; payments out £144m including pensions, commutations, lump sum retirement benefit and death benefits; management expenses £17m plus net returns on investments (£267m).

The Committee sought clarity around levels of funds held in cash and received assurance that these were adequate and could be invested in to private equity funds at the right time.

RESOLVED: That the Draft Statement of Accounts for Buckinghamshire Pension Fund for the year ended 31st March 2022 be noted and the timing and requirements for completion and authorisation of the final Statement of Accounts also be noted.

7 FORWARD PLAN

RESOLVED: That the Forward Plan be noted.

Prior to entering the confidential portion of the meeting, the Chairman highlighted that he had received a number of questions from residents of Buckinghamshire raising concerns about Brunel investment levels in fossil fuels and the detrimental effect this had on the efforts to combat Climate Change. The Chairman advised that each of the questioners had been responded to individually with a written response.

8 EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded for the following items as they were exempt by virtue of Paragraph 3 of Part 1 of Schedule 12a of the Local Government Act 1972 because they contained information relating to the financial or business affairs of any particular person (including the authority holding that information).

9 **CONFIDENTIAL MINUTES OF THE LAST MEETING**
Restricted

10 **BUCKINGHAMSHIRE PENSION BOARD CONFIDENTIAL MINUTES**
Restricted

11 **ACTUARIAL VALUATION TRAINING**
Restricted

12 **PENSION FUND PERFORMANCE**
Restricted

13 **ENVIRONMENTAL, SOCIAL AND GOVERNANCE CONSIDERATIONS**
Restricted

14 **DATE OF THE NEXT MEETING/AOB**
Thursday 29 September 2022 at 2pm.

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Report to Pension Fund Board

Date:	19 October 2022
Title:	Breaches of the Law
Author and/or contact officer:	Claire Lewis-Smith, Pensions Administration Manager
Recommendations:	**The Board is asked to NOTE the content of this report and COMMENT on the breaches log.**

1. Executive summary

1.1 The Procedure for Reporting Breaches of the Law (Appendix 1) complies with the requirements of the Pensions Act 2004 and the Pensions Regulator's Code of Practice. The procedure details how individuals responsible for reporting and whistleblowing can identify, assess and report (or record if not reported), a breach of law relating to the Buckinghamshire Pension Fund.

2. Content of report

2.1 The Breach Log at Appendix 2 to this report, details the administration breaches recorded for Q2/3/4 for 2021/22 and Q1 for 2022/23, along with details of the percentage of annual benefit statements issued for 2021/22. For contributions, the position is reported for the 12 month period up until 30 June 2022.

3. Other options considered

3.1 Not applicable.

4. Legal and financial implications

4.1 The procedure details how individuals responsible for reporting and whistleblowing can identify, assess and report (or record if not reported) a breach of law relating to the Buckinghamshire Pension Fund. It aims to ensure individuals responsible are able to meet their obligations and avoid placing any reliance on others to report. The procedure also assists in providing an early warning of possible malpractice and reduce risk to the Fund.

5. Corporate implications

5.1 Not applicable.

6. Consultation and communication

6.1 Not applicable.

7. Next steps and review

7.1 The breach log is reviewed annually.

Buckinghamshire Pension Fund

Procedure for Reporting Breaches of the Law

Author: Claire Lewis-Smith

Date: 1 April 2020

Reporting Breaches Procedure

Introduction
This document sets out the procedures to be followed by certain persons involved with the Buckinghamshire Pension Fund (the Local Government Pension Scheme Fund managed and administered by Buckinghamshire Council), in relation to reporting breaches of the law to the Pensions Regulator ("the Regulator").

Buckinghamshire Council, as Administering Authority, has delegated responsibility for the implementation of these procedures to the Head of Finance – Pensions, Investments & Projects.

Breaches can occur in relation to a wide variety of the tasks normally associated with the administrative function of a scheme such as keeping records, internal controls, calculating benefits and making investment or investment-related decisions.

In the main, this document applies to:

- members of the Pension Fund Committee ("PFC") and Buckinghamshire Local Pension Board ("the Board");
- all officers involved in the management of the Pension Fund including members of Buckinghamshire Council's Pensions and Investments Team, the Head of Finance - Resources & Pensions and the Service Director Corporate Finance (who is also the Section 151 Officer);
- any professional advisers including auditors, actuaries, legal advisers and fund managers; and
- officers of employers participating in the Buckinghamshire Pension Fund who are responsible for LGPS pension matters.

The next section clarifies the full extent of the legal requirements and to whom they apply.

Requirements

Pensions Act 2004
Section 70 of the Pensions Act 2004 ("the Act") imposes a reporting requirement on the following persons:

- a trustee or manager of an occupational or personal pension scheme
- a person who is otherwise involved in the administration of such a scheme
- the employer in relation to an occupational pension scheme
- a professional adviser in relation to such a scheme
- a person who is otherwise involved in advising the trustees or managers of an occupational or personal pension scheme in relation to the scheme.

Where the person has reasonable cause to believe that:

- a duty which is relevant to the administration of the scheme, and is imposed by or by virtue of an enactment of law, has not been or is not being complied with, and
- the failure to comply is likely to be of material significance to the Regulator in the exercise of its functions,

they must give a written report of the matter to the Regulator as soon as reasonably practicable.

The Act states that a person can be subject to a civil penalty if he or she fails to comply with this obligation without a reasonable excuse.

The duty to report breaches under the Act overrides any other duties the individuals listed above may have. However, the duty to report does not override 'legal privilege'. This means that, generally, communications between a professional legal adviser and his/her client, or a person representing his/her client, in connection with legal advice being given to the client, do not have to be disclosed.

The Pension Regulator's Code of Practice
Practical guidance in relation to this legal requirement is included in The Pension Regulator's Code of Practice including in the following areas:

- implementing adequate procedures;
- judging whether a breach must be reported;
- submitting a report to the Regulator; and
- whistleblowing protection and confidentiality.

Application to the Buckinghamshire Pension Fund
Buckinghamshire Council has developed this procedure which reflects the guidance contained in The Pension Regulator's Code of Practice in relation to the Buckinghamshire Pension Fund and this document sets out how the Council will strive to achieve best practice through use of a formal reporting procedure.

Training on reporting breaches and related statutory duties, and the use of this procedure is provided to Pension Fund Committee members, Pension Board members and key officers involved with the management of the Buckinghamshire Pension Fund on a regular basis. Further training can be provided on request to the Pensions & Investments Manager.

The Buckinghamshire Pension Fund Reporting Breaches Procedure
The following Procedure details how individuals responsible for reporting and whistleblowing can identify, assess and report (or record if not reported) a breach of law relating to the Buckinghamshire Pension Fund.

It aims to ensure individuals responsible are able to meet their legal obligations and avoid placing any reliance on others to report. The Procedure will also assist in providing an early warning of possible malpractice and reduce risk.

1. Clarification of the law

Individuals may need to refer to regulations and guidance when considering whether or not to report a possible breach. Some of the key provisions are shown below:

- Section 70(1) and 70(2) of the Pensions Act 2004: www.legislation.gov.uk/ukpga/2004/35/contents
- Employment Rights Act 1996: www.legislation.gov.uk/ukpga/1996/18/contents
- Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 (Disclosure Regulations): www.legislation.gov.uk/uksi/2013/2734/contents/made
- Public Service Pension Schemes Act 2013: www.legislation.gov.uk/ukpga/2013/25/contents
- Local Government Pension Scheme Regulations (various): http://www.lgpsregs.org/timelineregs/Default.html (pre 2014 schemes) http://www.lgpsregs.org/index.php/regs-legislation (2014 scheme)
- The Pensions Regulator's Code of Practice: http://www.thepensionsregulator.gov.uk/codes/code-governance-administration-public-service-pension-schemes.aspx
  In particular, individuals should refer to the section on 'Reporting breaches of the law', and for information about reporting late payments of employee or employer contributions, the section of the code on 'Maintaining contributions'.

