

Avon Pension Fund Committee

Date: Friday 26th September 2025

Time: 10.00am

Venue: Council Chamber - Guildhall, Bath

Bath and North East Somerset Councillors: Toby Simon (Chair), Shaun Stephenson-McGall (Vice-Chair), George Leach, Chris Dando and Joanna Wright

Co-opted Voting Members: Councillor Mike Drew (South Gloucestershire Council), Councillor Robert Payne (North Somerset Council), Councillor Fi Hance (Bristol City Council), Charles Gerrish (Academies), William Liew (HFE Employers), Wendy Weston (Trade Unions), Pauline Gordon (Independent Member), John Finch (Independent Member) and Jackie Peel (Independent Member)

Co-opted Non-voting Members: Edmund Cannon (Parish & Town Councils), Shona Jemphrey (Unison) and James Hillary (Unite)

Chief Executive and other appropriate officers

Press and Public



Mark Durnford

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NOTES:

1. Inspection of Papers: Papers are available for inspection as follows:

Council's website: <https://democracy.bathnes.gov.uk/ieDocHome.aspx?bcr=1>

2. Details of decisions taken at this meeting can be found in the minutes which will be circulated with the agenda for the next meeting. In the meantime, details can be obtained by contacting as above.

3. Recording at Meetings:-

The Openness of Local Government Bodies Regulations 2014 now allows filming and recording by anyone attending a meeting. This is not within the Council's control. Some of our meetings are webcast. At the start of the meeting, the Chair will confirm if all or part of the meeting is to be filmed. If you would prefer not to be filmed for the webcast, please make yourself known to the camera operators. We request that those filming/recording meetings avoid filming public seating areas, children, vulnerable people etc; however, the Council cannot guarantee this will happen.

The Council will broadcast the images and sounds live via the internet www.bathnes.gov.uk/webcast. The Council may also use the images/sound recordings on its social media site or share with other organisations, such as broadcasters.

4. Public Speaking at Meetings

The Council has a scheme to encourage the public to make their views known at meetings. They may make a statement relevant to what the meeting has power to do. They may also present a petition or a deputation on behalf of a group.

Advance notice is required not less than two full working days before the meeting. This means that for meetings held on Thursdays notice must be received in Democratic Services by 5.00pm the previous Monday.

Further details of the scheme can be found at:

<https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=12942>

5. Emergency Evacuation Procedure

When the continuous alarm sounds, you must evacuate the building by one of the designated exits and proceed to the named assembly point. The designated exits are signposted. Arrangements are in place for the safe evacuation of disabled people.

6. Supplementary information for meetings

Additional information and Protocols and procedures relating to meetings

<https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=13505>

Avon Pension Fund Committee - Friday 26th September 2025

at 10.00am in the Council Chamber - Guildhall, Bath

A G E N D A

1. EMERGENCY EVACUATION PROCEDURE

The Chair will ask the Committee Administrator to draw attention to the emergency evacuation procedure as set out under Note 5.

2. APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

3. DECLARATIONS OF INTEREST

At this point in the meeting declarations of interest are received from Members in any of the agenda items under consideration at the meeting. Members are asked to indicate:

- (a) The agenda item number in which they have an interest to declare.
- (b) The nature of their interest.
- (c) Whether their interest is **a disclosable pecuniary interest** or an **other interest**,
(as defined in Part 4.4 Appendix B of the Code of Conduct and Rules for Registration of Interests)

Any Member who needs to clarify any matters relating to the declaration of interests is recommended to seek advice from the Council's Monitoring Officer or a member of his staff before the meeting to expedite dealing with the item during the meeting.

4. TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIR

5. ITEMS FROM THE PUBLIC - TO RECEIVE STATEMENTS, PETITIONS OR QUESTIONS

6. ITEMS FROM COUNCILLORS AND CO-OPTED AND ADDED MEMBERS

To deal with any petitions or questions from Councillors and where appropriate co-opted and added members.

7. MINUTES: 27TH JUNE 2025 (PUBLIC & EXEMPT) (Pages 7 - 32)

8. INVESTMENTS UPDATE: POOLING DECISION (Pages 33 - 74)

The purpose of this report is to inform the Committee's in-principle decision in respect of which investment pool Avon Pension Fund (APF) should partner with.

9. FUNDING STRATEGY STATEMENT 2025 (Pages 75 - 198)

The Funding Strategy Statement sets out the key assumptions which the actuary has used in preparing the actuarial valuation and, in those cases where the Administering Authority has some discretion, the policies adopted by the Administering Authority.

10. PENSION FUND ADMINISTRATION - PERFORMANCE REPORT (Pages 199 - 238)

The purpose of this report is to present the Fund's administration performance for the period up to and including 31st July 2025 vs key performance indicators (KPI's).

11. LEGISLATION UPDATE (Pages 239 - 246)

The purpose of this report is to update the Pension Committee on the latest position concerning the Local Government Pension Scheme [LGPS] and any proposed regulatory matters that could affect scheme administration.

12. RISK MANAGEMENT PROCESS & RISK REGISTER (Pages 247 - 254)

The purpose of this report is to update the Committee with the quarterly review of the risk register.

13. GOVERNANCE UPDATE (Pages 255 - 272)

The Democratic Services Officer for this meeting is Mark Durnford who can be contacted on 01225 394458.

BATH AND NORTH EAST SOMERSET

AVON PENSION FUND COMMITTEE

Friday 27th June 2025

Bath and North East Somerset Councillors: Toby Simon (Chair), Shaun Stephenson-McGall (Vice-Chair), George Leach, Chris Dando and Joanna Wright

Co-opted Voting Members: Councillor Robert Payne (North Somerset Council), Councillor Fi Hance (Bristol City Council), Charles Gerrish (Academies), William Liew (HFE Employers), Wendy Weston (Trade Unions), Pauline Gordon (Independent Member), John Finch (Independent Member) and Jackie Peel (Independent Member)

Co-opted Non-voting Members: Shona Jemphrey (Unison)

Advisors: Steve Turner (Mercer), Paul Middleman (Mercer) and Nick Page (Mercer)

Also in attendance: Nick Dixon (Head of Pensions), Liz Woodyard (Group Manager for Funding, Investment & Risk), Nathan Rollinson (Investments Manager), Carolyn Morgan (Governance and Risk Advisor), Jeff Wring (Director of Financial Services, Assurance & Pensions) and Claire Newbery (Pensions Operations Manager)

1 EMERGENCY EVACUATION PROCEDURE

The Democratic Services Officer announced the emergency evacuation procedure.

2 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

Edmund Cannon had sent his apologies to the Committee.

3 DECLARATIONS OF INTEREST

Councillor George Leach declared an 'other interest' with particular regard to agenda item 14 (Governance Update). He is an employee of Hymans Robertson who provide LGPS training services, but he has no direct professional links with Avon Pension Fund.

4 TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIR

There was none.

5 ITEMS FROM THE PUBLIC - TO RECEIVE STATEMENTS, PETITIONS OR QUESTIONS

Youssef Ezzat Ibrahim addressed the Committee in the absence of Ray Wilson who had registered to make a statement but was unable to attend. A copy of Ray Wilson's statement is available as an online appendix to these minutes, and a summary of the statement given is set out below.

He stated that the climate crisis is at a breaking point and that the Avon Pension Fund was still investing in companies that will make it worse.

He said that the ongoing conflicts that involve weapons funded by Avon Pension Fund are having a devastating overall effect on the planet. He added that they are destroying its natural structure, poisoning the environment and leading to a climate breakdown.

He said that the arms companies that profit from these wars are facilitating a climate emergency.

He asked if all the Fund members realise that they are investing in the acceleration of a climate crisis and funding war crimes?

He demanded that a full consultation of all members is carried out, not just a sample of them. He said that people were feared of being shut down and want to know that their pension is protecting the planet and not funding war crimes.

He stated that the Fund cannot claim to support peace and climate justice by still funding these crimes.

He said that he was disappointed that the Committee had not already made a decision to disinvest from companies involved in the arms trade that is supporting the genocide in Gaza.

Benazir Jatoi addressed the Committee, a copy of her statement is available as an online appendix to these minutes, and a summary is set out below.

'I speak before you today as an Avon Pension Fund Scheme member, a Bath resident and a passionate believer in peace and justice – which means no war, no weapons and definitely no investment of my pension money in arms companies and weapons manufacturers.

Unfortunately, at the last Committee meeting, it was decided that the committee will continue to maintain the status quo – i.e continue to invest our money in arms companies.

As a reminder: Your fiduciary duty, as trustees of our money, is not, as some wrongly believe, only about ensuring maximum returns for the best interest of members. You can exclude sectors if they would cause legal, environmental or reputational risks relevant to beneficiaries.

You have discretion and we know you know how to use it – you have rightly recognised the risk to the Fund from climate change and recognise your power as a shareholder to influence change.

Given the grave environmental impact of weapons production and the devastating death and destruction they cause to people and planet around the world, I cannot emphasis enough the need for a transparent, thorough, and robust consultation that is widely carried out with all its members. I welcome that research partners are being consulted.

Since the last Committee meeting, a small group of members, here in Bath, have organised to draft, print and post over 10,000 flyers and letters to employers and employees from the Avon Pension Fund - alerting them of an upcoming consultation. We are all waiting for this consultation.

Dr Eldin Fahmy addressed the Committee, a copy of his statement is available as an online appendix to these minutes, and a summary is set out below.

'Israel's ongoing assault on Gaza is a moral catastrophe without recent parallel. There is no comparable case where a captive population has been so relentlessly persecuted, terrorised, and killed on this scale by a State actor - and UK ally. The suffering Israel is inflicting in Gaza and beyond is undermining international law and global security. If we do not act, there may yet be worse to come in Gaza...

The Avon Pension Fund continues to invest members' deferred wages in companies profiting from arms exports to Israel which facilitate illegal occupation of territory and egregious human rights abuses.

The Committee has suggested without evidence that jobs in Bristol are at risk if we do not continue to invest in arms companies facilitating war crimes in Palestine. In fact, arms companies are doing brisk business - global defence spending is now at heights not seen for over 40 years.

The Committee believes that investing in arms companies facilitating war crimes in Palestine helps 'keep us safe'. In fact, it is the predatory and expansionist activities of military powers like Israel, the USA, and Russia which are destabilising the international order.

The Board acknowledged in March the need to consult members on their wishes. It is regrettable that the Board has chosen to consult on maintaining the status quo – and to do so based on their own political views, opinions and interests.

Decision-making bodies usually consult on maintaining the status quo (i.e. literally consult on doing nothing). It would be shameful if personal and institutional vested interests were allowed to skew the consultation in this way. But it is difficult to see how choosing to consult on doing nothing is consistent with good governance principles.

It would also be regrettable if the consultation was limited to only a small sample of APF members, however representative they may be. APF Committee is responsible for investing members' deferred wages. For practical purposes, it is THEIR money - and ALL members must be entitled to express a view on this matter in any consultation. This is highly feasible due to developments in online survey methods which are now routinely used in UK Government surveys at very low cost.

So far, APF Committee has made no public statement about how any consultation will be conducted, who will be included, and what questions will be asked.

It is time for APF Committee to come clean about their plans - and to expedite them ASAP. It is time to let all members have their say.'

Roger Thomas addressed the Committee, a summary of their statement is set out below.

He explained that he was a member of the scheme and was disappointed that no progress had appeared to have been made within the last three months, and that more weapons would have been sold as no change to the investment plans of the Fund have taken place.

He stated that these weapons are being used against civilians, that they are bombing women and children and that innocent people were being attacked while waiting for food, water and aid.

He said that any member of the Committee that has a conflict of interest and has a role in the procurement of weapons should declare it to the Committee.

He urged the Committee to vote for a full consultation of its members as he was sure that none of them want blood on their hands.

Eileen Kay addressed the Committee, a copy of her statement is available as an online appendix to these minutes, and a summary is set out below.

'I urge the Board to ensure that the upcoming consultation on arms divestment is conducted in good faith and reflects the principles of transparency and democracy. All members of the Avon Pension Fund, whose deferred wages are being invested, deserve a meaningful say in this decision.

The consultation must be open to *all* members, not just a sample, and must provide the necessary information and context to allow members to make an informed and independent decision. This includes the ethical, social, financial and environmental implications of continued investment in arms companies, including those arming governments accused of human rights abuses.

UWE UNISON, represent members in one of the largest contributing cohorts to the fund. We urge the Board to uphold your decision made in March to consult your members regarding divestment from the Aerospace and Defence sectors. Members have a right to say how they wish their deferred wages are invested, and we should be allowed to do this without further delay.

Freedom of Movement is protected by International Law. The right to work and just and favourable conditions is protected by International Law. The right to Health is protected by International Law. The right to Education is protected by International Law. The right to Water and Sanitation is protected by International Law.

Palestinians are denied safe and fair access to **all these rights**. By investing our wages in companies like BAE systems that help Israel maintain its illegal occupation of Palestinian territories – you are making us complicit in human rights violations without our consent. We have a responsibility as individuals and groups to 'promote and protect universally recognised human rights and fundamental freedoms', this has been recognised in International Law since 1999.

The British Army emits around 11 million tons of CO2 annually, equivalent to over 60 other countries combined, with 30% of those emissions being attributed to BAE Systems.

UWE staff are one of the largest contributors to APF. As the recognised trade union body representing staff that feed significantly into the fund, UWE UNISON is calling APF to:

- Conduct a full democratic consultation of all members of the fund
- To include an alternative in the form of the Paris Climate Fund

UWE UNISON members are asking APF to choose Welfare not Warfare.'

Loulou Brouard addressed the Committee, a summary of their statement is set out below.

She began by seeking clarification on whether there was any outcome from a conflict of interest complaint against Councillor Dando.

She said that she was an advocate for the Fund to carry out a consultation on its investments as there needs to be a stable, positive and liveable future.

She stated that it was her view that the weapons industry needs to be scrutinised and that she had not yet been consulted on the question of divestment.

She said that she expected the Avon Pension Fund to invest her money responsibly and to gain consent for how her money is invested. She added that she suspected that many members of the Fund were unaware of how their money was being invested.

She said that the ongoing conflicts were also causing an environmental devastation alongside the human impact from bombing schools, hospitals and civilians.

Sheila Caffrey (NEU) addressed the Committee, a summary of their statement is set out below.

She said that the Union were in a strong position to support their staff on this matter and were seeking for pensions to be provided ethically.

She stated that by holding a consultation it was a chance for members to voice their opinion. She added that many other unions support their views on divestment.

She called for notification of a timeframe for the consultation to be given as soon as possible and said that all current and receiving members should be consulted.

She questioned how the data following the consultation would be shared with the public and how would it be ensured that all voices will be heard.

She said that all conflicts of interest should be shared with the Committee and that members must be accountable for their decisions.

The Chair commented that members of the Committee are obliged to declare any disclosable pecuniary interests. Members may also choose to declare 'other interests' at their own discretion. Any concerns about such declarations should be addressed to the Council's Monitoring Officer.

He also said that Avon Pension Fund had now selected a research partner for the survey, which would now work with the Fund to design the survey, including the questions, methodology, and sample population.

He outlined a provisional timeline for the survey process:

- **July 2025** – Development of survey methodology and sample population; Committee briefing
- **August 2025** – Survey testing and data preparation
- **September 2025** – Survey launch
- **October/November 2025** – Public out-of-cycle Committee meeting to review results and make a final decision on Aerospace & Defence investments. This meeting will be open to the public

Shona Jemphrey asked if the name of the research partner could be disclosed.

The Head of Pensions replied that they were called Prevision Research and that they had robust experience working across the public sector with this type of work.

Councillor Joanna Wright said that she had received many letters from the public on this issue and asked if there was any way in which the process could be sped up.

The Head of Pensions replied that he had to be mindful of several competing priorities that affect the timing of the survey, including, migration of the core administration system to the cloud, regulatory deadlines for Annual Pension Statements, changes to investment pooling arrangements and the summer holiday period. The timeline outlined would thus be how the matter would be progressed.

The Chair thanked the members of the public for attending and those that had made statements to the Committee.

6 ITEMS FROM COUNCILLORS AND CO-OPTED AND ADDED MEMBERS

There were none.

7 MINUTES: 28TH MARCH 2025

The Committee **RESOLVED** that the minutes of the meeting on 28th March 2025 be confirmed as a correct record and signed by the Chair.

8 DRAFT PENSION BOARD MINUTES: 3RD JUNE 2025

The Committee **RESOLVED** to note the draft minutes of the Board meeting held on 3rd June 2025.

9 DRAFT FUNDING STRATEGY STATEMENT 2025

The Group Manager for Funding, Investment & Risk introduced the report. She explained that a review of the Statement takes place every 3 years to coincide with the completion of a full statutory actuarial valuation. She added that the report reflects the workshop discussion that took place earlier in the month.

Paul Middleman, Mercer, addressed the Committee and highlighted the following points to them.

In the draft Funding Strategy Statement 2025 the following changes are being incorporated:

- **Discount Rate basis for past service liabilities (funding target)** - The key assumption which drives the value of the pension Fund liabilities (the future benefit payments) and therefore deficit or surplus is the discount rate. This is set by the Fund, based on advice from the Actuary, to reflect the overall investment return which we expect to achieve on the Fund's assets (within reasonable risk parameters) over the long term with a suitable and necessary allowance for prudence to support contribution sustainability.
- The discount rate reflects the “real” expected asset return above the CPI baseline assumption when assessing the long-term solvency target. Increases in inflation will increase the liabilities as the benefits are inflation linked and potentially it can also reduce the real return on assets. A judgement is needed as to expected future inflation, with the risk that understating inflation and its persistency in this valuation will transpire into higher contributions at the next valuation in 2028.
- The Actuary is proposing to increase the expected level of real return above CPI by 1.80% from the 2022 valuation to CPI+3.30% per annum, which includes an appropriate level of prudence to support contribution sustainability (as in the probability of achieving the discount rate) taking into account a range of factors/assumptions including the economic and geopolitical environment. The level of prudence includes judgement for the Actuary on the level of uncertainty of these factors in the context of the current global environment.
- **Future service rate (FSR) discount rate basis** - The future service liabilities are calculated using the same assumptions as the funding target except that a different financial assumption for the discount rate is used. A critical aspect here is that the Regulations state the desirability of keeping the “Primary Rate” (which is the future service rate) as stable as possible so this needs to be taken into account when setting the assumptions.
- As future service contributions are paid in respect of benefits built up in the future, the FSR should take account of the uncertainty in market conditions applying at future dates, not just the date of the valuation, it is justifiable to use a lower expected return from the investment strategy compared to the past service discount rate.

- The Actuary's view is that the real return applied in 2022 can be increased by 0.25% to CPI +2.25% per annum. As a result, there will be a reduction in FSR (all other things equal).
- **Mortality assumption** - The baseline and short-term trend in mortality will be adjusted to reflect the Fund's experience since 2022. The full demographic analysis has yet to be completed. However, the initial demographic analysis indicates that life expectancy has in general fallen (the exception being amongst female pensioners) which will reduce the baseline liabilities. The longevity assumption used to date is in line with current Continuous Mortality Investigation (CMI) (2023) with a long-term improvement trend of 1.75% p.a. and this is set out within the FSS. This will be updated to use the 2024 CMI tables once they are available, and the Actuary will consider further the long-term improvement trend in light of the additional analysis that will follow.
- **Surplus Reserve Policy** - The Fund is now in a stronger funding position than at recent previous valuations and some employers may have moved into surplus position, so an enduring surplus policy is required. The Fund's objective is to maintain stability of contributions and in the 2025 valuation circumstances of worldwide financial market turmoil, there is a need for a surplus reserve to protect against adverse experience leading to unsustainable contribution levels.
- Relatively small surpluses are also fragile in the context of the daily variations in funding level and so the introduction of a sustainability reserve aims to provide a cushion against adverse experience to support the sustainability of contributions rates.
- The FSS sets out differing surplus reserves by employer characteristics, given that some employers' funding positions will be more sensitive to changes in market conditions, for example, than others, and at future valuations as the circumstances require the surplus reserve could be nil.
- A critical consideration for committee is whether the reserves should vary by employer type (linked to the sensitivity of funding position to changes in assumptions) or maintain a constant reserve for employers and accept the potential lower likelihood of sustainable contributions. The draft policy shows provisional surplus reserves for the different categories of employer e.g. a 5% reserve for Councils/public bodies to allow for this variability in a practical way, along with circumstances where they would be considered on a case by case basis.

William Liew commented that he felt that it was right for the Fund to build in prudence, that he felt that employers value the certainty and therefore a 5% reserve was reasonable.

Jackie Peel queried whether the reserves should vary by employer type as it seemed like a level of complexity that wasn't really needed.

Paul Middleman replied that he was content to keep it simplistic and that the Committee could consider having one reserve level. He said that this would be consistent and easier to understand for all. He added that an employer could always choose to contribute more if they wish.

Jackie Peel asked if she could send in further comments in writing.

The Group Manager for Funding, Investment & Risk replied that officers would be able to receive comments over the next couple of weeks.

The Committee **RESOLVED** to;

- i) Approve the draft Funding Strategy Statement as set out in Appendix 1 for wider consultation, subject to the insertion of information which can only be included when the actuarial valuation and consultation processes are complete.
- ii) Delegate power to officers, having taken advice from the Actuary, to amend the draft FSS for technical updates and updated information as appropriate.

10 FUND GOVERNANCE FRAMEWORK

The Governance & Risk Advisor introduced the report to the Committee and highlighted the following areas.

- No changes have been made to the Terms of Reference (ToR) for the Committee & Investment Panel apart from minor job title changes. The minor changes were approved by Council on 22nd May.
- The Committee's role is strategic in nature, setting the policy framework and monitoring compliance within that framework. Due to the wide scope of the Committee's remit, investment issues are delegated to the Investment Panel, (a sub-committee of the Committee) which explores the issues in greater detail before making decisions and/or recommendations to the Committee. The implementation of strategic decisions is delegated to Officers.

She stated that changes to the framework were expected following any decision on the pooling arrangements for LGPS funds.

Jackie Peel referred to page 168 of the agenda pack and said that the second paragraph under 'Committee Scope' should read "The Avon Pension Fund is a member of the Brunel Pension Partnership (Brunel). Brunel Pension Partnership Ltd (BPP Ltd) is responsible for implementing the Fund's Investment Strategy.

Councillor Fi Hance commented that a summary of the amendments would be appreciated.

The Governance & Risk Advisor replied that any significant changes would have been highlighted in the report and that at this time only minor job title changes had taken place.

The Chair stated that any member of the Committee was welcome to attend future meetings of the Local Authority Pension Fund Forum (LAPFF) and said that some conferences were also upcoming.

The Committee **RESOLVED** to:

- i) Approves the Terms of Reference of the Committee & Investment Panel
- ii) Approves the Governance Compliance Statement, including draft Representation Policy.
- iii) Approves the Scheme of Delegation
- iv) Approves the changes to the Conflicts of Interest Policy
- v) Notes the Decision Making Matrix.
- vi) Notes the roles and responsibilities of the members, advisors and officers
- vii) Agrees independent member representation of the Brunel Working Group.
- viii) Agrees substitute of Brunel Oversight Board. Chair of Investment Panel
- ix) Agrees the member(s) to represent the fund on the Local Authority Pension Fund Forum. Chair of the Committee
- x) Agrees to delegate the drafting of the Annual Report to Council to Officers and the Chair (subject to informal consultation with Committee members prior to the Chair approving the report).

11 INVESTMENT STRATEGY (FOR PERIODS ENDING 31 MARCH 2025)

The Investments Manager introduced the report to the Committee and highlighted the following areas.

- Over one year the Fund delivered an absolute return of -0.6% and underperformed its benchmark by 5.4% in relative terms, where most portfolios underperformed their respective benchmarks. Of the listed equity portfolios, underperformance was most pronounced in the Global Sustainable Equity portfolio, with Global High Alpha also lagging its benchmark return. A key driver of this underperformance was the Fund's underweight exposure to the 'Magnificent 7' technology stocks which were the primary contributors to global equity gains during the period.
- The equity protection strategy, designed to mitigate downside risk, also detracted from returns in what was a positive but narrowly led equity market. This environment proved particularly challenging for active managers as gains were concentrated in a small subset of mega-cap technology names.
- Brunel have been invited to a future meeting of the Investment Panel to discuss performance levels.
- The Investment Panel were informed that the remaining £30m uncommitted local impact capital would be allocated to the Fund's existing three managers: Schroders Greencoat (Renewable Infrastructure), Octopus (Affordable Housing) and Foresight (SME Private Equity).

- Mercer has previously provided suitability advice on all three managers and is supportive of the proposal given all managers have a demonstrable pipeline of opportunities and have successfully deployed capital in relatively short order. A 'top-up' of this size is unlikely to materially increase portfolio concentration in any one area or asset.
- The Fund will be considering whether to raise its allocation to local impact as part of the 2025 Investment Strategy Review.

Steve Turner, Mercer addressed the Committee and highlighted the following points from Appendix 1.

- The funding level is in a healthy position at around 105% / 106%.
- Continued rate cuts by most developed market central banks, European politics and tariffs were the key themes driving markets in the first quarter of 2025.
- Overall, global equities ended the quarter in the red driven by the considerable uncertainty from tariff and growth concerns.
- Changes in bond yields were mixed across developed markets. The curve steepened in the UK amidst hawkish BOE cuts, tariff woes and revised budget spending plans.
- Markets have not been hugely impacted by the ongoing conflicts around the world.
- Portfolios are well diversified, but it was recognised that there is room for improvement in the performance of Brunel.

Councillor George Leach commented that he would welcome seeing figures for five years within the report.

Steve Turner replied that these figures would be available and could form part of future reports.

Charles Gerrish asked if despite being underweight to certain big US technology stocks, had the Fund benefitted from the value of the US dollar falling.

Steve Turner replied that the Fund had benefited from this through their hedging arrangements.

William Liew asked for officers to monitor Brunel with regard to any issues of key staff retention.

The Head of Pensions replied that the Committee would be updated of any key changes.

The Committee **RESOLVED** to note the information set out in the report and appendices.

12 PENSION FUND ADMINISTRATION - OVERVIEW & SUMMARY PERFORMANCE REPORT

The Pensions Operations Manager introduced the report to the Committee and highlighted the following points.

SLA monthly performance average April 2024 to April 2025

- Peaked at 89% (Feb 2025). Average at around 80%
- High influx of member inquiries had an impact on staff resources. Letters sent re: McCloud and tracing, year-end work and Pensions Increase a factor over this period.
- Team is working as hard as ever and we remain above our projected expectations.

Recruitment – The fund has successfully recruited 11 new officers joining the Operations and Business Change teams in the last month, 10 of which were in Administration. This leaves a further 4.5 vacant posts including 1 within Business Change team, recruitment is ongoing.

The introduction of Hybrid Mail has already improved the timescales for certain tasks for officers and should lessen the possibility of any data breaches.

McCloud – A further update would be provided to the Committee in September.

Administration Software Procurement

- New 7- year contract signed with Heywood via the COTS agreement with Softcat 17 April 2025
- New contract covers existing Altair & i-Connect plus new Products & Services - Hosting, Dashboard ISP, Data Cleanse, Engage (with SMS & EIDV), Enhanced Admin to Pay
- Reinforced and improved our relationship with Heywood
- Sets foundation for Digital improvement
- Supports regulatory needs for Pensions Dashboard

Migrating from 'On-premises' to 'Hosted'

- **WHY?** - To support **B&NES Cloud First** programme moving the application software and databases from a B&NES on-premises server to a cloud hosted solution.
- **WHO?** - **Heywood**, our software provider for Altair and associated modules, will provide hosting services via their supplier, Service Express.

- **WHEN?** - In progress now. BANES IT & Financial Systems are supporting us with the move. Aiming to complete move by **end July 2025**.

Avon Pension Fund: Connecting to Pensions Dashboards

- The Avon Pension Fund is preparing to link with the Pensions Dashboard, making it easier for our members to access their pension information. This will be carried out in phases with the aim of being live and connected by 31st October 2025.
- Phase 1 – Complete - System Configuration / Upload member data and resolve errors captured (scenario testing) / Set Matching requirement.
- Phase 2 - Configure live matching rules / Registration with TPR / Test Admin processes for enquiries.

Wendy Weston asked if it was still the case that staff within the Fund were being poached by larger companies or was it in a stronger position to retain them now.

The Pensions Operations Manager replied that staff retention has improved, and that recent turnover of staff had been limited. She added that the improved pay offer for many members of staff had helped in this process.

Shona Jemphrey asked what figures were involved in the member tracing work.

The Pensions Operations Manager replied that a member tracing project to trace around 6000 “gone away” members is underway prior to connection to the Pension Dashboard.

Charles Gerrish commented that there had been a fall in the percentage of death grants in April 2025.

The Pensions Operations Manager replied that this had been due to slight peak and further training was being provided to officers in an attempt to improve this area in the coming months.

The Chair, on behalf of the Committee, wished to thank all officers within the service for their ongoing work.

The Committee **RESOLVED** to note the service performance for the period ending 30th April 2025.

13 RISK MANAGEMENT PROCESS & RISK REGISTER

The Governance & Risk Advisor introduced the report to the Committee and highlighted the following areas.

- The quarterly review of the risk register has taken place and a couple of changes have been made to scores for this quarter. Some amendments have also been made to current impacting factors.

- Risk NR19 - structural reform to LGPS / Pooling has been amended to 'Move to new asset pool'. The score has been updated to reflect the likelihood increasing from likely to almost certain.
- Risk NR07 – Employers Data. Following the successful roll out of I-Connect to all employers and more employer training taking place the likelihood has been reduced from likely to possible.
- Our top 3 risks have been updated to reflect the change of score to the pooling risk:
 - NR06 – the loss of IT including cyber attack and loss of power. The fund is planning to move its admin system to a Heywood hosted solution and appropriate data protection and cyber assessments are being carried out.
 - NR01 – Poor service levels below agreed standards. The current factors impacting this risk are set out in the Pension Fund Administration report. As part of the Business Continuity Plan review a service level plan and crisis communication plan have also been agreed.
 - NR19 – Move to new asset pool. Work and discussions are ongoing with pool and advisors. See full report within June Committee report.

The Committee **RESOLVED** to note the report.

14 GOVERNANCE UPDATE

The Governance & Risk Advisor introduced the report to the Committee and highlighted the following areas.

- In March 2024 The Pensions Regulator (TPR) combined various codes of practice into a single General Code of Practice which is applicable to most public and private occupational pension schemes, including the LGPS.
- The purpose of the report is to summarise the Fund's view of compliance with the Code. There are a number of criteria which Funds must comply with in order to satisfy the requirements of the various sections of the Code.
- Appendix 1 sets out the requirements in more detail and records the findings from the assessment by Fund officers across all relevant subject areas. Conducting the assessment against the requirements has allowed the Fund to create an action plan, detailing owners and timescales with the aim of reaching compliance with the code over the next year.
- In summary the Fund was compliant with app 70% of the requirements. The other 30% are partially compliant. Most actions are minor or are areas where significant work is already being undertaken. Eg – implementation of changes to internal controls, review and testing of the Business Continuity Plan. The key areas of the work will be in the following areas:

- Knowledge & Skills of Committee & Pension Board members
 - Internal Controls
 - Communications & disclosure of information to members
 - Review of record keeping and data improvement plan
 - Review of breaches policy
 - Business Continuity Plan
 - Monitoring Advisors & contracts
- Progress against the action plan will be shared with Committee and Pension Board on a quarterly basis.

The Committee **RESOLVED** to:

- i) Note TPR GCOP action plan
- ii) Note the Committee workplan & training programme
- iii) Note the service plan monitoring report

15 STRATEGIC INVESTMENT REVIEW

The Committee, having been satisfied that the public interest would be better served by not disclosing relevant information, **RESOLVED**, in accordance with the provisions of the Section 100(A)(4) of the Local Government Act 1972 that the public should be excluded from the meeting for this item of business, because of the likely disclosure of exempt information as defined in paragraph 3 of Part I of Schedule 12A of the Act as amended.

16 LGPS POOLING - UPDATE

The Committee, having been satisfied that the public interest would be better served by not disclosing relevant information, **RESOLVED**, in accordance with the provisions of the Section 100(A)(4) of the Local Government Act 1972 that the public should be excluded from the meeting for this item of business, because of the likely disclosure of exempt information as defined in paragraph 3 of Part I of Schedule 12A of the Act as amended.

The meeting ended at 1.02 pm

Chair(person)

Date Confirmed and Signed

Prepared by Democratic Services

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Bath & North East Somerset Council		
MEETING:	AVON PENSION FUND COMMITTEE	
MEETING DATE:	26 SEPTEMBER 2025	AGENDA ITEM NUMBER
TITLE:	INVESTMENTS UPDATE: POOLING DECISION	
WARD:	ALL	
AN OPEN PUBLIC ITEM		
List of attachments to this report: Exempt Appendix 1 – KPMG report ‘Project Cornerstone’		

1 THE ISSUE

- 1.1. The purpose of this report is to inform the Committee’s in-principle decision in respect of which investment pool Avon Pension Fund (APF) should partner with.
- 1.2. This decision is required, as the government decided in April 2025 that Brunel must close and APF assets should transfer to an alternative pool.

2 RECOMMENDATION

The Committee:

- 1.1 **Notes the background to pooling changes and the limited choice faced by the Avon Pension Fund.**
- 1.2 **Approves in principle the recommendation to adopt Local Pension Partnership Investments (LPPI) as APF’s new pool partner to replace Brunel.**
- 1.3 **Delegates to the Chair of the APF Committee the authority to sign non-binding agreements with LPPI, or with its client or shareholder funds, which are recommended by officers, such as Heads of Terms or a Memorandum of Understanding.**

3 FINANCIAL IMPLICATIONS

- 1.4 There will be material one-off costs incurred in closing down Brunel and moving the Fund’s assets into the new joint pool, which should be mitigated over time by lower ongoing costs.
- 1.5 Regulatory capital held by Brunel will partially cover such costs, which need to be estimated and shared with the Committee as soon as practical, and in any event before the Committee decides to conclude a binding shareholder agreement. The Government has required this to be before 31 March 2026.

4 PROCESS & ASSESSMENT

- 1.6 In April 2025, a formal letter from the Pensions Minister and MHCLG Minister notified us that “Brunel’s proposal does not meet the Government’s vision for the future of the LGPS” and that each Brunel fund needs to “identify which pool to partner with going forward”.
- 1.7 The government’s stated reasons for the above decision included: limited in-house asset management expertise, low scale, and limited merger appetite. The government confirmed that two pools would close – Brunel and Access – and six pools would remain.
- 1.8 Looking forward, there are two key dates:
- 30 September 2025, by when APF needs to confirm with MHCLG its in-principle decision on which new pool to join.
 - 31 March 2026, by when such decision needs to be legally binding, e.g. through a new shareholder agreement.
- 1.9 Of the six pools under consideration, three were considered unsuitable:
- Northern: owned by three ‘mega’ LGPS funds (Merseyside, Manchester, West Yorkshire), which showed no appetite to engage.
 - London CIV: the practical capacity for new partners is limited by their ongoing need to pool assets from its 32 London boroughs.
 - Wales: is a national asset and needs to make material changes to comply with government requirements.
- 1.10 Border-to-Coast withdrew and declined to address our due diligence. We later learned that they had already decided which funds to accept.
- 1.11 Hence APF’s practical choice was between:
- Central – currently serving eight funds, based in Wolverhampton, and managing c. £45 billion
 - LPPI – currently serving three funds, based in London and Preston, managing c. £23 billion.
- 1.12 The ten Brunel funds undertook a review of the two options, advised by KPMG, which were assessed versus critical decision factors including:
- Shareholder: all funds need to enjoy equal shareholder rights.
 - Culture: client driven, working together, robust governance.
 - Meets government requirements, e.g. in-house asset management.
 - Costs: there should be a clear pathway towards lower unit costs across both internal pool costs and 3rd-party fees.
 - Investments: deep capability, good performance, with flexibility to meet each individual fund’s investment strategy.

5 PLANNED RECOMMENDATION

- 1.13 Both Central and LPPI would be excellent pool partners.
- 1.14 Both pools score very similarly on the majority of criteria.
- 1.15 Central is more attractive in respect of the opportunity to build flexibility required for our investment proposition and its unit costs are lower.
- 1.16 LPPI on the other hand demonstrates proven ability to offer investment advice, with strength in strategic asset allocation.
- 1.17 A detailed assessment of relative merits – across LPPI and Central – is summarised in the attached report compiled with KPMG.
- 1.18 A material number of Brunel funds are likely to join LPPI.
- 1.19 Furthermore, LPPI is likely, on the basis of initial discussions, though this not guaranteed, to integrate the Brunel business. Hence APF is hopefully able to join LPPI with peer funds from Brunel.
- 1.20 LPPI is recommended as APF's new pool partner.

6 NEXT STEPS

- 26 September: APF Committee makes its in-principle pool decision
- 30 September: APF confirms its decision to Treasury and MHCLG
- 20 October:
 - Agreement of key negotiation points among the seven Brunel funds
 - Integration work plan.
- October 2025 – March 2026
 - Negotiations between seven Brunel funds and LPPI funds and at pool corporate level
 - Formation of joint Committees and decision groups, leading to a NewCo shareholder agreement
 - Regular engagement with the APF Committee
- 31 March 2026: APF signs binding legal agreements.

2. RISK MANAGEMENT

- 2.1 The Avon Pension Fund Committee is the formal decision-making body for the Fund. It has responsibility to ensure adequate risk management processes are in place. It discharges this responsibility by ensuring the Fund has an appropriate investment strategy and investment management structure in place that is regularly monitored. In addition it monitors the benefits administration, the risk register and compliance with relevant investment, finance and administration regulations. The creation of an Investment Panel further strengthens the governance of investment matters and contributes to reduced risk in these areas.

3. CLIMATE CHANGE

- 3.1 The Fund is implementing a digital strategy across all its operations and communications with stakeholders to reduce its internal carbon footprint. The Fund acknowledges the financial risk to its assets from climate change and is in the process of addressing this through its strategic asset allocation to Paris Aligned Equities and renewable energy opportunities. The strategy is monitored and reviewed by the Committee. As part of the valuation the Actuary will report on the potential impact of climate change risks in his final valuation report in line with best practice.

4. OTHER OPTIONS CONSIDERED

- 4.1 We considered alternative options listed earlier in this report.

5. CONSULTATION

- 5.1 The report and its contents have been discussed with the Head of Pensions representing the Avon Pension Fund and the Director of Financial Services, Assurance & Pensions, representing the administering authority.

Contact person	Nick Dixon Head of Avon Pension Fund nick_dixon@bathnes.gov.uk
Background papers	None, other than the paper highlighted under 'List of attachments'
Contact the report author if you need to access this report in an alternative format	

Access to Information Arrangements

Exclusion of access by the public to Council meetings

Information Compliance Ref: LGA-2569861
Meeting / Decision: Avon Pension Fund Committee
Date: 26 th September 2025
Author: Nick Dixon
Report Title: Investments Update:- Pooling Decision Exempt Appendix Title: Appendix 1 – KPMG report ‘Project Cornerstone’

The appendix contains exempt information, according to the categories set out in the Local Government Act 1972 (amended Schedule 12A). The relevant exemption is set out below.