Further guidance and assistance can be provided by the Head of Finance – Pensions, Investments & Projects, provided that requesting this assistance will not result in alerting those responsible for any serious offence (where the breach is in relation to such an offence).

2. Clarification when a breach is suspected

Individuals need to have reasonable cause to believe that a breach has occurred, not just a suspicion. Where a breach is suspected the individual should carry out further checks to confirm the breach has occurred.

Where the individual does not know the facts or events, it will usually be appropriate to check with the Head of Finance - Pensions, Investments & Projects at Buckinghamshire Council, a member of the Pension Fund Committee or Pension Board or others who are able to explain what has happened. However, there are some instances where it would not be appropriate to make further checks, for example, if the individual has become aware of theft, suspected fraud or another serious offence and he/she is also aware that by making further checks there is a risk of either alerting those involved or hampering the actions of the police or a regulatory authority. In these cases, the Regulator should be contacted without delay.

3. Determining whether the breach is likely to be of material significance

To decide whether a breach is likely to be of material significance, an individual should consider the following, both separately and collectively:

- cause of the breach (what made it happen);
- effect of the breach (the consequences of the breach);
- reaction to the breach; and
- wider implications of the breach.

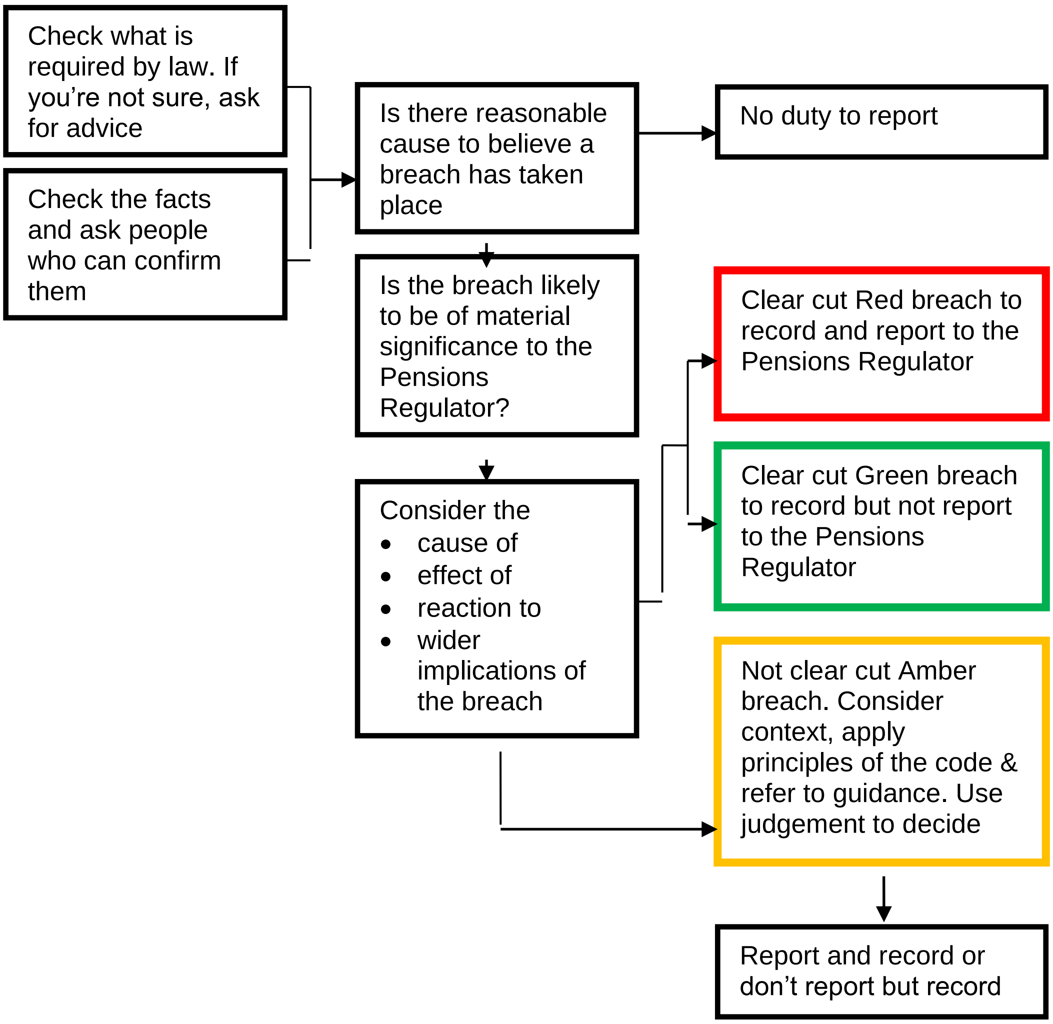
Individuals may also request the most recent breaches report from the Head of Finance - Pensions, Investments & Projects, as there may be details on other breaches which may provide a useful precedent on the appropriate action to take.

Further details on the above four considerations are provided in **Appendix A** to this procedure.

The individual should use the traffic light framework described in **Appendix B** to help assess the material significance of each breach and to formally support and document his/her decision.

A decision tree is provided below to show the process for deciding whether or not a breach has taken place and whether it is materially significant and therefore needs to be reported.

Decision tree – deciding whether to report



4. Referral to a level of seniority for a decision to be made on whether to report

Buckinghamshire Council has designated an officer (Head of Finance - Pensions, Investments & Projects) to ensure this procedure is appropriately followed. They are considered to have appropriate experience to help investigate whether there is reasonable cause to believe a breach has occurred, to check the law and facts of the case, to maintain records of all breaches and to assist, where appropriate, in any reporting to the Regulator.

If breaches relate to late or incorrect payment of contributions or pension benefits, information on the matter should be highlighted to the Head of Finance - Pensions, Investments & Projects, at the earliest opportunity to ensure the matter is resolved as a matter of urgency.

Individuals must bear in mind, however, that the involvement of the Head of Finance - Pensions, Investments & Projects is to help clarify the potential reporter's thought process and to ensure this procedure is followed. The reporter remains responsible for the final decision as to whether a matter should be reported to the Regulator.

The matter should not be referred to the Head of Finance - Pensions, Investments & Projects if doing so would alert any person responsible for a possible serious offence to the investigation (as highlighted in section 2). If that is the case, the individual should report the matter to the Regulator setting out the reasons for reporting, including any uncertainty; a telephone call to the Regulator before the submission may be appropriate, particularly in more serious breaches.

5. Dealing with complex cases

The Head of Finance - Pensions, Investments & Projects may be able to provide guidance on particularly complex cases. Guidance may also be obtained by reference to previous cases, information on which will be retained by Buckinghamshire Council, or via discussions with those responsible for maintaining the records. Information may also be available from national resources such as the Scheme Advisory Board or the LGPC Secretariat (part of the LGA: http://www.lgpsregs.org/).

If timescales allow, legal advice or other professional advice can be sought and the case can be discussed at the next Pension Fund Committee or Board meeting.

6. Timescales for reporting

The Pensions Act and the Pensions Regulator’s Code of Practice requires that, if an individual decides to report a breach, the report must be made in writing as soon as reasonably practicable. Individuals should not rely on waiting for others to report and nor is it necessary for a reporter to gather all the evidence which the Regulator may require before acting. A delay in reporting may exacerbate or increase the risk of the breach. The time taken to reach the judgements on ‘reasonable cause to believe’ and on ‘material significance’ should be consistent with the speed implied by ‘as soon as reasonably practicable’. In particular, the time taken should reflect the seriousness of the suspected breach.

7. Early identification of very serious breaches

In cases of immediate risk to the scheme, for instance, where there is any indication of dishonesty, the Regulator does not expect reporters to seek an explanation or to assess the effectiveness of proposed remedies. Reporters should only make such immediate checks as are necessary.

The more serious the potential breach and its consequences, the more urgently reporters should make these necessary checks. In cases of potential dishonesty, the reporter should avoid, where possible, checks which might alert those implicated. In serious cases, reporters should use the quickest means possible to alert the Regulator to the breach.

8. Recording all breaches even if they are not reported

The record of past breaches may be relevant in deciding whether to report a breach (for example it may reveal a systemic issue). Buckinghamshire Council will maintain a record of all breaches identified by individuals and reporters should therefore provide copies of reports submitted to the Regulator to the Head of Finance - Pensions, Investments & Projects. Records of unreported breaches should also be provided to the Head of Finance - Pensions, Investments & Projects as soon as reasonably practicable and certainly no later than within 20 working days of the decision made not to report. These will be recorded alongside all reported breaches. The record of all breaches (reported or otherwise) will be included in a Monitoring Report to Pension Fund Committee meeting, and this will also be shared with the Board.

Reporting a breach

Reports must be submitted in writing via the Regulator's online system at www.tpr.gov.uk/exchange, or by post, email or fax, and should be marked urgent if appropriate. If necessary, a written report can be preceded by a telephone call.

Reporters should ensure they receive an acknowledgement for any report they send to the Regulator. The Regulator will acknowledge receipt of all reports within five working days and may contact reporters to request further information. Reporters will not usually be informed of any actions taken by the Regulator due to restrictions on the disclosure of information.

As a minimum, individuals reporting should provide:

- full scheme name (LGPS: Buckinghamshire Pension Fund);
- description of breach/breaches;
- any relevant dates;
- name, position and contact details;
- role in connection to the scheme; and
- employer name or name of scheme manager (the latter is Buckinghamshire Council).

If possible, reporters should also indicate:

- the reason why the breach is thought to be of material significance to The Pensions Regulator;
- scheme address (provided at the end of this document);

- scheme manager contact details (provided at the end of this document);
- pension scheme registry number (PSR **10123049**); and
- whether the breach has been reported before.

The reporter should provide further information or reports of further breaches if this may help the Regulator in the exercise of its functions. The Regulator may make contact to request further information.

Confidentiality
If requested, the Regulator will do its best to protect a reporter's identity and will not disclose information except where it is lawfully required to do so.

If an individual's employer decides not to report and the individual employed by them disagrees with this and decides to report a breach themselves, they may have protection under the Employment Rights Act 1996 if they make an individual report in good faith.

Reporting to Pension Fund Committee
A Monitoring Report will be taken to Pension Fund Committee and the Pension Board annually. This will set out:

- all breaches, including those reported to the Regulator and those unreported, and for each breach
    - the associated dates;
    - the action(s) taken, result of any action(s) (where not confidential) and any future actions for the prevention of the breach in question being repeated.

If any Red breaches occur, these will be reported separately to the next available Pension Fund Committee and Pension Board meeting.

This information will also be provided upon request to any other individual or organisation (excluding sensitive/confidential cases or ongoing cases where discussion may influence the proceedings).

An example of the information to be included in the reports is provided in **Appendix C** to this procedure.

Review
This procedure for Reporting Breaches of the Law was by the Pension Fund Committee on 24 September 2018. It will be kept under review and updated as considered appropriate by the Head of Finance - Pensions, Investments & Projects. It may be changed as a result of legal or regulatory changes, evolving best practice and ongoing review of the effectiveness of the procedure.

Further Information
If you require further information about reporting breaches or this procedure, please contact:

Claire Lewis-Smith, Pensions Administration Manager ***or***

Julie Edwards, Pensions & Investments Manager

Buckinghamshire Pension Fund
Walton Street Offices
Walton Street
Aylesbury
HP20 1UD

Email – Claire.Lewis-Smith@buckinghamshire.gov.uk
Telephone – 01296 383424

Email – Julie.Edwards@buckinghamshire.gov.uk
Telephone – 01296 383910

Designated officer (scheme manager) contact details:
Head of Finance - Pensions, Investments & Projects: Mark Preston
Email: Mark.Preston@buckinghamshire.gov.uk
Telephone – 01296 383107

Further information on the Buckinghamshire Pension Fund can be found at:

Telephone – 01296 383755
Email - pensions@buckinghamshire.gov.uk
Buckinghamshire Council website – www.buckinghamshire.gov.uk/pensions

Appendix A – Determining whether a breach is likely to be of material significance
To decide whether a breach is likely to be of material significance individuals should consider the following elements, both separately and collectively:

- cause of the breach (what made it happen)
- effect of the breach (the consequence(s) of the breach)
- reaction to the breach
- wider implications of the breach.

The cause of the breach
Examples of causes which are likely to be of concern to the Regulator are provided below:

- acting, or failing to act, in deliberate contravention of the law
- dishonesty
- incomplete or inaccurate advice
- poor administration, i.e. failure to implement adequate administration procedures
- poor governance
- slow or inappropriate decision-making practices.

When deciding whether a cause is likely to be of material significance individuals should also consider:

- whether the breach has been caused by an isolated incident such as a power outage, fire, flood or a genuine one-off mistake
- whether there have been any other breaches (reported to the Regulator or not) which when taken together may become materially significant.

The effect of the breach
Examples of the possible effects (with possible causes) of breaches which are considered likely to be of material significance to the Regulator in the context of the LGPS are given below:

- Committee/Board members not having sufficient knowledge and understanding resulting in the Committee/Board failing to fulfil its role, the scheme not being properly governed and administered and/or the scheme manager breaching other legal requirements;
- conflicts of interest of Committee/Board members resulting in the members being prejudiced in the way in which they carry out their roles and/or the ineffective governance and administration of the scheme and/or the scheme manager breaching legal requirements;
- poor internal controls, leading to the scheme not being run in accordance with scheme regulations and other legal requirements, and risks not being properly identified;
- inaccurate or incomplete information about benefits and scheme information provided to members, resulting in members not being able to effectively plan or make decisions about their retirement;
- poor member records held resulting in member benefits being calculated incorrectly and/or not being paid to the right person at the right time;
- misappropriation of assets, resulting in scheme assets not being safeguarded;
- other breaches which result in the scheme being poorly governed, managed or administered.

The reaction to the breach

A breach is likely to be of concern and material significance to the Regulator where a breach has been identified and those involved:

- do not take prompt and effective action to remedy the breach and identify and tackle its cause in order to minimise risk of recurrence;
- are not pursuing corrective action to a proper conclusion; or
- fail to notify affected scheme members where it would have been appropriate to do so.

The wider implications of the breach

Reporters should also consider the wider implications when deciding whether a breach must be reported. The breach is likely to be of material significance to the Regulator where the fact that a breach has occurred makes it more likely that further breaches will occur within the Fund or, if due to maladministration by a third party, further breaches will occur in other pension schemes.