Stating the exemption:

3. *Information relating to the financial or business affairs of any particular person (including the authority holding that information).*

The public interest test has been applied, and it is concluded that the public interest in maintaining the exemption outweighs the public interest in disclosure at this time. It is therefore recommended that the appendix be withheld from publication on the Council website. The paragraphs below set out the relevant public interest issues in this case.

PUBLIC INTEREST TEST

If the Committee wishes to consider a matter with press and public excluded, it must be satisfied on two matters.

Firstly, it must be satisfied that the information likely to be disclosed falls within one of the accepted categories of exempt information under the Local Government Act 1972. Paragraph 3 of the revised Schedule 12A of the 1972 Act exempts information which relates to the financial or business affairs of the organisations which is commercially sensitive to the organisations. The officer responsible for this item believes that this information falls within the

exemption under paragraph 3 and this has been confirmed by the Council's Information Compliance Manager.

Secondly, it is necessary to weigh up the arguments for and against disclosure on public interest grounds. The main factor in favour of disclosure is that all possible Council information should be public and that increased openness about Council business allows the public and others affected by any decision the opportunity to participate in debates on important issues in their local area. Another factor in favour of disclosure is that the public and those affected by decisions should be entitled to see the basis on which decisions are reached.

Weighed against this is the fact that the exempt appendix contains strategic and financial information about the proposal, which is commercially sensitive and could prejudice the commercial interests of the organisation if released. It would not be in the public interest if advisors and officers could not express in confidence opinions or proposals which are held in good faith and on the basis of the best information available.

It is also important that the Committee should be able to retain some degree of private thinking space while decisions are being made, in order to discuss openly and frankly the issues under discussion in order to make a decision which is in the best interests of the Fund's stakeholders.

The Council considers that the public interest has been served by the fact that a significant amount of information regarding the report has been made available – by way of the main report. Therefore, it is recommended that exemptions set out above apply. The Council considers that the public interest is in favour of not holding this matter in open session at this time, and that any reporting on the meeting is prevented in accordance with Section 100A(5A).

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Bath & North East Somerset Council		
MEETING:	AVON PENSION FUND COMMITTEE	
MEETING DATE:	26 SEPTEMBER 2025	AGENDA ITEM NUMBER
TITLE:	FUNDING STRATEGY STATEMENT 2025	
WARD:	ALL	
AN OPEN PUBLIC ITEM		
List of attachments to this report: Appendix 1 – Funding Strategy Statement Appendix 2 – Responses to Funding Strategy Statement Consultation Appendix 3 – SAB guidance checklist		

1 THE ISSUE

- 1.1 The Local Government Pension Scheme (LGPS) regulations require each administering authority to prepare and publish a Funding Strategy Statement (FSS). The FSS sets out the key assumptions which the actuary has used in preparing the actuarial valuation and, in those cases where the Administering Authority has some discretion, the policies adopted by the Administering Authority. The Committee approved a draft FSS at its meeting on 27 June 2025 which has been circulated to the employing bodies for comment.
- 1.2 An updated draft FSS is attached as Appendix 1 which, after consideration by Fund Officers and the Actuary, takes into account the comments received from the employing bodies following the consultation period. The Actuary will attend the meeting to discuss the comments and any changes to the draft FSS.
- 1.3 As the body responsible for agreeing the Funding Strategy, the Committee must consider the FSS within the regulatory framework;
 - a) Ensure that the benefits paid out in the future will be reasonably met (the Solvency Objective)
 - b) That the amount paid in annually covers the current cost of the pension benefit accrued
 - c) That current pension debt is not deferred for future generations to fund (the Long-Term Cost Efficiency Objective).
- 1.4 Given the FSS includes regulatory/legal matters/technical updates that are yet to be confirmed, delegated authority is requested for Officers to finalise before 31/03/26 having taken advice from the Actuary.
- 1.5 Individual employer results will be disseminated from late October. Meetings will be held with employers to explain the outcome as required.

2 RECOMMENDATION

The Committee:

- 2.1 Notes the feedback responses received, and the proposed amendments to the FSS.**
- 2.2 Approves the FSS as set out in Appendix 1, subject to the insertion of information which can only be included when the actuarial valuation is complete.**
- 2.3 Delegates the refinement and finalisation of the FSS to Fund Officers, with assistance of Fund Actuary.**

3 FINANCIAL IMPLICATIONS

- 3.1 The actuarial costs for reviewing the FSS is included in the 2022 actuarial valuation fee and is provided for in the 2025/26 budget.

4 THE REPORT

- 4.1 The LGPS regulations require each administering authority to prepare and publish an FSS. The key points of the regulation for the FSS are as follows:
 - After consultation with all employing bodies, the administering authority must prepare and publish their funding strategy
 - In preparing the FSS, the administering authority must have regard to:
 - (i) FSS guidance issued by MHCLG in January 2025
 - (ii) The Investment Strategy Statement (ISS) under Regulation 12 of the LGPS (Management and Investment of Funds) Regulations 2016
 - The FSS must be revised and published whenever there is a material change in either the policy on the matters set out in the FSS or ISS.
 - The Fund's actuary must have regard to the FSS as part of the valuation process.
- 4.2 The FSS sets out all the key assumptions which the actuary has used in preparing the actuarial valuation, together with the Administering Authority's policies in the areas where the Administering Authority has discretion to manage the funding position of the Fund.
- 4.3 Procedurally, the Fund's actuary cannot finalise the valuation until the FSS has been approved by the Committee.
- 4.4 There are outstanding technical (and potentially regulatory) matters that will need to be included in the FSS which may affect the contributions and /or funding policy (e.g. review of the termination policy assumptions and the finalisation of the ill health and death in service captive premiums). These will be resolved as the valuation progresses. As these are technical in nature, it is recommended that Officers are given delegated powers to finalise the FSS having received full advice from the Actuary, should there need to be any changes as a result of further development on these or similar matters.
- 4.5 As per in previous valuations, it is reasonable to assume that the FSS will be reviewed before the next valuation in 2028 – for example if New Fair Deal comes into force. Any revisions will be brought to Committee for full consideration.

- 4.6 The draft FSS was circulated to the employing bodies with comments required by 22 August 2025. Those comments which have been received are summarised in Appendix 2.
- 4.7 The Pension Board confirmed that the draft FSS complies with the LGPS regulations and MHCLG guidance following their meeting on 2 September 2025. The Fund's checklist of compliance is provided in Appendix 3.
- 4.8 The comments received via the consultation were considered carefully and it has been concluded that no fundamental changes to the draft FSS are required (other than to update the technical information as the valuation progresses) as it was felt that the framework covered the issues raised and there was sufficient flexibility within the FSS to address the points raised where appropriate.
- 4.9 The draft FSS for approval is attached as Appendix 1, which includes estimates of certain information that can only be confirmed once the valuation and associated analysis has been completed. Once the valuation is finalised, the FSS will be updated and published. For admissions and exits, the 2025 FSS actuarial assumptions will be effective from 1 April 2026. This is consistent with our current policy.

5 COMMENTS ON RESPONSES FROM EMPLOYING BODIES

5.1 The consultation asked specifically for comments about:

- a) The appropriateness of the assumptions and in particular those that relate to them e.g. the pay increases they expect to award over the next few years?
- b) In relation to the affordability of contributions and in particular whether there is any particular year over 2026/2029 which will be more challenging. This will help us form a view on any further flexibility required.
- c) Additional comments or feedback employers wanted to make on specific areas of the FSS such as the assumptions or the policies.

5.2 The responses are summarised by employer in Appendix 2. They highlight the funding pressures in the public sector. The main themes are summarised below with a response from the Fund to each:

- a) **Surplus policy - approach: mixed responses have been received in relation to the use of a surplus reserve and the policy. Two employers challenge the reserve approach, including requesting contributions are reduced in line with current fund surplus/a lower surplus reserve for tax-backed employers and proposing employers are given flexibility to manage surplus as part of the management of their reserves. Other employers have welcomed the surplus approach as a means to support long-term stability and cost efficiency.**

Officers and the Actuary are aware of the cost pressures facing all employers and the uncertainty of funding/support from government. The FSS builds in flexibility and officers have discretion to flex the funding plans further within the 3-year valuation period at the employer level. The aim of the surplus reserve approach is to support longer term sustainable contribution reductions which in turn supports intergenerational fairness for taxpayers who underwrite pension costs. The surplus is retained in the Fund for the future benefit of employers. Whilst the current cost pressures are clear, there is currently no strong evidence to support the position will materially improve in the future and a greater step down in contributions at the current valuation increases the risk of a greater step increase at a future valuation. Fund officers will continue the dialogue with employers on

affordability so that this can be factored into monitoring against the Fund's objectives.

The Fund considered whether to adopt a higher surplus reserve for non-tax-payer backed employers but on balance felt the 105% level was appropriate for these employers also, taking into account the introduction of this new policy. However for closed and/or exiting employers the surplus reserve is higher, and reflects the termination funding level for that employer, such that surplus is not returned if the employer is in deficit relative to their termination basis.

The Fund has taken actuarial advice and considered scenario analysis, stochastic analysis looking at the potential progression of surplus over time and likelihood of contribution increases longer term as well as current employer affordability requirements and given consideration to key systemic risks such as climate risk in formulation of the approach for the 2025 valuation. After consideration of feedback received, the Fund remains of the view that the proposed balance of cost versus risk (both current and longer-term), built into the surplus policy and wider funding approach, is appropriate. This will be monitored in the inter valuation to ensure that the current funding plan remains sustainable in the longer term.

- b) **Surplus policy – clarifications:** (i) clarity has been requested on when deficit funding is triggered (i.e. below 100% funding level or below 105% funding level); (ii) There has been challenge to the restriction that prevents pre-payments for employers in surplus (iii) The approach for MATs that are not currently pooled has been queried: whether the past service can be pooled so that surplus in one academy can be used to mitigate the need for deficit contributions in another, whilst at the same time retaining individual future service contribution rates based on individual employer member profiles.

- (i) The main body of the FSS (page 24) sets out

“If the funding level of an employer is below 100% at the valuation date (i.e. the assets of the employer are less than the liabilities), a deficit recovery plan needs to be implemented such that additional contributions are paid into the Fund to meet the shortfall.” However, an additional statement within the surplus policy itself to clarify this point will be added.

- (ii) The Fund has opted to restrict pre-payments where an employer is in surplus as the costs outweigh the benefits of the approach. There is a significant practical administrative complexity of managing prepayments due to uncertainty in estimating contributions that are linked to a percentage of pay which will be the basis for contributions where there is a surplus as well as future service contributions. Where prepayments that are linked to a percentage of pay are made, then a “true-up” at the end of the year needs to be made based on actual pay to comply with regulatory requirements. For employers in deficit the situation is different as deficit contributions are fixed £s amounts so known in advance with certainty. Also, in the current environment of higher borrowing costs for employers and lower reserves/affordability, the financial benefit of offering the discount for pre-payments is generally expected to be much lower than in the past for all employers. For both these reasons we believe the cost/complexity vs versus benefit to employers is much diminished so the facility will be restricted going forward.

- (iii) Whilst the surplus reserve is retained in the Fund, it is retained on the employer's notional balance sheet for the benefit of future contribution

smoothing for individual employers. The rationale for pooling is that this is a shared risk approach whereby all academies in a trust pay the same rate for past benefits and future benefits building up. A quasi approach to pooling could create inequalities in terms of how risk is distributed and how costs are met across the trust that contradict the principles of pooling. For example, the quasi-approach could mean that an employer with younger members has the benefit of the lower future service rate (reflecting the younger age profile) but then the higher risk associated with younger members (as they are being funded over a longer time horizon which is more uncertain) is pooled with other employers in terms of deficit contributions/surplus off-sets. It can also create operational complexities.

We are not aware of a quasi-approach to pooling being made available by other Funds and it is not something the Avon Fund would be looking to offer. The Fund already offers the option for full academy trust pooling i.e. sharing of cost right across past and future benefit calculations, and if concerned about an individual employer surplus reserve then the MAT and constituent academies could opt to fully pool which would deal with this issue.

- c) **Pay/inflation increases:** Comments are generally supporting a slightly lower salary increase assumption over the next three years with more uncertain outlook longer term, although generally anticipated to be below the assumption. There has been a mixture of both challenge and agreement for the long-term salary and inflation assumptions in responses provided.

The valuation is using an average real salary growth assumption of 1.5% p.a. above inflation, and this includes allowance for promotional pay scales. This translates into a long-term assumption of 4.1% p.a. for employers on the higher risk funding strategy and (reflecting inflation hedging) 4.6% for ongoing employers in the lower risk strategy, with no short-term pay adjustment. Employer feedback received has been in respect of employers in the higher risk strategy so 4.1% p.a. assumption. Feedback would support a short term pay assumption of 3% or 3.5% over the period to the next valuation, although there is less visibility longer term. However, in general, the proportion of liabilities linked to salary increases is diminishing and this means the impact on the average funding level of making a short-term pay adjustment of this magnitude would be less than 0.5% on the funding level (and nil in many cases). The salary increase assumption does not impact the future service contribution rate as these liabilities are not linked to final pay at retirement or leaving. Therefore, making no short-term adjustment seems reasonable but where an employer demonstrates affordability challenges then there is discretion within the policy to adjust funding plans on these grounds where evidence is provided.

- d) **Guarantee of last resort:** request for clarification

Further detail has been requested by DfE regarding the practical meaning of 'guarantor of last resort,' including its implications for employer contribution rates and deficit recovery periods. How is risk applied under a 'guarantee of last resort' compared with the treatment of a full guarantor.

This is covered in the FSS under pages 29 and 30, the termination policy in Appendix G and also the Glossary. However an update to the wording in the FSS has been made to provide further clarity, to rename it 'guarantor of exit debt' as well as referring to instances where the guarantor is not a Fund employer e.g. DfE. The Fund will also respond to DfE to ensure the relevant points have been understood.

e) Overall approach and ongoing review

Employer feedback has been supportive of the Fund's engagement and consultation approach including acknowledgement by one employer of the valuable introduction of the explanatory video for 2025 and a helpful layout of the FSS document itself. Supportive comments have also been received by one employer about retaining ongoing review of the discount rate in light of geopolitical and market volatility, with consideration of sector specific experience where possible. One employer requested an annex with details of the statistical methods shown for future employer consultations however it is the Fund's view that this is likely to be too technical for most readers and risks detracting from the headline messages.

f) Employer covenant: request for transparency on approach and right of appeal and a guidance note to accompany the notifiable event framework

The Fund's covenant policy aims to be broad to cover the range of information and circumstances when covenant review will be undertaken and this will need to vary depending on the circumstances for which the review is being undertaken. As such too much prescription here would not be appropriate. In addition, the Fund's other policies including for deficit contributions and surplus set out how affordability and employer type is taken into account in determining contribution requirements and it is the Fund's view that this provides sufficient detail balancing the need also to retain flexibility to deviate from the approach where circumstances require. The appeal process is covered in the context of the determination of exit credits in the FSS Termination Policy. However, we have also added additional wording regarding the general right of appeal of a Fund decision within the main section of the FSS with a link to the Fund's disputes policy and also inserted a link to the disputes policy within the termination policy.

In relation to the notifiable events framework, a note has been added upfront to highlight that employers will be notified if the events framework applies to them. The need for a checklist or guidance note around notifiable events will be considered on a case-by-case basis, given the notifiable events framework is usually introduced for employers as part of a wider discussion around a particular event or circumstance in any case.

6 PRELIMINARY WHOLE FUND RESULT

- 6.1 The final actuarial outcome will be reported to Committee at March 2026 meeting and will take into account various refinements to individual employer results e.g. relating to ill-health and death in service captive premiums. The preliminary whole Fund results (based on the proposed assumptions to assess solvency and future service plus updated demographic assumptions) are set out below:

	£m
Assets	5,788
Liabilities	5,450
Surplus	338
Average Funding Level	106%
Average Employer future service contribution rate	16.4% p.a.

7 RISK MANAGEMENT

- 7.1 The Avon Pension Fund Committee is the formal decision-making body for the Fund. As such it has responsibility to ensure adequate risk management processes are in place. It discharges this responsibility by ensuring the Fund has an appropriate investment strategy and investment management structure in place that is regularly monitored. In addition it monitors the benefits administration, the risk register and compliance with relevant investment, finance and administration regulations. The creation of an Investment Panel further strengthens the governance of investment matters and contributes to reduced risk in these areas.

8 CLIMATE CHANGE

- 8.1 The Fund is implementing a digital strategy across all its operations and communications with stakeholders to reduce its internal carbon footprint. The Fund acknowledges the financial risk to its assets from climate change and is in the process of addressing this through its strategic asset allocation to Paris Aligned Equities and renewable energy opportunities. The strategy is monitored and reviewed by the Committee. As part of the valuation the Actuary will report on the potential impact of climate change risks in his final valuation report and the summary outcomes will be included in the FSS in line with best practice.

9 OTHER OPTIONS CONSIDERED

- 9.1 None.

10 CONSULTATION

- 10.1 The Council's Monitoring Officer and Section 151 Officer have had the opportunity to input to this report and have cleared it for publication.

Contact person	Julia Grace, Funding & Valuation Manager
Background papers	MHCLG guidance for preparing and maintaining an FSS Correspondence with actuary Responses to FSS from employing bodies
Please contact the report author if you need to access this report in an alternative format	

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FUNDING STRATEGY STATEMENT

AVON PENSION FUND

MARCH 2026

BATH AND NORTH EAST SOMERSET COUNCIL

The information enclosed in this statement and the accompanying policies have a financial and operational impact on all participating employers in the Avon Pension Fund (“the Fund”). It is imperative that all existing and potential employers are aware of the details set out herein.

A glossary of the key terms used throughout is available at the end of this document [here](#)

This Funding Strategy Statement has been prepared by Bath and North East Somerset Council (the Administering Authority) to set out the funding strategy for the Avon Pension Fund (“the Fund”), in accordance with Regulation 58 of the Local Government Pension Scheme Regulations 2013 (as amended) and guidance issued by the Scheme Advisory Board in 2025.

CONTENTS AND GUIDE TO THE FUNDING STRATEGY STATEMENT (FSS) AND POLICIES

The key sections of the FSS, as required by overarching guidance and Regulations are as follows:

- A. [Purpose of the Fund and the FSS](#)
- B. [Key funding principles](#)
- C. [Employer events](#)

This document also sets out the Fund's detailed policies in the following key areas. Please contact Julia Grace at APF_EmployerValuations@BATHNES.gov.uk for any queries relating to the FSS or Fund policies below.

1. Asset Share Policy (Appendix A)

Local Government Pension Scheme (LGPS) funds are not legally sectionalised by employer under the LGPS Regulations. An employer's allocated asset share is calculated on a notional basis. The Fund's approach to calculating individual employer asset shares at key points including the actuarial valuation as well as entry and exit from the Fund is set out [here](#).

2. Demographic Assumptions (Appendix B)

The demographic assumptions used for assessing the funding position of the Fund and the individual employers, known as the "Primary" contribution rate, and any contribution variations due to underlying surpluses or deficits, known as the "Secondary" rate, are set out [here](#).

3. Deficit Recovery Plans (Appendix C)

The key principles when considering deficit recovery plans as part of the valuation are set out [here](#).

4. Surplus Policy (Appendix D)

The Fund's approach to determining "structural" surplus and how this is taken into account for setting employer contribution rates, including key principles for determining surplus offset plans as part of the valuation, is set out [here](#).

5. Employer Types and Admission Policy for New Employers (Appendix E)

Various types of employers are permitted to join the LGPS under certain circumstances. The conditions upon which their entry to the Fund is based and the approach taken is set out [here](#).

6. New Academy Conversions and Multi-Academy Trusts (Appendix F)

Current Fund policy regarding the treatment of local authority maintained schools when converting to academy status is for the new academy to inherit the school's share of the

historic local authority deficit at the point of its conversion. Further details on this and multi-academy trusts can be found [here](#).

The SAB Guide on Academy Conversions is also available here:
[Oct2023SABGuidanceonAcademyConversions.pdf](#)

7. Termination Policy, Flexibility for Exit Payments and Deferred Debt Agreements (Appendix G)

When an employer ceases to participate within the Fund, it becomes an exiting employer under the Regulations. The Fund is then required to obtain an actuarial valuation of that employer's liabilities in respect of the benefits of the exiting employer's former employees, along with a termination contribution certificate showing any exit debt or exit credit due from or to the exiting employer. In some circumstances an employer and the Fund can enter a Deferred Debt Agreement. The termination policy can be found [here](#).

8. Review of Employer Contributions between Valuations (Appendix H)

In line with the Regulations, the Administering Authority has the discretion to review employer contributions between valuations in prescribed circumstances. The Fund's policy on how the Administering Authority will exercise its discretion is set out [here](#).

9. Employers Moving between Investment Strategies (Appendix I)

The Fund currently operates two investment strategies for employers (the higher and lower risk investment strategies) and this policy sets out the conditions upon which employers can move between these investment strategies and circumstances when the Fund may instigate a move. The policy can be found [here](#).

10. Covenant Assessment and Monitoring Policy (Appendix J)

An employer's financial covenant is its legal obligation and crucially the ability to meet its financial responsibilities to the Fund now and in the future. This is a critical consideration in an employer's funding and investment strategy as it is the employers who underwrite the risks to which the Fund is exposed, including underfunding, longevity, investment and market forces. Further details on how employer covenant is assessed and monitored by the Fund is set out [here](#).

11. Notifiable Events Framework (Appendix K)

Whilst in most cases regular covenant updates will identify some of the key employer changes, in some circumstances, employers are required to proactively notify the Administering Authority of any material changes. This policy sets out when this may happen and the notifiable events process. More details are set out [here](#).

12. Ill Health Insurance Arrangements (Appendix L)

The Fund has implemented a captive insurance arrangement which pools the risks associated with ill health retirement costs for employers whose financial position could be materially affected by ill health retirement of one of their members. The captive arrangement is reflected in the employer contribution rates (including on termination) for the eligible employers. More details are set out [here](#).

13. Death in Service Captive Policy (Appendix M)

The Fund has implemented a captive insurance arrangement with effect from 1 April 2023, in relation to the provision of death in service benefits. More details are set out [here](#).

14. Roles and responsibilities of key parties (Appendix N)

The efficient and effective management of the Fund can only be achieved if all parties (including pensions committee, investment managers, auditors and legal advisors, investment advisors, pension board etc.) exercise their statutory duties and responsibilities conscientiously and diligently. The key parties and their roles for the purposes of the FSS are set out [here](#).

15. Glossary (Appendix O)

A glossary of the key terms used throughout the FSS and Fund policies is available [here](#).

A. PURPOSE OF THE FUND AND THE FSS

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AIMS AND OBJECTIVES OF THE FSS

Ensuring that the Avon Pension Fund (the “Fund”) has sufficient assets to meet its pension liabilities in the long-term is the fiduciary responsibility of the Administering Authority (Bath and North East Somerset Council). The Funding Strategy adopted by the Fund is critical in achieving this. The Administering Authority has taken advice from the Actuary in preparing this Statement.

The purpose of this FSS is to set out a clear and transparent funding strategy regarding how each Fund employer’s pension liabilities are to be met.

Given this, and in accordance with governing legislation, all interested parties connected with the Fund have been consulted and given the opportunity to comment prior to this FSS being finalised and adopted. This statement takes into consideration all comments and feedback received and has been agreed by the Pension Committee. As the landscape changes, the Fund will continue to develop and evolve the strategy to ensure it continues to reflect its risk appetite and feedback from employers, where this can be accommodated.

INTEGRATED RISK MANAGED STRATEGY

The funding strategy set out in this document has been developed alongside the Fund’s investment strategy on an integrated basis taking into account the overall financial and demographic risks inherent in the Fund to meet the objective for all employers over different periods. The funding strategy includes appropriate margins to allow for the possibility of adverse events (e.g. material reduction in investment returns, economic downturn and higher inflation outlook) leading to a worsening of the funding position which would result in greater volatility of contribution rates at future valuations if these margins were not included. This prudence is required by the Regulations and guidance issued by professional bodies and Government agencies to assist the Fund in meeting its primary solvency and long-term cost efficiency objectives. Individual employer results will also have regard to their covenant strength and the investment strategy applied to the asset shares of those employers.

THE REGULATIONS

The Local Government Pension Scheme Regulations 2013 (“the 2013 Regulations”), the Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014 (“the 2014 Transitional Regulations”) and the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 (all as amended) (collectively: “the Regulations”) provide the statutory framework from which the Administering Authority is required to prepare a FSS.

This FSS also takes into account the latest version of the guidance issued by MHCLG for preparing and maintaining a Funding Strategy Statement (FSS) dated January 2025.

THE SOLVENCY OBJECTIVE

The Administering Authority's long-term objective is for the Fund to achieve a 100% solvency level over a reasonable time period. Contributions are set in relation to this objective which means that once 100% solvency is achieved, if assumptions are borne out in practice, there would be sufficient assets to pay all benefits earned up to the valuation date as they fall due.

However, because financial and market conditions/outlook change between valuations, the assumptions used at one valuation may need to be amended at the next in order to meet the Fund's objective. This in turn means that contributions will be subject to change from one valuation to another. This objective translates to an employer specific level when setting individual contribution rates.

The general principle adopted by the Fund is that the assumptions used, taken as a whole, will be chosen with sufficient prudence for this objective to be reasonably achieved in the long term at each valuation.

LONG TERM COST EFFICIENCY

Employer contributions are also set in order to achieve long-term cost efficiency. Long-term cost efficiency requires that any funding plan must provide equity between different generations of taxpayers. This means that the contributions must not be set at a level that is likely to give rise to additional costs in the future which fall on later generations of taxpayers or put too high a burden on current taxpayers. The funding parameters and assumptions (e.g. deficit recovery period) must have regard to this requirement which will underpin the decision-making process. Furthermore, the FSS must have regard to the desirability of maintaining as nearly constant a primary rate of contribution as possible.

When formulating the funding strategy, the Administering Authority has taken into account these two key objectives and also considered the implications of the requirements under Section 13(4)(c) of the Public Service Pensions Act 2013. As part of these requirements the Government Actuary's Department (GAD) must, following an actuarial valuation, report on whether the rate of employer contributions to the Fund is set at an appropriate level to ensure the "solvency" of the Fund and "long term cost efficiency" of the Scheme so far as it relates to the Fund.

PURPOSE OF THE FSS

Funding is making advance provision to meet the cost of pension and other benefit promises. Decisions taken on the funding approach therefore determine the pace at which this advance provision is made. Although the Regulations specify the fundamental principles on which funding contributions should be assessed, implementation of the funding strategy is the responsibility of the Administering Authority, acting on the professional advice provided by the Actuary. The purpose of this FSS is therefore:

- to establish a clear and transparent fund-specific strategy which will identify how employers' pension liabilities are best met going forward by taking a prudent long-term view of funding those liabilities.
- to establish contributions at a level to "secure the solvency of the pension fund" and the "long term cost efficiency".
- to have regard to the desirability of maintaining as nearly constant a primary rate of contribution as possible.

The intention is for this strategy to be both cohesive and comprehensive for the Fund as a whole, recognising that there will be conflicting objectives which need to be balanced and reconciled.

THE AIMS OF THE FUND ARE TO:	THE PURPOSE OF THE FUND IS TO:
<ul style="list-style-type: none"> • manage employers' liabilities effectively and ensure that sufficient resources are available to meet all liabilities as they fall due • enable employer contribution rates to be kept at a reasonable and affordable cost to the taxpayers and employers including Mandatory Scheme Employers, Resolution and Admitted Bodies • achieve and maintaining fund solvency and long term cost efficiency, which should be assessed in light of the profile of the Fund now and in the future due to sector changes • maximise the returns from investments within reasonable risk parameters taking into account the above aims. 	<ul style="list-style-type: none"> • receive monies in respect of contributions, transfer values and investment income, and • pay out monies in respect of scheme benefits, transfer values, exit credits, costs, charges and expenses as defined in the Regulations.

Further details of how the Fund looks to measure and manage the solvency, long-term cost efficiency and stability objectives is set out in [Section B: Key Funding Principles](#), which covers the Funding Target, Actuarial Assumptions and the Fund's approach to managing risk.

MONITORING AND REVIEW OF THE FSS

A full review of this Statement will occur no less frequently than every 3 years, to coincide with the completion of a full statutory actuarial valuation. Any review will take account of the current economic and demographic outlook and will also reflect any legislative changes.

The Administering Authority will also monitor the progress of the funding strategy between full actuarial valuations. If considered appropriate, the funding strategy statement will be reviewed and updated in the interim between valuations.

Examples of when a review of the funding strategy might be appropriate, include:

- material changes to the scheme benefit structure or regulations (e.g. HM Treasury-led) on the advice of the Fund actuary
- if there has been a significant change in market conditions, and/or deviation in the progress of the funding strategy
- if there has been significant changes to the investment strategy or if there has been significant market volatility which impacts the FSS or goes beyond the expectations outlined in the existing FSS
- if there have been significant changes to the Fund membership and/or fund maturity profile
- if there has been significant or notable changes to the number, type, or individual circumstances of any employers to such an extent that they impact on the funding strategy (e.g. exit/restructuring/failure which could materially impact cashflow and/or maturity profile and/or covenant)
- if there has been a material change in the affordability of contributions and/or employer(s) financial covenant strength which has an impact on the FSS
- recommendations from MHCLG/GAD.

In undertaking such reviews, the Fund will consider the following:

- the implications for the funding strategy and, if significant, determine what action should be taken to revise the FSS
- the implications for meeting the liabilities of individual employers and any amendments required to the Investment Strategy Statement (ISS) and other key fund documents
- communicating with the individual (or groups) of employers specifically impacted by any changes and specifically any impact on employers on entry or exit from the fund or in response to change in risk.

When monitoring the funding strategy, if the Administering Authority considers that any action is required, the relevant employers will be contacted. This will include any guarantors where the impact of the change has material implications for the amount of liabilities backed by the guarantor or the risk of the guarantee being called upon.

B. KEY FUNDING PRINCIPLES

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FUNDING TARGET

Securing “solvency” and “long term cost efficiency” is a regulatory requirement. To meet these requirements, the Administering Authority’s long term funding objective is for the Fund to achieve and then maintain sufficient assets to cover 100% of projected accrued pension liabilities (the “funding target”) assessed on an ongoing past service basis, including allowance for projected final pay where appropriate.

EMPLOYER CONTRIBUTIONS

The cost of meeting the future benefits for Fund members is met from a combination of:

- the contributions paid in by employers and members; and
- the investment returns on those contributions and the existing assets.

The required levels of employee contributions are specified in the Regulations. Employers participating in the Fund must therefore meet the balance of cost that is not met by investment returns.

Each employer’s contributions are set at such a level to achieve long-term cost efficiency and full solvency in a reasonable timeframe.

Employer contributions are determined in accordance with the Regulations which require that an actuarial valuation is completed every three years by the Actuary, including a rates and adjustments certificate specifying the “primary” and “secondary” rate of the employer’s contribution (further details on these contributions is set out [here](#)). As referenced in [Section A](#), one of the key objectives of the Fund is to maintain as nearly constant a primary rate of contribution as possible. Further details on how employers’ contribution rates are set can be found in the section below.

The investment returns on contributions will depend on the investments held by the Fund and the strategy that applies for an employer. Employers in the Fund will be in one of two funding and investment strategies:

- The “higher risk” strategy; or
- The “lower risk” strategy.

Subject to the fund’s discretion, employers can choose their funding and investment strategy, although in certain circumstances the Fund can require an employer to be in the lower risk strategy – for example a materially detrimental covenant. Further details of the Fund’s policy for employers to move between different investment strategies and the potential use of Fund discretion in this area is set out in [Appendix H](#).

The Fund balances contributions and reliance on investment return by:

- Making a long-term prudent assessment of the potential outlook for investment returns
- Taking into consideration employer short and longer term affordability
- Taking professional advice on these matters from its Fund actuary, investment consultant and where required, covenant adviser

Ongoing employer contributions are assessed at each triennial valuation which may reveal a *deficit* (employer assets are below the pension liabilities) or a *surplus* (employer assets are above their pension liabilities).

- The period over which a *deficit* must be recovered depends on employer circumstances. The Fund's policy for setting recovery periods is set out in [Appendix C](#).
- In certain circumstances, the Fund may allow an employer's *surplus* to be run-down over a reasonable period, via an off-set to the primary contribution rate. The Fund's methodology and process for determining the amount of surplus to be used in this way and over what period is set out in [Appendix D](#).

Employer profile is taken into consideration in determining the funding strategy and outcomes in terms of contribution rates for employers, in the following ways:

- If an employer is open to new members, the primary contribution rate assumes the average profile (in particular age, gender and pay) of active members remains constant over time.
- If an employer is closed to new members, the primary contribution rate builds in an allowance for active members to get older, on average, over time. This usually means a higher rate than an open rate as, on average, it assumes less investment return is available to meet the cost of benefits (and so higher contributions are needed).
- The period for recovering deficits or running down a surplus will take into consideration the time the employer is expected to be in the Fund and employer type.
- The investment strategy (higher or lower risk) will determine the assumptions used for future investment returns and inflation (further detail on assumptions is set out [here](#)).
- The employer covenant (plus any additional support e.g. security over a property) will be taken into consideration by the Fund when taking a decision on the need for exercising its discretion to deviate from the default funding parameters and approach.

- The Fund retains absolute discretion to take additional relevant factors into consideration when determining contributions for employers to maintain the financial health of the Fund and/or protect employers against unrecoverable debts.

The Fund's policies on deficit recovery ([Appendix C](#)) and surplus distribution ([Appendix D](#)) include further detail on how employer type and circumstances (covenant and outlook for participation) are taken into account.

MANAGING RISK

Funding risks are considered as part of the Fund's overarching risk management framework and strategy. This FSS covers those risks specific to the funding strategy of the pension fund or employer covenant and the measures taken to mitigate those risks. Recent developments alongside the management of other risks (including operational risks) are set out in the Fund's risk register which is reviewed regularly and available to view in the Pension Committee and Board reports which are available on the Administering Authority's [website](#).

In the context of managing various aspects of the Fund's financial risks, the Administering Authority has implemented a number of investment risk management techniques and these have been allowed for in the actuarial valuation calculations. In outline these are set out below (further information can be found in the ISS).

Equity Protection	The Fund has implemented protection against potential falls in the equity markets via the use of derivatives. The aim of the protection is to provide further stability (or even a reduction) in employer deficit contributions (all other things equal) in the event of a significant equity market fall (although it is recognised that it will not protect the Fund in totality).
Liability Driven Investments (LDI)	The Fund has implemented an LDI strategy in order to hedge part of the Fund's assets against changes in liabilities for one or more employers.
Lower risk investment strategy	This strategy predominately uses corporate bond investment assets and is expected to reduce funding volatility for employers within it. In these circumstances, the discount rate is directly linked to the yields on the corporate bonds within the strategy. In addition, the strategy has exposure to the Liability Driven Investment ("LDI") portfolio (see Glossary for further details). The implementation of a strategy constructed on this basis will better match the overall changes in the liabilities of those employers included in the strategy. All other things equal, this in turn would result in greater stability of the deficit and therefore the contributions for these employers.

The principal aim of these risk management techniques is to provide more certainty of real investment returns versus CPI inflation for the Higher Risk strategy and/or protect against volatility in the termination position. In other words they are designed to reduce risk and provide more stability/certainty of outcome for funding and ultimately employer contribution

rates. The effect of these techniques has been allowed for in the actuarial valuation calculations and could have implications on future actuarial valuations and the assumptions adopted. Further details of the framework have been included in the ISS.

IDENTIFICATION OF RISKS AND COUNTER-MEASURES

The funding of defined benefits is by its nature uncertain. When actual experience is not in line with the assumptions adopted, for example if the investment return is higher or lower than assumed, then a surplus or shortfall will emerge at the next actuarial assessment and will require a subsequent contribution adjustment to bring the funding back into line with the target.

The Administering Authority has been advised by the Actuary that the greatest risk to the funding level is the risk inherent in the investment strategy, so that actual asset out-performance between successive valuations could diverge significantly from that assumed in the long term. The Actuary's formal valuation report includes a quantification of the key risks in terms of the effect on the funding position.

FINANCIAL	MITIGATIONS
<p>The financial risks are as follows:-</p> <ul style="list-style-type: none"> • Economic outlook moves at variance with assumptions • Investment markets fail to perform in line with expectations • Protection and risk management policies fail to perform in line with expectations • Investment Fund Managers fail to achieve performance targets over the longer term • Asset re-allocations in volatile markets may lock in past losses • Pay and price inflation is significantly more than anticipated • An employer ceasing to exist without prior notification, resulting in a large exit credit requirement from the Fund impacting on cashflow requirements. • Experience is worse than assumed when assessing the termination liabilities for exiting employers whose liabilities are orphaned in the Fund and are underwritten by all remaining employers. This would lead to additional costs falling on other employers. 	<p>Any increase in employer contribution rates (as a result of these risks) may in turn impact on the service delivery of that employer and their financial position.</p> <p>In practice the extent to which these risks can be reduced is limited. However, the Fund's asset allocation is kept under constant review and the performance of the investment managers is regularly monitored. In addition, the implementation of the risk management framework will help to reduce the key financial risks over time.</p> <p>The Fund also takes a prudent approach to ongoing funding with additional protections built in in relation to termination liabilities where these liabilities are orphaned in the Fund.</p>

DEMOGRAPHIC	MITIGATIONS
<p>The demographic risks are as follows:-</p> <ul style="list-style-type: none"> • Future changes in life expectancy (longevity) that cannot be predicted with any certainty. Increasing longevity is something which government policies, both national and local, are designed to promote. It does, however, potentially result in a greater liability for pension funds. • Potential strains from ill health retirements, over and above what is allowed for in the valuation assumptions for employers • Unanticipated acceleration of the maturing of the Fund (e.g. due to further cuts in workforce and/or restrictions on new employees accessing the Fund) resulting in materially negative cashflows (and hence liquidity risk) and shortening of liability durations. 	<p>To minimise these risks, the Fund Actuary undertakes a detailed demographic analysis of the Fund's experience on at least a triennial basis, alongside consideration of national trends and future projection scenarios to inform the Fund's view of an appropriate assumption for life expectancy and other demographic factors, including ill health assumptions for employers both part of and outside of the ill health captive.</p> <p>The Fund considers the maturity profile on at least a triennial valuation as part of the valuation and undertakes the investment strategy review alongside the valuation to ensure an integrated approach for funding and investment risks including cashflow requirements.</p> <p>Early retirements for reasons of redundancy and efficiency do not immediately affect the solvency of the Fund because they are the subject of a direct charge (payable when incurred and invoiced by the Fund).</p>

GOVERNANCE AND EMPLOYERS	MITIGATIONS
<p>Governance and employer risks are as follows:-</p> <ul style="list-style-type: none"> • The quality of membership data supplied by the employer is inaccurate or incomplete or there is a breakdown in processes for updating the information, each of which would result in liabilities being under or overstated • Administering Authority unaware of structural changes in employer's membership (e.g. large fall in employee numbers, large number of retirements) with the result that contribution rates are set at too low a level • Administering Authority not advised of an employer closing to new entrants, 	<p>For these risks to be minimised much depends on information being supplied to the Administering Authority by the employing bodies. The Fund has a Notifiable Events policy which sets out the information and events that need to be notified to the Fund. Arrangements are strictly controlled and monitored (e.g. the use of iConnect for transferring data from employers), but in most cases the employer, rather than the Fund as a whole, bears the risk.</p>

<p>something which would normally require an increase in contribution rates</p> <ul style="list-style-type: none"> • An employer ceasing to exist with insufficient funding or a bond which is not adequate, leaving remaining employers to fund the benefits. • A material deterioration in employer short-term affordability or longer term viability. 	
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REGULATORY	MITIGATIONS
<ul style="list-style-type: none"> • The key regulatory risks are as follows:- • Changes to Regulations, e.g. changes to the benefits package, retirement age, potential new entrants to scheme, • Changes to national pension requirements and/or HMRC Rules • Political risk that the guarantee from the Department for Education for Academies and Further Education bodies is removed or modified along with the operational risks as a consequence of the potential for a large increase in the number of academies in the Fund due to Government policy. • Uncertainty about the Government's policy with regard to Higher Education bodies, with the result that the Fund is unsure about the security within which these bodies operate and may therefore be taking undue risk when setting contribution rates 	<p>Membership of the Local Government Pension Scheme is open to all local government staff and should be encouraged as a valuable part of the contract of employment. However, increasing membership does result in higher employer monetary costs.</p> <p>The Fund is not able to control policy/regulatory developments however it routinely monitors emerging issues and developments in the sector and actively contributes to consultations in key areas that impact the Fund.</p>

CLIMATE CHANGE

An important part of the risk analysis underpinning the funding strategy will be for the Actuary to identify the impact of climate change transition risk (shorter term) and physical risks (longer term) on the potential funding outcomes. Climate change is a systemic risk meaning it can

impact on funding, investment and employer covenant – all at once. Therefore, the fund keeps the management and governance of climate risk under review.

The impact of climate risk cannot be measured with certainty. For the current valuation the fund has considered different climate change scenarios at the Whole Fund level. Analysis has been undertaken relative to the baseline position assuming that the funding assumptions are played out on a best estimate basis. The projections are meant to illustrate the different elements of risk under four climate change scenarios based on the current strategic allocation. The scenarios are not meant to be predictors of what may happen and are only a small subset of a very wide range of scenarios that could arise depending on the global actions taken in relation to climate change.

The information on climate risk is used by the fund in two key areas:

- A. Considering the inadequacy of the prudence margins required in the actuarial assumptions in order to mitigate against material downside events. The prudence in the funding strategy is predominantly reflected in the valuation discount rate.
- B. The surplus reserve retained in the fund above which surplus may be run down by means of employer contribution reductions.

The fund recognises that as climate risk is inherently uncertain, it is necessary to apply judgement and an integrated approach across funding, investment and covenant risk to mitigate.

When considering funding issues related to climate change, the fund also gives regard to the key funding principles document for preparing climate scenario analysis approved by GAD, MHCLG and SAB. The actions taken (both historically and in future) by the Fund in relation to making its asset portfolio more sustainable is set out in the separate Taskforce for Climate Change (TCFD) reports and analysis of the asset portfolio adopting the same (or similar) scenarios although this can be over a different time period.

The analysis considers a projection of the funding levels under the scenarios considered which are designed to illustrate the transition and physical risks over different periods depending on what actions are taken globally on climate change.

The key metrics are the relative impact on the funding level over the different time periods as this illustrates the impact of climate related market shocks on the funding plan. Whilst these scenarios are only three out of a considerable range of potential outcomes, it shows that climate change can have far reaching effects on the Fund.

The Actuary applies a nuanced approach to understand what is/is not priced into the markets in terms of transition and physical risks. They include assumptions about what is currently priced into markets, and later price in shocks when the markets account for future impacts (both physical and transition impacts). The four climate shock scenarios considered are:

1. **Rapid Transition** – there is a highly ambitious low carbon policy and rapid technology transition. Sudden divestments in 2026 to align with the Paris Agreement goals have disruptive effects on financial markets with sudden repricing followed by stranded assets and a sentiment shock. Average temperature increase is assumed to stabilise at 1.6°C from 2050 onwards.

Relative to a best estimate projection of the funding level from the valuation date, financial factors could have a detrimental impact on the funding level of around 5% after 5 years following the sudden repricing. However, there is then a period of recovery in the following years, with reduced physical damages in the long term and a positive overall contribution to the funding level of c4% after 20 years and c7% after 40 years. Given the Fund's allocation to sustainable assets, the full impact of the initial shock is mitigated to some extent. This scenario is expected to be positive for life expectancy for older members, adding almost 1.5 years to life expectancy from age 65 and a slightly negative impact for very young members. In combination (but in isolation of other factors) this would increase liabilities c5%.

2. **Delayed Transition** – Limited additional action until 2030, at which point a highly ambitious set of low-carbon policies is introduced. Financial markets price in transition and physical risk in 2030 to align with the ambitious policy change, associated with stranded assets and a sentiment shock. Assumed temperature increase of 1.9°C by 2100.

Relative to a best estimate projection of the funding level from the valuation date, financial factors could have a minimal impact on the funding level after 5 years. However there are greater physical damages in the long term than compared with the rapid transition scenario and as such this has a slightly detrimental impact on the funding level of c2% after 20 years and c5% after 40 years. The Fund's allocation to sustainable assets again mitigates some of the full impact of the initial shock. This scenario is expected to have a similar impact on life expectancy as the rapid transition.

3. **Limited Transition** – Emissions targets and commitments are not fully met. Financial markets price in climate-related risks in 2030 and 2039 as the scale of future risks become more widely accepted and understood. Assumed temperature increase of 2.9°C by 2100.

Relative to a best estimate projection of the funding level from the valuation date, financial factors could have a minimal impact on the funding level after 5 years. However there are much greater physical damages in the long term than compared with the rapid or delayed transition scenarios and this has a material detrimental impact on the funding level of c14% after 20 years and c24% after 40 years, which shows the material consequences of the physical risks from the significant temperature increases as time progresses. This scenario is expected to result in a material reduction in life expectancy for younger members although a slight increase for older members, which in combination (but in isolation of other factors) would increase the liabilities by c2%.

4. **Failed Transition** – No new climate policies are enacted, but transition progresses on economic grounds. Financial markets price in climate-related risks in 2030 and 2039 as the scale of future risks become more widely accepted and understood. Assumed temperature increase of 3.7°C by 2100.

Relative to a best estimate projection of the funding level from the valuation date, financial factors could have a minimal impact on the funding level after 5 years. However, of the 4 scenarios considered, this scenario assumes the most significant physical damages in the long term. As such this is hugely detrimental for the funding level, with a reduction of c24% after 20 years and c39% after 40 years. This scenario is expected to be detrimental for life expectancy for Fund members with the most material impact for the youngest members of around 5 years reduction in life expectancy from age 65. In isolation, this would reduce liabilities by c2%.

The actuarial assumptions (versus the best estimate) include a level of prudence which implicitly allows for the climate risk and other risks to support future contribution stability and the Actuary has concluded that the level of prudence is currently sufficient. However, any climate related impacts will potentially put significant stress on the funding plan, especially when taken into account with other risk factors so needs to be monitored over time.

The quantitative analysis has considered financial factors and also the potential impact on longevity. In addition, the impact on UK GDP on the above scenarios has also been considered noting that whilst budgets for taxpayer backed employers will not be directly linked to UK GDP, they will be influenced by it. The Fund will consider whether any additional analysis of employer covenant in terms of resilience to climate transition and physical risk will be required as part of its wider covenant strategy. The expected impact on asset returns under different scenarios and timeframes will be shown in more detail in the separate TCFD reports.

MAIN ACTUARIAL ASSUMPTIONS

The key whole Fund assumptions used for calculating the funding target and the cost of future accrual for the 2025 actuarial valuation are set out below.

FINANCIAL ASSUMPTIONS			
	2025 valuation assumption		Description
Investment return / discount rate	Higher Risk Strategy	5.90% p.a. (past) and 4.85% p.a. (future)	Derived from the expected return on the Fund assets based on the long term strategy set out in the ISS, including appropriate margins for prudence. For the 2025 valuation this is based on an assumed return of 3.30% p.a. above CPI inflation (past service) and 2.25% p.a. above CPI inflation (future service). This real return will be reviewed from time to time based on the investment strategy, market outlook and the Fund's overall risk metrics.
	Lower Risk Strategy	5.65% p.a. (past and future for a very mature employer)	Linked directly to the yields available for the assets within the lower risk investment strategy. The typical discount rate is equivalent to a return of 0.52% p.a. above gilt yields as at 31 March 2025. This assumption will be regularly reviewed and updated to allow for changes in market conditions at the relevant employing body's cessation date, along with any other structural or legislative changes.
Inflation (Retail Prices Index)	3.30% p.a.		The investment market's expectation as indicated by the difference between yields derived from market instruments, principally conventional and index-linked UK Government gilts as at the valuation date (reflecting the profile and duration of the whole Fund's accrued liabilities).
Inflation (Consumer Prices Index)	Higher Risk Strategy	2.60% p.a. (includes an adjustment of 0.70% p.a.)	RPI inflation (above) reduced to reflect the expected long-term difference between RPI and CPI measures of inflation (reflecting the profile and duration of the whole Fund's accrued liabilities and 2030 RPI reform) and adjusted to remove the estimated impact of supply/demand distortions as well as Bank of England forecasts. This varies for the higher and lower risk strategies, reflecting the degree of inflation hedging inherent in each strategy
	Lower Risk Strategy	3.10% p.a. (includes an adjustment	

FINANCIAL ASSUMPTIONS			
		of 0.20%p.a. for a very mature employer)	and will reflect the duration of an employer's liabilities. The adjustment to the RPI inflation assumption will be reviewed from time to time to take into account any market factors which affect the estimate of CPI inflation.
Salary increases (long-term)	Higher Risk Strategy	4.10% p.a.	Pre 1 April 2014 benefits (and 2014 to 2022 McCloud underpin) - the assumption for real salary increases (salary increases in excess of price inflation) will be determined by an allowance of 1.50% p.a. over the appropriate CPI inflation assumption as described above. This includes allowance for promotional increases.
	Lower Risk Strategy	4.60% p.a.	
Salary increases (short-term)	No allowance		The default approach is to make no short-term adjustments to the long-term salary increase assumption above. However, an allowance for short-term salary increases may be considered on an individual employer basis by exception only, based on affordability grounds, at an employer's request. To the extent that experience differs to the assumption adopted, the effects will emerge at the next actuarial valuation.
Pension Increases and Deferred Revaluation	Assumed to be in line with the CPI inflation assumption above (noting that pension increases cannot be negative as pensions cannot be reduced). At the 2025 valuation, an adjustment has been made to the liabilities to allow for the known inflation for the period September 2024 to March 2025, and where material, allowance will continue to be made for inflation as it emerges when assessing funding positions between valuations.		
Indexation of CARE benefits	Assumed to be in line with the CPI inflation assumption above. For members in pensionable employment, indexation of CARE benefits can be less than zero (i.e. a reduction in benefits).		
McCloud	A reasonable estimate for the potential cost of McCloud has been included within the 2025 valuation results for each employer. This has been calculated based on the actual data provided for the 2025 valuation and in line with national guidance.		

DEMOGRAPHIC ASSUMPTIONS

Mortality/Life Expectancy

The derivation of the mortality assumption is set out in separate advice as supplied by the Actuary. The mortality in retirement assumptions will be based on the most up-to-date information in relation to self-administered pension schemes published by the Continuous Mortality Investigation (CMI) including a loading reflecting Fund specific experience and will make allowance for future improvements in longevity and the experience of the scheme. A specific mortality assumption has also been adopted for current members who retire on the grounds of ill health.

For all members, it is assumed that the trend in longevity seen over recent time periods (as evidenced in the 2024 CMI analysis) will continue in the longer term and as such, the assumptions build in a level of longevity 'improvement' year on year in the future in line with the CMI 2024 projections and a long term improvement trend of 1.5% per annum.

As an indication of impact, we have set out the life expectancies at age 65 based on the 2022 and 2025 assumptions:

	Male Life Expectancy at 65		Female Life Expectancy at 65	
	2022	2025	2022	2025
Pensioners	22.5	22.0	24.4	24.5
Actives aged 45 now	24.1	23.1	26.7	26.0
Deferreds aged 45 now	23.5	22.2	26.2	25.3

For example, a male pensioner, currently aged 65, would be expected to live to age 87.0. Whereas a male active member aged 45 would be expected to live until age 88.1. The difference reflects the expected increase in life expectancy over the next 20 years in the assumptions above.

The mortality before retirement has also been reviewed based on LGPS wide experience.

The detailed actuarial tables adopted for the post retirement mortality assumptions are set out in [Appendix B](#).

The other demographic assumptions include the rates of early, normal and ill health retirement, the rate at which pension is exchanged for additional tax-free cash and the proportion of members where a dependant's pension will become payable after their death. Such assumptions have been determined by considering:

- The experience of the Fund's membership
- The experience of a wider LGPS dataset
- National trends
- The advice of the Actuary
- The need for prudence (however the default position is that these assumptions are set on best estimate principles with prudence primarily reflected in the investment return assumption and the post-retirement mortality assumption).

METHOD

The actuarial method to be used in the calculation of the solvency funding target is the Projected Unit method, under which the salary increases assumed for each member are projected until that member is assumed to leave active service by death, retirement or withdrawal from service. This method implicitly allows for new entrants to the scheme on the basis that the overall age profile of the active membership will remain stable. As a result, for those employers which are closed to new entrants, an alternative method (the Attained Age method) is adopted, which makes advance allowance for the anticipated future ageing and decline of the current closed membership group potentially over the period of the rates and adjustments certificate. Employers who move from open to closed may see an increase in contributions as a result of this change, at the point the Fund is notified of the status change.

The assumptions to be used in the calculation of the funding target are set out above. Underlying these assumptions are the following two tenets:

- that the Fund is expected to continue for the foreseeable future; and
- favourable investment performance can play a valuable role in achieving adequate funding over the longer term.

This allows the Fund to take a longer term view when assessing the contribution requirements for certain employers.

There will be a funding plan for each employer. In determining contribution requirements the Administering Authority, based on the advice of the Actuary, will consider whether the funding plan adopted for an employer is reasonably likely to be successful having regard to the particular circumstances of that employer (potentially taking into account any material changes after the valuation date up to 31 March 2026).

As part of each valuation separate employer contribution rates are assessed by the Fund Actuary for each participating employer or group of employers. As indicated above, these rates are assessed taking into account the experience and circumstances of each employer (or group of employers), following a general principle of no cross-subsidy between the distinct employers in the Fund. The financial assumptions for investment return and inflation will vary depending on whether an employer is in the higher risk or lower risk strategy and therefore so will the resulting contribution requirement. In addition, employer circumstances (e.g. employer type, guarantees from public bodies, affordability, expected duration remaining in the Fund)

are further taken into consideration when determining the recovery period of deficits/surplus and also the level of the surplus reserve. Further details on this are set out in Appendices [C](#) and [D](#).

EMPLOYER POOLING AND RISK SHARING ARRANGEMENTS

Generally individual employers will be responsible for their own liabilities and have a notional asset share allocated to them. However, there are some circumstances where employer assets and liabilities are pooled across a group of employers. This relates to some academies where the Multi-Academy Trust (MAT) is also an employer in the Fund and so the funding of all academies in the MAT can be pooled across the group.

Further details on how this will impact the funding assessment on entry, as part of the ongoing contribution requirement and on exit is set out in the [relevant section](#) of this FSS including the pros and cons of such arrangements.

For admitted bodies, there may be some instances where the admitted body, and the letting employer enter into a “pass-through” arrangement, where some/all of the pension risks are retained by the letting employer. Such arrangements are commercial arrangements between the admitted body and the letting employer. From the Fund’s perspective, where the letting employer is an academy, DfE has confirmed that use of a pass-through arrangement where responsibility for the liabilities remains with the letting employer, will mean that the admitted body is covered by the [DfE LGPS Academy Guarantee](#). In such cases a bond or other indemnity would be deemed unnecessary.

In all cases, the attribution of pension risk in such arrangements may impact how any termination / bond assessments are undertaken and therefore it’s important for Employers to make the Fund aware of the risk sharing arrangements in place when undertaking such exercises.

EMPLOYER ASSET SHARES

The Fund is a multi-employer pension scheme that is not formally unitised and so individual employer asset shares are calculated at each actuarial valuation. This means it is necessary to make some approximations in the timing of cashflows and allocation of investment returns (in line with the appropriate investment strategy) as calculated by the Actuary based on relevant financial information, when deriving the employer asset share.

In attributing the overall investment performance obtained on the assets of the Fund to each employer in either the higher risk or lower risk strategy, a pro-rata principle is adopted. This involves applying the appropriate individual employer investment strategy to each employer unless this is varied by agreement between the employer and the Fund at the sole discretion of the Administering Authority.

At each review, cashflows into and out of the Fund relating to each employer, any movement of members between employers within the Fund, along with investment return earned on the

asset share, are allowed for when calculating asset shares at each valuation. In addition, the asset shares may be restated for changes in data or other policies.

Adjustments are also made on account of the funding positions of orphan bodies which fall to be met by all other active employers in the Fund.

Further details on the method by which employer assets are determined and tracked over time is set out in [Appendix A](#).

LINKS TO THE INVESTMENT STRATEGY STATEMENT (ISS) AND INVESTMENT POLICY

The investment and funding strategies are closely linked. After employer and employee contributions, investment returns are the third key pillar of LGPS funding. The Fund must be able to pay benefits when they are due – those payments are met from a combination of contributions (through the funding strategy) and asset returns and income (through the investment strategy).

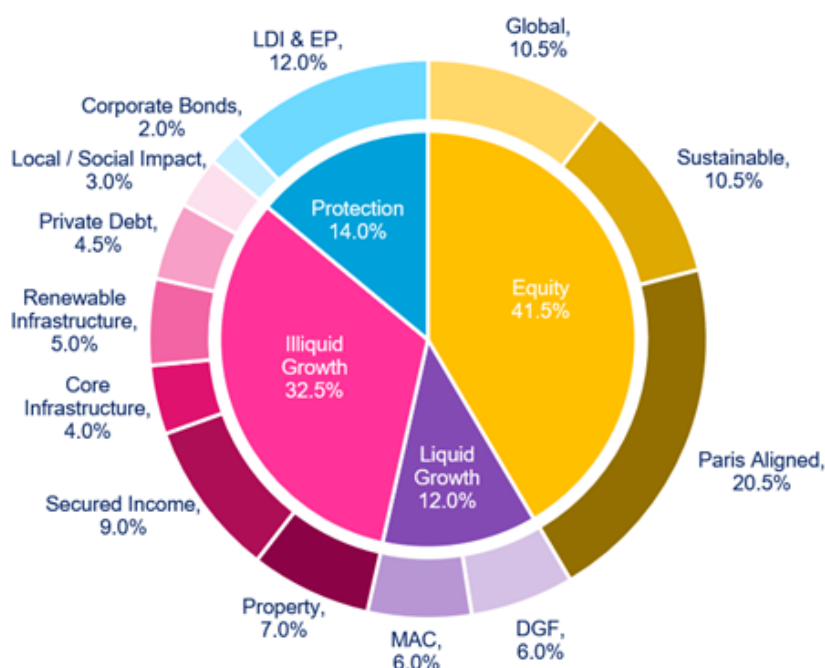
If investment returns or income are lower than expected, the Fund may need to set higher contributions from employers to ensure benefits can be paid. Therefore, the investment returns required by the funding strategy, as set out in this FSS, must be compatible with the investment policy as set out in the ISS.

The results of the 2025 valuation show the liabilities to be [TBC]% covered by the assets, with the funding surplus of [TBC]%.

In formulating a Fund's overall investment strategy, the liability profile and funding position in relation to the liabilities of the Fund as a whole (assessed on an appropriate and prudent basis), is taken into account, alongside the Fund's overall risk appetite across funding, investment and covenant.

As noted above, individual Fund employers will be in one of two possible funding and investment strategies in the Fund: the Higher Risk Strategy or the Lower Risk Strategy. The funding assumptions for investment return and inflation will vary depending on the strategy the employer is in, reflecting the nature of the investments underlying the strategy.

The overall strategic asset allocation for the Fund as a whole is set out in the Investment Strategy Statement (ISS), which can be found [here](#). The current strategy is included below.



HOW EMPLOYER CONTRIBUTIONS ARE CALCULATED

PRIMARY RATE OF THE EMPLOYERS' CONTRIBUTION (FUTURE ACCRUAL) - METHOD AND ASSUMPTIONS

The future service liabilities are calculated using the same assumptions as the funding target except that for Employers in the Higher Risk strategy, a different financial assumption for the discount rate is used.

A critical aspect here is that the Regulations state the desirability of keeping the "Primary rate" (which is the future service rate) as stable as possible so this needs to be taken into account when setting the assumptions. Therefore, for employers in the Higher Risk strategy, as they are typically expected to remain in the Fund for a long time horizon, and as future service contributions are paid in respect of benefits built up in the future, the Primary rate should take account of the market conditions applying at future dates, not just the date of the valuation. In addition, the associated benefits being built up are paid out over a longer time horizon than benefits already accrued; thus it is justifiable to use a different expected return from the past service discount rate to support sustainability/stability of employer contributions over the longer term. Whether this is higher or lower than the past service discount rate will depend on prevailing market conditions at the valuation date.

For employers in the Lower Risk strategy the future service liabilities are calculated using the same assumptions as the funding target. These employers are typically expected to remain in the Fund over a shorter time horizon and therefore adjustment for future market conditions is generally inappropriate.

The impact of different employer covenant (i.e. type of employer, the availability and nature of any guarantee and affordability) is not explicitly reflected in the calculation of the primary contribution rate although this will be implicit where an employer has moved to the Lower Risk strategy. Employer covenant is however, taken into consideration when determining deficit recovery and surplus run-off plans (see below).

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

The primary contribution includes the employers' share of administration costs alongside the cost of insurance provided by the Fund for ill-health early retirement strains and death in service strains. Further details (including eligibility and Fund policy) on the Fund's ill-health and death in service captive insurance arrangements are set out in [Appendix L](#) and [Appendix M](#) respectively.

The process and decision making followed by the Fund to set primary contribution rates is consistent across all employers. However, this does not necessarily translate into the same outcomes, which will be dependent on employer circumstances as referred to above and as such the Fund retains the right to use its discretion where individual circumstances require.

SECONDARY RATE OF THE EMPLOYERS' CONTRIBUTION

Deficit Recovery Plans – Key Principles

If the funding level of an employer is below 100% at the valuation date (i.e. the assets of the employer are less than the liabilities), a deficit recovery plan needs to be implemented such that additional contributions are paid into the Fund to meet the shortfall.

It is the Fund's objective that any funding deficit is eliminated as quickly as the participating employers can reasonably afford given other competing cost pressures, based on the Administering Authority's view of the employer's covenant and risk to the Fund.

The average recovery period for the Fund as a whole is [12] years at this valuation which is one year shorter than the average recovery period from the previous valuation. Subject to affordability and other considerations individual employer recovery periods would also be expected to reduce at this valuation.

Recovery periods will be set by the Fund on a consistent basis across employer categories where possible. This will determine the minimum contribution requirement and employers will be free to select any shorter deficit recovery period and higher contributions if they wish, including the option of prepaying the deficit contributions in one lump sum either on an annual basis or a one-off payment.

Deficit contributions paid to the Fund by each employer will be expressed as cash amounts (flat or increasing year on year).

Surplus Run Off Plans– Key Principles

If the funding level of an employer is above 100% at the valuation date (i.e. the assets of the employer are greater than the liabilities, then the Fund will consider whether a reduction to

the primary contribution rate is required in order to run-off surplus over a suitable time horizon. Whether any surplus is run-off will depend on the funding level (i.e. is it above the surplus reserve retained in the Fund for the benefit of the employer to support contribution stability). The period during which excess surplus above the surplus reserve will be run-off will be set by the Fund on a consistent basis across employer categories where appropriate. This will determine the minimum total contribution requirement for employers, however employers will be able to opt to pay higher contributions if they wish to retain a higher surplus reserve.

Surplus off-sets will usually be expressed as a % of pensionable salary or £ (if appropriate) deduction to the primary contribution rate.

Further details on the key principles when determining the secondary rates payable by employers is set out in [Appendix C](#) in respect of deficit recovery plans and [Appendix D](#) in respect of surplus run-off plans. Employers will be notified of their individual deficit recovery / surplus run-off period as part of the provision of their individual valuation results.

The Administering Authority retains ultimate discretion in applying these principles for individual employers on grounds of affordability and covenant strength and it may be deemed necessary to deviate under exceptional circumstances.

CONFLICTS OF INTEREST

Where an actual, or perceived, conflict of interest is identified in relation to the setting of employer contribution rates (whether primary or secondary), the Administering Authority will follow the Fund's conflicts of interest [policy](#). Where necessary, for example where an actual, or perceived, conflict emerges when setting contribution outcomes for the Administering Authority itself, as a Scheme Employer, the Administering Authority will ensure a separation of decision making to manage any conflict. In such, any decisions would be subject to the approval of the Pensions Committee and subject to the scrutiny and oversight of the Local Pensions Board.

PAYMENT OF ADDITIONAL CONTRIBUTIONS

There may be circumstances when Employers are required to make other payments to the Fund in respect of member benefits. This might be, for example in relation to:

- awards of additional pension;
- strain costs arising from retirement before normal retirement age on unreduced benefits;
- strain costs arising from early retirement on ill-health grounds for those employers who are not part of the ill-health captive arrangement (see [Appendix L](#) for further details on this).

The Fund's default position is that awards of additional pension and strain costs arising from early retirement on unreduced benefits are funded by an immediate contribution from the employer. Employers should request an estimate of the potential costs of any such awards from the Fund.

Ill-health retirement strain costs in respect of employers who are not part of the captive insurance arrangement are usually considered on a triennial basis as part of the actuarial

valuation with any strains reflected in the balance sheet and where there is a deficit this will need to be recovered over the relevant recovery period specific to employer circumstances (see [Appendix C](#) for further information on deficit recovery periods).

The Fund reserves the right to use its discretion to adjust the approach for the timing of any additional payments, for example due to affordability or financial stability concerns regarding the employer where this is appropriate in the best interests of all Fund employers.

ACTUARIAL VALUATION

As required by the Regulations (Regulation 62 of the LGPS Regulations 2013), an Administering Authority must obtain an actuarial valuation of the assets and liabilities by its pension funds as at 31 March every 3 years. The effective date of the most recent actuarial valuation is 31 March 2025. In addition, the FSS must be formerly renewed by the Administering Authority every 3 years and in advance of the completion of the actuarial valuation (which must be within 12 months of the valuation effective date) or such later date as the Secretary of State may agree.

As part of the triennial valuation, the Administering Authority must obtain a report by an actuary (the “actuarial valuation report”) and a rates and adjustments certificate prepared by an actuary. This certificate sets out the contribution rates to be paid by all employers participating in the Fund for the following 3 years (i.e. for 3 years from 1 April 2026 until 31 March 2029 in respect of the 31 March 2025 valuation). As the accuracy of the valuation calculations and resulting contributions is reliant on the accuracy of the membership data used, employers therefore have a critical role in this process ensuring that the employee information provided to the Fund is as accurate as possible.

The rates and adjustment certificate is appended to the valuation report, but otherwise information in the report is aggregated at the whole Fund level.

The actuarial valuation report:

- shows the aggregate funding position for the Fund as a whole as compared with the previous valuation
- sets out a summary of the key reasons for the change in funding position and a summary of key inter-valuation experience.
- includes sensitivity analysis and commentary to support understanding of the key risks including a projection of the potential funding level at the next valuation.
- Summarises the key financial and demographic assumptions adopted alongside the underlying membership and investment data as at the valuation date.
- includes quoting a primary and secondary contribution rate for the Fund as a whole, equal to the weighted average based on the whole Fund payroll in respect of rates that are expressed as a percentage of pay and as a total amount in respect of cash adjustments. The purpose of this is to facilitate a single net rate of contributions expected to be received over each of the three years that can be readily compared with other rates within the Fund and reconciled with actual receipts.
- includes information required by the Government Actuary’s Department for the purpose of undertaking its Section 13 assessment.

REVIEW OF EMPLOYER CONTRIBUTIONS BETWEEN VALUATIONS

The Regulations permit Administering Authorities to review an Employer's contribution rate in the interim period between triennial actuarial valuations where there has been a significant change to the liabilities or covenant of that employer.

The Administering Authority will consult with the Employer prior to undertaking a review of their contributions, including setting out the reason for triggering a review. An employer may request a review of contributions from the Administering Authority if they feel there has been a significant change to their liabilities or covenant.

MHCLG has confirmed its view as set out in Scheme Advisory Board statement on surpluses issued in December 2023 that generally local authorities and other tax-backed employers are not subject to a change in covenant as they have a statutory obligation to pay employer contributions to the fund in which they participate. Changes in funding values due to market movements are not themselves usually sufficient to trigger a review.

The Fund's policy on undertaking an interim review of contributions is set out in [Appendix H](#).

Any review of contributions may result in no change and a continuation of contributions as per the latest actuarial valuation assessment. In the normal course of events, a rate review would not be undertaken close to the next actuarial valuation date except in exceptional circumstances.

FUND APPROACH TO MANAGING SURPLUSES AND DEFICITS

The funding position of each LGPS fund is different: some have surpluses, some are experiencing deficits, and some will shift between surplus and deficit positions over time – this will depend on the circumstances of each fund in terms of experience (including amount of employer contributions and how long members live) and policies.

The funding position of individual employers in the Fund will also differ and change over time and these differences can be material. Usually, any deficit or surplus will not, however be required to be paid up front and can be recovered (or run-off where there is a surplus) over a period of time. This has the effect of smoothing contributions required to finance a potentially volatile funding position. This smoothing works both ways i.e. both in respect of the additional contributions required to recover a deficit and also any contribution reductions that might be applied in respect of running down a surplus.

Employers will also themselves be facing different affordability challenges and pose risks to a differing degree to the Fund. Some will participate in the Fund long-term whilst others may be exiting soon. For this reason, the Fund's approach for adjusting contributions to make good deficits or run-down surpluses over time will differ depending on the type of employer concerned. The starting point for this will be based on whether or not the employer is tax-payer backed (or guaranteed by a tax-payer backed employer or organisation such as the Department for Education), although other factors are also taken into consideration for example the existing recovery or run off periods. For employers in surplus, the Fund will

also consider the need to retain a surplus reserve in the Fund to help achieve contribution stability for the benefit of the employer, the amount of which may vary by employer type and may be zero. The Fund will also consider whether it should use its discretion to vary the approach for any individual employer based on detailed consideration of the circumstances of the employer and actuarial advice.

Further details on how the Fund determines the approach for making good deficits and running-down surpluses, including how this varies by type of employer, is included in [Appendix C](#) and [Appendix D](#) respectively.

As noted earlier, the Fund operates two funding and investment strategies - the Higher Risk strategy and the Lower Risk strategy.

Most employers will be in the Higher Risk strategy. This aims to deliver higher long-term investment returns by investing in higher risk assets than the Lower Risk strategy. If the aims are achieved then the long-term costs in terms of employer contributions are expected to be lower than the Lower Risk strategy – but this is not guaranteed. The aim of the Lower Risk strategy is to deliver a stable funding level (i.e. the ratio of assets and liabilities) and more cost certainty. However, as this is predominantly based on investment in corporate bond assets, it can produce very volatile primary contribution rates (similar to the volatility seen for an employer service cost under accounting figures).

Further details on these strategies is set out in [Appendix I](#). The costs involved in management of the Higher and Lower Risk investment strategies are met from the investment return applied to employer assets.

EMPLOYER COVENANT

Covenant is the employer's legal obligation and financial ability to meet their defined benefit obligations in the Fund now and in the future. Regular assessment and monitoring of employer covenant is undertaken to understand the current strength of the employer's covenant and how they could change in the future. This is important to assist the Fund in deciding the appropriate level of risk when setting the investment strategy, employer funding targets and where necessary employer recovery plans/surplus reserve and run-off periods. Therefore, a sound understanding of the covenant of employers is an essential part of the integrated approach to risk management of the Fund.

The strength of employer covenant can be subject to substantial variation over relatively short periods of time and, as such, regular monitoring and assessment is undertaken. The employers' covenants will be assessed and monitored objectively in a proportionate manner and their ability to meet their obligations in the short and long term will be considered when determining an individual employer's funding strategy.

The Fund has established a proportionate covenant assessment and monitoring framework which is set out in [Appendix J](#). This includes information on:

- How the Fund assesses and keeps employer covenant under review, as appropriate for the employer type
- The risk assessment methodology and criteria by which the Fund will assess the long-term financial health of employers, and how this will be monitored.
- How the Fund assesses covenant risk

Timely reporting to the Fund of events that have the potential to materially impact on employer covenant strength is critical to the management and monitoring of employer covenant risk. The Fund has therefore agreed a Notifiable Event framework which specifies the types of event or changes in circumstances that employers will be obliged to notify the Fund about. The Fund's current Notifiable Events framework is attached in [Appendix K](#).

If there is assessed to be a significant change in covenant then the Fund will initially contact the employer to further understand the position and this may lead to additional information being requested. The Fund will take professional advice e.g. actuarial, legal, covenant, investment as appropriate depending on the circumstances in order to evaluate the impact in the context of the overall risk as part of the integrated risk management strategy and on potential avenues to mitigate or reduce the risk. This may include seeking covenant strengthening measures such as a guarantor or security; reducing investment risk by moving to the Lower Risk strategy and/or determining a revised contribution between actuarial valuations, where appropriate. Ultimately the outcome will be dependent on the specific circumstances and in exercising the Fund's discretion in such cases.

As set out in [Appendix H](#), a material change in employer covenant may also trigger the need to consider a contribution rate review.

The Fund's over-riding responsibility will be to act in the best interests of all Fund members and their participating employers.

GUARANTORS

Certain employers in the Fund will be guaranteed by another employer which may also be participating in the Fund. For example, new admission bodies joining the Fund must be guaranteed by a Scheme employer. Other bodies who do not participate in the Fund may also provide guarantees for some employers, for example the Department for Education provides a guarantee of the exit debt in respect of academy trusts and further education bodies.

In the case of a full guarantee (e.g. in the case of new admissions) when the employer exits the Fund, the responsibility for funding the future pension costs associated with its employees, earned during its admission in the Fund, will pass to the guarantor i.e. liabilities are 'subsumed'. The assets are also subsumed, although depending on the contractual arrangements in place and Fund exercising its discretion where there is surplus, a termination payment/exit credit may be payable from/to the exiting employer first.

In the case of a 'guarantee of the exit debt' (e.g. for academy trusts and further education bodies) the guarantor may or may not be an employer that participates in the Fund. The

guarantor in this situation does not subsume the exiting employer's assets/liabilities on termination and instead the guarantee is to cover only the exit debt, if there is one. Following the employer's exit, if future pension costs are higher than the termination assessment, responsibility passes to the remaining ongoing Fund employers to meet the cost.

The existence and type of guarantee for a non-tax-backed employer is an important consideration for the risk profile of the employer, alongside employer type. As a result, it is taken into account in the funding strategy in a number of ways.

- The frequency and detail of covenant review
- The deficit recovery period or surplus reserve and run-off period as applicable
- The assumptions used to assess any deficit/surplus on termination (where there is no guarantee or only a guarantee of the exit debt, additional prudence is built into the termination assumptions to provide greater protection for the ongoing employers against adverse experience given they would underwrite the termination liabilities going forward).
- whether a bond or other security is required to support the admission

ADMISSION BODIES

Under the LGPS regulations, an administering authority must assess the risk a proposed new admission body poses to the Fund should the admission body become insolvent or go out of business.

After considering the level of risk, the administering authority may decide that the admission body must provide security, such as a guarantee from the letting employer, an indemnity, or a bond. This security must cover some or all the:

- strain costs of any early retirements if employees are made redundant when a contract ends prematurely
- allowance for the risk of assets performing less well than expected
- allowance for the risk of liabilities being greater than expected
- allowance for the possible non-payment of employer and member contributions
- admission body's existing deficit.

Further information on this is set out in [Section C](#) of this FSS and the Fund's policy on its approach in this area is set out in [Appendix E](#).

It is recognised that the parties involved may wish to depart from the above default position on commercial grounds, and the Fund would be open to considering alternatives on a case-by-case basis.

PENSION ADMINISTRATION STRATEGY

The Fund keeps a separate pension administration strategy which outlines the responsibilities, performance and procedures for employers and the Fund. Compliance with the Fund's pension administration strategy, in particular areas such as communication, skills and training and data accuracy is essential for ensuring employers are in a position to understand and manage their pension costs and risks in a changing economic, demographic

and legislative landscape alongside ensuring assessment of such costs and risks can be as accurate as possible. Failure to adhere to these requirements could have a material effect on an employer's liabilities in the Fund.

Alongside the triennial actuarial valuation, there will be a number of occasions where the Actuary will use updated membership data to carry out its calculations, as referenced in the next section e.g. terminations (where an exit debt/credit is to be assessed in full), inter-valuation contribution rate reviews, new admissions, bulk transfers, and in some cases accounting calculations where a significant event has occurred during the accounting period. To ensure membership data is as accurate as possible, the Fund undertakes annual data quality assessments (including against requirements set out by The Pensions Regulator) and also instructs the Actuary to undertake independent inter-valuation data quality assessments.

The Fund's Administration Strategy Statement is available [here](#).

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C. EMPLOYER EVENTS

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Key events during an employer's participation in the Fund could impact on an employer's and the Fund's funding circumstances. The Fund's approach to policy and process for dealing with any possible outcomes from those events is summarised below. The Fund's detailed policy in each of these areas is included in the relevant Appendix referenced.

Employers have a right to appeal a decision made by the Fund and the Fund has a separate Internal Disputes Resolution Procedure (IDRP), which is available on the Fund website here. In the first instance employers should ensure that they are conversant with the details of the policy before lodging an appeal to the Fund.

JOINING THE FUND AND EMPLOYER CONTRIBUTION RATE SETTING AND MONITORING

All Scheme employers (as defined under Schedule 2 Part 1 of the LGPS 2013 Regulations) are entitled to join the Fund under the Regulations. These bodies include tax raising bodies, those funded by central government (academies and colleges) and universities (reliant on non-government income). Other Scheme Employers (specifically those defined under Schedule 2 Part 2 of the Regulations) can designate eligibility to join the Scheme for individuals or groups, where they pass a resolution to that effect.