Appendix B - Traffic light framework for deciding whether or not to report
Buckinghamshire Council recommends those responsible for reporting to use the traffic light framework when deciding whether to report to the Regulator. This is illustrated below:

Red	Where the cause, effect, reaction and wider implications of a breach, when considered together, are likely to be of material significance. These must be reported to the Regulator. Example: Several members' benefits have been calculated incorrectly. The errors have not been recognised and no action has been taken to identify and tackle the cause or to correct the errors.
Amber	Where the cause, effect, reaction and wider implications of a breach, when considered together, may be of material significance. They might consist of several failures of administration that, although not significant in themselves, have a cumulative significance because steps have not been taken to put things right. You will need to exercise your own judgement to determine whether the breach is likely to be of material significance and should be reported. Example: Several members' benefits have been calculated incorrectly. The errors have been corrected, with no financial detriment to the members. However, the breach was caused by a system error which may have wider implications for other public service schemes using the same system.
Green	Where the cause, effect, reaction and wider implications of a breach, when considered together, are not likely to be of material significance. These should be recorded but do not need to be reported. Example: A member's benefits have been calculated incorrectly. This was an isolated incident, which has been promptly identified and corrected, with no financial detriment to the member. Procedures have been put in place to mitigate against this happening again.

All breaches should be recorded even if the decision is not to report.

When using the traffic light framework individuals should consider the content of the red, amber and green sections for each of the cause, effect, reaction and wider implications of the breach, before considering the four together. Some useful examples of this framework are provided by the Regulator at the following link:

http:// www.thepensionsregulator.gov.uk/codes/code-related-report-breaches.aspx

Appendix C – Example Record of Breaches

Date	Category (e.g. administration, contributions, funding, investment, criminal activity)	Description and cause of breach	Possible effect of breach and wider implications	Reaction of relevant parties to breach	Reported / Not reported (with justification if not reported and dates)	Outcome of report and/or investigations	Outstanding actions

*New breaches since the previous meeting should be highlighted

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Record of Breaches – 01/07/2021-30/06/2022

Date	Category (e.g. administration, contributions, funding, investment, criminal activity)	Description and cause of breach	Possible effect of breach and wider implications	Reaction of relevant parties to breach	Reported / Not reported (with justification if not reported and dates)	Outcome of report and/or investigations	Outstanding actions
Q2 01/07/2021 - 30/09/2021 Q3 01/10/2021-31/12/2021 Q4 01/01/2022-31/03/2022 Q1 01/04/2022-30/06/2022	Administration	3 refunds of employee contributions were paid in excess of 5 years since their date of leaving 2 refunds of employee contributions were paid in excess of 5 years since their date of leaving 23 refunds of employee contributions were paid in excess of 5 years since their date of leaving 15 refunds of employee contributions were paid in excess of 5 years since their date of leaving	Non-compliance with statutory regulations	None received	Not reported. The LGPS Regulations 2013 stipulate that a refund of contributions must be paid before the expiry of 5 years of the member leaving however, there is little action that can be taken if a member does not claim the refund.	Members are written to after leaving and informed that they have a refund due. They can claim the refund or transfer the value of their fund to another approved pension arrangement. Where an election is not received, a reminder is sent to the member 6 months prior to the 5 year expiry date.	N/A – Green breach

Q2 01/07/2021 - 30/09/2021 Q3 01/10/2021- 31/12/2021 Q4 01/01/2022- 31/03/2022 Q1 01/04/2022- 30/06/2022	Administration	3 pensions paid after age 75 1 pension paid after age 75 3 pensions paid after age 75 2 pensions paid after age 75	Non-compliance with statutory regulations	None received	Not reported. The LGPS Regulations 2013 stipulate that pension benefits must be paid before age 75 however, there is little action that can be taken if a member does not claim their pension benefits.	Members are written to at leaving notifying them of their pension benefits and the date they must be claimed by. If not claimed three months prior to Normal Pension Age (in most cases this is State Pension Age), a notification is issued to the member confirming benefits can be claimed or payment deferred until the day before age 75 is attained. A further reminder is issued three months prior to age 75.	N/A – Green breach
31/08/2022	Administration	100% of annual benefit statements not issued by statutory deadline, 99.89% issued	Non-compliance with statutory regulations	None received	Not reported	In 2020/21 98.14% of ABS were issued by the deadline.	N/A – Green breach
30/06/2022	Contributions	Employees/employer's contributions not received by the 19th of the month following the					Amber breach Monthly debt days have been

<table>
<tr>
<td></td>
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<td>month in which they were deducted:

<table>
<tr><td colspan="3">2021/22</td></tr>
<tr><td colspan="3">Late Payments</td></tr>
<tr><td>1-10 days late</td><td>107</td><td></td></tr>
<tr><td>11-30 days late</td><td>36</td><td></td></tr>
<tr><td>1-3 months late</td><td>22</td><td></td></tr>
<tr><td>4-7 months late</td><td>10</td><td></td></tr>
<tr><td>8-11 months late</td><td>1</td><td></td></tr>
<tr><td>12+ months late</td><td>-</td><td></td></tr>
<tr><td></td><td>176</td><td></td></tr>
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Value received late £1,059,372.73

<table>
<tr><td colspan="3">Outstanding Payments</td></tr>
<tr><td>April</td><td>-</td><td></td></tr>
<tr><td>May</td><td>-</td><td></td></tr>
<tr><td>June</td><td>-</td><td></td></tr>
<tr><td>July</td><td>3</td><td></td></tr>
<tr><td>August</td><td>8</td><td></td></tr>
<tr><td>September</td><td>6</td><td></td></tr>
<tr><td>October</td><td>6</td><td></td></tr>
<tr><td>November</td><td>7</td><td></td></tr>
<tr><td>December</td><td>9</td><td></td></tr>
<tr><td>January</td><td>7</td><td></td></tr>
<tr><td>February</td><td>5</td><td></td></tr>
<tr><td>March</td><td>8</td><td></td></tr>
<tr><td>Total</td><td>44</td><td></td></tr>
</table>

Value outstanding £344,239.38</td>
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<td>scheduled into the finance teams’ diaries to ensure this is addressed every month</td>
</tr>
</table>

2022/23		
Late Payments		
1-10 days late	34	
11-30 days late	5	
1-3 months late	-	
4-7 months late	-	
8-11 months late	-	
12+ months late	1	
	39	

Value received late £561,846.87

Outstanding Payments		
April	8	
May	10	
June	8	

Value outstanding £208,733.36

Report to Pension Fund Board

Date: 19th October 2022

Reference number: N/A

Title: Funding Strategy Statement

Relevant councillor(s): None specific

Author and/or contact officer: Julie Edwards, Pensions and Investments Manager

Ward(s) affected: None specific

Recommendations: The Board is asked to NOTE the revised Funding Strategy Statement (FSS).

Reason for decision: The Local Government Pension Scheme (LGPS) Regulations require all LGPS Administering Authorities to prepare a FSS. A revised FSS updated to reflect pass-through arrangement for new admission bodies was approved by the Pension Fund Committee in September 2022.

Executive summary

1.1 The FSS seeks to set out how the administering authority has balanced the conflicting aims of affordability of contributions, transparency of processes, stability of employers' contributions and prudence in the funding basis. It is reviewed every three years following the triennial valuation. From time to time, ad hoc revisions to the FSS are required, the FSS has been updated to set out the position where admission bodies join the Fund under a pass-through arrangement. The pass-through arrangement was agreed by the Pension Fund Committee as the default approach for new admission bodies in March 2022. Under a pass-through arrangement the letting authority retains the pension risk.

Content of report

1.2 Following completion of the 2019 Actuarial Valuation, a revised FSS was agreed by the Pension Fund Committee in February 2020. The Committee subsequently agreed a revised FSS in July 2020 following an amendment to the LGPS Regulations covering exit credits, administering authorities were given a lot more flexibility in their approach to paying exit credits and the FSS was updated to reflect the flexibility given in respect of exit credits.