Initial funding calculations

Typically, there are two main approaches used for new employers depending on their specific circumstances:

- Fully funded at the start: the value of the liabilities of the transferring group of members is assessed and the assets that are notionally reallocated within the Fund from the original employer to the new employer body are equal to this amount, meaning no initial surplus or deficit.
- Partially funded at the start: where the assets notionally reallocated are less than the value of the liabilities transferring. The method of assessment for this initial deficit can vary depending on the specifics of each case.

Bespoke commercial arrangements can also be entered into between the new entity and the letting authority which may be different to these and must be communicated to the Administering Authority. For example, a "pass-through" arrangement where some/all the risk is retained by the letting authority.

It is most common for admission bodies to join the Fund on a "**fully funded**" basis. There can be exceptions to this where an outsourcing body has structured the commercial arrangements such that the new body takes on a deficit.

Initial contribution rate assessment

The initial contribution rate assessment will be an actuarial calculation of the future service pension cost that applies in respect of the members transferring to the new entity. This assessment will take account of:

- The pay levels of the transferring group (and so the implied employee contribution rate)
- The timing of the benefits that are expected to fall due (depending on any applicable transitional protections for certain members)
- Whether the new body will be open, or closed to new entrants
- Whether any funding deficit is ultimately transferred and the period over which it is expected to repay that deficit.

Conversion to academy status

The Fund's policy regarding the treatment of schools when converting to academy status is for the new academy to inherit the school's appropriate share of the historic local authority deficit or surplus prior to its conversion. This is in accordance with the Department for Education (DfE) guidance issued when the Academy conversion programme was extended to cover all schools.

Therefore, the transferring deficit or surplus is calculated as the capitalised amount of the funding contributions relating to past service to the conversion date (based on the local authority recovery period) the school would have made to the Fund had it not converted to academy status. In the case of a deficit, it will be subject to a limit to ensure that the minimum asset share of the new academy is nil.

Multi-Academy Trusts (MATs) are groups of academies managed and operated by one proprietor. The employer of non-teaching staff in academies is the proprietor of the Academy Trust and not the individual academy within the Trust. It is therefore the proprietor who is the employer for LGPS purposes making the MAT legally responsible for staff across all schools in the pool.

In cases where numerous academies are operated by the same managing Trust, the Fund is willing to allow a combined funding position and average contribution requirements to apply to all constituent academies. This decision would have implications for all future actuarial calculations for the MAT; an overall funding position and the same "average" contribution requirement would apply to all constituent academies. It also means pension fund accounting under FRS101 / FRS102 / IAS19 would only be produced for the entire body. Notwithstanding this, the Fund will continue to track the constituent academies separately, in the interests of transparency and clarity around entry and exit events. In the case of an exit from the Fund by a pooled employer, an individual balance sheet for the exiting employer would be determined in order to identify whether there is a surplus or deficit payment due.

Full details of the Fund's policy in relation to how the contribution rate is assessed and calculated for academy employers/multi academy trusts, are set out in [Appendix F](#).

Any new academies joining an existing MAT pool would contribute at the grouped employer contribution rate already established for the MAT in respect of future service, plus additional deficit contributions relating to the academy, calculated in line with the academy approach outlined above. This would be next reviewed at the triennial valuation, taking experience into account including any new deficit taken on when new academies join.

A grouped or “pooled” rate would mean that experience for individual academies is shared across the group and contributions are assessed based on the member profile of the MAT as a whole. The benefit of pooling is that costs and risks are shared across the whole pool, but this will mean a higher rate is payable by some employers and a lower rate payable by others depending on the circumstances that unfold in the future.

For example, employers with younger active members would usually have a lower primary contribution rate than an employer with older active members (as there is more time for future investment returns to pay towards the cost of the benefits building up). However, if the contributions for such employers were pooled, this would mean a higher rate payable for the former employer and a lower rate payable for the latter employer. In addition, the impact of experience such as membership changes is shared across the group. For example, if membership for one academy lives longer than the valuation assumption, the additional costs of this are borne across the pooled group.

As academies (whether pooled as part of a MAT or not) participate in both the ill health captive insurance arrangement and the death in service captive insurance arrangement, costs relating to ill-health retirements/death in service strains are “insured” through the Fund in any case, rather than managed within the pooled MAT and these are the usually the most significant pension cost risks that would typically arise in respect of an employer’s membership.

PREPARING FOR EXIT AND EVENTS WHICH MAY TRIGGER TERMINATION

Unless entering a Deferred Debt Agreement (see below), an employer ceases to participate in the Fund when the last active member leaves the Fund or when a suspension notice ends, and the employer then becomes an “exiting employer” under the Regulations. In this situation the Fund is required to obtain an actuarial valuation of that employer’s liabilities in respect of the benefits of the exiting employer’s current and former employees, along with a termination contribution certificate setting out whether an exit payment is due to the Fund or a credit is payable to the employer.

The Fund’s policy for settling termination payments/credits is as follows:

1. The default position is for exit payments and exit credits to be paid immediately in full once the cessation assessment has been completed by the Actuary (and any determination notice issued by the Fund where applicable).
2. At the discretion of the Administering Authority, instalment plans (known as a Debt Spreading Agreement (DSA)) over a defined period may be agreed but only when there are clear issues of affordability that risk the financial viability of the organisation and the ability of the Fund to recover the debt.

The Fund’s detailed policy on determining whether an exit payment is due to the Fund, or a credit is payable to the employer is set out in [Appendix G](#). This includes the detailed assumptions and approach used to assess the amount of a payment/credit payable upon

termination; the factors the Fund will take into consideration when exercising discretion and the information that employers would need to provide in certain circumstances to enable the discretion to be exercised.

DEFERRED DEBT AGREEMENTS

As opposed to paying the exit debt upfront (or via a Debt Spreading Agreement), an employer may participate in the Fund with no contributing members and utilise the “Deferred Debt Agreements” (DDA) at the sole discretion of the Administering Authority. This will only be considered when there are issues of affordability that risk the financial viability of the employer organisation and the ability of the Fund to recover the debt. Typically, this will be relevant to small ‘not for profit’ organisations that constitute a potential risk to the Fund because they may cease operations with insufficient residual assets to meet their pension liabilities. A DDA would be at the request of the employer in writing to the Administering Authority.

Details of the process that will determine whether the Fund will agree to allow the employer to enter into such an arrangement are included in [Appendix G](#).

SUSPENSION NOTICES

Regulation 64(2A) provides the Fund with the discretion to issue a “suspension notice” and suspend payment of an exit amount for up to three years, where it reasonably believes the exiting employer is likely to take on one or more active member within the period specified in the suspension noted.

If a suspension notice is applied, any contributions not related to pay (e.g. lump sum payments as set on the Rates and Adjustments Certificate) will continue to be paid to the Fund as certified. The suspension notice will also set out the terms for review of those contributions. If the conditions in the suspension notice are not met, then the suspension notice may be withdrawn in which case any exit debt / credit will become payable immediately unless any other arrangements are agreed with the Administering Authority at its absolute discretion taking affordability and employer risk into consideration.

Further details of Fund’s policy on this are set out in [Appendix G](#).

PARTIAL TERMINATIONS

So-called “partial termination” is where an employer exits the Fund for deferred and pensioner members (and potentially past service benefits for active members) but seeks to remain a participating employer for active members (potentially just in respect of future service benefits). The objective is to lock in current liability values for deferred and pensioner members (and potentially earned benefits for active members) but would also mean that there is no recourse to that employer if those estimates prove too low in future aside from its (much lower) share of the orphan liabilities. If that happens, as with other orphan liabilities, the extra costs become the responsibility of all employers in the Fund.

The Fund's default position is that such arrangements are not permitted. The position would be reconsidered in future only in the event that the legal basis for such arrangements is established to the satisfaction of the Fund, after taking its own legal advice. The costs of the Fund considering any requests in this area, including legal advice the Fund would need to take, must be met by the requesting employer. Even if a legal basis is established for such arrangements, this doesn't guarantee that the Fund will permit the option as it will need to balance the costs and risks of the approach, taking into account the other options employers already have to manage their pension risk, including use of the Lower Risk strategy alongside the insurance arrangements for death in service and ill-health retirement.

BULK TRANSFERS (BOTH TO OR FROM THE LGPS)

Bulk transfers may be:

- internal (or "intra-fund") transfers, where the two employers both participate in the Fund,
- external, where one of the employers participates in a different LGPS Fund,
- external to the LGPS, where members are transferring to / from a non-LGPS pension fund.

They may involve some of an employer's members (and so assets and liabilities), or the employer's whole position (membership, assets and liabilities) transferring to a new Fund (typically under a Secretary of State direction order).

General principles

A summary of the general over-riding principles, processes and responsibilities the Fund will apply for all bulk transfers are set out below.

- The LGPS Regulations provide the framework if a Fund employer has an external bulk transfer of staff, and the Fund will adhere to the Regulations.
- The Fund's primary objective will be to protect the position of, and minimise the risk to, the Fund and the other Fund employers – this is particularly relevant for cases where a transfer out of the Fund will result in "orphaned" members / liabilities. Subject to this, where both applicable and practical, the Fund will consider other relevant factors including the views of the relevant Fund employer(s) and the circumstances of the transfer.
- Generally, there will be no cross-subsidy between the employers participating in the bulk transfer and all other Fund employers. This means that for an outgoing transfer, the assets and liabilities that are transferred to the new employer are deducted from the transferring employer's balance sheet. Likewise, for an incoming bulk transfer, the assets and liabilities are added to the employer's balance sheet. There will be no adjustment applied to the position for other employers in the Fund.
- It is the employer's responsibility to notify the Fund that a transfer is required and the relevant details – in particular the date of transfer, the other Fund and / or employer, and in particular the affected members and all relevant member data. As the transfer of assets to the new employer and potentially the provision of benefits to members transferring will be reliant on the data used, it is critical that the data provided is

complete and accurate. Neither the Fund, nor the Fund Actuary will be responsible for errors or issues arising due to the provision of incomplete or inaccurate data

- Once notified, it is the Fund's responsibility to facilitate the bulk transfer by liaison with the employers involved (and external Fund where applicable), including notifying the employer(s) of the information required, notifying the Fund Actuary of the details of the bulk transfer so that the Fund Actuary can calculate the assets to be transferred (including agreement of the assumptions where applicable – see below) and arrangement for the payment to be made/received where this involves an external Fund.
- All Fund costs relating to any bulk transfer will be met by the relevant Fund employer(s)

Intra-fund bulk transfers

The default position is that the assets that would transfer to the new employer within the Fund will be calculated to be equal to the valuation of the liabilities to transfer i.e. on a “fully funded” basis. Where an employer's commercial requirements require a different treatment, it will be the responsibility of the employers to notify the Fund. The Fund will then consider whether this is possible and appropriate.

The standard approach is that intra-fund bulk transfers are formally assessed at the first triennial valuation following the transfer (or, if timing prevents this, then the first triennial valuation where assessment is possible), and the financial impacts of the transfer will be reflected in the assets and liabilities quoted as part of the employer's valuation results. However if the transfer is significant, the employers may ask the Actuary to calculate the potential impact on their balance sheet at the point of transfer, rather than at the subsequent actuarial valuation (e.g. to reflect in inter-valuation accounting figures or for a contribution rate review (see [Appendix H](#) for the Fund's policy on inter-valuation contribution reviews)).

External bulk transfers

Where one of the employers involved in the transfer does not participate in the Fund, the value of the assets to be transferred to / from the Fund will be calculated in line with the underlying LGPS Regulations. This may involve a calculation of Cash Equivalent Transfer Values, or where the number of members transferring is sufficient, the methodology for determining the asset calculation will need to be agreed between the Fund actuaries (with input from the administering authority, and potentially the relevant Fund employer, as required).

In all bulk transfer cases, where possible the Fund will take a simplified approach in order to manage the costs of the process (which are met by the employers directly involved), provided interests of all employers in the Fund are protected.

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APPENDIX A – ASSET SHARE POLICY

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BACKGROUND

Local Government Pension Scheme (LGPS) funds are not legally sectionalised by employer under the LGPS Regulations. An employer's allocated asset share is calculated on a notional basis, taking into account the circumstances of that employer in order to assess that employer's contributions (including on termination) as per the Regulations. Employer asset shares are considered formally at each actuarial valuation, with interim updates where required (e.g. for accounting disclosures or when an employer joins (usually a provisional figure) or leaves the Fund). Employer asset share values will move (most significantly) in line with the total Fund assets, according to Fund investment strategy and market movements. As well as individual employer funding and investment strategy (e.g. the alternative strategies offered by the Fund), membership size, experience, cashflow and other events can cause changes in the employer asset share over time.

The Fund's Actuary assesses this asset share in line with policies agreed with the Administering Authority, which are routinely reviewed and informed by common practices across all LGPS funds. This document will be formally reviewed at least at each triennial actuarial valuation.

There is therefore no separately audited asset statement in relation to each employer's own asset allocation within the Fund and an employer does not formally get allocated the underlying assets. Furthermore, the Fund remains the legal owner of the assets and any decisions on the assets rests with the Administering Authority, however they must be invested in line with the Regulations governing the LGPS. This is of particular importance in the context of accounting figures where the Fund will be unable to provide individual audited asset statements.

WHAT ARE THE KEY FACTORS THAT CAN INFLUENCE AN EMPLOYER'S ASSET SHARE?

In simple terms, an employer's asset share at a certain point in time will typically be determined by:

- a) The employer's provisional starting assets on admission, based on the admission data provided
- b) Any restatement of the opening assets following a more detailed review at the first formal valuation for that employer, in particular where the member data may differ to that provided at admission
- c) Plus the employer and employee contributions
- d) Minus any net benefit/expense payments in relation to the employer
- e) Plus/minus the impact of membership movements in/out of the employer
- f) Plus/minus the net investment returns earned by the employer's assets

The Administering Authority allocates employers to alternative investment strategies depending on the funding and risk strategy adopted for that employer. In such cases, the return from those strategies would be notionally allocated instead of the total Fund's actual return achieved. Employers are notified of what strategy applies to them. In attributing the overall investment returns to each employer, a pro-rata principle is adopted.

In practice, there are a number of other factors that need to be taken into account and these are explained in more detail in this policy, together with the main circumstances when an asset share will need to be determined by the Actuary (e.g. the starting assets for an employer on entry to the Fund may vary depending on the type of employer and the funding approach adopted).

It is also important to note that it is often necessary to make some practical approximations in the timing of employer cashflows and allocation of investment returns (in line with the appropriate employer investment strategy) when deriving the asset share for employers. Equally when members move between employers in the Fund, a notional intrafund transfer of assets is made.

It should be noted that whilst Funds will seek to allocate assets to employers in line with the approach set out in this paper, there may be occasions where the Fund and Actuary will need to apply a bespoke approach depending on the circumstances of a particular case (e.g. where one off adjustments could be required due to pending transfers after the calculation date). In such cases, the approach would be communicated to the employer to ensure transparency and to also preserve any audit trail for future reference.

EVENTS WHEN AN ASSET ALLOCATION WILL BE DETERMINED

Typically speaking, the circumstances when the Actuary will determine a notional asset allocation for an employer, during its participation in the Fund, will be as follows:

EVENT	PURPOSE
Admission to the Fund	Determine initial provisional balance sheet / contribution requirements
Triennial Actuarial Valuation	Inform decision making on contribution requirements
Employer Accounting	For employers to include in their accounts
Bulk Transfers	To determine value of payments to/from the Fund, or between employers in the Fund.
Inter-valuation funding updates	To assist with budget setting / inform decision making on contribution requirements
Cessation / Termination from the Fund	To determine potential exit payment to/from the outgoing employer.

Further information in relation to the above events is set out below.

ADMISSION TO THE FUND

On entry to the Fund, unless a pooled or temporary contribution rate is payable (see comment below), the Actuary will be required to assess the contribution rate payable by the new employer once they join the Fund.

The provisional liabilities will be assessed by the Actuary based on the members transferring to the new employer (for benefits accrued up to the admission date).

The provisional asset share allocated to the new employer on entry to the Fund will be determined by the funding status and in line with Fund's admission policy. Further details can be found in [Appendix E](#) of the Funding Strategy Statement (FSS). The FSS is reviewed on a regular basis (typically annually) and fully as part of each actuarial valuation. A summary of the key scenarios is set out below:

- For **fully funded admissions**, the initial asset allocation will be the same as the value of the liabilities.
- For **partially funded admissions**, the assets allocated will be equal to the value of the liabilities, less any deficit allocated on inception based on agreed policies. This would be subject to a minimum asset allocation of zero.
- For admissions where **surplus is allocated from the ceding employer**, the assets allocated will be equal to the value of the liabilities, plus any surplus allocated on inception based on agreed policies.
- Where a local authority school **converts to academy status**, the assets allocated to the new academy will depend on the Administering Authority's policy to allocating a share of the ceding local authority's deficit or surplus to the new academy. Further details of this policy can be found in [Appendix F](#) of the FSS.

The provisional admission figures above will be re-assessed at the first formal triennial valuation for that employer. In some cases, the data provided at the initial admission can differ materially to the data at the valuation; for example, some members included in the initial admission may not have joined the new employer.

In situations where a pooled or temporary contribution rate is payable and hence an initial contribution rate assessment is not required (e.g. the employer is admitted via a pass through arrangement), the initial asset allocation will be determined by the Actuary at the subsequent actuarial valuation (or accounting) exercise undertaken, whichever is first in line with the principles set out in this policy e.g. for pass through arrangements, the initial asset allocation will be determined in line with the fully funded admission approach referenced above.

ACTUARIAL VALUATION

For all employers in the Fund at the triennial actuarial valuation, the Fund and the Actuary will review the notional asset share and liabilities of all employers in order to determine the funding position for each and set the contributions payable for the next inter-valuation period. The total

assets allocated across the Fund will sum to the total assets shown in the audited Fund accounts.

This will be done in two approaches to ensure the asset share is appropriate to that employer, taking into account all relevant factors.

1. “ANALYSIS OF SURPLUS” APPROACH

The Actuary will apply an “analysis of surplus” approach whereby the surplus/deficit position of each employer will be calculated according to their actuarial gains or losses since the previous valuation (or since admission if they are a new employer to the Fund). This approach allows for all factors including membership data changes since the previous valuation.

The emerging surplus/deficit is then added to/subtracted from the employer’s liabilities at the valuation date in order to determine the notional asset share. This is in line with common actuarial practices.

When undertaking the “analysis of surplus” approach the key drivers of the emerging asset allocation are a combination of:

- **Investment Returns** – The extent to which performance of the Fund’s assets (net of expenses), based on the underlying investment strategy applying to the employer, are greater/lesser than those expected.
- **Contributions** – The extent to which contributions (both employer and employee) payable over the inter-valuation period are more/less than the cost of benefits being accrued. This will include any early retirement strain costs incurred and any contributions paid towards those over the period.
- **Membership Experience** – The extent to which membership experience (e.g. salary growth, pension increases, ill-health retirements, deaths etc.) has deviated from that expected based on the assumptions made at the preceding valuation (or admission date).
- **Benefit Payments** – For the most part, the combined total of transfers received/paid (both individual and bulk), lump sum payments (retirement and death), pension payments, and other payments to leavers will be broadly neutral on the “analysis of surplus” approach as they impact on the assets and liabilities equally, although the timing of such payments will be allowed for.
- **Membership Data Changes and Intrafund Transfers** – The “analysis of surplus” approach ultimately allows for changes in the underlying membership data where an actual cashflow does not emerge, in particular individual member movements between employers within the Fund (which trigger a notional “intrafund” payment) and/or the restatement of any underlying membership data between valuations. The impact of any notional transfers to new employers / from exiting employers would be adjusted for in the Actuary’s assessment.

Generally speaking, cashflows will be assumed to occur half way through the period and investment returns will be allocated to reflect this (with the exception of significant one-off contribution payments and allowance for significant transfers in/out of the Fund which will allow for time of payment).

This asset value emerging from the “analysis of surplus” approach is then reviewed for reasonableness against the corresponding “asset roll-forward” figure discussed below.

2. “ASSET ROLL-FORWARD” APPROACH

Under this approach the assets allocated to an employer at the previous actuarial valuation (or date of entry to the Fund if later) are rolled forward to the current valuation date taking into account investment returns, contributions paid (employer and employee), benefit payments, transfer payments made into/out of the Fund, and net intrafund internal transfers (based on the individual liabilities of the members who have moved between employers, given a monetary transaction does not take place).

As with the “analysis of surplus” approach, cashflows will be assumed to occur half way through the period (with the exception of significant one-off contribution payments and allowance for significant transfers in/out of the Fund which will allow for time of payment).

WHICH APPROACH WILL BE USED TO SET THE ACTUARIAL VALUATION POSITION?

As noted above, the Actuary will calculate the actuarial valuation position for each employer under both the “analysis of surplus” and “asset roll forward” approaches. In the majority of cases, they would expect the asset allocation to be broadly the same. However, in some instances one approach will provide a more credible answer appropriate to setting the contribution requirements under the Regulations. For example, where there has been a significant change in membership resulting from transfers of members from one employer to another in the Fund (intrafund transfers), or material data changes, then it may be that the analysis of surplus approach provides a more appropriate asset share for that employer. Critical to the process is what is appropriate to set the employer contribution rates, taking into account the individual circumstances of that employer as required under the Regulations.

OTHER ADJUSTMENTS

The following additional adjustments are also made at each triennial valuation:

- **Orphan Employers** – Other adjustments will also be made by the Actuary to allow for orphan bodies in the Fund (i.e. historic employers whose liabilities are the responsibility of all other remaining active employers in the Fund in the absence of a guarantor body within the Fund) to ensure no residual surplus/deficit exists at the valuation date in relation to these employers. Any surplus or deficit in relation to these bodies would typically be allocated on a pro-rata basis across the appropriate employers, given the collective nature of the LGPS. To inform this, the Administering Authority must consider the orphan body funding requirements as part of each triennial valuation and reserve appropriately.
- **Audited total Fund assets** – At the actuarial valuation date, the total assets calculated for all employers (using the approaches above) are reconciled to the total Fund assets to ensure they are equal and any difference is adjusted for on a pro-rata

basis. If any adjustment required, it is typically small by the nature of the process adopted.

- **Ill health and death in service captive** – The Fund also operates captive insurance arrangements to cover the ill health early retirement and death in service risks. The premiums are paid into the captive funds, which form part of separate notional pots of assets tracked by the Fund Actuary at each triennial valuation and these are used to cover any costs for employers over each valuation period. Further information on each captive arrangement can be found in the captive policies within Appendices [L](#) and [M](#) of the FSS.

EMPLOYER ACCOUNTING DISCLOSURES

Whilst not impacting on contributions payable to the Fund, some employers will be required to report figures in their annual accounts relating to the appropriate accounting standard (e.g. IAS19, FRS101/102 etc).

The production of employer pension accounting disclosure report requires the Fund's Actuary (or the employer's own nominated Actuary if disclosures are calculated outside of the Fund's standard bulk process) to obtain an updated employer asset share value in relation to the employer's participation in the Fund. This is calculated based on the roll-forward approach only, which was agreed with CIPFA when accounting standards were introduced in the early 2000's for public bodies. Whilst some of the details in the CIPFA guidance have been superseded by changes in the accounting standards, the underlying roll-forward approach is still recognised and maintained.

The starting point for assessing the asset allocation will be the most recent actuarial valuation assessment undertaken (or the provisional admission assessment undertaken if later).

One of the differences between valuation/cessation exercises and accounting exercises is that, unless requested by the employer, the Actuary will typically only allow for changes in the membership data between accounting assessments (e.g. leavers, deaths, transfers of staff etc) where the materiality limit (as advised by the employer's auditor) is breached. It is the employer's responsibility (in conjunction with their auditor) to request allowance for such events to be made in their accounting figures based on their materiality.

To comply with short reporting timescales for employers, some estimations may be made where only part year data is available (e.g. cashflows and investment returns may be estimated for a small number of months). Employers will be notified of this within their accounting disclosure.

Once a triennial actuarial valuation exercise has been completed (i.e. the employer's asset share has been rebased taking into account all factors), the next set of accounting disclosures will be adjusted to reflect the impact of the updated valuation results. The re-basing every three years will come through as an experience adjustment on the assets.

BULK TRANSFERS

On occasion, there may be a bulk transfer of staff between two employers. For internal (or intrafund) transfers, where the two employers both participate in the same fund, if the transfer is significant, the employers may ask the Actuary to calculate the potential impact on

their balance sheet at the point of transfer, rather than at the subsequent actuarial valuation (e.g. to reflect in inter-valuation accounting figures or for a contribution rate review). In such cases, in the same way as asset share calculations are undertaken on admission, the basis of transfer (i.e. fully funded or partially funded), will determine the value of assets to be transferred, alongside the underlying liabilities.

Where one of the employers involved in the transfer does not participate in the Fund, the value of the assets to be transferred to/from the Fund will be calculated in line with the underlying LGPS Regulations. This may involve a calculation of Cash Equivalent Transfer Values, or where the number of members transferring is sufficient, the methodology for determining the asset calculation will need to be agreed between the Fund actuaries (with input from the administering authority as required).

To facilitate and aid in meeting reporting timescales for employers, the Fund may apply some estimation to cashflows and investment returns where only part year data is available. This will be notified to employers when bulk transfer estimates are provided.

INTER-VALUATION FUNDING UPDATE / CONTRIBUTION REVIEW

During an inter-valuation period, there may be occasions where the Actuary needs to determine an updated asset figure for an employer. The two main scenarios where a determination may be required would be:

- a) In the lead up to the next actuarial valuation - Where the assessment of an updated funding level for the employer will assist with potential budgeting discussions in light of how contribution requirements may evolve following the valuation, and
- b) Where the Fund agrees to a review of an employer's contribution requirements in advance of a valuation being undertaken this is in line with the Fund's employer flexibility policy which can be found in [Appendix H](#) of the Funding Strategy Statement. This policy sets out the circumstances when such a review may be undertaken.

In both cases, the starting point for assessing the asset allocation will be the most recent actuarial valuation assessment undertaken (or date of admission if later). This figure will be rolled forward to the review date allowing for the investment returns / contributions / net benefit payments.

In the case of a contribution rate review, the impact of membership movements (which could include both movements between employers and changes in underlying data due) may also need to be considered.

CESSATION OF PARTICIPATION IN THE FUND

Whilst the above scenarios set out the approach adopted to determine the contributions payable by employers on entry to the Fund, and at subsequent actuarial valuation exercises, contributions may also be required to be paid by the employer when they exit the Fund.

Equally an exit credit may be payable to the employer if the assets exceed the termination liabilities on exit, and certain conditions set out by the administering authority are satisfied.

When a cessation occurs, the Actuary will be commissioned by the administering authority to undertake an assessment of the termination position, informed by an up to date assessment of the employer asset share. The termination policy sets out the policy by which amounts payable on cessation are determined, according to the nature of exit and the funding positions on exit.

As for other scenarios above, the starting point for assessing the asset allocation on cessation will be the most recent actuarial valuation assessment undertaken (or date if admission of later). This figure will be calculated at the termination date allowing for the investment returns / contributions / net benefit payments and membership experience/data changes (as per the comments above). For cessations, the final asset share will be dependent on the treatment of any remaining active members on cessation where a transfer to other employers in the Fund is taking place (i.e. whether or not the transfer is on a partial/fully funded basis). Any residual assets would then be compared to the remaining non-active liabilities to determine any final payment due, payable from/to the employer. Following termination, the liabilities would either become orphan or subsumed into another employer in the Fund depending on the circumstances. Further information can be found in the termination policy in [Appendix G](#) of the FSS.

FREQUENTLY ASKED QUESTIONS

The table below sets out a summary of the key areas from this policy document in a FAQ format alongside other commonly asked questions. As a minimum this document will be reviewed as part of each triennial actuarial valuation.

QUESTION	ANSWER
1. Can employers be provided with an individual audited asset statement in relation to the assets allocated?	No. LGPS Funds are not legally sectionalised and so the assets allocated to the employers in the Fund are done so on a notional basis for contribution assessment purposes only and hence individual employer audited asset statements cannot be provided.
2. What investment strategy will be applied to the employer's asset share?	The investment return will be allocated in line with the investment strategy applicable to the employer. This will have been notified to the employer and would be shown on their accounting disclosure schedule. Further details can be found in the Funding Strategy and Investment Strategy Statements.
3. How are assets allocated to employers on entry to the Fund?	The assets allocated on entry to the Fund will depend on:

	<ul style="list-style-type: none"> • The past service liabilities of the membership associated with the employer on entry, • The funded status of the employer (e.g. partially funded or fully funded) which may vary depending on the employer type and the Fund's underlying policy (e.g. the approach for academies may differ to the approach for admitted bodies). <p>In some cases e.g. for pass through arrangements, the initial asset allocation may not be carried out (or carried out very approximately) on entry but as part of the subsequent actuarial valuation or employer accounting assessment. As a consequence, a temporary or provisional contribution rate may be implemented for an employer which will then be reassessed at the next actuarial valuation.</p>
4. When will an employer's asset share be formally reassessed?	<p>The asset share will be formally reviewed at the triennial actuarial valuation following entry to the Fund, and at each valuation thereafter. There may be occasions when the asset share is reviewed inter-valuation typically for employer accounting, cessation or in some instances an inter-valuation contribution rate review.</p>
5. What are the key factors that will determine the asset share in between actuarial valuation assessments?	<p>The key factors impacting on asset allocations from one valuation to the next will be:</p> <ul style="list-style-type: none"> • Investment returns • Contributions paid • Net Benefit Payments • Changes in underlying membership data • Changes in underlying Fund policy
6. How are assets allocated when an employer is part of a pooling arrangement e.g. payment of a pooled rate by a Multi Academy Trust (MAT)?	<p>The asset shares for each employer in a pooled MAT are tracked individually from one valuation to the next. The pooling arrangement simply serves to produce a combined average contribution rate payable by the pooled employers, covering all constituents in the pool.</p>
7. How are assets calculated when an employer leaves the Fund and ceases participation?	<p>The starting point for such calculations will be the most recent triennial valuation assessment undertaken. This figure will be assessed at the termination date allowing for the investment returns / contributions / net benefit payments and membership experience/data changes. The treatment of any member transfers on termination will also impact the final asset figure calculated. This calculation will also</p>

	be undertaken if an employer and the Fund enter into a Deferred Debt Agreement and does not cease participation at that point.
8. Can the assets differ for funding and accounting, even though the effective dates are the same?	Depending on the timescales for preparing figures for accounting exercises, the Actuary may need to estimate cashflows and investment returns when calculating the asset figure. In addition, the impact of membership movements (including orphan employer apportionments) will typically only emerge in accounting figures every three years (i.e. following completion of a triennial actuarial valuation).
9. Will the percentage share of assets for an employer relative to the Whole Fund assets be fixed?	No. The percentage share is not fixed and will vary as the employer's experience differs from the Fund as a whole (e.g. in terms of contributions and benefits paid) as well as the investment strategy applied to the employer's asset share.
10. Are the actuarial valuation assets set based on an "analysis of surplus" or an "asset roll forward" approach?	As noted above, the Actuary will calculate the actuarial valuation position for each employer under both the "analysis of surplus" and "asset roll forward" approaches. In the majority of cases, they would expect the asset allocation to be broadly the same. However, in some instances one approach will provide a more credible answer appropriate to setting the contribution requirements under the Regulations. For example, where there has been a significant change in membership resulting from transfers of members from one employer to another in the Fund (intrafund transfers), or material data changes, then it may be that the analysis of surplus approach provides a more appropriate asset share for that employer. Critical to the process is what is appropriate to set the employer contribution rates taking into account the individual circumstances of that employer as required under the Regulations.

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APPENDIX B - DEMOGRAPHIC ASSUMPTIONS

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Further details on the demographic assumptions adopted for the 31 March 2025 valuation are set out below.

Life expectancy assumptions

The post retirement mortality tables adopted for this valuation are set out below:

Current Status	Retirement Type	Mortality Table
Annuitant	Normal Health	97% S4PMA CMI 2024 [1.5%] 90% S4PFA_M CMI 2024 [1.5%]
	Dependant	117% S4PMA CMI 2024 [1.5%] 103% S4PFA_M CMI 2024 [1.5%]
	Ill Health	101% S4IMA CMI 2024 [1.5%] 109% S4IFA CMI 2024 [1.5%]
Active	Normal Health	104% S4PMA CMI 2024 [1.5%] 93% S4PFA_M CMI 2024 [1.5%]
	Ill Health	155% S4IMA CMI 2024 [1.5%] 170% S4IFA_M CMI 2024 [1.5%]
Deferred	All	116% S4PMA CMI 2024 [1.5%] 102% S4PFA_M CMI 2024 [1.5%]
Future Dependant (from current non pensioners)	Dependant	132% S4PMA CMI 2024 [1.5%] 138% S4PFA_M CMI 2024 [1.5%]

* The life expectancy assumptions use core model parameters.

OTHER DEMOGRAPHIC ASSUMPTIONS	
Commutation	It has been assumed that all retiring members will take 75% of the maximum tax-free cash available at retirement. The option which members have to commute part of their pension at retirement in return for a lump sum is a rate of £12 cash for each £1 p.a. of pension given up.
Proportions Married / Civil Partnerships assumption	This has been reviewed and updated based on LGPS wide experience with a 90% weighting applied to standard ONS tables

OTHER DEMOGRAPHIC ASSUMPTIONS	
Other Demographics	<p>Following an analysis of Fund experience carried out by the Actuary, the incidence of ill health retirements and withdrawal rates remain in line with the assumptions adopted for the last valuation, which used age related tables established in 2013 for each of the ill health/withdrawal assumptions with an 80% weighting/150% weighting applied to the respective tables</p> <p>No allowance will be made for the future take-up of the 50:50 option. Where any member has actually opted for the 50:50 scheme, this will be allowed for in the assessment of the rate for the next 3 years.</p>
Expenses	<p>General expenses are met out of the Fund, in accordance with the Regulations. This is allowed for by adding 0.7% of pensionable pay to the contributions from participating employers. This is reassessed at each valuation. Investment expenses have been allowed for implicitly in determining the discount rates.</p>
Discretionary Benefits	<p>The costs of any discretion exercised by an employer in order to enhance benefits for a member through the Fund will be subject to additional contributions from the employer as required by the Regulations as and when the event occurs. As a result, no allowance for such discretionary benefits has been made in the valuation.</p>

Further details on the demographic assumptions are set out in the Actuary's formal report.

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APPENDIX C – DEFICIT RECOVERY PLANS

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If the funding level of an employer is below 100% at the valuation date (i.e. the assets of the employer are less than the liabilities), a deficit recovery plan needs to be implemented such that additional contributions are paid into the Fund to meet the shortfall.

It is the Fund's objective that any funding deficit is eliminated as quickly as the participating employers can reasonably afford given other competing cost pressures, based on the Administering Authority's view of the employer's covenant and risk to the Fund.

EMPLOYER DEFICIT RECOVERY PLANS– KEY PRINCIPLES

The average recovery period for the Fund as a whole is [12] years at this valuation which is one year shorter than the average recovery period from the previous valuation. Subject to affordability and other considerations individual employer recovery periods would also be expected to reduce at this valuation.

Recovery periods will be set by the Fund on a consistent basis across employer categories where possible. This will determine the minimum contribution requirement and employers will be free to select any shorter deficit recovery period and higher contributions if they wish, including the option of prepaying the deficit contributions in one lump sum either on an annual basis or a one-off payment.

Deficit contributions paid to the Fund by each employer will be expressed as cash amounts (flat or increasing year on year).

The Administering Authority retains ultimate discretion in applying these principles for individual employers on grounds of affordability and covenant strength and it may be deemed necessary to deviate under exceptional circumstances. Employers will be notified of their individual deficit recovery period as part of the provision of their individual valuation results.

The key principles when considering deficit recovery for different types of employer are as set out in the table below. Employers have the freedom to adopt a recovery plan on the basis of a shorter period if they so wish.

Employer Type	Recovery Period (2022)	Default Recovery Period (2025)
Tax-raising bodies, Academies and Further Education Employers	12 years and above	Reduce by 3 years (subject to a minimum of 12 years under normal circumstances)
	Below 12 years	Increase to 12 years

Non tax-raising bodies and Employers without a guarantee	12 years and above	Reduce by at least 3 years to target full solvency over a similar (or shorter time horizon)
	Below 12 years	Reduce by 0 – 3 years at the Fund's discretion based on covenant and affordability of each employer
Exiting Employer	Normally recovered over remaining period to exit if shorter than the period implied above	
Closed Employer	Linked to the expected average future working lifetime of the active membership if shorter than the period implied above.	
Admitted body (with a guarantee from the outsourcing Scheme employer)	Length of commercial contract left to expiry (or the average remaining working lifetime of the membership if this is shorter). If Scheme employer is retaining the financial risk, deficit recovery period applied can equal the Scheme employer's period. The terms of the Scheme employer's contract with the admission body may be a factor in these cases where this is made known to the Fund. To be discussed where applicable with the outsourcing Scheme employer.	

This is to maintain (as far as possible) equity between different generations of taxpayers and to protect the Fund against the potential for an unrecoverable deficit.

In addition to the above table, the following general principles will apply.

1. The deficit recovery period will be set to at least cover the expected interest costs (actual interest costs will vary in line with investment performance) on the deficit.
2. Subject to affordability considerations and other factors, a bespoke period may be applied in respect of particular employers where the Administering Authority considers this to be warranted.
3. Where there has been a significant increase in deficit, in exceptional circumstances, the Fund may allow an employer to extend their recovery period. The Fund will take into account affordability and covenant considerations when making the decision.
4. Employers will be permitted to prepay deficit contributions in return for a discount at the beginning of the 3 year period or on an annual basis, in line with the rates and adjustment certificate and employer results schedule provided. The prepayment of primary contributions may be allowed where an employer is in deficit at the Fund's discretion. A copy of the primary contribution prepayment policy can be provided by the Fund upon request. The Fund's policy is not to allow the prepayment of employee contributions.
5. Where increases in total employer contributions are required from 1 April 2026, following completion of the 2025 actuarial valuation, any increase in the primary contribution rate

(from the rates of contribution payable in the year 2026/27) may be implemented in steps over a period of 3 years, depending on affordability of contributions as determined by the Administering Authority. The minimum step will be 0.5% of pay per annum (i.e. the increase in primary contribution rate must be at least 1.5% for this facility to apply). However, where total contributions (primary plus secondary) have reduced, the Fund would not consider it appropriate for any increase in contributions paid in respect of future accrual of benefits to be implemented in steps.

6. The secondary contributions may be set with reference to a different funding target, subject to the discretion of the Fund.
7. For employers that do not have a financial year end of 31 March 2026 (e.g. 31st July 2026 or 31st August 2026), the Fund can, at the employer's request before 28th February 2026, allow the employer to continue to pay at their current contribution level (i.e. the 2025/26 contribution rate) until their financial year end date. The new contribution plan would then be implemented after this date (i.e. 1 August 2026 if the year-end is 31 July 2026).
8. As part of the process of agreeing funding plans with individual employers, the Administering Authority will consider the use of contingent assets and other tools such as bonds or guarantees that could assist employing bodies in managing the cost of their liabilities or could provide the Fund with greater security against outstanding liabilities.
9. It is acknowledged by the Administering Authority that, whilst posing a relatively low risk to the Fund as a whole, a number of smaller employers may be faced with significant contribution increases that could seriously affect their ability to function in the future. The Administering Authority therefore would be willing to use its discretion to accept an evidence-based affordable level of contributions for the organisation for the three years 2026/2029. Any application of this option is at the ultimate discretion of the Fund in order to effectively manage risk across the Fund. It will only be considered after the provision of the appropriate evidence as part of the covenant assessment and also the appropriate professional advice.
10. For those bodies identified as having a relatively weak covenant, the Administering Authority will need to balance the level of risk plus the solvency requirements of the Fund with the sustainability of the organisation when agreeing funding plans.
11. The contributions for any employer may be varied as agreed by the Actuary and Administering Authority to reflect any changes as a result of any benefit costs being insured with a third party or internally within the Fund.
12. Notwithstanding the above principles, the Administering Authority, in consultation with the Actuary, has the discretion to consider whether any exceptional arrangements should apply in particular cases.

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APPENDIX D – SURPLUS POLICY

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KEY OBJECTIVES

The objective of the Fund is to pay out the pension and lump sum benefits promised to members but also manage the level of contribution affordability/sustainability for employers.

The key principles for the surplus management policy are:

- Secure the solvency of the Fund whilst balancing intergenerational fairness for taxpayers by ensuring contributions are as sustainable as possible for employers.
- Take into account the level of reasonably affordable contributions based on objective evidence via the Fund's covenant analysis.
- Allow for the level of risk and variability in financial and demographic factors when deciding on the level of surplus to distribute and over what period.
- Allow for the Fund's investment strategy (including the lower risk strategy), market outlook and risk management strategy allowing for long term systematic tail risks such as climate change.
- Consider the potential impact of differing contributions (including future service contributions) and investment returns on the likelihood of achieving a sustainable contribution outcome for employers.

SURPLUS MANAGEMENT POLICY

The Fund is now in a stronger funding position at the 2025 actuarial valuation which presents a set of unique issues and opportunities to consider. Some employers are significantly in surplus so a policy which allows for an employer's ability to support its liabilities in the long term is important.

The purpose of this surplus management policy is to set out the Fund's approach to determining how any surplus assets are used in determining contribution outcomes for employers.

The same "steady state" objective for eliminating deficits, which is to recover over an average period of 12 years, will be applied for surplus for the 2025 valuation as the default minimum position. Employers will be able to adopt a longer period for surplus run-off and this will provide for a higher likelihood that total contributions remain sustainable with a lower reliance on the Fund's assets to generate surplus to maintain the same level of overall contributions. The position will be reviewed and may be revised at future valuations, taking account of the factors described above as part of the Fund's overall review of this policy.

DETERMINING THE SURPLUS

At each triennial valuation, the Fund will determine the surplus for each employer. The surplus is defined as excess assets over and above what is required to prudently service the accrued liabilities. The value of the accrued liabilities will be calculated by the Fund Actuary

on the ongoing or lower risk funding basis depending on the investment strategy that underpins the employer's liabilities.

It is therefore crucial that the funding, investment and risk management strategy are closely aligned when making decisions over the investment strategy and the surplus management policy. The Fund's Funding Risk Management Group (FRMG) works with its advisers, to ensure this on an ongoing basis as risks and opportunities develop over time.

SURPLUS RESERVE

At each valuation the Fund will determine the surplus reserve (which may be zero) which will be retained in the Fund to protect against adverse experience leading to unsustainable contributions levels.

If the funding level of an employer is below 100% at the valuation date (i.e. the assets of the employer are less than the liabilities), a deficit recovery plan needs to be implemented such that additional contributions are paid into the Fund to meet the shortfall. Deficit contributions will not be requested to fund the surplus reserve.

When considering the level of reserve, the Actuary has considered the pathway of the funding and future contribution outcomes based on a range of economic and financial scenarios to "test" the sustainability of the funding strategy for the Fund as a whole. This will underpin the decision making on a surplus reserve held to cushion against any adverse experience over a number of valuation cycles. The Fund will utilise analysis as part of its decision making on the requirement for a surplus reserve, alongside being cognisant of the principles under the approach to measuring the Fund's long term cost efficiency objective as part of the Section 13 valuation process.

As well as considering the financial and demographic outlook, the Fund will take into account:

- The employer type and the ability to withstand future contribution increases.
- The overall reasonable affordability of contributions (including future service contributions) and the impact of any contribution reductions on future covenant strength.
- The investment strategy backing the employers' liabilities e.g. the more certain returns/outcomes from the lower risk investment strategy will mean a lower or nil reserve is required.
- Whether an employer is likely to exit the Fund in the near future and terminate its participation in the Fund. This may mean nil, or a reduced amount of surplus may be returned to the employer, and the final surplus would be determined on exit and the appropriate exit credit paid.

When determining employer contributions, only the surplus in excess of their surplus reserve will then be run-off over time via a reduction to the future service contribution rate ("the contribution off-set").

The surplus reserve will be expressed as a funding target as a percentage of the assets. For example, a surplus reserve of 5% means only surplus over a funding level of 105% would be distributed. The contribution off-set will be expressed as a percentage of pensionable pay or

£ (if appropriate) for each year of the certificate. Total contributions (i.e. future service contributions less the surplus off-set) will be subject to a minimum of zero to comply with the LGPS regulations and actuarial certification.

For the 2025 valuation, the surplus reserve will apply as set out below for the general employer groups who are on the higher risk strategy, with surplus in excess of the reserve run-off over the default periods shown.

Employer type	Surplus Reserve	Minimum run-off period
Councils and other public bodies	105% ¹	12 years
Academies and FE employers	105% ¹	12 years
Non tax-raising bodies and Employers without a guarantee	Lower of Termination Reserve ² and 105%	12 years
Exiting Employer	Termination Reserve ²	Recovered over remaining period to exit
Closed Employer	Termination Reserve ²	Linked to the expected average future working lifetime of the active membership if shorter than the period implied above.
Admitted body (with a guarantee from a Scheme employer)	If Scheme employer is retaining the financial risk, surplus reserve will equal the Scheme employer's. ¹	Length of commercial contract left to expiry (or the average remaining working lifetime of the membership if this is shorter). If Scheme employer is retaining the financial risk, run-off period applied can equal the Scheme employer's. ³

For employers who are on the lower risk strategy, the surplus reserve will be zero for the 2025 valuation, unless the employer is funding for termination, in which case it will be the termination reserve².

1. The above is subject to review in the following circumstances, which aims to provide additional protection for employers more likely to be exposed to volatility risk due to potential membership profile changes:

- Where the duration of an employer's liabilities (average time frame over which benefits are to be paid) as measured on their ongoing funding basis is less than 12 years
 - Where an employer's total membership in the Fund is below 20 members
2. "Termination reserve" represents the excess of the termination liabilities (as measured on the termination basis) at the valuation date over and above the liabilities as measured on the employer's ongoing funding target (which may be on the basis of the higher risk or lower risk assumptions as applicable to their employer investment strategy). The termination reserve is subject to a minimum of zero.
 3. The terms of the Scheme employer's contract with the admission body may be a factor in these cases where this is made known to the Fund. To be discussed where applicable with the out-sourcing Scheme employer.
 4. Employers in surplus will not be permitted to prepay contributions.
 5. The surplus reserve/secondary contributions may be set with reference to a different reserve or funding target, subject to the discretion of the Fund based on the advice of the Actuary. This will be considered based on the individual circumstances of the relevant employer.
 6. For employers that do not have a financial year end of 31 March 2026 (e.g. 31st July 2026 or 31st August 2026), the Fund can, at the employer's request before 28th February 2026, allow the employer to continue to pay at their current contribution level (i.e. the 2025/26 contribution rate) until their financial year end date. The new contribution plan would then be implemented after this date (i.e. 1 August 2026 if the year-end is 31 July 2026).
 7. As part of the process of agreeing funding plans with individual employers, the Administering Authority will consider the use of contingent assets and other surety such as bonds or guarantees that could assist employing bodies in managing the cost of their liabilities or could provide the Fund with greater security against potential unrecoverable exit costs.
 8. The contributions for any employer may be varied as agreed by the Actuary and Administering Authority to reflect any changes as a result of any benefit costs being insured with a third party or internally within the Fund.

MONITORING AND FUND DISCRETION

The Administering Authority, on the advice of the Fund Actuary, retains ultimate discretion in applying these principles for individual employers on grounds of affordability and covenant strength and it may be deemed necessary to deviate under certain circumstances. This would typically involve a more detailed covenant review and analysis in line with existing policies, and employers would be required to adhere to the requirements of the notifiable events policy.

The funding position and covenant of certain employers would be monitored on an ongoing basis and any required rate review would be implemented at the sole discretion of the Fund, based on the advice of the Actuary.

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APPENDIX E – EMPLOYER TYPES AND ADMISSION POLICY FOR NEW EMPLOYERS

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ENTRY TO THE FUND

MANDATORY SCHEME EMPLOYERS

Certain employing bodies are required to join the scheme under the Regulations. These bodies include tax raising bodies, those funded by central government (academies and colleges) and universities (reliant on non-government income).

DESIGNATING BODIES

Designating bodies are permitted to join the scheme if they pass a resolution to this effect. Designating bodies including connected and controlled entities are not required under the Regulations to provide a guarantee. Apart from connected and controlled entities, these bodies usually have tax raising powers.

Connected entities and controlled entities, by definition, have close ties to a scheme employer given that they are either included in the financial statements of the scheme employer or owned/controlled by a scheme employer.

Although connected and controlled entities are “Designating Bodies” under the Regulations, they have similar characteristics to admitted bodies (in that there is an “outsourcing employer”). However, the Regulations do not strictly require such bodies to have a guarantee from a scheme employer.

To limit the risk to the Fund, the lower risk funding basis for calculating the liabilities will apply to all new connected and controlled entities unless a scheme employer provides a guarantee for their connected or controlled entity, in which case the higher risk valuation funding basis will be applied to value the liabilities.

ADMISSION BODIES

An admitted body is an employer which, if it satisfies certain regulatory criteria, can apply to participate in the Fund. If its application is accepted by the Administering Authority, it will then have an “admission agreement”. In accordance with the Regulations, the admission agreement sets out the conditions of participation of the admitted body including which employees (or categories of employees) are eligible to be members of the Fund.

Admitted bodies can join the Fund if:

1. They provide a service for a scheme employer as a result of an outsourcing (formerly known as Transferee Admission Bodies).
2. They provide some form of public service or their funding derives primarily from local or central government. In reality they take many different forms, but the one common element is that they are “not for profit” organisations (formerly known as Community Admission Bodies). These “not for profit” organisations are a diverse group. Some are financially very secure to the extent that they receive funding from either the government or local authorities on a quasi-permanent basis. Others either have short-term funding contracts with local authorities, which may not be renewed when they expire, or depend heavily on various forms of fund raising.

Admitted bodies may now only join the Fund if they are guaranteed by a scheme employer (this has not always been the case – see next section). Therefore, these employers pose less financial risk to the Fund. In the case of admitted bodies with an outsourcing contract, when the agreement or service provision ceases, the Fund’s policy is that the assets and liabilities of the admission body will in all cases revert to the outsourcing scheme employer or guaranteeing employer. Where there is an agreement in place whereby the admission body is required to make good any deficit which exists on termination, the Fund will, unless otherwise instructed by the outsourcing scheme employer or guarantor, seek to recover the amount due in the first instance. However, if it fails to do so within 30 days, it will be a matter for the outsourcing scheme employer or guarantor to enforce this agreement by instigating recovery procedures. Any sums recovered from outgoing admission bodies on termination must be paid into the Fund for the benefit of the outsourcing scheme employer or guarantor.

RISK MANAGEMENT OF “NOT FOR PROFIT” ADMISSION BODIES

For historical reasons, “not for profit” organisations (formerly known as Community Admission Bodies), which were admitted prior to 2004 have no guarantee and, as such, constitute a potential risk to the Fund. This is because they may cease operations with insufficient residual assets to meet their pension liabilities.

The risks associated with admitted bodies have always existed, but these risks have assumed a higher profile recently because most of these bodies now have much greater liabilities relative to the covenant underpinning them.

The tools available to manage these risks are limited to using a more prudent valuation basis (such as the lower risk valuation basis) which minimises the deficit on exit; obtaining charges on assets in favour of the Fund; setting up escrow accounts or obtaining other security.

This security must cover some or all the:

- strain costs of any early retirements if employees are made redundant when a contract ends prematurely
- allowance for the risk of assets performing less well than expected
- allowance for the risk of liabilities being greater than expected
- allowance for the possible non-payment of employer and member contributions
- admission body’s existing deficit

The approach to agreeing the funding plans of these bodies will have regard to the financial strength of each individual body. The aim will be to achieve a balance between securing the solvency of the Fund and the sustainability of the organisation. For those with less secure income streams, the Fund will consider how it can manage contributions into the Fund in the short to medium term without compromising the financial stability of the organisation. Where there are assets or reserves, the Administering Authority will explore how these contingent assets could be used to assist in funding the liabilities or providing security to the Fund and its employing bodies.

Where there are no contingent assets, the policy is to move over time to the lower risk funding basis and to shorten the deficit recovery period. However, this will need to be weighed against the ability of that body to pay higher contribution rates.

PASS THROUGH

Pass-through is a contractual agreement between the two parties, external to the Fund, setting out how LGPS pension risk is shared. Where new employers to join the Fund under such arrangements with the letting employer, a contribution rate for the new employer would be set in the normal way. The extent to which funding “cost” is then reallocated between the letting employer and the admitted body would then be agreed as part of the commercial agreement in place and be up to the letting employer and admitted body to manage external from the Fund. Such arrangements would need to be reflected in any exit assessment as appropriate and therefore the Fund should be kept informed where a pass through arrangement is in place.

For academy outsourcings, where the contractor has **not** entered a “pass-through” arrangement with the academy/MAT, the DfE guarantee would not automatically be available. In line with [guidance](#) updated December 2024, academy trusts would need to contact DfE (formerly this was ESFA until its closure on 31 March 2025) where the circumstances in the guidance do not apply. Where the guarantee doesn’t apply and in the absence of any bond, the academy would be responsible for any unfunded liabilities to emerge on termination.

CHILDREN’S CENTRE TRANSFER TO ACADEMY TRUSTS

Local education authorities have an obligation to provide Children’s Centres under the Childcare Act 2006. The Act places duties on these authorities in relation to establishing and running Children’s Centres and therefore the financial obligation to cover the LGPS costs of eligible staff remains a responsibility of the local education authority regardless of service delivery vehicle. The local education authority is liable for all the LGPS liabilities of the Children’s Centre. The extensive academisation programme in recent years has led to a number of Children’s Centres being run by an Academy or Academy Trust.

As the staff cannot be employed directly by an Academy or Academy Trust, the Fund will permit admission of a separate participating employer (with its own contribution rate requirements based on the transferring staff), through a tri-partite admission agreement between the Fund, the Local Education Authority of the ceding Council and the body

responsible for managing the Children's Centre (this could be an Academy Trust or private sector employer).

RELEVANT LEGISLATION

SECOND GENERATION OUTSOURCINGS FOR STAFF NOT EMPLOYED BY THE SCHEME EMPLOYER CONTRACTING THE SERVICES TO AN ADMITTED BODY

A 2nd generation outsourcing is one where a service is being outsourced for the second time, usually after the previous contract has come to an end. Best Value Authorities, principally the unitary authorities, are bound by The Best Value Authorities Staff Transfers (Pensions) Direction 2007 so far as 2nd generation outsourcings are concerned. In the case of most other employing bodies, they must have regard to Fair Deal Guidance issued by the Government.

It is usually the case that where services have previously been outsourced, the transferees are employees of the contractor as opposed to the original scheme employer and as such will transfer from one contractor to another without being re-employed by the original scheme employer. There are even instances where staff can be transferred from one contractor to another without ever being employed by the outsourcing scheme employer that is party to the Admission Agreement. This can occur when one employing body takes over the responsibilities of another, such as a maintained school (run by the local education authority) becoming an academy. In this instance the contracting scheme employer is termed a 'Related Employer' for the purposes of the Local Government Pension Scheme Regulations and is obliged to guarantee the pension liabilities incurred by the contractor. These liabilities relate both to any staff whom it may be outsourcing for the first time and to any staff who may be transferring from one contractor to another having previously been employed by a scheme employer prior to the initial outsourcing.

A "Related Employer" is defined as "any Scheme employer or other such contracting body which is a party to the admission agreement (other than an administering authority in its role as an administering authority)".

LGPS REGULATIONS 2013: SCHEDULE 2 PART 3, PARAGRAPH 8

This legislation primarily concerns the protection which must be put in place for the benefit of the Fund in the case of "not for profit" organisations.

The Fund is protected from any losses arising from the failure of a commercial organisation to whom a service is outsourced through the application of Regulation 64(3)(a) so that the provision in paragraph 8 which requires the outsourcing scheme employer to provide a guarantee in such cases is effectively superfluous. Outsourcing employers can protect themselves from the failure of one of its contractors by requiring the contractor to put in place a bond under the terms of paragraph 7 of Schedule 2, Part 3 of the Regulations.

Paragraph 8 of Schedule 2, Part 3 of the Regulations provides as follows:-

“Where, for any reason, it is not desirable for an admission body to enter into an indemnity or bond, the admission agreement must provide that the admission body secures a guarantee in a form satisfactory to the administering authority from—

- (a) a person who funds the admission body in whole or in part;
- (b) in the case of an admission body falling within the description in paragraph 1(d), the Scheme employer referred to in that paragraph;
- (c) a person who—
 - (i) owns, or
 - (ii) controls the exercise of the functions of, the admission body”.

In accordance with the above Regulations, the Fund requires a guarantee from the Related Employer in most instances. In exceptional circumstances the admission body may supply a bond. Separately from this, as indicated above, a Related Employer (the Outsourcing Scheme Employer) may seek a bond from the admitted body to protect itself taking into account the risk assessment carried out by the Fund Actuary.

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APPENDIX F – NEW ACADEMY CONVERSIONS AND MULTI-ACADEMY TRUSTS

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ACADEMY CONVERSIONS AND DEFICIT TRANSFERS

The Fund's policy regarding the treatment of schools when converting to academy status is for the new academy to inherit the school's appropriate share of the historic local authority deficit or surplus prior to its conversion. This is in accordance with the Department for Education (DfE) guidance issued when the Academy conversion programme was extended to cover all schools.

Therefore, the transferring deficit or surplus is calculated as the capitalised amount of the funding contributions relating to past service to the conversion date (based on the local authority recovery period) the school would have made to the Fund had it not converted to academy status. In the case of a deficit, it will be subject to a limit to ensure that the minimum asset share of the new academy is nil.

MULTI ACADEMY TRUSTS

Multi-Academy Trusts (MATs) are groups of academies managed and operated by one proprietor. The employer of non-teaching staff in academies is the proprietor of the Academy Trust and not the individual academy within the Trust. It is therefore the proprietor who is the employer for LGPS purposes making the MAT legally responsible for staff across all schools in the pool.

Within a MAT all academies are governed by one Trust and a Board of Directors. The MAT holds ultimate responsibility for all decisions regarding the running of the individual academies. However, the governing bodies of the individual academies remain in place and the MAT will need to decide the extent to which it delegates functions to these governing bodies to enable more focused local control.

Multi-Academy Trusts are often set up to cover a number of academies across England. The employees of the former schools can be employed directly by the Trust so they can be deployed across different academy schools in the Trust if necessary.

In cases where numerous academies are operated by the same managing Trust, the Fund is willing to allow a combined funding position and average contribution requirements to apply to all constituent academies. Notwithstanding this, the Fund will continue to track the constituent academies separately, in the interests of transparency and clarity around entry and exit events.

APPROACH TO SETTING CONTRIBUTION RATES

The Fund must have a separate employer number for each academy for transparency of cashflows and managing risks should an academy need to leave one Trust for another and also for accounting where disaggregated disclosure reports are required. It should also be noted that the DfE have confirmed that the guarantee relates to individual academies and MATs.

The Fund will provide the MATs with the option of having a common Primary contribution rate for all the academies within the trust if the MAT is willing to settle for that approach, bearing in mind that the risks of under and over payments will be shared by all academies in the MAT pool.

The past service deficit will still be assessed at an individual academy level so that it only relates to the staff of the respective academy. However, the MAT can opt to have the deficits for all the academies within the trust aggregated for the purposes of the actuarial valuation report.

Any new academies joining an existing MAT pool in the Fund can contribute at the employer contribution rate already established for the MAT but an actuarial assessment will still need to be carried out to determine the deficit applicable to the transferring staff.

OUTSOURCINGS BY MULTI ACADEMY TRUSTS

The Fund's current policy is in accordance with the Regulations requiring a separate admission agreement in respect of separate contracts.

Under Schedule 2, Part 3, paragraph 5. of the 2013 Regulations, if the admission body is exercising the functions of the scheme employer in connection with more than one contract or other arrangement under paragraph 1(d)(i), the administering authority and the admission body shall enter into a separate admission agreement in respect of each contract or arrangement.

With the development of MATs, there is a case for the Fund to allow a MAT to enter into a single admission agreement with the contractor providing similar services at various sites provided the outsourcing is covered by a single commercial contract. The Fund has developed a mechanism whereby this can be done, subject to certain conditions which must be agreed by the MAT.

The Fund will need to have sight of the contract in order to satisfy the regulatory requirement that the Admission Agreement covers one contract. The Admission Agreement will need to have provision for adding future employees should any academies join the MAT subsequent to the commencement date.

The scheme employer, the Multi Academy Trust in this instance, needs to be a party to any admission agreement and, as such, is the ultimate guarantor. In the event of contractor failure, the LGPS regulations provide that the outstanding liabilities assessed by the Fund's Actuary can be called from the scheme employer i.e. the Multi Academy Trust.

If academies are to comply with “new” Fair Deal guidance, employees carrying out a service on behalf of the Academies must be allowed continued access to the LGPS. This can be achieved by entering into an Admission Agreement with the Administering Authority, Multi Academy Trust and the contractor (admitted body).

For academy outsourcings, where the contractor has **not** entered a “pass-through” arrangement with the academy/MAT, the DfE guarantee would not automatically be available. In line with [guidance](#) updated December 2024, academy trusts need to contact DfE (formerly this was ESFA until its closure on 31 March 2025) where the circumstances in the guidance note do not apply. Where the guarantee doesn’t apply and in the absence of any bond, the academy would be responsible for any unfunded liabilities to emerge on termination.

At every triennial valuation the Actuary reviews the funding level of the admitted body and adjusts its employer contribution rate as required. Once either the service contract comes to an end or all the LGPS members have left, the admission agreement terminates and, in accordance with Fund policy, the Trust becomes responsible for the assets and liabilities standing to the account of the admitted body. A cessation valuation can be provided by the Fund Actuary should the Trust request it.

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APPENDIX G - TERMINATION POLICY, FLEXIBILITY FOR EXIT PAYMENTS AND DEFERRED DEBT AGREEMENTS

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EXITING THE FUND

TERMINATION POLICY

Unless entering a DDA, an employer ceases to participate in the Fund when the last active member leaves the Fund or when a suspension notice ends and the employer then becomes an “exiting employer” under the Regulations. In this situation the Fund is required to obtain an actuarial valuation of that employer’s liabilities in respect of the benefits of the exiting employer’s current and former employees, along with a termination contribution certificate setting out whether an exit payment is due to the Fund or a credit is payable to the employer.

The Fund’s policy for settling termination payments/credits is as follows:

1. The default position is for exit payments and exit credits to be paid immediately in full once the cessation assessment has been completed by the Actuary (and any determination notice issued by the Fund where applicable). Further detail is set out below.
2. At the discretion of the Administering Authority, instalment plans over a defined period may be agreed but only when there are clear issues of affordability that risk the financial viability of the organisation and the ability of the Fund to recover the debt.
3. Where an employer has a guarantor of the exit debt, the guarantor may or may not be a Fund employer and is expected to cover the termination shortfall upfront where this is not affordable for the exiting employer (or such proportion of it that is not affordable for the exiting employer) and so there is no requirement for an instalment plan or other flexibility to settle the shortfall. Where assets and liabilities are being subsumed by a guarantor following exit, any unpaid shortfall will become the responsibility of the guarantor. It will be reflected in the guarantor’s balance sheet and will usually be considered as part of the funding plan at the next actuarial valuation of the Fund.

The assumptions and approach used to assess the amount of a payment/credit payable upon termination will be consistent with the previous valuation assumptions, updated for market yields and inflation applying at the cessation date. With the following exceptions:

	Employers with no guarantor in the Fund/ only a guarantee of the exit debt	Employers with a guarantor
Financial assumptions	The lower risk funding basis unless the Administering Authority agrees otherwise, based on the advice of the Actuary. The assumptions will be based on a full yield curve and will take into account the duration of the employer's projected cashflows/liabilities. This basis provides some mitigation against financial market risks and protection for the Fund. In the event that the lower risk basis produces a higher discount rate than the higher risk valuation funding basis, the higher risk valuation funding basis will be used.	If the employing body has a guarantor within the Fund or a successor body exists either of which would take over the employing body's liabilities, the Fund's policy is that the higher risk valuation funding basis will be used for the termination assessment unless the guarantor informs the Fund otherwise.
Demographic Assumptions	In line with the assumptions adopted for the 2025 valuation with the exception of a higher level of prudence in the mortality assumptions to further protect the remaining employers. The rate of improvement in the mortality rates will therefore be increased to [2.25]% p.a. This will be reviewed from time to time to allow for any material changes in life expectancy trends and will be formally reassessed at the next valuation.	In line with the assumptions adopted for the 2025 valuation for ongoing funding and contribution purposes. This will be kept under review to allow for any material changes in life expectancy trends and will be formally reassessed at the next valuation.
Ill-health retirements	For employers who participate in the ill-health captive insurance arrangement, the Fund will review any ill-health retirement strain costs incurred since the previous valuation. The Fund reserves the right to levy an additional charge relating to ill-health retirement strain costs where these are found to be materially in excess of the premium paid.	
McCloud	A reasonable estimate for the potential cost of McCloud will be included. This will be calculated for all scheme members of the outgoing employer (reflecting the data made available). For the avoidance of doubt, there will be no recourse for an employer with regard to McCloud, once the final termination has been settled and payments have been made.	

	Employers with no guarantor in the Fund/ only a guarantee of the exit debt	Employers with a guarantor
Additional Costs	<p>The exit valuation costs on the Fund's website and any additional costs incurred will be identified and notified to both exiting employer and outsourcing employer/guarantor and included in the exit valuation. These costs will be paid by the exiting employer unless the outsourcing scheme employer or guarantor directs otherwise, in which case the costs will be borne by the outsourcing scheme employer or guarantor. Where the guarantor is responsible for paying the costs, the default approach is for the cost to be included in the next actuarial valuation assessment as a liability and spread over the length of their recovery period. However, the Fund and the guarantor can agree an alternative approach at the Fund's absolute discretion.</p> <p>In the case of employers without a guarantor, there may also be costs associated with a transition of assets into the lower risk strategy. The Administering Authority reserves the right to pass these costs on to the employer usually via a deduction in the notional asset share.</p>	
Default policy once the termination certificate has been provided	<ul style="list-style-type: none"> • In the case of a surplus - the Fund pays the exit credit to the exiting employer following completion of the termination process (within 6 months of the exit date, or within 6 months of the completion of the cessation assessment by the Actuary (if later), providing no appeals have been raised with the Fund during this time). • In the case of a deficit - the Fund would require the exiting employer to pay the termination deficit to the Fund as a lump sum cash payment (unless agreed otherwise by the Administering Authority at their sole discretion) following completion of the termination process. 	<p>The guarantor or successor body will subsume the assets and liabilities of the employing body within the Fund under the default policy, subject to any deficit being made good by the exiting employer or any surplus being paid to the exiting employer where this is a requirement under the terms of any relevant contract. See further information below for cases where risk sharing applies and / or there is a dispute between the interested parties.</p>

The Administering Authority can vary the treatment on a case-by-case basis at its sole discretion if circumstances warrant it based on the advice of the Actuary based on any representations from the interested parties (where applicable).

Employers have a right to appeal a decision made by the Fund and the Fund has a separate Internal Disputes Resolution Procedure (IDRP), which is available on the Fund website here. In the first instance employers should ensure that they are conversant with the details of the policy before lodging an appeal to the Fund.

REVIEW OF THE TERMINATION POLICY

As set out in the table above, for employers without a guarantor or with a guarantee of the exit debt, the financial assumptions are currently based on the lower risk basis. The principle of the termination policy and the assumptions used is to ensure (as far as possible) there is sufficient monies to pay all the benefits due in relation to the “orphan” members of the outgoing employer as otherwise the remaining employers would potentially have to fund this via their contributions at subsequent valuations. This is why the Fund takes a more cautious view as set out in this policy. For other employers, the policy is to use the appropriate ongoing funding assumptions if the orphaned liabilities are to be wholly subsumed by a guarantor in the Fund (once any exit payment is paid to/from the employer depending on the circumstances).

The policy will be reviewed as a matter of course at each actuarial valuation but will also be reviewed in times of extreme events, such as a material shift in market conditions or shift in economic/fiscal policy, which will affect the assets or liabilities of the exiting employer. This is to ensure that the approach remains appropriate, given the risk associated with funding the orphaned liabilities left behind by an exiting employer is being passed to other Fund employers, and ultimately the tax payer. This means that the assumptions (both financial and demographic) can be changed if circumstances warrant it. Employers would be notified of any change (and the rationale for the change) and the policy would be updated.

The Fund also has the discretion to apply a different approach on a case by case basis taking into account all factors (financial and non-financial) pertaining to the exiting employer.

DETERMINATION NOTICES (EMPLOYERS WITH A GUARANTOR)

This section is primarily concerned with the outsourcing of services by a scheme employer who then becomes the guarantor of the contractor's pension liabilities under the Regulations. Where there is an outsourcing there will also be a commercial contract between the outsourcing scheme employer and the admission body governing all aspects of the outsourcing. If properly drafted, the contract will make clear whether any deficit or surplus on termination will be the responsibility of the outsourcing scheme employer or the admission body. However, problems arise when the contract either overlooks this issue or fails to provide sufficient clarity.

The Fund will make a determination in all exit credit cases whatever the circumstances. The Fund will have regard to all relevant factors that have been brought to its attention by the letting employer and contractor in making a determination, including, in line with the regulations, the proportion of this excess of assets which has arisen because of the value of the employer's contributions.

Generally, where there is insufficient clarity or ambiguity exists within the contract the Fund's default in these cases is that any surplus would be retained by the Fund in favour of the outsourcing employer/guarantor. This is because the Fund would assume that, had there been a deficit, this would have been the responsibility of the outsourcing scheme employer. Any determination made by the Fund with regard to the allocation of a surplus can be

challenged by one or other of the interested parties who can make representations in accordance with the procedure set out in the Regulations (see below). In addition, where the outgoing employer is responsible for only part of the residual deficit or surplus as per a separate risk sharing agreement, the Fund's default will also be that any surplus would be retained by the Fund in favour of the outsourcing employer/guarantor.

For the avoidance of doubt, where the outgoing employer is not responsible for any termination liability then the default position is that no exit credit will be paid provided that the guarantor provides the Fund with a copy of the commercial contract or provides other such reasonable evidence supporting the position.

If there is any dispute, then the following arrangements will apply:

- In the case of a surplus, in line with the amending Regulations (The Local Government Pension Scheme (Amendment) Regulations 2020) the parties will need to make representations to the Administering Authority if they believe an Exit Credit should be paid outside the policy set out above, or if they dispute the determination of the Administering Authority. The Fund will notify the parties of the information required to make the determination on the dispute.
- If the Fund determines an Exit Credit is payable then they will pay this directly to the exiting employer within 6 months of the exit date, or within 6 months of the completion of the cessation assessment by the Actuary (if later)
- In the case of a deficit, in order to maintain a consistent approach, the Fund will seek to recover this from the exiting employer in the first instance although if this is not possible then the deficit will be recovered from the guarantor either as a further contribution collection or it will be taken into account at the next valuation depending on the circumstances.

The Administering Authority will provide details of the information considered as part of their determination. An exit credit determination notice will be provided to both the guarantor and the exiting employer alongside the termination assessment from the Actuary in cases where there is an exit credit. The notice will cover the following information and process steps:

1. Details of the employers involved in the process (e.g. the exiting employer and guarantor).
2. Details of the admission agreement, commercial contracts and any amendments to the terms that have been made available to the Administering Authority and considered as part of the decision making process. The underlying principle will be that if an employer is responsible for a deficit, they will usually be eligible for any surplus. This is subject to the information provided and any risk sharing arrangements in place.
3. The final termination certification of the exit credit by the Actuary.
4. The Administering Authority's determination based on the information provided.
5. Details of the appeals process in the event that a party disagrees with the determination and wishes to make representations to the Administering Authority.

The LGPS Regulations (2013) Sections 74-77 set out the requirement for a Scheme employer and administering authority to appoint an adjudicator. The adjudicator's role is to consider applications from any person whose rights or liabilities under the Scheme are affected by (a) a decision under regulation 72 (first instance decisions); or (b) any other act or omission by a Scheme employer.

DESIGNATING BODIES AND CONNECTED AND CONTROLLED ENTITIES

In the event of cessation:

- Designating bodies will be required to meet any outstanding liabilities valued in line with the "employers with no guarantor in the Fund" approach outlined above. Upon exit, the residual assets and liabilities will revert to the Fund as a whole (i.e. all current active employers).
- Connected and controlled entities will be required to meet any outstanding liabilities valued in line with the approach outlined above for designating bodies. This applies unless a scheme employer provides a guarantee, in which case the Determination Notices (Employers with a guarantor) above will apply. The assets and liabilities will revert in totality to that scheme employer on termination, including any unrecovered deficit, where appropriate.

POLICY IN RELATION TO THE FLEXIBILITY FOR DEBT SPREADING AGREEMENTS (DSA) AND DEFERRED DEBT AGREEMENTS (DDA)

The default position for exit payments is that they are paid in full at the point of exit once the cessation assessment has been completed by the Actuary (adjusted for interest where appropriate).

Under the Regulations the Fund has complete discretion as to whether it agrees to put a DDA in place provided that it follows the procedure set out in the Regulations.

If an employer requests that an exit debt payment is recovered over a fixed period of time (e.g. via a DSA) or that they wish to enter into a DDA with the Fund, they must make a request in writing covering the reasons for such a request. Any deviation from the default position will be based on the Administering Authority's assessment of whether the full exit debt is affordable and whether it is in the interests of the Fund (and therefore ultimately taxpayers) to adopt either of the approaches. In making this assessment the Administering Authority will consider the covenant of the employer and also whether any security is required and available to back the arrangements.

For the avoidance of doubt, the Fund will not agree to a request for a DSA or DDA which arises because of a decision taken by an employer to exit the Fund prematurely. This applies unless it is clear that continued participation in the Fund puts the solvency of that employer at risk in the foreseeable future and therefore to do so is in the best interest of the Fund in terms of managing risks to the remaining employers and therefore the taxpayer. As part of the evidential requirements backing a DDA/DSA request by an employer (see below),

the Fund will expect employers to be in a position to demonstrate that alternative flexibility with other existing and new sources of finance (including banks and funders) have also been explored and the reasons for why these are not viable.

Similarly, where an employer has a guarantor who is also participating in the Fund, the default position would be that the assets and liabilities would be subsumed by the guarantor with any debt recovery settled between the exiting employer and the guarantor external from the Fund where this cannot otherwise be recovered upfront from the terminating employer. Where the guarantor is a guarantor of the exit debt, then the guarantor may or may not be a Fund employer and the Fund would expect the guarantor to pay the termination shortfall upfront (or proportion of such shortfall that is unaffordable for the employer).

Any costs (including necessary actuarial, legal and covenant advice) associated with assessing this will be borne by the employer and, depending on the employer's circumstances, will either be required as an upfront payment or included in the contribution plan or exit debt payment.

POLICY FOR SPREADING EXIT PAYMENTS

The following process will determine whether an employer is eligible to spread their exit payment over a defined period via a DSA.

1. The Administering Authority will request financial information from the employer including annual accounts, management accounts, budgets, cashflow forecasts and any other relevant information to use as part of their covenant review. As part of this, the Administering Authority will take advice from the Fund Actuary, covenant, legal and any other specialist adviser. If this information is not provided then the default policy of immediate payment will be adopted.
2. Once this information has been provided, the Administering Authority (in conjunction with the Fund Actuary, covenant and legal advisors where necessary) will review the covenant of the employer to determine whether it is in the interests of the Fund to allow them to spread the exit debt over a period of time. Depending on the length of the period and also the size of the outstanding debt, the Fund may request security to support the payment plan before entering into an agreement to spread the exit payments.
3. The payment plan could include non-uniform payments e.g. a lump sum up front followed by a series of payments over the agreed period. The payments required will include allowance for interest on late payment.
4. The initial process to determine whether an exit debt should be spread may take up to 3 months from receipt of data so it is important that employers who request to spread exit debt payments notify the Fund in good time
5. If it is agreed that the exit payments can be spread then the Administering Authority will engage with the employer regarding the following:

- a. The spreading period that will be adopted (this will be subject to a maximum of 5 years except in exceptional circumstances).
 - b. The initial and annual payments due and how these will change over the period
 - c. The interest rates applicable and the costs associated with the payment plan devised
 - d. The level of security required to support the payment plan (if any) and the form of that security e.g. bond, escrow account etc.
 - e. The responsibilities of the employer during the exit spreading period including the supply of updated information and events which would trigger a review of the situation
 - f. The views of the Actuary, covenant, legal and any other specialists necessary
 - g. The covenant information that will be required on a regular basis to allow the payment plan to continue.
 - h. Under what circumstances the payment plan may be reviewed or immediate payment requested (e.g. where there has been a significant change in covenant or circumstances)
6. Once the Administering Authority has reached its decision, the arrangement will be documented and any supporting agreements will be included.
 7. Decisions made by the Administering Authority will be final and will only be reconsidered on receipt of relevant, new information being provided to the Fund and/or the Fund being made aware of a material change in circumstances such as the amount or availability of security or employer affordability.
 8. Subject to the employer's circumstances, any costs will either be required as an upfront payment or included in the contribution plan.

A debt spreading agreement would not normally be subject to review during its term unless the Fund becomes aware of a material change in the employer's financial circumstances, such as its ability to continue to meet the payments or a weakening in the security arrangements supporting the agreement or there is a material failure by the employer to comply with the terms of the agreement, such as continued failure to provide information as may be specified in the agreement. Should this be the case, actions taken may include spreading payments over a longer period, requesting alternative security or requiring the employer to settle the outstanding balance of the termination shortfall. The Fund retains the absolute discretion to take action in such circumstances that will maximise the recovery of the debt to the Fund

EMPLOYERS PARTICIPATING WITH NO CONTRIBUTING MEMBERS (DDA)

As opposed to paying the exit debt upfront or via a DSA, an employer may participate in the Fund with no contributing members and utilise the "Deferred Debt Agreements" (DDA) at the sole discretion of the Administering Authority. This will only be considered when there are issues of affordability that risk the financial viability of the employer organisation and the

ability of the Fund to recover the debt. Typically, this will be relevant to small 'not for profit' organisations that constitute a potential risk to the Fund because they may cease operations with insufficient residual assets to meet their pension liabilities. A DDA would be at the request of the employer in writing to the Administering Authority.