1.3 In March 2022, the Pension Fund Committee agreed a default approach for new admission bodies to join the Fund under a pass-through arrangement. Under a pass-through arrangement, the letting authority retains the pensions risk. The admission body is responsible for paying the agreed contribution rate and also additional costs as set out in each admission agreement e.g. redundancy and early retirement costs. Before 1 April 2022, the default approach was a full risk transfer.

1.4 Under a full risk transfer the admission body becomes responsible for all the pensions risk associated with the benefits accrued by transferring members and the benefits to be accrued over the contract length. The administering authority may consider requests for a full risk transfer from new admission bodies. The revised FSS sets out the position regarding funding at the start of the contract, employer contribution rates, accounting and risk sharing.

1.5 The FSS, attached as Appendix 1, sets out the approach to pass-through arrangements. Pages 15 and 16 have been updated to reflect the approach to new employers joining the Fund.

Legal and financial implications

1.6 The Local Government Pension Scheme (LGPS) Regulations 2013 require all Pension Administering Authorities to prepare a FSS.

Next steps and review

The FSS is reviewed every three years following the triennial actuarial valuation.

Background papers

None.

Buckinghamshire Pension Fund Funding Strategy Statement

Contents

Introduction

This is the Funding Strategy Statement for the Buckinghamshire Pension Fund (the Fund). It has been prepared in accordance with Regulation 58 of the Local Government Pension Scheme Regulations 2013 as amended (the Regulations) and describes Buckinghamshire Council's strategy, in its capacity as administering authority of the Fund. Buckinghamshire Council replaced Buckinghamshire County Council as administering authority of the Fund on 1 April 2020.

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

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

Purpose of the Funding Strategy Statement

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

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

Aims and purpose of the Fund

The aims of the Fund are to:

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

The purpose of the Fund is to:

- Pay pensions, lump sums and other benefits to Scheme members as provided for under the Regulations;
- Meet the costs associated in administering the Fund; and
- Receive and invest contributions, transfer values and investment income.

Funding objectives

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

The funding objectives are to:

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

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

Key parties

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

The administering authority

The administering authority for the Fund is Buckinghamshire Council. The main responsibilities of the administering authority are to:

- Operate the Fund in accordance with the LGPS Regulations;
- Collect employee and employer contributions, investment income and other amounts due to the Fund as stipulated in the Regulations;
- Invest the Fund's assets in accordance with the Fund's Investment Strategy Statement;
- Pay the benefits due to Scheme members as stipulated in the Regulations;
- Ensure that cash is available to meet liabilities as and when they fall due;
- Take measures as set out in the Regulations to safeguard the Fund against the consequences of employer default;
- Manage the actuarial valuation process in conjunction with the Fund Actuary;
- Prepare and maintain this FSS and also the ISS after consultation with other interested parties;
- Monitor all aspects of the Fund's performance;
- Effectively manage any potential conflicts of interest arising from its dual role as both Fund administrator and Scheme employer; and
- Enable the Local Pension Board to review the valuation process as they see fit.

Scheme employers

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

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

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

Scheme members

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

Fund Actuary

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

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

Funding strategy

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

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

2019 valuation results	
Surplus (Deficit)	(£186m)
Funding level	94%

On a whole Fund level, the primary rate required to cover the employer cost of future benefit accrual was 18.2% of payroll p.a.

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

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

Funding method

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

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

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

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

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

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

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

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

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

Payment of contributions

Employers pay contributions on a monthly basis. Primary contributions are certified as a percentage of payroll and payments received will fluctuate in line with payroll each month. Secondary rate adjustments can also be certified as a percentage of payroll or as a monetary amount. Monetary amounts are payable in 12 equal monthly instalments throughout the relevant year.

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 the Fund Actuary and the administering authority.

From 1 April 2023 no discount will be offered in exchange for prepayment of either primary or secondary contributions.

Valuation assumptions and funding model

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

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

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

Future price inflation

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

This assumption was reviewed following the Chancellor's November 2020 announcement on the reform of RPI and is now assumed to be 0.4% p.a. lower than the 20 year point on the inflation curve. This change will be fully reflected in the ongoing funding assumptions from 31 March 2021. This adjustment accounts for both the shape of the curve in comparison to the Fund's liability profile and the view that investors are willing to accept a lower return on investments to ensure inflation linked returns.

Future pension increases

Pension increases are linked to changes in the level of the Consumer Price Index (CPI). Inflation as measured by the CPI has historically been less than RPI due mainly to different calculation methods. At the March 2019 actuarial valuation, a deduction of 1.0% p.a. was made to the RPI inflation assumption to derive the CPI inflation assumption. The CPI assumption adopted at March 2019 was 2.6% p.a.

This assumption was also reviewed in light of the Chancellor's announcement on the reform of RPI mentioned above and CPI inflation is now assumed to be 0.4% p.a. lower than the RPI assumption (i.e. a total of 0.8% p.a. below the 20 year point on the Bank of England implied RPI inflation curve). This change will be fully reflected in the ongoing funding assumptions from 31 March 2021. This reflects the anticipated reform of RPI inflation from 2030 following the UK Statistics Authority's proposal to change the RPI calculation method in line with the Consumer Prices Index including Housing costs (CPIH). This assumption will be reviewed at future valuations and the difference between RPI and CPI is expected to move towards 0.0% p.a. as we get closer to 2030.

Future pay increases

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

Future investment returns/discount rate

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

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

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

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

Financial assumptions as at 31 March 2019	
RPI inflation	3.6% p.a.
CPI inflation	2.6% p.a.
Pension/deferred pension increases and CARE revaluation	In line with CPI inflation
Pay increases	CPI inflation + 1.0% p.a.
Discount rate	4.8% p.a.

Asset valuation

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

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

Demographic assumptions

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

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

McCloud/Sargeant judgements

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

In December 2018, the Court of Appeal ruled that the transitional protection offered to some members as part of the reforms amounted to unlawful discrimination. On 27 June 2019 the Supreme Court denied the Government's request for an appeal in the case. A remedy is still to be either imposed by the Employment Tribunal or negotiated and applied to all public service schemes, so it is not yet clear how this judgement may affect LGPS members' past or future service benefits. It has, however, been noted by Government in its 15 July 2019 statement that it expects to have to amend all public service schemes, including the LGPS. On 16 July 2020, the Government published a consultation on the proposed remedy to be applied to LGPS benefits. The consultation closed on 8 October 2020 and the final remedy will only be known after the consultation responses have been reviewed and a final set of remedial Regulations are published.

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

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

Guaranteed Minimum Pension (GMP) indexation and equalisation

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

On 23 March 2021, the government published the outcome to its Guaranteed Minimum Pension Indexation consultation, concluding that all public service pension schemes, including the LGPS, will be directed to provide full indexation to members with a GMP reaching SPA beyond 5 April 2021. This is a permanent extension of the existing 'interim solution' that has applied to members with a GMP reaching SPA on or after 6 April 2016. Details of the consultation outcome can be found at: https://www.gov.uk/government/consultations/public-service-pensions-guaranteed-minimum-pension-indexation-consultation. The 2019 valuation assumption for GMP is that the Fund will pay limited increases for members that have reached SPA by 6 April 2016, with the Government providing the remainder of the inflationary increase. For members that reach SPA after this date, it is assumed that the Fund will be required to pay the entire inflationary increase.