The following process will determine whether the Fund will agree to allow the employer to enter into such an arrangement:

1. The Administering Authority will request updated covenant data from the employer including annual accounts, management accounts, budgets, cashflow forecasts and any other relevant information showing the expected financial progression of the organisation. If this information is not provided then a DDA will not be entered into by the Administering Authority.
2. Once this information has been provided, the Administering Authority will firstly consider whether it would be in the best interests of the Fund and employers to enter into such an arrangement with the employer. This decision will be based on a covenant review of the employer to determine whether the employer could afford the exit debt (either immediately or via a debt spreading agreement) at that time (based on advice from the Actuary, covenant and legal advisor where necessary). If the exit debt is deemed to be affordable then a Deferred Debt Agreement will not apply to the employer.
3. The initial process to determine whether a DDA should apply may take up to 3 months from receipt of the required information so an employer who wishes to request that the Administering Authority enters into such an arrangement needs to make the request in advance of the potential exit date (for example when the Employer's active membership has reduced below 5 members and it appears likely that termination could be triggered within the next 6-9 months).
4. If the Administering Authority's assessment confirms that the potential exit debt is not affordable, the Administering Authority will engage in discussions with the employer about the potential format of a DDA which will be based on the principles set out in the Scheme Advisory Board's separate guide. As part of this, the following will be considered and agreed:
 - a. What security the employer can offer whilst the employer remains in the Fund. In general the Administering Authority will not enter into such an arrangement unless they are confident that the employer can support the arrangement in future. Provision of security may also result in a review of the recovery period and other funding arrangements.
 - b. The investment strategy that would be applied to the employer e.g. the lower risk strategy or otherwise which could support the arrangement.
 - c. Whether an upfront cash payment should be made to the Fund initially to reduce the potential debt.
 - d. What the updated secondary rate of contributions would be required up to the next valuation.

- e. The financial information that will be required on a regular basis to allow the employer to remain in the Fund and any other monitoring that will be required.
- f. The advice of the Actuary, covenant, legal and any other specialists necessary.
- g. The responsibilities that would apply to the employer while they remain in the Fund.
- h. What conditions would trigger the implementation of a revised deficit recovery plan and subsequent revision to the secondary contributions (e.g. provision of security).
- i. The circumstances that would trigger a variation in the length of the DDA (if appropriate), including a cessation of the arrangement (e.g. where the ability to pay contributions has weakened materially or is likely to weaken in the next 12 months). Where an agreement ceases an exit payment (or credit) could become payable. Potential triggers may be the removal of any security or a significant change in covenant assessed as part of the regular monitoring or a material failure by the employer to comply with the terms of the arrangement such as continued failure to provide information to the Fund that is specified in the arrangement.
- j. Under what circumstances the employer may be able to vary the arrangement e.g. a further cash payment.

The Administering Authority will then make a final decision on whether it is in the best interests of the Fund to enter into a DDA with the employer and confirm the terms that are required. This would only be reconsidered on receipt of relevant, new information being provided to the Fund such as a deterioration in financial affordability of the employer since the original request.

- 5. For employers that are successful in entering into a DDA, contribution requirements will continue to be reviewed as part of each actuarial valuation or in line with the DDA in the interim if any of the triggers are met.
- 6. The costs associated with the advice sought and drafting of the DDA will be passed onto the employer as part of the arrangements and contribution requirements. Subject to the employer's circumstances, any costs will either be required as an upfront payment or included in the contribution plan.

SUSPENSION NOTICES

Regulation 64(2A) provides the Fund with the discretion to issue a "suspension notice" and suspend payment of an exit amount for up to three years, where it reasonably believes the exiting employer is likely to take on one or more active member within the period specified in the suspension noted.

If a suspension notice is applied, any contributions not related to pay (e.g. lump sum payments as set on the Rates and Adjustments Certificate) will continue to be paid to the Fund as certified. The suspension notice will also set out the terms for review of those contributions. If the conditions in the suspension notice are not met, then the suspension notice may be withdrawn in which case any exit debt / credit will become payable

immediately unless any other arrangements are agreed with the Administering Authority at its absolute discretion taking affordability and employer risk into consideration.

PARTIAL TERMINATIONS

So-called “partial termination” is where an employer exits the fund for deferred and pensioner members (and potentially past service benefits for active members) but seeks to remain a participating employer for active members (potentially just in respect of future service benefits). The objective is to lock in current liability values for deferred and pensioner members (and potentially earned benefits for active members) but would also mean that there is no recourse to that employer if those liability estimates prove too low in future aside from its (much lower) share of the orphan liabilities. If that happens, as with other orphan liabilities, the extra costs become the responsibility of all employers in the Fund.

The Fund’s default position is that such arrangements will not be accommodated. The position would be reconsidered in future only in the event that the legal basis for such arrangements is established to the satisfaction of the Fund, after taking its own legal advice. The costs of the Fund considering any requests in this area, including legal advice the Fund would need to take, must be met by the requesting employer. Even if a legal basis is established for such arrangements, this doesn’t guarantee that the Fund will permit the option as it will need to balance the costs and risks of the approach, taking into account the other options employers already have to manage their pension risk, including use of the Lower Risk strategy alongside the insurance arrangements for death in service and ill-health.

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APPENDIX H - REVIEW OF EMPLOYER CONTRIBUTIONS BETWEEN VALUATIONS

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The Administering Authority has the ability to review employer contributions between valuations. The Administering Authority and employers have the following flexibilities:

1. The Administering Authority may review the contributions of an employer where there has been a significant change to the liabilities of an employer.
2. The Administering Authority may review the contributions of an employer where there has been a significant change in the employer's covenant.
3. An employer may request a review of contributions from the Administering Authority if they feel that either point 1 or point 2 applies to them. The employer would be required to pay the costs of any review following completion of the calculations and is only permitted to make a maximum of two requests between actuarial valuation dates (except in exceptional circumstances and at the sole discretion of the Administering Authority).

MHCLG has confirmed its view as set out in Scheme Advisory Board statement on surpluses issued in December 2023 that generally local authorities and other tax-backed employers are not subject to a change in covenant as they have a statutory obligation to pay employer contributions to the fund in which they participate. Changes in funding values due to market movements are not themselves usually sufficient to trigger a review.

Where the funding position for an employer significantly changes solely due to a change in assets (and changes in actuarial assumptions), the Regulations do not allow employer contributions to be reviewed outside of a full valuation although changes in assets would be taken into account when considering if an employer can support its obligations to the Fund after a significant covenant change (see 2. above).

The Administering Authority will consult with the employer prior to undertaking a review of their contributions including setting out the reason for triggering the review.

For the avoidance of doubt any review of contributions may result in no change and a continuation of contributions as per the latest actuarial valuation assessment. In the normal course of events, a rate review would not be undertaken close to the next actuarial valuation date, unless in exceptional circumstances. For example:

- A contribution review due to a change in membership profile would not be undertaken in the 6 months leading up to the valuation Rates and Adjustments Certificate.
- However, where there has been a material change in covenant, a review will be considered on a case by case basis which will determine if it should take place and when any contribution change would be implemented.

SITUATIONS WHERE CONTRIBUTIONS MAY BE REVIEWED

Contributions may be reviewed if the Administering Authority becomes aware of any of the following scenarios. Employers will be notified if this is the case.

Consideration will also be given to the impact that any employer changes may have on the other employers and on the Fund as a whole, when deciding whether to proceed with a contribution review.

- **Significant changes in the employer's liabilities**

This includes but is not limited to the following scenarios:

1. Significant changes to the employer's membership which will have a material impact on their liabilities, such as:
 - a. Restructuring of an employer
 - b. A significant outsourcing or transfer of staff to another employer (not necessarily within the Fund)
 - c. A bulk transfer into or out of the employer
 - d. Other significant changes to the membership for example due to redundancies, significant salary awards, ill health retirements (for employers not included in the captive arrangement) or large number of withdrawals
 - e. Where the aggregation of member movements materially shortens the expected time horizon for continued participation in the Fund
2. Two or more employers merging including insourcing and transferring of services
3. The separation of an employer into two or more individual employers

In terms of assessing the triggers under 1. above, the Administering Authority will only consider a review if the change in liabilities is expected to be more than 5% of the total liabilities. In some cases, this may mean there is also a change in the covenant of the employer.

Any review of the rate will only take into account the impact of the change in liabilities (including, if relevant, any underfunding in relation to pension strain costs) both in terms of the Primary and Secondary rate of contributions.

- **Significant changes in the employer's covenant**

This includes but is not limited to the following scenarios:

1. Provision of, or removal of, or impairment of, security, bond, guarantee or some other form of indemnity by an employer against their obligations in the Fund. For the avoidance of doubt, this includes provision of security to any other pension arrangement or creditor (e.g. banks), which may impair the security provided to the Fund.
2. Material change in an employer's immediate financial strength or longer-term financial outlook (evidence should be available to justify this) including where an employer ceases to operate or becomes insolvent.
3. Where an employer exhibits behaviour that suggests a change in their ability and/or willingness to pay contributions to the Fund.

In some instances, a change in the liabilities will also result in a change in an employer's ability to meet its obligations.

Whilst in most cases the regular covenant updates requested by the Administering Authority will identify some of these changes, in some circumstances, employers will be required to agree to notify the Administering Authority of any material changes. Where this applies, employers will be notified separately and the Administering Authority will set out the requirements (an example of the notifiable events framework is set out in [Appendix K](#)).

Additional information will be sought from the employer in order to determine whether a contribution review is necessary. This may include annual accounts, budgets, forecasts and any specific details of restructure plans. As part of this, the Administering Authority will take advice from the Fund Actuary, covenant, legal and any other specialist adviser.

Where a contribution review is triggered by a significant change in employer covenant, any review of the contribution rate would include consideration of the updated funding position (both on an ongoing and termination basis) and would usually allow for changes in asset values when considering if the employer can meet its obligations on both an ongoing and termination basis (if applicable). This could then lead to the following actions:

- The contributions changing or staying the same depending on the conclusion, and/or;
- Security to improve the covenant to the Fund, and/or;
- If appropriate, a change in the investment strategy via the lower risk investment option.

In the case of an employer who may exit the Fund, there is statutory provision for rates to be amended between valuations, but it is unlikely that this power will be invoked other than in exceptional circumstances.

PROCESS AND POTENTIAL OUTCOMES OF A CONTRIBUTION REVIEW

Where one of the listed events occurs, the Administering Authority will enter into discussion with the employer to clarify details of the event and the Administering Authority will notify the employer of the intention to review contributions if a contribution review is deemed necessary. Ultimately, the decision to review contributions as a result of the above events rests with the Administering Authority after, if necessary, taking advice from their Actuary, legal or a covenant specialist advisor.

This also applies where an employer requests a review of the contributions and the employer will be required to agree to meet any professional and administration costs associated with the review. The employer will be required to outline the rationale and case for the review through a suitable exchange of information prior to consideration by the Administering Authority.

The Administering Authority will consider whether it is appropriate to use updated membership data within the review (e.g. where the change in data is expected to have a

material effect on the employer's liabilities in the Fund) and whether any supporting information is required from the employer.

As well as revisiting the employer's funding plan, as part of the review it is possible that other parts of the funding strategy will also be reviewed where the covenant of the employer has changed, for example the Fund will consider:

- Whether the employer's investment strategy remains appropriate or whether they should move to an alternative strategy (e.g. the higher risk or lower risk) in line with this FSS.
- Whether the Primary contribution rate should be adjusted to allow for any profile change and/or investment strategy change
- Whether the secondary contributions should be adjusted including whether the length of the recovery period adopted at the previous valuation remains appropriate. The remaining recovery period from the valuation would be the maximum period adopted (except in exceptional and justifiable circumstances and at the sole discretion of the Administering Authority on the advice of the Actuary).

The review of contributions may take up to 3 months from the date of confirmation to the employer that the review is taking place, in order to collate the necessary data.

Any change to an employer's contributions will be implemented at a date agreed between the employer and the Fund. The Schedule to the Rates and Adjustment Certificate at the last valuation will be updated for any contribution changes. As part of the process the Administering Authority will consider whether it is appropriate to consult other Fund employers prior to implementing the revised contributions. Circumstances where the Administering Authority may consider it appropriate to do so include where there is another employer acting as guarantor in the Fund, then the guarantor would be consulted on as part of the contribution review process.

The Administering Authority will agree a proportionate process for periodical ongoing monitoring and review following the implementation of the revised contribution plan. The Employer will be required to provide information to the Fund to support this, which will depend in part of the reasons for triggering the contribution review.

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APPENDIX I - EMPLOYERS MOVING BETWEEN INVESTMENT STRATEGIES

The Fund currently operates two investment strategies for employers:

- **The Higher Risk Investment Strategy** – This is the current overall Fund investment strategy, as set out in the Investment Strategy Statement and applies to the majority of employers currently.

This is intended for employers that have a reasonable level of security (e.g. tax raising employers and employers with a guarantee).

- **The Lower Risk Investment Strategy** – This strategy exhibits a lower investment risk than the current whole fund strategy. It is predominately linked to corporate bond assets and is expected to reduce funding volatility for employers within it. In addition, the strategy has exposure to the Liability Driven Investment (“LDI”) portfolio to provide protection against changes in market inflation expectations.

This is generally intended for employers that do not have any security, particularly those with a weaker covenant or employers who are close to exiting the Fund. The Fund can move an employer to this strategy if they deem it appropriate (e.g. where there are concerns around employer covenant, where the employer is deemed to be close to exit based on the remaining active membership or it is clear that the employer intends to leave the Fund). However, an employer can also request to switch to this strategy subject to agreement with the Fund as discussed below.

The applicable investment strategy will be reflected in the relevant employer’s notional asset share, funding basis and contribution requirements from the date they are deemed to have switched to that strategy.

CHOOSING TO MOVE TO ANOTHER STRATEGY

Each employer’s current investment strategy will be shown on their valuation schedule. For new employers, they will be placed in the higher risk investment strategy unless informed otherwise.

If an employer would like to move to a different strategy (e.g. from the higher to the lower risk strategy) then the following will apply:

1. The employer must notify the Fund of their choice in writing
2. The Fund will need to consider whether it is appropriate to allow the change in strategy, considering all relevant factors
3. The employer will be notified of any change in contributions that will apply following the switch (e.g. a move to the lower risk strategy may lead to a significant increase in future service and deficit contributions).
4. Assuming that both the Fund and employer are happy to proceed, the switch will take place from the quarter end following notification to switch by the employer to the Fund, (after the contribution changes have been confirmed). For example, if the decision is made on 1 February the switch will be made effective from 31 March. This is to allow the Fund to transition assets in a managed way as with any strategy change (subject to discretions below). Please note that the notification to switch must be provided at least 15 working days prior to the quarter end (with the exception of December where 20 working days' notice will be required), otherwise the switch will be delayed to the next quarter end.
5. The revised contributions will be payable from the start of the quarter from which the switch is made.
6. Under normal circumstances, the employer will remain within that strategy for all future funding and contribution assessments (e.g. at each future actuarial valuation) whilst it continues to be an ongoing employer in the Fund with active members (further detail on when a subsequent change may be appropriate is set out below).

Employers that are considering moving between strategies can ask the Fund for regular funding updates if this would assist with any decision making.

OTHER CONSIDERATIONS

1. If an employer is:
 - a. deemed to have a relatively weak covenant, or
 - b. poses a higher risk in other areas, or
 - c. is deemed to be close to exit based on the remaining active membership or other evidence such as a decision in principle by the employer.

then the Fund reserves the right to automatically move the employer from the higher risk to the lower risk strategy where it is felt that that the investment risk being taken is too high irrespective of the timing considerations noted above (typically following discussions with the employer).

This determination is based on:

1. the type of employer, whether they have a guarantor in place and if so, the nature of the guarantee;
2. current funding position on both the ongoing and termination basis; and

3. the strength of covenant and the ability to improve this over time.

This is to protect the Fund as a whole (ultimately the taxpayers) and all employers within it.

2. Once an employer has moved into the lower risk strategy, they will be unable to move back to the higher risk strategy unless they can provide sufficient security (e.g. a guarantee or evidence of a change in employer type). Any move would be at the sole discretion of the Fund.
3. There may be costs associated with a transition of assets into the lower risk strategy. The Administering Authority reserves the right to pass these costs on to the employer usually via a deduction in the notional asset share.

IMPLEMENTING THE MOVE TO THE LOWER RISK STRATEGY

A further step will apply before any action is taken to avoid potential timing issues in switching strategy. If there has been a material shift in market conditions between the date of notification to switch by the employer and the following quarter end, then at the absolute discretion of the Fund, decision to move can be postponed:

- **By the employer** if they feel that market conditions have changed such that the move would be more detrimental to their funding position than initially thought at the time of notification
- **By the Fund** if the transition of assets would be too expensive based on the current financial conditions

The factors taken into account by the Fund in considering whether this will be possible include whether or not the process to disinvest assets has already commenced.

In this case, an agreement will be reached as to when it will be appropriate to move in the future and triggers will be implemented to achieve this.

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APPENDIX J – COVENANT ASSESSMENT AND MONITORING POLICY

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Covenant is the employer's legal obligation and financial ability to meet their defined benefit obligations in the Fund now and in the future. Regular assessment and monitoring of employer covenant is undertaken to understand the current strength of the employer's covenant and how they could change in the future. This is important to assist the Fund in deciding the appropriate level of risk when setting the investment strategy, employer funding targets and, where necessary, employer recovery plans, its surplus reserve and run-off periods. Therefore, a sound understanding of the covenant of employers is an essential part of the integrated approach to risk management of the Fund.

Employer's covenant can change quickly and therefore assessing the covenant of employers from a legal and financial perspective is an ongoing activity. The Fund has a well-developed and proportionate framework to monitor employer covenant and identify changes in covenant. The Fund can also draw on the expertise of external covenant advisers when necessary.

RISK CRITERIA

The assessment criteria upon which the affordability and recovery of employer contributions should be reviewed could include:

- Nature and prospects of the employer's industry
- Employer's competitive position and relative size
- Management ability and track record
- Financial policy of the employer
- Profitability, cashflow and financial ability to meet contributions (both ongoing and on exit)
- Employer's credit rating
- Position of the economy as a whole
- Legal aspects

Not all of the above would be applicable to assessing employer risk within the Fund; rather a proportionate approach to consideration of the above criteria would be made, with further consideration given to the following:

- The scale of obligations to the pension scheme relative to the size of the employer's operating cashflow
- The relative priority placed on the pension scheme compared to corporate finances
- An estimate of the amount which might be available to the scheme on insolvency of the employer as well as the likelihood of that eventuality.

ASSESSING EMPLOYER COVENANT

The strength of employer covenant can be subject to substantial variation over relatively short periods of time and, as such, regular monitoring and assessment is undertaken. The employers' covenants will be assessed and monitored objectively in a proportionate manner and their ability to meet their obligations in the short and long term will be considered when determining an individual employer's funding strategy.

An assessment of employer covenant includes determining the following:

- Type of employer body and its origins
- Nature and enforceability of legal agreements
- Whether there is a bond in place and the level of the bond
- Whether a more accelerated recovery plan should be enforced
- Whether there is an option to call in contingent assets
- Whether there is a need for monitoring of ongoing and termination funding ahead of the next actuarial valuation

The employer covenant will be assessed based on publicly available information and/or information provided by the employer. The monitoring of covenant strength along with the funding position (including on the termination basis) enables the Fund to anticipate and pre-empt employer funding issues and thus adopt a proactive approach. In order to objectively monitor the strength of an employer's covenant, adjacent to the risk posed to the Fund, a number of fundamental financial metrics will be reviewed to develop an overview of the employer's stability and a rating score will be applied using a Red/Amber/Green (RAG) rating structure. Research will be carried out into employers' backgrounds and, in addition, employers may be contacted to gather further information. Focus will be placed on the regular monitoring of employers with a proactive rather than reactive view to mitigating risk. The covenant assessment will be combined with the funding position to derive an overall risk score. Action will be taken if these metrics meet certain triggers based on funding level, covenant rating and the overall risk score

FREQUENCY OF MONITORING

The funding position and contribution rate for each employer participating in the Fund will be reviewed in detail at each triennial actuarial valuation and will continue to be monitored between valuations (including on the termination basis) using an online system provided to officers by the Fund Actuary.

Employers subject to a more detailed review, where a risk criterion is triggered, will be reviewed at least every six months.

In some circumstances, employers will be required to agree to notify the Administering Authority of any material changes in covenant. Where this applies, employers will be notified separately. The notifiable event requirements are set out in [Appendix K](#).

COVENANT RISK MANAGEMENT

The focus of the Fund's risk management is the identification and treatment of the risks and it will be a continuous and evolving process which runs throughout the Fund's strategy. Mechanisms that will be explored with certain employers, as necessary (including if there is a significant change in covenant as a result of the Fund's monitoring or the employer notifying the Fund), will include but are not limited to the following:

1. Parental Guarantee and/or Indemnifying Bond
2. Transfer to a more prudent funding/investment approach (e.g. the lower risk basis)
3. The need for an interim contribution review
4. Shortened recovery periods and increased cash contributions
5. Managed exit strategies
6. Contingent assets and/or other security such as escrow accounts.
7. The frequency and detail of monitoring by the Fund and the need for the employer to adhere to the notifiable events framework

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APPENDIX K - NOTIFIABLE EVENTS FRAMEWORK

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The Fund regularly monitors the covenant of its employers. Whilst in most cases the regular covenant updates will identify some of the key employer changes, in some circumstances, employers are required to notify the Administering Authority of any material changes. This is in keeping with the guide that the Scheme Advisory Board published in 2021 ([A Guide for Administering Authorities](#)) in which is recommended that Administering Authorities should include a notifiable events process within its policies.

It is considered to be in the best interests of the employer to inform the Fund of any notifiable events that occur. This will enable the Fund to work with the employer to find an effective solution, particularly in times of change or financial distress and keep the interests of the employer, the Fund, the members and a guarantor (if one exists) in mind. Early engagement is always more effective and efficient for all parties than retrospective steps.

By not informing the Fund of a notifiable event, it may be seen as a deliberate act to hide the information or delay the Fund from taking action. If the Fund becomes aware of an event that has not been openly communicated as part of this policy, they reserve the right to implement one or more of the actions set out below without the consent of the employer.

In the case of guaranteed employers this policy applies to both the employer and the guarantor.

A notifiable event is any event or circumstance that, in the judgement of the Fund, could materially affect one or more of the following:

- the employer's basis for continued participation in the Fund
- the employer's ability to pay its ongoing contributions to the Fund*
- the employer's ability to pay its termination debt to the Fund in the event of ceasing to participate in the Fund*

* These conditions would also apply where an employer and the Fund has entered into a Deferred Debt Agreement allowing continued participation as a Deferred Employer with no contributing members.

This policy sets out a list of typical events that, if they apply, must be notified to the Fund within a reasonable time period. The list is not exhaustive and may be modified from time to time. The Fund would deem 10 working days to be reasonable in the majority of cases. In some cases, notification prior to the event occurring may be required and this is detailed within the relevant sections below. The Fund will ensure that all information is treated as confidential.

Employers will be notified if this notifiable events framework applies to them.

EVENTS THAT MUST BE NOTIFIED TO THE FUND

The Fund considers any change that would be detrimental to either the employer's ability to finance their pension obligations or the ongoing viability of the employer to be 'material' and 'significant'.

Typical events that must be notified to the Fund include the following:

1) Significant changes in the employer's membership / liabilities

This includes but is not limited to the following scenarios, where applicable:

1. Significant changes to the employer's membership which will have a material impact on their liabilities, such as:
 - a. Restructuring of the employer involving significant changes in staffing
 - b. A significant outsourcing or transfer of staff to another employer (not necessarily within the Fund)*
 - c. A bulk transfer of staff into the employer, or out of the employer to another pension scheme*
 - d. Other significant changes to the membership for example due to redundancies, significant salary awards, ill health retirements or a large number of member withdrawals*
 - e. A decision which will restrict the employer's active membership in the future*
2. Two or more employers merging including insourcing and transferring of services*
3. The separation of an employer into two or more individual employers*
4. Concerns of fraudulent activity that may include pensions aspects

*In these examples, the Fund requires prior notification of events at least 14 days before commencement of staff consultation regarding proposed changes to members' pensions. The Fund will ensure that all information is treated as confidential.

2) Significant changes to the employer covenant

i. Significant changes in the employer's financial strength / security

A material change in an employer's immediate financial strength or longer-term financial outlook. This includes but is not limited to the following scenarios (where applicable):

- a. An employer's forecasts indicate reduced affordability of contributions.
- b. A significant reduction in funding (e.g. reduction in grants, central government funding or other income stream)
- c. Provision of security to any other party including lenders and alternative pension arrangements
- d. Impairment of security, bond or guarantee provided by an employer to the Fund against their obligations
- e. The sale or transfer of significant assets, where the net book value or sale value exceeds 10% of the employer's net assets

- f. A material increase in gearing (i.e. taking on additional debt in order to finance its operations)
- g. The employer has defaulted on payments
- h. There has been a breach of banking (or other) covenant or the employer has agreed a waiver with the lender
- i. The employer's officers are seeking legal advice in the context of continuing to trade and/or potential wrongful trading
- j. An employer becomes insolvent

ii. A change in the employer's circumstances

This includes but is not limited to the following scenarios, where applicable:

- a. A merger of the employer with another organisation
- b. An acquisition by the employer of another organisation or relinquishing control
- c. An employer commences the wind down of its operations or ceases to trade
- d. A material change in the employer's business model
- e. A change in the employer's legal status (to include matters which might change qualification as a scheme employer under the LGPS Regulations)
- f. The employer becoming aware of material suspected / actual fraud or financial irregularity
- g. The employer becoming aware of material legal or court action against them
- h. There has been suspension or conviction of senior personnel
- i. Regulatory investigation and/or sanction by other regulators
- j. Loss of accreditation by a professional, statutory or regulatory body

In the examples set out above, the Fund requires prior notification of these events (e.g. at the time that there has been a decision in principle rather than once the event has happened). The Fund will ensure that all information is treated as confidential.

WHAT INFORMATION SHOULD BE PROVIDED TO THE FUND?

The information required will vary depending on the situation that has arisen. The first step will be to email or call the Fund to notify them of the event that has occurred.

WHAT ACTION WILL THE FUND TAKE ONCE NOTIFIED?

Where one of the listed events occurs, the Fund will enter into discussion with the employer to clarify details of the event. If necessary, advice will be taken from the Fund Actuary, legal or a covenant specialist advisors. Depending on the outcome of the Fund's review of the situation, potential actions that may be taken as a result are as follows:

- a. No further action required
- b. More detailed request for further information and ongoing monitoring

- c. The Fund will review the documentation provided and respond on next steps
- d. A review of employer contributions
- e. A review of the recovery period used to calculate secondary contributions
- f. A review of the employer's investment strategy
- g. A review of the termination position and discussions with the employer as to how this may be addressed
- h. A review of any deferred debt agreements if applicable

Employers will be kept informed of all steps throughout the process.

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APPENDIX L – ILL HEALTH INSURANCE ARRANGEMENTS

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OVERVIEW OF ARRANGEMENT

Ill health retirements can be expensive for employers, particularly small employers where one or two costly ill health retirements can take them well above the “average” implied by the valuation assumptions.

For certain employers in the Fund (following discussions with the Fund Actuary and after considering potential alternative insurance arrangements) a captive insurance arrangement was established by the Administering Authority to cover ill-health retirement costs. This has applied to all ill-health retirements since 1 April 2017. It applies only to ill-health retirements involving the early payment of pension and to the associated benefit costs.

The captive arrangement operates as follows:

- “Premiums” are paid by the eligible employers into the captive arrangement which is tracked separately by the Fund Actuary in the valuation calculations. The premiums are included in the employer’s primary rate. The premium for 2026/29 is [TBC]% of pay per annum.
- The captive arrangement is then used to meet strain costs (over and above the premium paid) emerging from ill-health retirements in respect of active members i.e. there is no initial impact on the deficit position for employers within the captive and any subsequent impact should be manageable.
- The premiums are set with the expectation that they will be sufficient to cover the costs in the 3 years following the valuation date. If any excess premiums over costs are built up in the Captive, these will be used to offset future adverse experience and/or result in lower premiums at the discretion of the Administering Authority based on the advice of the Actuary.
- In the event of poor experience over a valuation period any shortfall in the captive fund is effectively underwritten by the other employers within the Fund. However, the future premiums will be adjusted to recover any shortfall over a reasonable period with a view to keeping premiums as stable as possible for employers. Over time the captive arrangement should therefore be self-funding and smooth out fluctuations in the contribution requirements for those employers in the captive arrangement.
- Premiums payable are subject to review from valuation to valuation depending on experience and the expected ill health 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.

- Where, in exceptional circumstances, early payment of deferred pensions is agreed by an employer on compassionate grounds this cost is not covered by the ill-health captive.

EMPLOYERS COVERED BY THE ARRANGEMENT

Those employers (both existing and new) that will generally be included in the captive are:

- Academies
- Community related Admitted Bodies
- Contract related Admitted Bodies
- Town and Parish Councils
- Designating Bodies.

These employers have been notified of their participation. New employers entering the Fund who fall into the categories above will also be included. At the discretion of the Administering Authority and where it is felt to be beneficial to the long term covenant and financial health of an employer, specific employers (outside of the categories listed above) may be included within the captive arrangement. In addition, the Administering Authority has the ability to exclude any employer in order to manage employer risk within the Fund.

For all other employers who do not form part of the captive arrangement, the current treatment of ill-health retirements will still apply. The Fund therefore continues to monitor ill-health retirement strain costs incurred in line with the allowance made in the actuarial assumptions. Once the allowance is exceeded, any excess costs are recovered from the employer, either at the next valuation or at an earlier review of the contributions due, including on termination of participation.

EMPLOYER RESPONSIBILITIES

Apart from the regulatory procedures in place to ensure that ill-health retirements are properly controlled, **employing bodies should be doing everything in their power to ensure robust processes are in place to determine eligibility for ill health retirements.**

The Fund and the Actuary will monitor the number of retirements that each captive employer is granting over time. If any employer has an unusually high incidence of ill health retirements, consideration will be given to the governance around the eligibility criteria applied by the employer and it is possible that some or all of the costs would fall on that employer if the governance was not deemed strong enough.

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APPENDIX M – DEATH IN SERVICE CAPTIVE POLICY

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OVERVIEW OF ARRANGEMENT

The Fund has implemented a captive insurance arrangement with effect from 1 April 2023, in relation to the provision of death in service benefits.

If a member dies whilst in pensionable service, then the benefits paid in respect of the member change and the impact can be significant (e.g. a death grant is paid and an enhanced survivor's and/or dependant's pension may be paid in addition). This can mean that an actuarial funding cost or saving manifests, which can impact on an employer's pension costs.

A funding cost typically manifests if the member has unfortunately died at a young age or the member has only been in the Fund for a short period. In some cases, in particular for employers within the Fund with a relatively small membership, the potential cost emerging and the corresponding impact on the employer's subsequent contribution requirements can be significant. Any additional contributions due can prove unaffordable for the employer and in the extreme can impact on their viability as an organisation and ultimately their participation in the Fund. It is in all employers' interests to protect against this risk because if an employer goes insolvent and cannot afford to meet its pension obligations, the costs then fall to all other employers in the Fund. For larger employers the impact is much less as across the membership the impact is inherently smoothed over time.

All Fund employers will participate in the death in service captive. New employers entering the Fund will also be included in the captive. The captive will cover all funding costs/savings arising due to a death in service benefit falling due.

The captive arrangement operates as follows:

- "Premiums" are paid by all employers into the captive arrangement, which is tracked separately by the Fund Actuary in the valuation calculations. The premiums are included in the employer's primary rate. The premium for 2026/29 is [TBC]% of pay per annum.
- The captive arrangement is then used to meet any funding strain costs (over and above the premium paid) emerging from the death of any active members. If there is a funding gain, this will be absorbed by the captive for the benefit of all employers (via lower future premiums/to protect against adverse future experience). Therefore, there is no initial impact on the deficit/surplus position for employers when a death in service occurs.
- The premiums are set with the expectation that they will be sufficient to cover the costs in the 3 years following the valuation date. If any excess premiums over costs are built up in the captive, these will be used to offset future adverse experience and/or result in lower premiums at the discretion of the Administering Authority based on the advice of the Actuary.

- In the event of adverse experience versus assumptions over a valuation period, any shortfall in the captive fund will be recovered through future premiums over a reasonable period, with a view to keeping premiums as stable as possible for employers. Over time the captive arrangement should be self-funding and smooth out fluctuations in the contribution requirements.
- Premiums payable are subject to review from valuation to valuation depending on experience and the expected life expectancy 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.
- If an employer exits the Fund, they will not receive any return of premiums from the captive fund or any share of the captive fund if they terminate. However, the employer would be protected against any strain costs incurred up to the point of termination.
- As part of the governance of the arrangement, the Fund will periodically test whether it is more cost effective for employers to insure the death in service benefits with a 3rd party insurer. This would result in no change to the arrangement except that an aggregate insurance premium would be paid to the insurer and a lump sum payment would be reclaimed directly from the insurer and paid to the Fund for each death in service case.

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APPENDIX N – ROLES AND RESPONSIBILITIES OF KEY PARTIES

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The efficient and effective management of the Fund can only be achieved if all parties (including pensions committee, investment managers, auditors and legal advisors, investment advisors, pension board etc) exercise their statutory duties and responsibilities conscientiously and diligently. The key parties and their roles for the purposes of the FSS are set out below:

The Administering Authority should:	The Individual Employer should:
<ul style="list-style-type: none"> • operate the Fund • collect employer and employee contributions, investment income and other amounts due to the Fund as stipulated in the Regulations • have an escalation policy in situations where employers fail to meet their obligations • pay from the Fund the relevant entitlements as stipulated in the Regulations • invest surplus monies in accordance the Regulations • ensure that cash is available to meet liabilities as and when they fall due • ensure benefits paid to members are accurate and undertake timely and appropriate action to rectify any inaccurate benefit payments • take measures as set out in the Regulations to safeguard the fund against the consequences of employer default • manage the valuation process in consultation with the Fund's Actuary • prepare and maintain a FSS and an Investment Strategy Statement ("ISS), both after proper consultation with interested parties 	<ul style="list-style-type: none"> • Ensure staff who are eligible are contractually enrolled and deduct contributions from employees' pay correctly after determining the appropriate employee contribution rate (in accordance with the Regulations), unless they are a Deferred Employer • pay all contributions, including their own, as determined by the Actuary and set out in the rates and adjustments certificate, promptly by the due date (including any exit payments upon ceasing participation where applicable) • provide the Fund with accurate data and understand that the quality of the data provided to the Fund will directly impact on the assessment of their liabilities and their contributions. In particular, any deficiencies in their data may result in the employer paying higher contributions than otherwise would be the case if their data was of high quality. • notify the Administering Authority promptly of any changes to membership or their financial covenant to the Fund, which may affect future funding, and comply with any particular notifiable events specified by the Fund. • understand the pensions impacts of any changes to their organisational structure and service delivery model. • develop a policy on certain discretions and exercise those discretions as permitted within the regulatory framework

<ul style="list-style-type: none"> • monitor all aspects of the Fund's performance and funding, amending the FSS/ISS as necessary • establish a policy around exit payments and payment of exit credits/debts in relation to employer exits • effectively manage any potential conflicts of interest arising from its dual role as both fund administrator and a scheme employer, • enable the Local Pension Board (LPB) to review the valuation and FSS review process as set out in their terms of reference; and • support and monitor the LPB more generally as required by the Public Service Pensions Act 2013, the Regulations and the Pensions Regulator's relevant Code of Practice. 	<ul style="list-style-type: none"> • make additional contributions in accordance with agreed arrangements in respect of, for example, augmentation of scheme benefits and early retirement strain • have regard to the Pensions Regulator's focus on data quality and comply with any requirement set by the Administering Authority in this context • comply with Regulations in the case of a bulk transfer of staff (noting that any costs incurred by the Fund will be recharged to the receiving / transferring employer).
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The Fund Actuary should:	A Guarantor should:
<ul style="list-style-type: none"> • prepare valuations including the setting of employers' contribution rates at a level aiming to ensure fund solvency and long-term cost efficiency based on assumptions set by the Administering Authority and having regard to its FSS and the LGPS Regulations • provide advice so the Fund can set the necessary assumptions for the valuation • prepare advice and calculations in connection with bulk transfers and individual benefit-related matters such as early retirement strain costs, ill health retirement costs, etc • provide advice and valuations on the termination of admission agreements • provide advice to the Administering Authority on the use of bonds and other forms of security against the financial effect on the Fund of employer default • assist the Administering Authority in assessing whether employer contributions need to be revised between 	<ul style="list-style-type: none"> • notify the Administering Authority promptly of any changes to its guarantee status, as this may impact on the treatment of the employer in the valuation process or upon termination. • provide details of the agreement, and any changes to the agreement, between the employer and the guarantor to ensure appropriate treatment is applied to any calculations. • be aware of all guarantees that are currently in place • work with the Fund and the employer in the context of the guarantee • receive relevant information on the employer and their funding position in order to fulfil its obligations as a guarantor.

<p>valuations as required by the Regulations</p> <ul style="list-style-type: none"> • advise on funding strategy, the preparation of the FSS and the inter-relationship between the FSS and the ISS, and • ensure the Administering Authority is aware of any professional guidance or other professional requirements which may be of relevance to the Fund Actuary's role in advising the Fund. • Identify to the Fund and manage any potential conflicts of interest that may arise in the delivery of the contractual arrangements to the Fund and other clients 	
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The [Pensions Committee](#) is responsible for taking decisions on funding, risk and investment strategy and approval of material decisions and policies which have been developed by Fund Officers after taking advice from the Fund actuary, investment, legal and covenant advisers as may be applicable in the circumstances. This will include, but is not limited to, the following:

- decisions on the appropriate level of risk across funding, investment and covenant strategies
- approval of the FSS including the actuarial assumptions used to determine the valuation
- approval of policies relating to funding and risk management, such as flexibility on termination, interim contribution reviews and employer risk;
- approval of discretionary decisions made by the Fund where these are material.

The [Local Pension Board](#) has responsibility to assist the administering authority to secure compliance with the LGPS regulations, other legislation relating to the governance and administration of the LGPS, any requirements imposed by the Regulator in relation to the LGPS, and to ensure the effective and efficient governance and administration of the LGPS. In relation to the development of the FSS, this includes

- review of the FSS
- review the compliance of scheme employers with their duties under the FSS, regulations and other relevant legislation
- review of communications in relation to the FSS.

APPENDIX O - GLOSSARY OF TERMS

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ACTUARIAL VALUATION: an investigation by an actuary into the ability of the Fund to meet its liabilities. For the LGPS the Fund Actuary will assess the funding level of each participating employer and agree contribution rates with the Administering Authority to fund the cost of new benefits and make good any existing deficits as set out in the FSS. The asset value is based on market values at the valuation date.

ADMINISTERING AUTHORITY: the council with a statutory responsibility for running the Fund and that is responsible for all aspects of its management and operation. This is Bath and North East Somerset Council in relation to the Avon Pension Fund.

ADMISSION BODIES: a specific type of employer under the Local Government Pension Scheme (LGPS) who do not automatically qualify for participation in the Fund but are allowed to join if they satisfy the relevant criteria set out in the Regulations.

ADMISSION AGREEMENT: a written agreement which provides for a body to participate in the LGPS as a scheme employer.

ASSUMPTIONS: forecasts of future experience which impact the costs of the scheme. For example, pay growth, longevity of pensioners, inflation, and investment returns.

BENCHMARK: a measure against which fund performance is to be judged.

BENEFITS: the benefits provided by the Fund are specified in the governing legislation contained in the Regulations referred to within the FSS. Benefits payable under the Fund are guaranteed by statute and thereby the pensions promise is secure for members.

The Fund is a defined benefit arrangement with principally final salary related benefits from contributing members up to 1 April 2014 and Career Averaged Revalued Earnings ("CARE") benefits earned thereafter. There is also a "50:50 Scheme Option", where members can elect to accrue 50% of the full scheme benefits in relation to the member only and pay 50% of the normal member contribution.

BEST ESTIMATE ASSUMPTION: an assumption where the outcome has a 50/50 chance of being achieved.

BONDS: loans made to an issuer (often a government or a company) which undertakes to repay the loan at an agreed later date. The term refers generically to corporate bonds or government bonds (gilts). See also 'index linked gilts' and 'gilts' below.

CAREER AVERAGE REVALUED EARNINGS SCHEME (CARE): with effect from 1 April 2014, benefits accrued by members in the LGPS take the form of CARE benefits. Every year members will accrue a pension benefit equivalent to 1/49th of their pensionable pay in that

year. Each annual pension accrued receives inflationary increases (in line with the annual change in the Consumer Prices Index) over the period to retirement.

CMI: the 'Continuous Mortality Investigation' carries out research in relation to mortality and morbidity experience which can be used by actuaries to assess the funding required by pension funds and other bodies.

CODE OF PRACTICE: the Pensions Regulator's General Code of Practice.

CPI: acronym standing for "Consumer Prices Index". CPI is a measure of inflation with a basket of goods that is assessed on an annual basis. The reference goods and services differ from those of RPI and the method of calculation is different. The CPI is expected to provide lower, less volatile inflation increases. Pension increases in the LGPS are linked to the annual change in CPI.

CPIH: an alternative measure of CPI which includes owner occupiers' housing costs and Council Tax (which are excluded from CPI).

CONTINGENT ASSETS: assets held by employers in the Fund that can be called upon by the Fund in the event of the employer not being able to cover the debt due upon termination. The terms will be set out in a separate agreement between the Fund and employer.

COVENANT: the assessed financial strength of the employer. A strong covenant indicates a greater legal obligation and financial ability to pay for pension obligations in the long run. A weaker covenant means that it appears that the employer may have difficulties meeting its pension obligations in full over the longer term or affordability constraints in the short term.

DATA (SECTION 13): for GAD to carry out its function under Section 13 of the Public Service Pensions Act 2013, GAD will request data to be provided by the local administering authorities/local fund actuaries, and it is assumed that this data will be provided promptly and accurately.

DEBT SPREADING ARRANGEMENT (DSA): the ability to spread an exit payment over a period of time.

DEFERRED DEBT AGREEMENT (DDA): a written agreement between the Administering Authority and an exiting Fund employer for that employer to defer their obligation to make an exit payment and continue to make contributions at the assessed secondary rate until the termination of the DDA.

DEFERRED EMPLOYER: an employer that has entered into a DDA with the Fund.

DEFICIT: the extent to which the value of the Fund's past service liabilities exceeds the value of the Fund's assets. This relates to assets and liabilities built up to date and ignores the future build-up of pension (which in effect is assumed to be met by future contributions).

DEFICIT RECOVERY PERIOD: the target length of time over which the current deficit is intended to be paid off. A shorter period will give rise to a higher annual contribution, and vice versa.

DERIVATIVES: financial instruments linked to the performance of specific assets which can be used to magnify or reduce exposure to those assets.

DISCOUNT RATE: the rate of interest used to convert a cash amount e.g. future benefit payments occurring in the future to a present value i.e. the liabilities. A higher discount rate means lower liabilities and vice versa.

EARLY RETIREMENT STRAIN: the additional cost incurred by a scheme employer as a result of allowing a Scheme Member aged 55 or over to retire before Normal Retirement Age and to receive a full pension based on accrued service at the date of retirement without full actuarial reduction.

EMPLOYER'S FUTURE SERVICE CONTRIBUTION RATE ("PRIMARY RATE"): the contribution rate required to meet the cost of the future accrual of benefits including ancillary, death in service and ill health benefits together with administration costs. It is expressed as a percentage of pensionable pay, ignoring any past service surplus or deficit, but allowing for any employer-specific circumstances, such as its membership profile, the funding strategy adopted for that employer, the actuarial method used and/or the employer's covenant. The Primary Contribution Rate for the whole Fund is the weighted average (by payroll) of the individual employers' Primary Contribution Rates.

EMPLOYING BODIES: scheme employers that participate in the LGPS.

EQUITIES: shares in a company which are bought and sold on a stock exchange.

EQUITY PROTECTION: an insurance contract which provides protection against falls in equity markets. Depending on the pricing structure, this may be financed by giving up some of the upside potential in equity market gains.

EXIT CREDIT: the amount payable from the Fund to an exiting employer where the exiting employer is determined to be in surplus at the point of cessation based on a termination assessment by the Fund Actuary.

FUNDING OR SOLVENCY LEVEL: the ratio of the value of the Fund's assets and the value of the Fund's liabilities expressed as a percentage.

FUNDING STRATEGY STATEMENT (FSS): this is a key governance document which the Administering Authority is obliged to prepare and publish that outlines how the Administering Authority will manage employer's contributions and risks to the Fund.

FUND VALUATION DATE: the effective date of the triennial fund valuation.

GILTS: loans made to the UK Government, which the Government undertakes to repay at an agreed later date. The “coupon” (i.e. the interest paid as part of the loan agreement) and the final settlement amount will be a fixed amount and agreed at the outset of the loan.

GOVERNMENT ACTUARY'S DEPARTMENT (GAD): the GAD is responsible for providing actuarial advice to public sector clients. GAD is a non-ministerial department of HM Treasury.

GUARANTEE / GUARANTOR: a formal promise by a third party (the guarantor) that it will meet any pension obligations not met by a specified employer. The presence of a guarantor will usually mean, for instance, that the Fund can consider the employer's covenant to be as strong as its guarantor's (subject to the nature including legal enforceability of the guarantee).

This may extend to the guarantor assuming responsibility for future funding needs relating to the pension obligations for the employer after it has terminated the Fund, with the assets and liabilities of the former employer subsumed by the guarantor.

GUARANTEE OF THE EXIT DEBT: for the purposes of the FSS, a guarantee of the exit debt refers to the situation where an employer has exhausted all alternative options for payment of an exit debt and so the debt is recovered from another employer or body who may or may not be a Fund employer, such as the Department for Education, however the liabilities are not subsumed in this case.

HEDGING: a strategy that aims to reduce funding volatility and provide higher certainty of returns. This is achieved by investing in assets (usually bonds or gilts) that capture levels of real yield based on agreed levels so the assets mimic the change in liabilities.

HIGHER RISK VALUATION FUNDING BASIS: the financial and demographic assumptions used to determine the employer's contribution requirements. The relevant discount rate used for valuing the present value of liabilities is determined based on the expected long term return achieved on the Fund's investments. This is expressed as an expected return over CPI.

ILL HEALTH CAPTIVE: this is a notional fund designed to protect certain employers against excessive ill health costs in return for an agreed insurance premium. It works like insurance in that a fixed premium is paid by employers who are part of the captive and then the captive arrangement will meet ill health funding costs that may arise in future, in respect of the employer's members, providing the policy criteria is met.

INDEX LINKED GILTS: loans made to the UK Government, which the Government undertakes to repay at an agreed later date. The coupon (i.e. the interest paid as part of the loan agreement) and the final settlement amount are adjusted in line with the movements in RPI inflation in order to retain their 'real' value over time and protect against the potential effects of inflation.

INVESTMENT STRATEGY: the long-term distribution of assets among various asset classes that takes into account the Funds objectives and attitude to risk.

LETTING EMPLOYER: an employer that outsources part of its services/workforce to another employer, usually a contractor. The contractor will pay towards the LGPS benefits accrued by the transferring members, but ultimately the obligation to pay for these benefits will revert to the letting employer.

LGPS: the Local Government Pension Scheme, a public sector pension arrangement put in place via Government Regulations, for workers in local government. These Regulations also dictate those employing bodies which are eligible to participate, members' contribution rates, benefit calculations and certain governance requirements.

LIABILITIES: the actuarially calculated present value of all benefit entitlements i.e. scheme cashflows of all members of the Fund, accumulated to date or in the future. The liabilities in relation to the benefit entitlements earned up to the valuation date are compared with the present market value of Fund assets to derive the deficit and funding/solvency level. Liabilities can be assessed on different set of actuarial assumptions depending on the purpose of the valuation.

LIABILITY DRIVEN INVESTMENTS (LDI): A way of investing which gives multiple exposure to gilts, meaning that the Fund can hedge part of its assets against changes in liabilities in order to provide protection against changes in interest rate and / or market RPI inflation expectations.

LOCAL PENSION BOARD: the board established to assist the administering authority (as the Scheme Manager for each fund).

LONG TERM COST EFFICIENCY: this is a measure of the extent to which the Fund's policies properly address the need to balance immediate budgetary pressures with the undesirability of imposing an excessive debt burden on future generations.

LOWER RISK FUNDING BASIS: an approach where the discount rate used to assess the liabilities is determined based on the expected long term return achieved on the Fund's lower risk investment strategy. This is usually adopted for employers who are deemed to have a weaker covenant than others in the Fund, are planning to exit the Fund or would like to target a lower risk strategy. This basis is adopted for ongoing contribution rate purposes as the employers' asset share is invested in the lower risk investment strategy.

LOWER RISK INVESTMENT STRATEGY: an investment strategy which is predominately linked to corporate bond investment assets and is expected to reduce funding volatility for employers within it (as a minimum this will be reviewed following each actuarial valuation). In addition, the strategy has exposure to the Liability Driven Investment ("LDI") portfolio to provide protection against changes in market inflation expectations.

MANDATORY SCHEME EMPLOYERS: employers that have the statutory right to participate in the LGPS. These organisations (set out in Part 1 of Schedule 2 of the 2013 Regulations) would not need to designate eligibility, unlike the Part 2 Scheme Employers. For example, these include councils, colleges, universities and academies.

MATURITY: a general term to describe a Fund (or an employer's position within a Fund) where the members are closer to retirement (or more of them already retired) and the investment time horizon is shorter. This has implications for investment strategy and, consequently, funding strategy.

MCCLOUD JUDGMENT: this refers to the linked legal cases of Sargeant and McCloud, which found that the transitional protections (which were afforded to older members when the public service pension schemes were reformed in 2014/15) constituted unlawful age discrimination.

MEMBERS: the individuals who have built up (and may still be building up) entitlement in the Fund. They are divided into actives (current employee members), deferreds (ex-employees who have not yet retired) and pensioners (ex-employees who have now retired and dependants of deceased ex-employees).

MHCLG: Ministry of Housing, Communities & Local Government

MINIMUM RISK FUNDING BASIS: an approach where the discount rate used to assess the liabilities is determined based on the market yields of Government bond investments based on the appropriate duration of the liabilities being assessed. This can be used as a benchmark to assess the level of reliance on future investment returns in the funding strategy and therefore the level of risk appetite in a Funds choice of investment strategy.

NON-STATUTORY GUIDANCE: guidance which although it confers no statutory obligation on the parties named, they should nevertheless have regard to its contents.

NOTIFIABLE EVENTS: events which the employer should make the administering authority aware of.

ORPHAN LIABILITIES: liabilities in the Fund for which there is no sponsoring employer within the Fund. Ultimately orphan liabilities must be underwritten by all other employers in the Fund.

PASS THROUGH ARRANGEMENT: Pass-through is a contractual agreement between the two parties, external to the Fund, setting out how LGPS pension risk is shared. Where new employers to join the Fund under such arrangements with the letting employer, a contribution rate for the new employer would be set in the normal way. The extent to which funding "cost" is then reallocated between the letting employer and the admitted body would then be agreed as part of the commercial agreement in place.

PENSION COMMITTEE: a committee or sub-committee to which an administering authority has delegated its pension function.

PENSIONS ADMINISTRATION STRATEGY: a statement of the duties and responsibilities of scheme employers and administering authorities to ensure the effective management of the scheme.

PERCENTILES: a method of ranking a series of outcomes. For example, a 10th percentile outcome means that only 10% of results would be expected to be as good as or better than the 10th percentile and 90% of results would be expected to be worse.

PHASING/STEPPING OF CONTRIBUTIONS: when there is an increase/decrease in an employer's long term contribution requirements, the increase in contributions can be gradually "stepped" or phased in over an agreed period. The phasing/stepping can be in equal steps or on a bespoke basis for each employer.

POOLING: employers may be grouped together for the purpose of calculating contribution rates, (i.e. a single contribution rate applicable to all employers in the pool). A pool may still require each individual employer to ultimately pay for its own share of deficit, or (if formally agreed) it may allow deficits to be passed from one employer to another.

PREPAYMENT: the payment by employers of contributions to the Fund earlier than that certified by the Actuary. The amount paid will be reduced in monetary terms compared to the certified amount to reflect the early payment.

PRESENT VALUE: the value of projected benefit payments, discounted back to the valuation date.

PRIMARY RATE OF THE EMPLOYERS' CONTRIBUTION: see definition of Employer's Primary Contribution Rate.

PROFILE: the profile of an employer's membership or liability reflects various measurements of that employer's members, i.e. current and former employees. This includes: the proportions which are active, deferred or pensioner; the average ages of each category; the varying salary or pension levels; the lengths of service of active members compared to their salary levels, etc.

PRUDENT ASSUMPTION: an assumption where the outcome has a greater than 50/50 chance of being achieved i.e. the outcome is more likely to be overstated than understated. Legislation and Guidance requires the assumptions adopted for an actuarial valuation to be sufficiently prudent.

RATES AND ADJUSTMENTS CERTIFICATE: a formal document required by the LGPS Regulations, which must be updated at least every three years at the conclusion of the formal valuation. This is completed by the Actuary and confirms the contributions to be paid by each employer (or pool of employers) in the Fund for the three-year period until the next valuation is completed.

REAL RETURN OR REAL DISCOUNT RATE: a rate of return or discount rate net of (CPI) inflation.

RECOVERY PLAN: if the funding level of an employer is above or below 100% at the valuation date (i.e. the assets of the employer are more or less than the liabilities), a recovery plan may be needed to return the funding level back to 100% over a fixed period ("the recovery period", as defined in the Funding Strategy Statement). The recovery plan will

set out the Secondary contributions payable by an employer over the recovery period. Secondary contributions can be positive or negative (i.e. an off-set to future accrual costs) but there are restrictions over which negative Secondary contributions will be applied, as set out in the Fund's policy.

RESOLUTION BODIES: Resolution (or Designated) bodies are permitted to join the scheme if they pass a resolution to this effect, subject to meeting the requirements set out in the Local Government Pension Scheme (LGPS) Regulations.

SAB FUNDING BASIS OR SAB BASIS: a set of actuarial assumptions determined by the LGPS Scheme Advisory Board (SAB). Its purposes are to set out the funding position on a standardised approach so that comparisons can be made with other LGPS Funds, and to assist with the "Section 13 review" as carried out by the Government Actuary's Department. As an example, the real discount rate over and above CPI used in the SAB Basis as at 31 March 2025 was [2.4]% p.a., so it can be substantially different from the actuarial assumptions used to calculate the Fund's solvency funding position and contribution outcomes for employers.

SCHEME EMPLOYERS: organisations that participate in the Fund.

SCHEME MANAGER: a person or body responsible for managing or administering a pension scheme established under section 1 of the 2013 Act. In the case of the LGPS, each fund has a Scheme Manager which is the administering authority. For the Avon Pension Fund this would be Bath and North East Somerset Council as Administering Authority for the Fund.

SECTION 13 VALUATION: in accordance with Section 13 of the Public Service Pensions Act 2014, the Government Actuary's Department (GAD) have been commissioned to advise the Department for Levelling Up, Housing and Communities (DLUHC) in connection with reviewing the 2025 LGPS actuarial valuations. All LGPS Funds therefore will be assessed on a standardised set of assumptions as part of this process.

SECONDARY RATE OF THE EMPLOYERS' CONTRIBUTION: an adjustment to the Primary Rate to reflect any past service deficit or surplus, to arrive at the rate each employer is required to pay. The Secondary Rate may be expressed as a percentage adjustment to the Primary Rate, and/or a cash adjustment in each of the three years beginning 1 April in the year following that in which the valuation date falls. The Secondary Rate is specified in the Rates and Adjustments Certificate. For any employer, the rate they are actually required to pay is the sum of the Primary and Secondary Rates. Secondary Rates for the whole fund in each of the three years shall also be disclosed. These will be calculated as the weighted average based on the whole fund payroll in respect of percentage rates and as a total amount in respect of cash adjustments.

SOLVENCY FUNDING TARGET: an assessment of the present value of benefits to be paid in the future. The desired funding target is to achieve a solvency level of a 100% i.e. assets equal to the accrued liabilities at the valuation date assessed on the ongoing concern basis.

STRAIN COSTS: the costs arising when a members retire before their normal retirement date and receive their pensions immediately without actuarial reduction. So far as the Fund is concerned, where the retirements are not caused by ill-health, these costs are invoiced directly to the retiring member's employer at the retirement date and treated by the Fund as additional contributions. The costs are calculated by the Actuary.

SURPLUS RESERVE: the amount of assets (which may be zero), expressed as a proportion of an employer's liabilities, which will be retained in the Fund for the benefit of the employer to protect against adverse experience leading to unsustainable contributions levels.

SWAPS: a generic term for contracts put in place with financial institutions such as banks to limit the Fund's investment and other financial risks where financial obligations on one basis are "swapped" for financial obligations on another basis.

50/50 SCHEME: in the LGPS, active members are given the option of accruing a lower personal benefit in the 50/50 Scheme, in return for paying a lower level of contribution.

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Responses to Funding Strategy Statement (FSS)

(The views expressed are those of the employers themselves; in some cases they have been paraphrased. The intention has been to represent the comments concisely and as accurately as possible. Inevitably some of the detailed supporting material has had to be omitted.)

Employer	Comments
Bristol City Council	<ul style="list-style-type: none"> • Feels there may be some over prudence in the long-term salary increase assumption of 4.1%–4.6% p.a. and would welcome closer alignment with own medium-term financial planning assumptions. • Council current budget planning assumes annual pay awards of 3%–4%, reflecting a CPI assumption of 3%-3.5% and reflects the level of the recently approved local government pay offer at 3.2%. • Funds assumption includes an element for promotional increases. Council believes this should be minimal. • Recommend the Fund considers adjusting assumptions to better reflect employer-specific budgetary constraints and inflation forecasts, particularly for employers in the higher risk strategy where long-term affordability is a key consideration and rebase this at 3.5% - 4%. • F/Ys 2026/27 to 2028/29 will remain challenging leading up to implementation of the three-year government spending review that will fundamentally change council funding allocations. Funding requirements include adults and children's social care and temporary accommodation which continue to increase in cost, activity and complexity creating above budget funding pressures. • Employer's pension contributions should be reduced in line with current fund surpluses to ensure contribution levels do not create greater surpluses, when the council funding need is for direct service provision. Contribution rates whilst decreasing in the current draft position, may not fully reflect the decreases possible given the surplus. • In the context of the Fund's commitment to long-term cost efficiency and intergenerational fairness, strongly encourage the Fund to consider reducing employer contribution rates in line with current funding levels and surplus positions. • Would like to see a level of surplus reserve set at a lower threshold for tax-backed organisations. • FSS is unclear as to how this surplus reserve will interact with the deficit recovery plans – will a surplus level of 105% be a requirement and therefore the deficit recovery plans will be needed / higher level of contributions required if funding dips below this threshold, or, will recovery plans only become instigated at the point of the 100% threshold? The council would like further clarification on this within FSS. • The surplus policy outlines at item 4. that 'Employers in surplus will not be permitted to prepay contributions', believe this is not a helpful incentive to maintaining a surplus position and would recommend that this clause is not included in the final FSS. • Appreciate the Fund's integrated approach to funding and investment strategy, and its commitment to transparency and employer engagement, noting that the FSS is comprehensive and clearly outlines the Fund's policies on key areas. • Support the Fund's approach to maintaining a stable primary rate of contribution and its use of captive insurance arrangements for ill-health and death in service costs, which help mitigate volatility for employers.

	<ul style="list-style-type: none"> • Consultation process is welcomed, however it is noted that there are still a number of assumptions and clarifications needed to areas including demographic and mortality figures that will impact the overall position on employer contributions.
South Gloucestershire Council	<ul style="list-style-type: none"> • Pay awards assumed to be 3% each year over the next 4 years. Would expect the funding strategy to be in line with the assumptions contained within the Councils Medium Term Financial Plan • Proposed changes to the funding settlement will result in less income over the next few years, and with a phased approach the later years become more problematic. FY 2026/27 expect to set a balanced budget but will have used a large proportion of earmarked reserves. • Object to the proposed management of the surplus balances. Believe this should be managed locally by APF employers with the use of reserves, providing employers with flexibility regarding funding. Instead recommendations for the value of provisions should be provided by the APF, allowing bodies to manage its own risk and make local decisions. Given funding pressures placed on local government bodies would want to minimise its contribution rates with the use of this surplus and make a local decision on the suitability of reserves to cover any future risk.
University of the West of England	<ul style="list-style-type: none"> • The pay increases assumption used is broadly in line with forecast in the medium term (inclusive of scale drift). • The UK higher education sector is increasingly facing financial challenges due to a combination of fixed (non-inflationary) UK tuition fees, pay awards, inflationary operating environment and government immigration policies that hamper recruitment of international students. • Imperative that employer's contributions to Avon Pension fund for 2026-2029 are set at an appropriate affordable level that reflect the surplus inherent in the fund.
The Partnership Trust	<ul style="list-style-type: none"> • As a multi-academy trust operating in the education sector, pay assumptions are shaped by national policy, funding settlements, and affordability constraints. Based on current projections and sector trends, anticipate; 2026–2027: estimated average increase of 3.5%, 2027–2028: estimated increase of 3.0%, 2028–2029: estimated increase of 2.5%, aligned with expected public sector pay restraint. • We expect stable membership with little to no change in the foreseeable future. • As a multi-academy trust financial planning is closely tied to government funding settlements, pupil numbers, and inflationary pressures. Aim to maintain financial resilience, anticipate future years to become more challenging, constantly looking to make regular savings to make sure the Trust is sustainable. • Proposed approach to setting a prudent discount rate based on expected outperformance over CPI appears reasonable. • Support intention to review this in light of geopolitical and market volatility. Encourage the Fund to consider sector-specific experience where possible, particularly for education employers, as our workforce profile may differ from other public sector bodies in the fund. • Appreciate the opportunity to provide employer-specific input. • Given the variability in national pay awards, suggest the Fund maintain flexibility in its modelling to accommodate sector-wide shifts. • Surplus Policy (Appendix D): The introduction of a surplus reserve and 12-year run-off period is a welcome development. Support this

	<p>balanced approach to managing overfunding while maintaining long-term sustainability.</p> <ul style="list-style-type: none"> • Covenant Assessment (Appendix J): understand the importance of assessing employer strength. We would welcome transparency on how covenant ratings are determined and whether there is scope for appeal if concerns arise. • Notifiable Events (Appendix K): The clarity around reporting obligations is helpful. Suggest the Fund consider issuing a short guidance note or checklist for employers to ensure compliance is straightforward and consistent. • The inclusion of a contents guide and glossary is very helpful. • Found the video overview and consultation format a positive introduction.
Cathedral Schools Trust	<ul style="list-style-type: none"> • Currently have a number of employer funds within our Multi Academy Trust (MAT) and they are treated separately for both primary and secondary contributions. With the new policy around surplus policy whereby no surplus will be repaid until the fund is funded at a level of over 105% ask for an explanation of what would happen where: • MAT has two schools - A and B. They both have identical primary contribution rates (say) 20% but, due to the way assets were initially allocated they have the following funding positions A : liabilities 100 / assets 95 (i.e. 95% funded) B : liabilities 100 / assets 105 (i.e. 105% funded) With the "individual" rates approach, A must fund a deficit of 5 but B is overfunded - but within the 5% surplus buffer - so it doesn't get any credit for that. So, overall, the MAT has to fund a deficit of 5. • With the "average" rates approach, everything is added together so the combined MAT position is 200 liabilities and 200 assets and no deficit. • Would we be able to adopt the consolidated approach with regards to the secondary contributions and keep the primary rates employer specific?
Castle Schools Educational Trust	<ul style="list-style-type: none"> • After a couple of years of high pay rises expecting these to be lower going forward and have budgeted at 2%. However, it is difficult to predict as these are set nationally.
Futura Learning Partnership	<ul style="list-style-type: none"> • Expect to pay in line with agreed Teacher's Pay and NJC increases
Doddington Parish Council	<ul style="list-style-type: none"> • The RPI & CPI values appear to be lower than might be expected to better mitigate against market shocks during the current climate. • With regards to pay increases would not be proposing to award increases above the CPI + 1.5% assumption included within the FSS. • The McCloud Remedy may have an impact on the funding position, but this was expected and PC has been able to meet previous deficits • Desirable objective for stable contributions over time supports PC with its own business planning. • Inclusion of the policies is useful in reviewing the FSS. The recent addition of the surplus policy also demonstrates commitment to the long-term cost efficiency objective of the fund, ensuring other employers are not prejudiced by not holding onto particularly large surpluses, while enabling pragmatic decision-making during business planning. • A separate annex with the statistical methodologies included would be desirable for future consultations.

Department for Education	<ul style="list-style-type: none"> • In reviewing the FSS, they noted the reference on page 29 that “the Department for Education provides a ‘guarantee of last resort’ in respect of academy trusts and further education bodies.’ • Requested clarification on the the rationale for distinguishing between ‘full guarantors’ and the DfE as a ‘guarantor of last resort.’ What’s the practical meaning of ‘guarantor of last resort,’ including its implications for employer contribution rates and deficit recovery periods. How is risk is applied under a ‘guarantee of last resort’ compared with the treatment of a full guarantor.
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If anyone would like to see any of these responses in full please let Julia Grace know.

FUNDING STRATEGY STATEMENT CHECKLIST

Overview of content contained and how it relates to the underlying guidance

This checklist has been prepared in line with MHCLG's "Guidance for Preparing and Maintaining a Funding Strategy Statement FSS" dated January 2025, which was developed in conjunction with SAB and CIPFA
[FSS guidance.Final January 2025.pdf](#)

ANNEX C - Funding Strategy Statement (FSS) Checklist

To assist with the development of the FSS, funds are strongly encouraged to follow the structure and terminology within this guidance. The below checklist has been created as a short, high-level summary of the themes covered in this guidance, but the main contents of this guidance should be reviewed as it provides the fuller detail of what to include in each section of a FSS.

Fund	AVON PENSION FUND	
Completed by	Mercer	
Reviewed by		Avon Pension Fund
Date	15 May 2025	19 May 2025
Version of FSS	12 May 2025 Draft	12 May 2025 Draft

Section A: Purpose of the fund and the FSS	Guidance Paragraph	Location in current FSS / additional comment (where necessary)
Aims and objectives of the FSS So that all parties to the FSS share a common understanding, the FSS should set out clearly the aims and purpose of the fund, in the context of fiduciary duty and requirement to pay pension benefits according to the LGPS and wider regulations	31	Page 5
Aims and objectives of the fund in relation to long term benefit funding, how these are measured and how risks are managed	32	Page 5
Monitoring and review of the FSS Circumstances when the fund would review the FSS and considerations in undertaking the review	33-35	Page 8
Section B: Key funding principles		
This section of the FSS should explain in principle how the aims and purposes set out in the previous section are to be achieved. This section should provide a framework within which an employer (or other interested body) can understand the fund's approach to achieving its funding targets and how the funding framework is established, set, and monitored.	36-37	Page 9
Funding Target Explain that it is a regulatory requirement that fund solvency and long-term cost efficiency is secured	38-39	Page 9
Commentary explaining how the fund balances contributions, reliance on investment return and how there may be deficit or surplus periods	40	Page 9
How funding differs according to employer type, how this is considered and managed overtime	41	Page 10
Managing risk Identify and explore the risks specific to the funding strategy of the pension fund or employer covenant and the measures taken to mitigate those risks. Specifically:	42-44	Pages 11-16
Main actuarial assumptions A summary of the methodology used to determine and monitor the actuarial assumptions used at the valuation.	45	Page 17-19
Links to the Investment Strategy Statement (ISS) or Statement of Investment Principles (SIP) The FSS should provide information on the development of the FSS and ISS/SIP, how they interlink and the impact on funding if investment returns or income are lower than expected	46-49	Page 22
The FSS should explain how funding requirements have been considered in setting the strategic asset allocation, reflecting appetite for investment risk	50	Page 22
How employer contributions are calculated The approach by which employer contribution rates are calculated, specific employer profiles are treated, employer covenant has been taken into consideration and assurance in consistency in process is considered	51-52	Page 23
Primary rate of the employers' contribution The methodology and process of calculating the primary rate for employers, strategy, and risk-sharing arrangements	53-54	Pages 23-24
Secondary rate of the employers' contribution Explain the fund's approach to setting secondary contributions and how any potential conflict of interests are managed	55-57	Pages 24-25
Payment of additional contributions Set out when employers may need to make other payments to the fund in respect of member benefits, how they are paid	58-59	Pages 25-26
Actuarial valuation The regulatory requirement for an actuarial valuation should be explained in the FSS and, for employers understanding, a high-level commentary on the typical contents of the fund's valuation report	60-61	Page 26
Review of employer contributions between valuations The FSS should set out the fund's approach and process to reviewing contribution rates between valuations and the rationale for the approach taken	62-64	Page 27
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The FSS should set out how the costs of tailored approaches might be met and how they fit with their overall risk management approach	67	Pages 27-28
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The FSS should also set out in general terms the termination assumptions basis on which surpluses or deficits will be calculated and the factors that may be considered and the process to be followed in exercising discretion on exit payment to be paid	90	Pages 34-35
The FSS should also set out in general terms the termination assumptions basis on which surpluses or deficits will be calculated and the process to be followed	90	Pages 34-35
The FSS should be clear on the decision-making principles and process to be considered when exiting employers and others affected by the decision (such as guarantors) will be able to make representations, timescales for making decisions and any rights or options to have decisions reconsidered, including reference to the appeals and adjudication provisions contained in the relevant LGPS Regulations.	91	Pages 34-35
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Bath & North East Somerset Council	
MEETING:	Avon Pension Fund Committee Meeting
MEETING DATE:	26 th September 2025 Item 10
TITLE:	PENSION FUND ADMINISTRATION Performance Report
WARD:	ALL
AN OPEN PUBLIC ITEM	
<p>List of attachments to this report:</p> <p>Appendix 1 – Pensions Administration Strategy</p> <p>Appendix 2 – Communication Policy</p> <p>Appendix 3 – KPI performance report</p> <p>Appendix 4 – TPR Data Improvement Plan</p> <p>Appendix 5 – McCloud determination</p>	

1 THE ISSUE

The purpose of this report is to present the Fund's administration performance for the period up to and including 31st July 2025 vs key performance indicators (KPI's).

2 RECOMMENDATION

The Committee:

- Approves the new Pensions Administration Strategy
- Approves the Communications Policy
- Notes the service performance for the period ending 31st July 2025.

3 Pensions Administration Strategy

The Local Government Pension Scheme (LGPS) Regulations 2013 (regulation 59) allows Pension Fund Administering Authorities to prepare and publish a Pensions Administration Strategy (PAS). The primary purpose of the PAS is to clearly define the roles and responsibilities of the Fund and scheme employers. Although it is not currently compulsory in any regulations to have a PAS, it is expected that the Scheme Advisor Board's Good Governance review will make this a mandatory requirement.

The PAS sets out the performance standards and best practice that the fund and scheme employers should aim to meet. The document defines clear roles and responsibilities and has been developed with the need to comply with new

regulations for Pensions Dashboards. The fund intends to apply the PAS in a working partnership arrangement with scheme employers and their third-party payroll providers. The new PAS can be found in Appendix 1. Once the Strategy has been approved by Committee the fund will go in to consultation with scheme employers for a period of 3 months.

The Pension Board have responsibility for monitoring the application of the PAS, including performance standards and will report to the Pensions Committee on both. The Board met in an informal meeting on 3rd September and approved the PAS and Communication policy.

4 Communication policy

The Communications policy is required by LGPS Regulations 2013, Section 61 and forms part of the PAS. It outlines our guidelines and principles on how the fund will communicate with members, employers and other stakeholders. It has been designed to provide an effective and transparent framework for communications. The new policy can be found in Appendix 2.

5 PERFORMANCE

Appendix 3 includes performance of service vs SLAs¹ up to 31st July 2025. Following a dip in performance in early 2025, the fund is now seeing continued improvement in performance.

6 Recruitment & Development

4 officers joined the fund in the last quarter, leaving the fund with 3.4 vacant posts across the Administration and Business Change teams. 4 Officers are starting the new LGPS Pension Administration qualification which will take 18 months to complete.

7 McCloud

On 12th August as part of the PAS workshop the Pension Board were briefed on the funds plan to exercise its discretion to make a determination in respect of McCloud. This will extend the deadline to complete the remedy exercise until 31 August 2026. All board members agreed with the fund's decision. Further details of the McCloud project can be found in Appendix 5.

8 Pensions software migration

The fund successfully migrated to our software provider, Heywood, hosted environment on 21st July. Following this success, work has begun on two key projects, 1) Integrated data cleansing 2) New member portal.

¹ service level agreements

9 Pensions Dashboard & ISP (Integrated Service Provider)

ISP implementation is progressing well and on track for connection by 31 October 2025. The fund has completed Phase 1 user acceptance testing of data reports and matching criteria and is working with Heywood to complete Phase 2 Dashboard connection activities. The fund's registration to the Pensions Dashboard Programme has been submitted by Heywood and approved. Engagement with AVC providers continues including finalising integration agreements and data reconciliation processes

10 Access & Fairness Consultation

In May 2025 MHCLG published the 'Access and Fairness' Consultation. This consultation seeks to address many regulation anomalies and bring about change to make benefits from the LGPS scheme fair to all.

The primary areas that the Government are looking to make change are:

- Survivor and cohabitee pensions
- Death grants
- Opt out and gender gap reporting

Despite supporting the consultations, the fund had reservations due to the impact of such regulation change and possible associated timescales for any remedy and reporting as follows:

For Survivor benefits, cohabitee pensions and death grants, the regulations will be changed retrospectively and so this will mean re-visiting past death cases, some as far back as 2005 when the respective marriage law changed.

As a relatively large fund, the work to identify, analyse and remedy these cases will be significant and the drain on resource heavy. If Government brings in the changes immediately, funds will not be ready to deal with the changes.

Administration systems will not be able to calculate the benefits and the costs to the fund will be at an all-time high with the other regulatory projects being concluded.

For opt out and gender gap reporting, if this is to become the responsibility of the Admin Authority, Avon Pension Fund with almost 500 employers it will be yet another significant burden. Further IT development will be needed from both scheme employer and admin authority.

The fund responded to the consultation in July before it closed in early August. We agreed with the proposals in main but urged the Government not to implement all the changes at once. The Governments response to the consultation is expected later in 2025.

11 Data Improvement plan

Appendix 4 is a summary of the Fund's data position and shows a slight improvement in the overall score at 95.6%. The fund is in the process of reviewing its Data Improvement Plan which will be shared with the Board when complete.

12 RISK MANAGEMENT

The Avon Pension Fund Committee is the formal decision-making body for the Fund, including responsibility for adequate risk management. It discharges this responsibility by ensuring the Fund has an appropriate investment strategy and investment management structure in place which is regularly monitored. It also monitors benefits administration, the risk register and compliance with relevant investment, finance and administration regulations.

13 EQUALITIES STATEMENT

A proportionate equalities impact assessment has been carried out using corporate guidelines and no significant issues have been identified.

14 CLIMATE

The Fund is implementing a digital strategy across all its operations and communications with stakeholders to reduce its internal carbon footprint in line with the Council's Climate Strategy. The Fund acknowledges the financial risk to its assets from climate change and addresses this through its strategic asset allocation to Paris Aligned Global Equities, Sustainable Equities and renewable energy opportunities. The strategy is monitored and reviewed by the Committee.

15 OTHER OPTIONS CONSIDERED

None.

16 CONSULTATION

The report and its contents have been discussed with the Head of Pensions representing the Avon Pension Fund and the Director of Financial Services, Assurance & Pensions, representing the administering authority.

Contact person	Claire Newbery Pensions Operations Manager 01225 394701
Background papers	Various statistical documents
Please contact the report author if you need to access this report in an alternative format.	



Pensions Administration Strategy 2025

DRAFT

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Introduction

The Local Government Pension Scheme (LGPS) [Regulations 2013 \(regulation 59\)](#) allows Pension Fund Administering Authorities to prepare and publish a Pensions Administration Strategy (PAS), the primary purpose of the PAS is to clearly define the roles and responsibilities of the Fund and scheme employers, under LGPS regulations and related legislation.

The PAS sets out the performance standards and best practice that the Administering Authority (Avon Pension Fund) and fund employers should aim to meet when conducting their scheme functions. The document defines clear roles and responsibilities.

The strategy has been developed to improve the overall standard of administration of the LGPS by the Fund. It's intended to apply in a working partnership with fund employers and their third-party payroll providers, where assistance will be provided by the Fund, to enable employers to improve administrative performance and meet the requirements of the strategy.

The Local Pension Board have responsibility for monitoring the application of the Strategy, including performance standards and will formally report to the Pensions Committee on both.

The PAS applies to the Fund and all its current and new employers.

The PAS will be reviewed every three years as a minimum, to reflect changes to LGPS regulations and Fund policies.

Avon Pension Fund (the Fund) must regularly review its Pensions Administration Strategy and update it whenever there's a major change in its policies that affects the strategy.

Legislation

The Fund and all its employers are required to comply with the statutory requirements specified in this PAS, which sets out the performance standards and expectations of the Administering Authority and employers when conducting their Scheme functions.

The strategy defines clear roles and responsibilities and aims to ensure the delivery of a high-quality service for all stakeholders.