Deficit recovery/surplus amortisation periods

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

Where the valuation for an employer discloses a deficit~~, then~~ the level of required employer contributions includes an adjustment to fund the deficit over a maximum period of 15 years. Shorter recovery periods have been used for the majority of employers. The adjustment may be set either as a percentage of payroll or as a fixed monetary amount.

Where the valuation for an employer discloses a surplus~~, then~~ the level of required employer contribution may include an adjustment to amortise the surplus over a minimum period of 11 years.

Where an employer's contribution has to increase significantly~~ then~~, if appropriate, the increase may be phased in over a period not exceeding 3 years.

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

- The significance of the surplus or deficit relative to that employer's liabilities;
- The covenant of the individual employer (including any security in place) and any limited period of participation in the Fund;

- The remaining contract length of an employer in the Fund (if applicable); and
- The implications in terms of stability of future levels of employers' contribution.

Pooling of individual employers

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

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

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

Pool	Type of pooling	Notes
Buckinghamshire Council	Past and future service pooling	All employers in the pool pay the same total contribution rate and have the same funding level
Milton Keynes Council	Past and future service pooling	All employers in the pool pay the same total contribution rate and have the same funding level
Thames Valley Police	Past and future service pooling	All employers in the pool pay the same total contribution rate and have the same funding level
Academies	Past and future service pooling	All academies in the pool have the same funding level. Slightly different contribution rates are paid by Bucks and Milton Keynes academies over 2020-2022, converging to the same rate payable from 1 April 2022
Town & Parish Council Pool	Past and future service pooling	All employers in the pool have the same funding level and target the same total contribution rate. Some employers in the pool are stepping up to this target contribution rate over the valuation period

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

Forming/disbanding a funding pool

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

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

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

New employers joining the Fund

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

Admission bodies

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

From 1 April 2022, the default approach will be for admission bodies to join the Fund under a pass-through arrangement. Under a pass-through arrangement, the letting authority retains the pensions risk. The admission body is responsible for paying the agreed contribution rate and also additional costs as set out in each admission agreement e.g. redundancy and early retirement costs.

Before 1 April 2022, the default approach was a full risk transfer. Under a full risk transfer the admission body becomes responsible for all the pensions risk associated with the benefits accrued by transferring members and the benefits to be accrued over the contract length. The administering authority may consider requests for a full risk transfer from new admission bodies. From a legal perspective the Fund continues to have a full claim against the admission body for the amounts payable to the Fund. The admission body enters into a back to back arrangement with the letting authority under which, as between the admission body and the letting authority, it is agreed that the letting authority will assume some or all of this risk but this in no way affects the claim that the Fund has against the admission body under the admission agreement.

Funding at start of contract

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

For pass-through employers the funding position will be re-set at 100% at each triennial valuation, with the balancing assets moved to/from the letting authority's section of the Fund as required. No such re-set is carried out under a full transfer of risk arrangement.

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

Contribution rate

The default approach for a new admission body with a pass-through arrangement will be for a simple fixed rate to apply. Consideration will be given to a variable rate in line with the cost of benefit accrual where the contract is for a long period.

- The simple fixed rate will be fixed at the outset and not re-calculated during the remainder of the contract. This will usually be set out as part of the commercial contract between the letting authority and the contractor. Where this rate differs from the cost of future benefits calculated by the actuary, the balance will be incorporated into the letting authority's certified rate.
- The variable rate would be set and then adjusted at each valuation in line with the change in the cost of future benefit accrual calculated by the actuary. This means that the contractor picks up the cost of changes in the profile of their membership, the life expectancy of their members and the actuary's updated assumptions, such as future investment returns, inflation and salary increases. The letting authority retains much of the market risk (e.g. asset performance) and experience (e.g. if inflation has been higher or lower between the valuation periods than assumed).

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

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

Accounting

Under the simple fixed rate pass-through arrangement, for accounting purposes, the contractor's obligation is simply to pay the agreed contribution rate. The contractor would not be expected to include any liability in respect of their LGPS pension participation on their balance sheet. Instead, the letting authority would include it in their disclosures. The contractor may report its participation in the LGPS as if it were a defined contribution scheme.

Under the variable rate pass-through arrangement, it is less clear whether the contractor needs to include a liability on their balance sheet, they are subject to some pensions risk but they never have the possibility of a past service funding deficit so it could be argued that they have no accounting balance sheet obligation. In these cases, the contractor and letting authority should check with their auditors what their requirements are.

Security

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

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

Risk-sharing

Although pass-though is the default approach, new admission bodies and the relevant letting authority may make a commercial agreement to deal with the pensions risk differently. For example, it may be agreed that the pensions risk is shared between the letting authority and the new admission body.

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

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

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

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

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

New academies

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

Funding at start

On conversion to academy status, the new academy will become part of the Academies funding pool and will be allocated assets based on the funding level of the pool at the conversion date.

Contribution rate

The contribution rate payable when a new academy joins the Fund will be in line with the contribution rate certified for the relevant section of the Academies funding pool at the 2019 valuation.

Contribution reviews between actuarial valuations

It is anticipated for most Scheme employers that the contribution rates certified at the formal actuarial valuation will remain payable for the period of the rates and adjustments certificate. However, there may be circumstances where a review of the contribution rates payable by an employer (or a group of employers) under Regulation 64A is deemed appropriate by the administering authority.

A contribution review may be requested by an employer or be required by the administering authority. The review may only take place if one of the following conditions are met:

(i) it appears likely to the administering authority that the amount of the liabilities arising or likely to arise has changed significantly since the last valuation;

(ii) it appears likely to the administering authority that there has been a significant change in the ability of the Scheme employer or employers to meet the obligations of employers in the Scheme; or

(iii) a Scheme employer or employers have requested a review of Scheme employer contributions and have undertaken to meet the costs of that review. A request under this condition can only be made if there has been a significant change in the liabilities arising or likely to arise and/or there has been a significant change in the ability of the Scheme employer to meet its obligations to the Fund.

Guidance on the administering authority's approach considering the appropriateness of a review and the process in which a review will be conducted is set out the Fund's separate Contribution review policy which can be accessed on the Funding Strategy Statement webpage. This includes details of the process that should be followed where an employer would like to request a review.

Once a review of contribution rates has been agreed, unless the impact of amending the contribution rates is deemed immaterial by the Fund Actuary, ~~then~~ the results of the review will be applied with effect from the agreed review date, regardless of the direction of change in the contribution rates.

Note that where a Scheme employer seems likely to exit the Fund before the next actuarial valuation ~~then~~ the administering authority can exercise its powers under Regulation 64(4) to carry out a review of contributions with a view to providing that assets attributable to the Scheme employer are equivalent to the exit payment that will be due from the Scheme employer. These cases do not fall under the separate contribution review policy.

With the exception of any cases falling under Regulation 64(4), the administering authority will not accept a request for a review of contributions where the effective date is within 12 months of the next rates and adjustments certificate.

Cessation valuations

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

Where a pass-through arrangement is in place, any deficit or surplus at the end of the contract will be consolidated into the Letting Authority's section of the Fund, subject to any agreed exceptions set out in the admission agreement or side agreement.

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

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

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

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

Exit credit policy

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

- Any employer who cannot demonstrate that they have been exposed to underfunding risk during their participation in the Fund will not be entitled to an exit credit payment. ~~This will include the majority of "pass-through" arrangements.~~ This is on the basis that these employers would not have been asked to pay an exit payment had a deficit existed at the time of exit.
- The administering authority does not need to enquire into the precise risk sharing arrangement adopted by an employer but it must be satisfied that the risk sharing arrangement has been in place before it will pay out an exit credit. The level of risk that an employer has borne will be taken into account when determining the amount of any exit credit. It is the responsibility of the exiting employer to set out why ~~the arrangements make~~ payment of an exit credit is appropriate.

- Any exit credit payable will be subject to a maximum of the actual employer contributions paid into the Fund.
- As detailed above, the Fund Actuary may adopt differing approaches when assessing whether an exit debt is payable by the employer, depending on the specific details surrounding the employer's cessation scenario. If the results reveal a surplus, the Fund Actuary will also assess whether an exit credit may be payable. The default approach to calculating any exit credit will be to consider the results on the ~~the cessation position will be on a~~ minimum-risk basis. If there is a surplus on the minimum-risk basis then the administering authority will consider the payment of an exit credit subject to the other conditions set out in this policy. ~~unless it can be shown that there is another employer in the Fund willing to guarantee the liabilities. If the administering authority is satisfied that there is another employer willing to act as a guarantor then the cessation position may be calculated on the ongoing funding basis.~~
- The administering authority will pay out any exit credits within six months of the cessation date where possible. A longer time may be agreed between the administering authority and the exiting employer where necessary. For example if the employer does not provide all the relevant information to the administering authority within one month of the cessation date the administering authority will not be able to guarantee payment within six months of the cessation date.
- Under the Regulations, the administering authority has the discretion to take into account any other relevant factors in the calculation of any exit credit payable and they will seek legal advice where appropriate.

Managing exit payments

Where a cessation valuation reveals a deficit and an exit payment is due, the expectation is that the employer settles this debt immediately through a single cash payment. However, should it not be possible for the employer to settle this amount, providing the employer puts forward sufficient supporting evidence to the administering authority, the administering authority may agree a deferred debt agreement (DDA) with the employer under Regulation 64(7A) or a debt spreading agreement (DSA) under Regulation 64B.

Under a DDA, the exiting employer becomes a deferred employer in the Fund (i.e. they remain as a Scheme employer but with no active members) and remains responsible for paying the secondary rate of contributions to fund their deficit. The secondary rate of contributions will be reviewed at each actuarial valuation until the termination of the agreement.

Under a DSA, the cessation debt is crystallised and spread over a period deemed reasonable by the administering authority having regard to the views of the Fund Actuary.

Whilst a DSA involves crystallising the cessation debt and the employer's only obligation is to settle this set amount, in a DDA the employer remains in the Fund as a Scheme employer and is exposed to the same risks (unless agreed otherwise with the administering authority) as active employers in the Fund (e.g. investment, interest rate, inflation, longevity and regulatory risks) meaning that the deficit will change over time.

Guidance on the administering authority's policy for entering into, monitoring and terminating a DDA or DSA is set out in the Fund's separate DSA and DDA policies document available on the Funding Strategy Statement webpage. This includes details of when a DDA or a DSA may be permitted and the information required from the employer when putting forward a request for a DDA or DSA.

Regulatory factors

At the date of drafting this FSS, the Government is currently consulting on potential changes to the Regulations, some which may affect the regulations surrounding an employer's exit from the Fund. This is set out in the *Local government pension scheme: changes to the local valuation cycle and the management of employer risk* consultation document.

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

Bulk transfers

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

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

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

Consolidation of Multi Academy Trusts (MATs)

Where an academy is transferring into or out of the Fund as part of a MAT consolidation exercise, the Fund generally expects that this will proceed through a Direction Order from the Secretary of State. In these situations and subject to the terms agreed between the Fund Actuary to both LGPS Funds, typically all the assets attributable to the academy in the ceding Fund are transferred to the receiving Fund.

Where the academy is transferring out of the Fund, the Fund requires a Direction Order to be sought such that all associated deferred and pensioner liabilities are also transferred out of the Fund.

Where the academy is transferring into the Fund, where appropriate, the academy will become part of the Fund's Academy pool. If the funding level of the transfer in to the Fund is substantially lower than the funding level of the academy pool~~, then~~ the Fund may require additional contributions to be paid by the academy to protect the other academies in the pool from an increased funding cost as a result of the transfer terms. There may be some instances where it is not deemed appropriate for the academy to join the Academy pool, or at least not immediately. For example if a large number of academies from a MAT transfer into the Fund at one time, then it may be more appropriate to initiate a separate funding pool for these academies until their funding position is in line with the main Academy pool, at which point it can then be merged into the Academy pool.

Links with the Investment Strategy Statement (ISS)

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

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

Risks and counter measures

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

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

Financial risks

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

The valuation results are most sensitive to the real discount rate (i.e. the difference between the discount rate assumption and the price inflation assumption). Broadly speaking an increase/decrease of 0.5% p.a. in the real discount rate will decrease/increase the valuation of the liabilities by 10%, and decrease/increase the required employer contribution by around 2.5% of payroll p.a.

However, the Pension Fund Committee regularly monitors the investment returns achieved by the fund managers and receives advice from ~~the~~ investment consultants, guidance from an independent adviser~~s~~ and guidance from officers on investment strategy.

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

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

Demographic risks

Allowance is made in the funding strategy via the actuarial assumptions for a continuing improvement in life expectancy. However, the main demographic risk to the funding strategy is that it might underestimate the continuing improvement in longevity. For example, an increase of one year to life expectancy of all members in the Fund will reduce the funding level by approximately 1%.

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

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

From 1 April 2023, the administering authority shall put in place a self-insurance arrangement to cover ill-health retirement and death-in-service benefits for all individual employers not involved in a pooling arrangement (see the Pooling of individual employers section for a list of all pooling arrangements).

When an ill-health retirement or death-in-service occurs a funding strain (i.e. the difference between the value of the benefits payable to the member and the value that was assumed as part of the actuarial valuation) is generated in the employer's section of the Fund. As part of the self-insurance arrangement, a reserve will be created based on the existing implicit assumption for ill-health and death-in-service liability exposure adopted by the Fund actuary. The reserve will be funded by a defined percentage of contributions or "premiums" paid by eligible employers and will be tracked separately by the Fund actuary at successive valuation. The premiums will be included within the employer's primary rate certified by the Fund actuary. Should a funding strain arise from an ill-health retirement or death-in-service, assets equal to the funding strain will be transferred from the reserve to the employer's section of the Fund.

The premiums are set with the expectation that they will be sufficient to cover the costs in the three years following the valuation date. The reserve will be reset to zero at each valuation. Any surplus or deficit of assets in the reserve would be redistributed in proportion to payroll (in total over the inter-valuation period). Therefore, if there was a shortfall (more assets have been transferred to individual employers than contributions paid in) then we would make a deduction to all the participating employers' asset pots (in proportion to payroll). If there was a surplus (fewer assets have been transferred to individual employers than contributions paid in) then we would refund all the participating employers by increasing their asset pots (in proportion to payroll).

The self-insurance arrangement is subject to review at subsequent valuations depending on experience and the expected ill-health and death-in-service trends. They will also be adjusted for any changes in ~~the~~ LGPS benefits. They will be included in employer rates at each valuation or on commencement of participation for new employers.

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

Maturity risk

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

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

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

Regulatory risks

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

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

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

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

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

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

McCloud/Sargeant judgements and cost cap

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

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

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

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

On 16 July 2020, the Government published a consultation on the proposed remedy to be applied to LGPS benefits and at the same time announced the unpausing of the 2016 cost cap process which will take into account the remedy for the McCloud and Sargeant judgement. The consultation closed on 8 October 2020 and the final remedy will only be known after the consultation responses have been reviewed and a final set of remedial Regulations are published. At the time of drafting this FSS, it is not yet known what the effect on the current and future LGPS benefits will be.

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

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

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

The consultation is currently ongoing: the consultation was closed to responses on 31 July 2019 and an outcome is now awaited.

So far, two partial responses to the consultation have been issued:

- On 27 February 2020, a partial response was issued relating to policy changes to exit credits
- On 26 August 2020, a partial response was issued relating to review of employer contributions and flexibility on exit payments

This FSS has been updated in light of these responses and will be revisited again once the outcomes are known for the remaining items.

Detail of the outstanding policy proposals are outlined below:

Timing of future actuarial valuations

LGPS valuations currently take place on a triennial basis which results in employer contributions being reviewed every three years. In September 2018 it was announced by the Chief Secretary to HMT, Elizabeth Truss, that the national Scheme valuation would take place on a quadrennial basis (i.e. every four years) along with the other public sector pension schemes. This results of the national Scheme valuation are used to test the cost control cap mechanism and HMT believed that all public sector schemes should have the cost cap test happen at the same time with the next quadrennial valuation in 2020 and then 2024.

Changes to employers required to offer LGPS membership

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

With consideration of the nature of the LGPS and the changes in nature of the further education and higher education sectors, the Government has proposed to remove the requirement for further education corporations, sixth form college corporations and higher education corporations in England to offer new employees access to the LGPS. Given the significance of these types of employers in the Fund (5% of total liabilities) this could impact on the level of maturity of the Fund and the cashflow profile. For example, increased risk of contribution income being insufficient to meet benefit outgo, if not in the short term then in the long term as the payroll in respect of these types of employers decreases with fewer and fewer active members participating in the Fund.

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

Employer risks

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

- Structural changes in an individual employer's membership;
- An individual employer deciding to close the Scheme to new employees; and
- An employer ceasing to exist without having fully funded their pension liabilities.

However, the administering authority monitors the position of employers participating in the Fund, particularly those which may be susceptible to the events outlined, and takes advice from the Fund Actuary when required.

In the case of admitted bodies, the Fund has a policy of requiring some form of security from the employer, in the form of a guarantee or a bond, in case of employer default where the risk falls to the Fund. Where the risk of default falls on the liabilities of an original letting authority, the Fund provides advice to the letting authority to enable them to make a decision on whether a guarantee, some other form of security or a bond should be required.

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

Governance risks

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

Monitoring and review

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

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

The timing of the next funding valuation was~~is~~ due to be confirmed as part of the Government's *Local government pension scheme: changes to the local valuation cycle and management of employer risk* consultation which closed on 31 July 2019. At the time of drafting this FSS, no formal response to the consultation has been published it is anticipated that for the ~~next~~ funding valuation ~~will be due~~ as at 31 March 2022 ~~but~~ the period for which contributions will be certified ~~remains unconfirmed~~ is from 1 April 2023 to 31 March 2026.

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

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Pension Fund Board Forward Plan

Updated	07-Oct-22

19 October 2022		MS Teams	
MS Teams	**Agenda Item**	**Author**	**Cyclical Item?**
10:00-12:00	Apologies/Declarations of interest/Minutes	Chairman	Every meeting
	Minutes of Pension Fund Committee	Pension Fund Committee Chairman	Every meeting
	i-Connect/Pensions 'Online' Update	Sam Price	Bi-annually
	Internal Administration Benchmarking	Sam Price	Annually
	Breaches of the Law	Claire Lewis-Smith	Annually
	Administration performance statistics	Sam Price	Every meeting
	Funding Strategy Statement	Julie Edwards	Triennial
	Forward Plan	Claire Lewis-Smith	Every meeting
	Annual Benefit Statements - Administration Year End Update	Sam Price	Every meeting
	Exclusion of Press and Public		
	Annual Benefit Statements - Confidential Appendix	Sam Price	Ad-hoc
	Confidential Minutes	Chairman	Every meeting
	Minutes of Pension Fund Committee	Pension Fund Committee Chairman	Every meeting
	Risk Register	Julie Edwards	Annually
	Pension Fund Performance	Julie Edwards	Every meeting
	Date of next meeting/AOB	--	

13 December 2022		MS Teams	
MS Teams	**Agenda Item**	**Author**	**Cyclical Item?**
10:00-12:00	Apologies/Declarations of interest/Minutes	Chairman	Every meeting
	Minutes of Pension Fund Committee	Pension Fund Committee Chairman	Every meeting
	Administration performance statistics	Sam Price	Every meeting
	Internal Dispute Resolution Procedure	Sam Price	Annually
	Cyber Security	Claire Lewis-Smith	Annually
	Training Opportunities	Claire Lewis-Smith	Annually
	McCloud Update	Claire Lewis-Smith	Bi-annually
	Annual Accounts Audit 2021/22	Julie Edwards	Annually
	Forward Plan	Claire Lewis-Smith	Every meeting
	Annual Benefit Statements - Administration Year End Update	Sam Price	Every meeting
	Exclusion of Press and Public		
	Annual Benefit Statements - Confidential Appendix	Sam Price	Ad-hoc
	Confidential Minutes	Chairman	Every meeting
	Minutes of Pension Fund Committee	Pension Fund Committee Chairman	Every meeting
	Pension Fund Performance	Julie Edwards	Every meeting
	Date of next meeting/AOB	--	

29 March 2022		MS Teams	
MS Teams	**Agenda Item**	**Author**	**Cyclical Item?**
10:00-12:00	Election of Chairman		Ad-hoc
	Apologies/Declarations of interest/Minutes	Chairman	Every meeting
	Minutes of Pension Fund Committee	Pension Fund Committee Chairman	Every meeting
	Scheme member and employer communications	Madelena da Costa	Annually
	i-Connect/Pensions 'Online' Update	Sam Price	Bi-annually
	Annual Review of Buckinghamshire Pension Board	Claire Lewis-Smith	Annually
	Governance Compliance Statement	Claire Lewis-Smith	Annually
	Administration performance statistics	Sam Price	Every meeting

Pension Fund Board Forward Plan

Updated	07-Oct-22

	Forward Plan	Claire Lewis-Smith	Every meeting
	Annual Benefit Statements - Administration Year End Update	Sam Price	Every meeting
	Exclusion of Press and Public		
	Annual Benefit Statements - Confidential Appendix	Sam Price	Ad-hoc
	Confidential Minutes	Chairman	Every meeting
	Minutes of Pension Fund Committee	Pension Fund Committee Chairman	Every meeting
	Pension Fund Performance	Julie Edwards	Every meeting
	Date of next meeting/AOB	--	

July 2022 TBC		**Venue TBC**	
In person	**Agenda Item**	**Author**	**Cyclical Item?**
The Gateway	Apologies/Declarations of interest/Minutes	Chairman	Every meeting
10:00-12:00	Minutes of Pension Fund Committee	Pension Fund Committee Chairman	Every meeting
	Review of Buckinghamshire Pension Board Policies	Claire Lewis-Smith	Ad hoc
	Pension Fund Annual Report 2021/22	Julie Edwards	Annually
	Annual Benefit Statements - Administration Year End Update	Sam Price	Every meeting
	Administration performance statistics	Sam Price	Every meeting
	McCloud update	Claire Lewis-Smith	Bi-annually
	Forward Plan	Claire Lewis-Smith	Every meeting
	Exclusion of Press and Public		
	Confidential Minutes	Chairman	Every meeting
	Minutes of Pension Fund Committee	Pension Fund Committee Chairman	Every meeting
	Employer Covenant Review	Claire Lewis-Smith	Triennial
	AVC Review	Claire Lewis-Smith	Ad hoc
	Pension Fund Performance	Julie Edwards	Every meeting
	Date of next meeting/AOB	--	

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Appendix 1

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Appendix 2

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Appendix 4

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