Under [regulation 70](#) it sets out circumstances in which the Fund may consider giving written notice to any of its employers for additional costs. These costs may be incurred on account of an employer's unsatisfactory performance in conducting its Scheme function.

The PAS is linked to the following statutory documents of the Administering Authority which can be found on the Fund's websites.

- Comms Policy (attachment)
- [Funding Strategy Statement](#)
- [Investment Strategy Statement](#)

Under no circumstances does the PAS override any provision or requirement of the LGPS regulations.

Governance

Bath & North East Somerset (B&NES) Council delegates its responsibility for administering the Fund to the Avon Pension Fund Committee. The Committee meets quarterly and is the Fund's formal decision-making body. Employers are widely represented within the Committee membership, as well as scheme member representatives and three independent members.

All LGPS funds are required to have a local pension board. The Pension Board is made up of member and employer representatives and they have an advisory role in assisting the Fund by making recommendations about compliance, process, and governance. The Pension Board helps to support the effective and efficient governance of the scheme by ensuring adherence to relevant legislation and compliance with The Pensions Regulator requirements.

The Committee and Board receive quarterly reports on the Fund and employer administrative processes and performance. This is supplemented with compliance information required by The Pensions Regulator regarding data. The Committee and Board review these summary results and act where appropriate. Reports on performance are available to the public via the [Pension Board](#) and [Pension Committee meeting minutes](#).

The Committee regularly reviews all administrative targets and service delivery costs. These reviews continue to inform future changes to the Administration Strategy.

Detailed roles and responsibilities of both the Pensions Committee and Local Pension Board as well as the terms of reference can be found on [our website](#).

The Fund's governance arrangements are in line with The Pension Regulator's expectations as set out in its [General Code of Practice](#).

The Fund has conducted a gap analysis and has an action plan in place to meet full compliance.

Data Protection

The main legislation governing personal data is the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Scheme employers are under a statutory obligation, as detailed in [Regulation 80 of the LGPS Regulations](#), to provide certain personal data relating to its members on an annual basis. This includes name, gender, date of birth, national insurance number, pensionable pay, employer and employee pension contributions, details of any additional pension contributions and additional voluntary contributions. Full details are set out in our [Memorandum of Understanding](#).

Data must be securely transferred to the Fund by i-Connect or Globalscape as explained on [the Fund's employer website](#).

Pension related data must be retained in accordance with the Fund's [Data Retention Policy](#). There is separate guidance for employers about our expectations for the retention of personal data we may require when administering the Scheme.

Further details on how the Fund uses, manages and shares data can be found in our [privacy notice](#).

Roles and Responsibilities

Admin authority

The main duties, responsibilities, and obligations for the Administering Authority are to:

- administer the LGPS for all scheme members (Active, Deferred and Pensioner members) in accordance with this Strategy
- maintain and review the Fund's policies, strategies, statements, reports, and all other matters relating to the governance of the scheme
- communicate and engage with employers on administration and LGPS matters
- provide support and training to scheme employers
- maintain and develop an effective web presence for the benefit of members and scheme employers
- establish levels of performance and set targets which the admin authority and scheme employers are expected to achieve when conducting their scheme functions, in line with regulatory requirements
- adhere to all legal and regulatory requirements, including the Pensions Dashboards Regulations 2022
- ensure accurate and timely data submission to the Pensions Dashboard
- maintain up-to-date records of pension scheme members.
- pay pension in line with regulatory requirements.

The key regulatory requirements of the Administering Authority are to:

- prepare and publish the Pension Fund Annual Report
- prepare, publish and maintain its Funding Strategy Statement
- prepare, publish and maintain its Communications Policy
- commission and obtain a valuation of Fund assets and liabilities as at the 31 March in every third year and to obtain a report and a rates & adjustments certificate prepared by an Actuary, in respect of that valuation
- issue annual pension statements for its active, deferred, and pension credit members
- issue a P60 by 31 May, to members who were receiving pension payments on 5 April
- make monthly pension payments by BACS into nominated accounts
- stop pension payments as soon as possible after a death is reported
- adjust pensions accounts each year by the index rate adjustment, from the date the increase would apply (Pensions (Increase) Act 1971)
- appoint an adjudicator in relation to Internal Dispute Resolution Procedure (IDRP) to consider applications from members.

Employers

The key regulatory responsibilities for the scheme employer are to:

- comply with obligations under Data Protection Law and LGPS Regulations and any other overriding regulations
- assess and communicate details of the LGPS to eligible staff
- enrol employees into the scheme under [contractual enrolment rules](#) of the scheme and apply auto enrolment rules where applicable
- provide secure accurate membership data to Avon Pension Fund monthly
- ensure the correct level of pension contributions are collected and paid across to the fund no later than the 19th of the following month after deduction
- provide accurate data for Year End purposes
- provide a prompt response to data requests, in line with service level agreement
- designate a main contact/lead officer to liaise with the Fund to help support and develop a successful working relationship
- roles and permissions for the lead officer can be found on [our website](#).

Employers must also make first-instance decisions in respect of their employees' pension entitlement and benefits in the scheme. In the LGPS employers are responsible for deciding [whether a member is entitled to benefits](#), including their right to join, the contributions they pay and the scheme and the benefits they receive upon leaving.

Employers must notify members of these decisions in writing, explaining the reasoning, providing further information, and outlining the right to appeal under the Internal Dispute Resolution Procedure (IDRP).

The key regulatory responsibilities tasks for employers are to:

- inform members of the right to appeal against any decisions you the employer make that may impact on them
- [appoint an IDRP representative](#) for any disputes between the member and employer
- at the end of the Scheme Year, provide the Fund with a statement of details of every employee, to comply with Year End Requirements.

The above list is not exhaustive, the [LGPS Regulations](#) should be referred to in the event of any doubt.

Performance reviews – where necessary, the Fund offer one-to-one meetings, online or at the workplace. These meetings can be initiated by the Fund, for instance, in cases of underperforming employers; or requested by employers seeking additional support with administrative issues.

For more information about any of the above services, please [contact the Employer Relations team](#).

Outsourced payroll services and providers

Where an employer outsources its payroll services to a third-party provider, the regulatory responsibility remains with the employer, including the submission of monthly data returns via i-Connect.

When procuring or changing payroll services and systems, all employers must ensure the new payroll providers do the following:

- securely store and retain the personal and financial data of its scheme members, as required by the Funds data retention policy and GDPR regulations
- use i-Connect (the Fund's data sharing portal) for monthly data returns
- provide accurate data submissions and relevant documentation via i-Connect to meet the reporting requirements of the Fund
- make all data submissions through i-Connect no later than the 22nd of the following month after contribution deduction.

Change of Payroll Provider

When appointing a new payroll provider the employer must:

Inform the Fund immediately and ensure the new service provider...

- has full knowledge of the requirements of the Fund and LGPS, in terms of data supply and reporting
- has a suitable software system in place, that can meet those requirements
- has sufficient knowledge of its duties and responsibilities, to seamlessly take over the supply of data submissions and manage data queries.

i-Connect and changes in payroll systems or providers

The Fund will support employers through any changes in payroll provider or system to ensure continuity of data. Employers must implement a clear process for access control and account management to ensure best practices for protecting user and member data is maintained.

[More information on appointing or changing payroll providers.](#)

The above summary of duties defines the main functions of the employer role, which enables the Fund to deliver an efficient, accurate and high-quality pension service to members.

For more information on employer duties, please refer to our [employer responsibilities web page](#).

Training and engagement

To effectively manage the scheme on an ongoing basis, it is essential that both Employers and the Fund ensure their staff possess the appropriate skills and knowledge. They must demonstrate a solid understanding of current LGPS regulations and administrative procedures. Therefore, the primary contact or lead officer for the employer plays a crucial role in ensuring themselves and relevant team members maintain sufficient knowledge and skills to comply with statutory LGPS responsibilities.

The Fund offers a comprehensive training programme to all employers within the LGPS and their role in administering the scheme. Training and workshop sessions typically cover the full range of administrative and regulatory responsibilities, as well as specific topics such as *employer discretionary policies*.

Upcoming training and workshop events are announced in the quarterly employer newsletter, along with instructions on how to book your place via the Fund's employer website.

Available sessions include:

- Employer responsibilities
- i-Connect implementation
- Support through payroll/payroll provider changes
- HR responsibilities training
- Data requirement sessions
- Refresher training sessions

A full list of the Fund's services to employers can be found [on our employer website](#).

Objectives and developments of the Fund

Performance management and developments of the Fund

Effective performance management and ongoing developments within the Fund are critical to ensuring high-quality service delivery and long-term sustainability. The fund's capacity to meet its Service Level Agreement objectives is contingent upon employers fulfilling their obligations in a timely and accurate manner.

Employer Service Level Agreement (SLA)

SLAs for scheme employers have been set by the fund to ensure both parties meet their regulatory requirements.

Employers participating in the LGPS agree to:

- ensure accurate and timely submission of member data
- deduct and remit employee and employer contributions within the statutory deadlines
- provide a leaver form for all retirements, early retirements, and ill-health retirements and deaths in service
- submit annual payroll and pension data as required for valuations and pension statements
- inform members about their pension rights and provide LGPS updates where necessary.

With regards to performance standards & reporting, employers must:

- maintain high standards of accuracy in employee records and payroll reporting
- ensure all submissions meet statutory deadlines, with delays subject to review and potential penalties
- respond to queries from the Fund within 5 business days
- ensure any new payroll provider submits data via the i-Connect portal within 3 months of the contract starting.

New Employers must ensure that data is submitted via the i-Connect portal within 3 months of joining the scheme.

LGPS new starter process

Employers must:

- notify the Fund of any new starters via the data submission system (i-Connect), the month of the new employee start date
- provide accurate employment details, including salary, pensionable pay, and contract type
- inform employees about their rights, contributions, and benefits under LGPS
- process opt-outs if employees choose to leave the scheme within the statutory timeframe.

LGPS leaver process

Employers must:

- provide final pensionable pay details for accurate benefit calculations
- submit required leaver forms (age 55 and over members) via the APF [employer website](#) within 15 days of the date of leaving
- detail the reason for leaving (resignation, retirement, ill health, redundancy) on each leaver form
- submit required leaver forms (underage of 55) via the i-Connect data submission system
- process refunds for any member opting out within 3 months of joining.

LGPS data queries

Employers must:

- submit accurate employee pension data and ensure timely updates for changes in salary, hours, and contract status
- respond to LGPS data validation requests within 5 working days, to enable the Fund to meet any regulatory requirements
- rectify discrepancies found in payroll or pension records promptly and within 5 days
- ensure secure data transmission to comply with data protection regulations.

Year End

i-Connect and Online Return employers.

- any queries received with the March data must be answered promptly and within 5 working days
- APF will issue a Data Confirmation spreadsheet upon completion of year end data checks via the portal. A response is required within 10 working days.

- any additional queries must be responded to by the stated Year End completion deadline
- a Year End Data Confirmation Declaration must be submitted as soon as all queries have been responded to and by the stated Year End completion deadline at the latest.

Failure to meet any deadline could incur a fine.

Using i-Connect

i-Connect streamlines the transfer of employee data from employer payroll systems to the fund. It reduces manual data entry, simplifies year-end reconciliation, and ensures accurate member data. By aligning with statutory requirements, it helps avoid penalties from The Pensions Regulator for breaching legislative time limits and other requirements.

As the Fund's main source of member data, the information employers submit via i-Connect allows us to establish benchmarks, monitor employer performance and track key metrics like submission accuracy, processing speed, and compliance rates.

Employers must submit accurate, timely data and ensure third-party payroll provider/systems integrate properly with i-Connect and submit data on time on their behalf. This ensures the Fund has all relevant data to calculate member benefits.

Employers must also adopt new features as they become available.

Employers must:

- ensure monthly i-Connect data submissions are uploaded by 22nd of the following month
- reply to queries before their next monthly file/return is uploaded
- supply no manual data outside of the i-Connect return
- consistently provide monthly data via i-Connect without gaps.

Annex 1: Employer tasks and the deadlines that must be met

Task	Deadline
Pay contributions and send remittance	19th of calendar month following the date of contribution deduction
Submit monthly return via the online data portal	22nd of calendar month following the date of contribution deduction
Pay any AVC/APC/ARC/Added Years contributions to AVC provider and additional contributions to the Fund	22nd of calendar month following the date of contribution deduction
Retirement notification including full data	At least 15 working days before the date of retirement
Death in Service notification including full data and Assumed Pensionable Pay (APP)	Within 5 working days of the following notification to the employer
Individual member additional data requests: Respond to the relevant officer	5 working days of request
Refund contributions through payroll (less than 3 month opt outs)	Next available payroll
Advise the Fund of a change payroll provider and TUPE transfers	At least 3 months before the changes occur.
Process Ill Health Retirements	Immediately upon notification
Appoint IRMP (Independent Registered Medical Practitioner)	Immediately upon notification Appointing and IRMP
Complete ill-health process	Immediately upon notification https://www.apfemployers.org.uk/knowledge-hub/ill-health-retirement/ill-health-retirement-current-employees
To review Tier 3 ill-health pensions in payment	18 months of commencement and, if required after 3 years.
To notify member in writing if Tier 3 ill-health pension ceases	Within 10 working days of receiving IRMP reassessment.
To notify member of any uplift from Tier 3 to Tier 2 benefits	The Fund and Member should be notified within 10 working days of receiving IRMP advice.

Employer performance

The goal of the Pensions Administration Strategy is to improve the administrative processes of the Fund. Both the Fund and each employer must contribute to achieving this goal. However, in cases of persistent poor performance, [Regulation 70 of The Local Government Pension Scheme Regulations 2013](#) provides pension funds with the ability to recover any additional administrative costs that have been incurred, because of a scheme employer's underperformance.

The Fund aims to give a poorly performing employer the opportunity to improve its performance before imposing additional charges. However, if the Fund believes the employer has not improved, it will issue a penalty fine (after consulting the employer). This fine will cover the additional costs incurred by the Fund due to the employer's poor performance, along with any disproportionate work conducted by Fund officers.

The employer has the right to appeal against any penalty fine and should submit any relevant evidence in writing within 30 days of the fine, to support any appeal.

A schedule of penalty fines is detailed in Annex 2 and 3. These fines must be paid within 30 days from the date of issue.

Failure to meet the deadline will result in interest being added at base rate plus 1%, as per LGPS 13 regulations.

Penalty fines

Most employers accurately submit data and pay pension contributions on time. However, when data or contributions are submitted late or inaccurately, the resulting costs to the Fund are unfairly distributed among all employers' contributions.

To enhance efficiency, lower costs, and more accurately allocate the expenses of non-compliance, extra charges will be applied see Annex 2 and 3.

Annex 2: Penalty fines for Fund employers

Title	Description	Fee
Overdue payment of contributions	Employer and / or Scheme Member/ MAT contributions	Interest calculated at base rate plus 1% as per the 2013 LGPS regulations, calc based on total late contribution amount.
Repeated late or inaccurate submission of contribution data	Employer and / or Scheme Member/ MAT contributions	Administration fees will be applied proportionally to the time spent addressing the issue: £70 per hour of additional work.
Overdue YE return	returns received after 30 April after the appropriate year end	£500 per occasion plus £100 per month or part thereof.
Unsolved YE data queries after 10 days	failure to respond to requests for information to resolve data queries within 10 working days	Queries more than 10% of membership at year end - £500 per occasion plus £100 per month or part thereof
Disproportionate work	Data submissions or actions that result in a disproportionate amount of work to the fund	£70 per hour of additional work.

Penalty fines associated with i-Connect submissions

The submission of monthly data via i-Connect is mandatory for all employers. The following penalty charges (annex 3) may apply if:

- Any new employer is not live within first 3 months of admission to the scheme.
- Once live a monthly submission is late.

Annex 3: Penalty fines associated with i-Connect submissions, depending on employer size

Number of Active members	Penalty charge for failure to start monthly i-Connect returns	Per additional month late or part thereof	Once i-Connect monthly returns are live, penalty charge for one late return during the tax year (after 22nd of month)	Once i-Connect monthly returns are live, penalty charge for second late return during the tax year (after 22nd of month)	Once i-Connect monthly returns are live, penalty charge for third or more late return during the tax year (after 22nd of month)
0-10	£500	£500	Warning	£500	£500 and report to TPR
11 - 99	£750	£750	Warning	£750	£750 and report to TPR
100 - 999	£1,000	£1,000	Warning	£1,000	£1,000 and report to TPR
1000 +	£1,250	£1,250	Warning	£1,250	£1,250 and report to TPR

Any remedial work required because of an employer's i-Connect data submission being incorrect or corrupting the data integrity of the administration data base, will be treated in line with the disproportionate work charge. Any subsequent third-party charges to rectify system data will also be passed on to the employer.

If poor performance persists and affects the Fund's ability to fulfil statutory functions, or if the employer fails to take corrective measures, the Fund reserves the right to report the employer to The Pension Regulator. Any fine from the regulator to the Fund, as a direct result of an employer performance issue will be passed onto the employer.

Underperformance penalty fines will be applied at the discretion of the Head of Avon Pension Fund and will be calculated based on a combination of the standard tariff of charges plus time spent at the disproportionate hourly rate.

If an employer fails to pay any amount due to the Fund (other than monthly contributions) within 30 days, interest for overdue payment will be charged accordingly. This includes charges and recharges levied for cost recovery.

When a penalty fine is imposed the Fund will send a written notice to the lead officer of the scheme employer, which includes:

(a) The reasons for the Fund's opinion.

(b) The amount the Fund has determined the scheme employer should pay for those costs, along with the basis for calculating the specified amount.

The Fund's ability to meet its performance objectives is contingent upon employer compliance with statutory obligations; instances of non-compliance are formally reported to the Pension Board and Committee, reflected in public disclosures.

Target Service Level Agreement (SLA)

The Fund has a statutory obligation to establish performance standards and disclose both targets, and the results achieved. This aims to monitor ongoing improvements in the administration service to members. Annex 4 outlines the target service level agreements and proposed targets that will be monitored

In line with regulatory guidance and sector benchmarking, the Fund has aligned targets to meet statutory deadlines, ensure timely benefit payments, and support ongoing data cleansing and scheme updates.

The Fund has set the following Service Level Agreement's (SLAs), which outline service standards and response times members can expect from us.

Performance will be monitored and reported to the Pension Board and Committee on a quarterly basis.

Annex 4: The Fund's Target Service Levels for service to members

Service	Target KPI	Legal Requirement 100%
New starter welcome letter	80% within 15 working days	Two months from start date
Transfer in quote	80% within 15 working days	Two months from date of request to provide quote
Transfer in confirmation	80% within 15 working days	
Benefit estimate	85% within 15 working days	No more than two months from date of request unless there has been a request in the last 12 months
Annual Pension Statement	95% issued annually (by 31 August)	31 st August each year
Retirement quote	90% within 15 working days	No more than two months from date of initial notification (from employer or member)
Retirement confirmation & payment	90% within 15 working days	
Death acknowledgment	90% within 5 working days	As soon as possible or no more than two months from initial notification
Death confirmation & payment	90% within 10 working days	
Early leavers with over 2 years service	80% within 25 working days	No more than two months from date of initial notification (from employer or member)
Refund quote	90% within 10 working days	No more than two months from date of initial notification (from employer or member)
Refund confirmation & payment	90% within 10 working days	
Transfer out quote	80% within 15 working days	No more than three months from the date of request
Transfer out confirmation & payment	80% within 15 working days	
Changes of details	95% within 5 working days	
Divorce quote	80% within 15 working days	No more than three months from the date of request
Divorce confirmation	80% within 15 working days	
Pension Payments	100% RTI reporting to HMRC must be completed on or before the pension payment is received.	

Online services

The Fund has two websites, one for scheme members and the public, one for employers.

[The Fund's public website](#), for scheme members, prospective members, and the public, is the primary information hub providing up-to-date details on all aspects of the LGPS. Members can access their secure online pension account, to update personal information including expression of wish forms, review Annual Pension Statements, generate pension estimates, and submit queries to the Fund.

Pensioner members can view their Pension Payment Advice slips and P60s and notify the Fund of any changes to their bank or building society details.

[The Fund's employer website](#) provides comprehensive information and guidance on areas such as Scheme responsibilities, contributions and payments, managing employee membership, plus information on training and support available. The site features online forms and a knowledge hub where employers can learn about topics such as Assumed Pensionable Pay (APP). Additionally, there is a section dedicated to the latest news and updates from the Fund.

Both websites and our member self-service portal are accessible and compatible with mobile devices.

Digital transformation

We are transforming the fund by embracing a fully digital experience to benefit members and employers. Members will gain easier access to pension management through an improved member portal, offering intuitive tools, personalised dashboards, and clearer retirement planning support.

Employers will experience streamlined processes that reduce admin burdens and improve efficiency. Smart automation and digital communication will make interactions faster, more responsive, and tailored to individual needs.

To achieve this, the Fund will harness the power of our administration systems, using automation to simplify tasks and free up time for better support. Data-driven insights will refine our services, and a paperless, tech-driven approach will enhance security and compliance.

At the same time, we will adapt our internal processes, finding faster, more efficient ways to communicate with both employers and members. By modernising our portal, workflows, and engagement methods, we will create a seamless, future-ready pension experience that is smarter, more accessible, and built around the people it serves.

Data

The Pensions Regulator's codes of practice mandates that scheme managers maintain records of both common and scheme-specific data for all membership categories. The fund will ensure that any data errors will be identified within The Pension Regulators requirements. The Pensions Board will independently scrutinize and assist the Fund with regulatory compliance, holding the authority to report any serious concerns to The Pensions Regulator (TPR).

The Fund has a Data Improvement Plan, to support and demonstrate compliance.

Data Improvement Plan [Link will be added when finalised](#)

Paying benefits

The Fund reserves the right to calculate and pay benefits based on the best available information, where members' benefits are unduly delayed, due to employers' underperformance in providing accurate data and information. The calculation basis will be explained to both the member and employer in each case, following the completion of the additional administration charges process. Any costs arising from the need to revise benefits will be charged to the employer.

Pensions Administration Strategy (PAS) review

This Administration Strategy sets the standards for performance and best practices that Avon Pension Fund and the Fund's employers should follow. It will start from 2026, after Committee approval and consultation with scheme employers. The Fund will regularly review and update the PAS to reflect changes in regulations and practices. The Pension Board will monitor the PAS to ensure efficient administration and governance.

The Strategy will be reviewed every 3 years.

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Communication Policy Statement

Our communication aims

Avon Pension Fund is committed to effective communication with its members, employers and other stakeholders.

Our communication aims are to

- provide relevant, accurate, accessible information for all stakeholders.
- use plain language and avoid unnecessary jargon.
- use communication channels which best fit individual needs while encouraging digital use to improve service experience.
- support members to make informed decisions about their pension.

This document outlines our guidelines and principles for communication. It's designed to provide a framework for consistent, effective, and transparent communication.

Communication Approaches and Principles

Public Websites: The Fund will develop and maintain two websites – one for employers, and one for members and wider stakeholders. The websites will be the Fund's primary information resource and the basis for content of the Fund's other communication channels.

Online portals requiring passwords: The Fund's online portals support and communicate with members and employers. We actively encourage members to sign-up to our self-serve member portal. It allows members to choose how they would like to be communicated with and to change their preferences at any time. We require all employers to use the i-Connect online platform to securely transfer employee information to Avon Pension Fund.

Digitalisation: The Fund will primarily use digital mediums such as email, online portals, websites, webforms and webinars for its communications. Communication via post is an option for members. Fund officers will remain accessible by phone, through video meetings and in person where necessary. Calls may be recorded for training, processing and monitoring purposes. The Fund will use software to assist with mass emails and Microsoft Teams (or equivalent software) for webinars.

Accessibility and range of mediums: All communications are designed to be accessible, with alternative formats (e.g., accessible PDF, large print, easy read, audio recording, Braille) available on request. While digital communication is encouraged, paper copies and traditional methods like telephone and face-to-face contact remain available. Both our websites and member portal are accessible and compatible with mobile devices such as tablets and smartphones.

Appropriate communications and member segmentation: We take into consideration our audience's requirements, regulatory factors, as well as cost implications for the Fund. We aim to use the most appropriate means of communication for the audiences receiving the information. The Fund will identify if there are opportunities to segment membership (e.g. by age, gender, membership status) and design communications relevant to that segment with the goal of improving engagement.

Data-driven decision making: The Fund will analyse the impact of each mass communication, assessing details such as email open rates, click through rates, feedback from surveys and attendance at events etc. and use this data to inform future communications.

Satisfaction monitoring: Feedback is collected via the website, surveys, and correspondence, and is used to improve services.

Social media: The Fund has a LinkedIn channel which aims to publish Fund news and pension-related stories. The Fund does not participate in other social media such as Facebook and Instagram, owing to costs managing rapid responses across multiple conversations. We can more effectively help individual members through other communication routes.

Communication Methods

Our methods to communicate with the Fund's stakeholders are described in respect of each stakeholder group below.

Scheme members

Communication type	Description
Website	www.avonpensionfund.org.uk is the Fund's public website. It is the primary information hub providing up-to-date details on all aspects of the LGPS.
Online Portal requiring a password	Through the Fund's public website, members can access our member portal to update personal information, review annual pension statements, and submit queries to the Fund. Pensioner members can also notify the Fund of any changes to their bank details and view their pension payment and P60 history.
E-communications	The Fund will produce member emails and bulletins.
Annual Report	The Fund's Annual report will be published on the public website: www.avonpensionfund.org.uk
Newsletter	Members receive at least one newsletter a year. For Active and Deferred members, a newsletter will be issued with their

	Annual Pension Statement. Pensioner members receive a newsletter alongside their P60.
Annual Pension Statement	An Annual Pension Statement is produced for all active and deferred members of the Fund showing their accrued benefits up to the end of the previous financial year. Our default approach is to upload statements to the online portal each year and email when it is available. For members who don't opt for digital communication, we will send a paper copy by post.
Scheme Information	Information on the scheme and any changes will be posted on the Fund's website. Where material changes occur, the Fund will also communicate such changes with members using other channels.
Payslips and P60 (routine)	The Fund sends annual payslips and P60s to pensioners before the end of May each year via post. In future, we are planning to provide these documents via the member portal.
Payslips (ad hoc)	A payslip is also sent where the difference in the net payment is £5 or more from the previous month.
Satisfaction monitoring	The Fund will seek feedback, where practical to do so, from members, measuring the success of communications events and overall communications strategy.

Scheme employers

Communication type	Description
Website	www.apfemployers.org.uk is our website for employers. It provides comprehensive guidance in areas such as employer responsibilities, contributions and payments, managing employee membership. The site also features online forms and a knowledge hub.
Online Portal requiring a password	Employers use the i-Connect portal to securely upload data submissions. This is continually being developed to improve employer experience.
E-communications	The Fund will regularly issue communications to employers digitally. They will be structured to ensure maximum impact and to be easily understood.
Employers' Guide	An online employers' guide is available via the Fund's website.
Satisfaction monitoring	The Fund will seek feedback where practical to do so from our employers, measuring the success of communications events and overall communications strategy.
Consultations	Employers will be consulted on key revisions to the Fund's strategy and policy across areas such as Investment Strategy, Administration Strategy, Communication Policy, and Funding Strategy.
Employer Meetings	We will set up an employer meeting plan for regular engagement. In the event of urgent meetings these will be arranged ad hoc and documented where appropriate.
Employer Training	We will establish a structured employer training programme with links to resources and videos to be stored on our website.
Central Communications	Any key regulatory changes from government or regulatory agencies will be circulated to employers to ensure they are kept informed.
Triennial Valuation	Every three years when the triennial valuation takes place, employer meetings are arranged with the actuary to discuss the valuation, contribution rates, and options around phasing deficit / surplus payments.
Annual Report	The Fund's Annual Report will be published on the public website and a link emailed to Employers.

Prospective scheme members

Communication type	Description
Website and Welcome Pack	The public website (under the 'Thinking of joining' section) contains information on joining the LGPS and the benefits of the scheme. New members can download a welcome pack containing all the information they require when joining.
Employer Communication channels	We actively work with employers to use their internal communication channels to promote the pension scheme and inform employees of their rights, contributions and benefits.

Representatives of members

Representatives of members tend to be in one of the following categories:

- **Power of attorney or parent/guardian of a child pensioner:** The Fund will communicate with these persons in the same way as it would with the member, subject to receiving sufficient evidence of the arrangement.
- **Family, friends or colleagues of members:** The Fund will communicate with these categories of persons, only when the member has given their expressed permission and the Fund determines that it is appropriate to do so. Typically, the Fund will assume that the permission only relates to communication of a single matter.
- **Financial advisers:** The Fund will communicate with a financial adviser in limited circumstances subject to receiving a signed authorisation from the member and being able to verify the identity of the adviser. The Fund will send calculated figures directly to the member (who may then decide whether to share these with their adviser).

Produced in compliance with LGPS Regulations 2013, Section 61.

Version	Reason for change and approval.
1.0	New version. Approved by the Avon Pension Fund Committee on DD Month YEAR.

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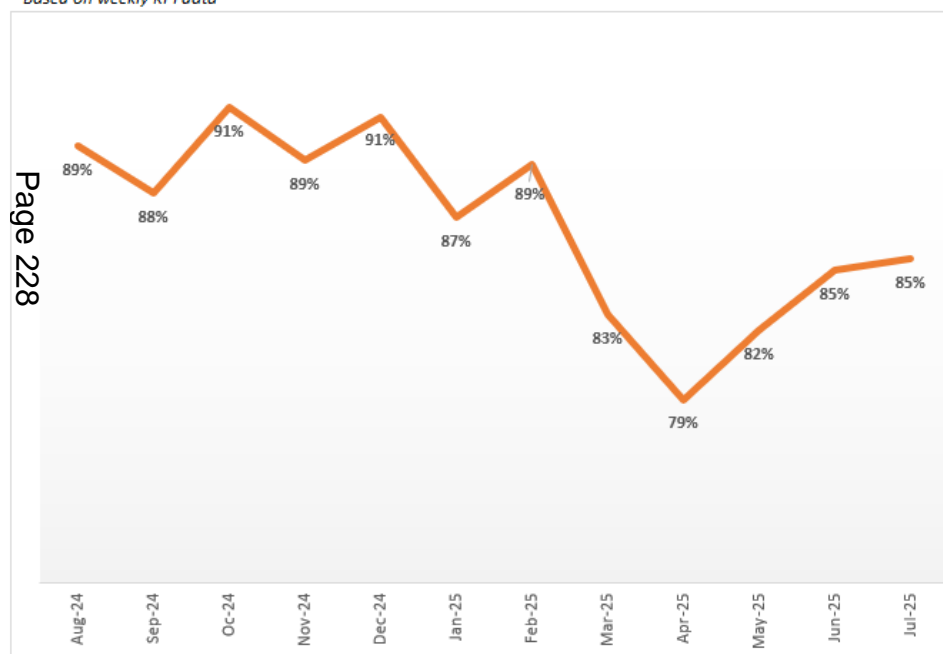
KPIs and Performance



SLA monthly performance average Aug-24 to Jul-25

Average SLA Performance

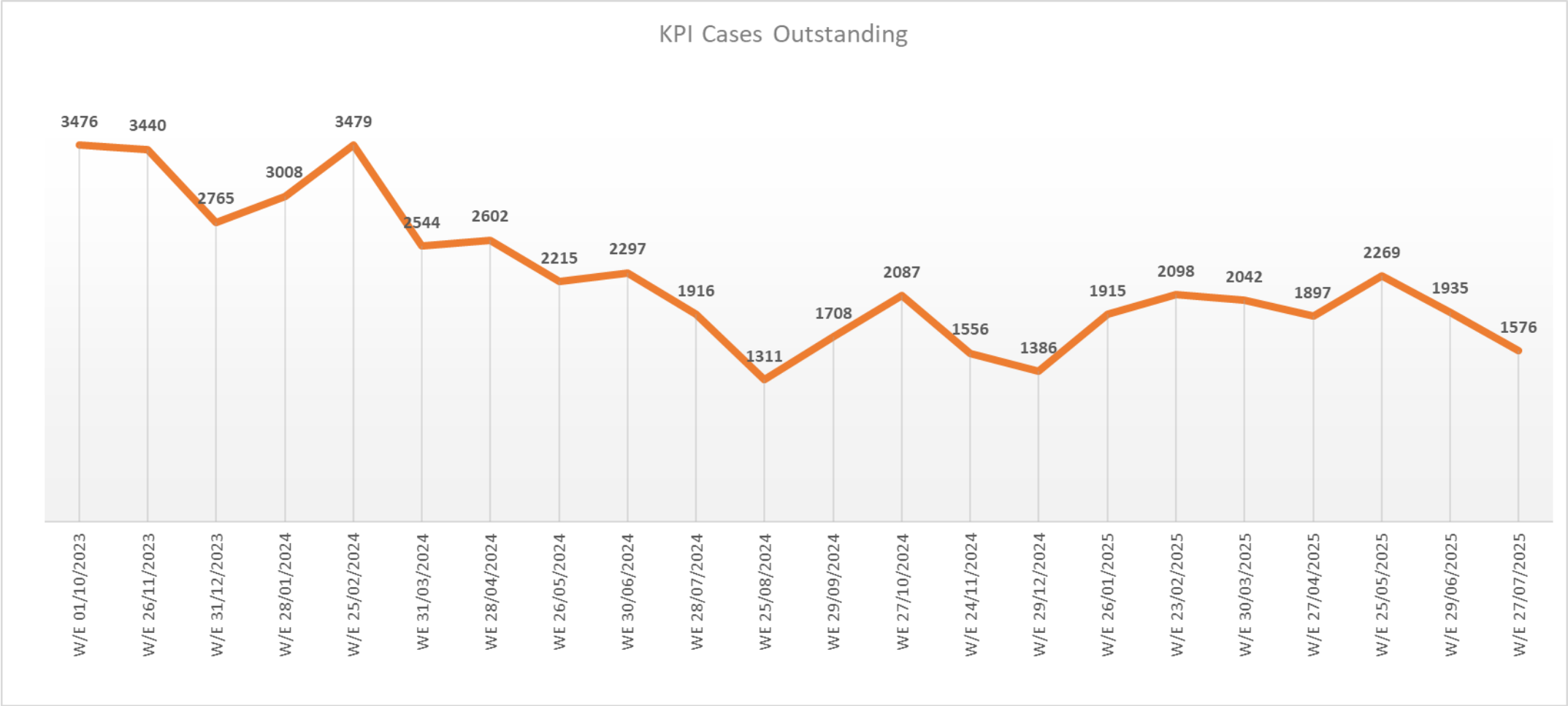
*Based on weekly KPI data



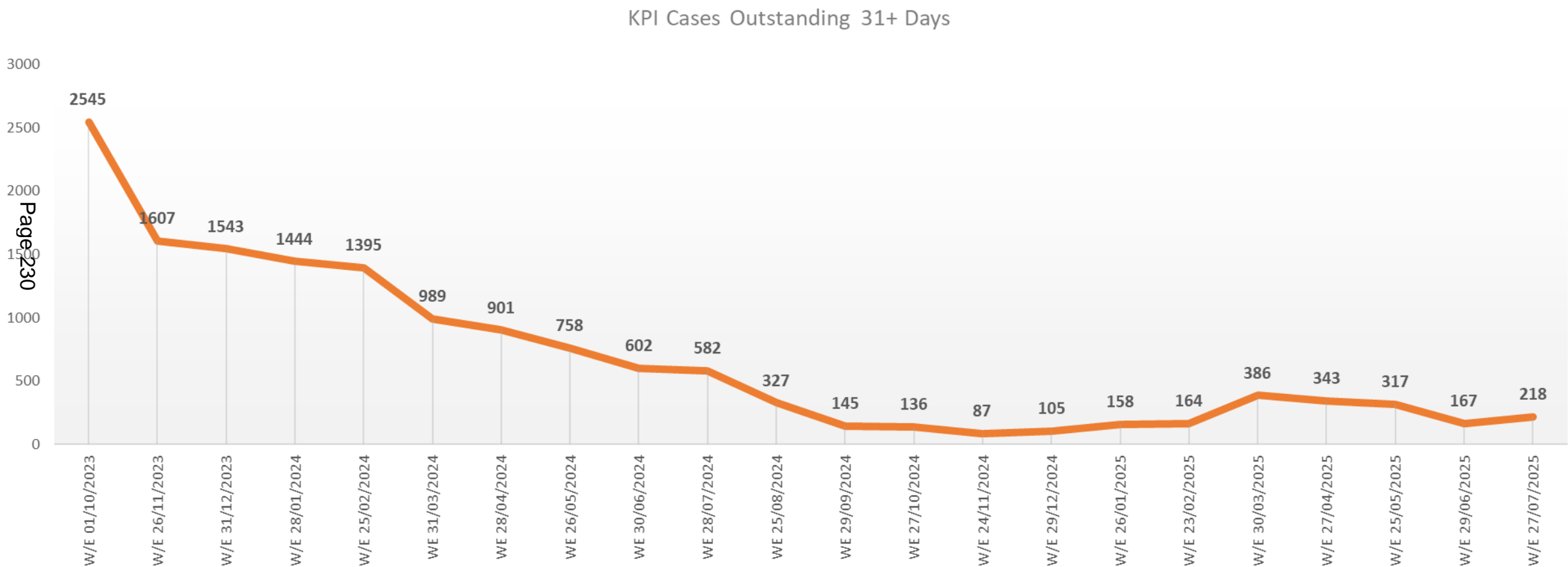
KPI Category	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Cases Created Jul-23 to Jul-25
Death Notification	83.9%	79.1%	94.4%	94.0%	87.6%	100.0%	93.8%	63.8%	71.0%	76.7%	90.6%	97.0%	1,268
Death - Act/Def/Pen - Payment	100.0%	73.4%	67.5%	94.4%	67.7%	81.6%	65.3%	59.9%	49.2%	60.3%	52.6%	70.4%	965
Retirement (Active) - Quote	81.0%	84.9%	84.1%	60.0%	86.3%	45.5%	83.5%	77.7%	80.4%	69.7%	61.7%	76.8%	3,248
Retirement (Active) - Actual	90.7%	94.3%	99.1%	96.7%	96.7%	94.4%	90.1%	83.5%	69.4%	78.5%	80.8%	97.0%	2,077
Retirement (Deferred) - Quote	83.2%	88.9%	88.2%	98.2%	96.2%	73.8%	71.3%	57.0%	25.5%	72.3%	80.7%	68.7%	4,544
Retirement (Deferred) - Actual	97.9%	95.9%	90.7%	98.8%	99.1%	99.0%	98.7%	77.0%	85.5%	77.4%	76.1%	88.5%	2,985
Divorce - Quote	100.0%	100.0%	91.7%	100.0%	100.0%	100.0%	100.0%	100.0%	86.3%	95.5%	100.0%	96.4%	550
Divorce - Actual	100.0%	100.0%	100.0%	33.3%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	21
Refund - Quotes	88.4%	88.1%	75.1%	87.9%	66.4%	73.4%	93.3%	72.5%	52.5%	64.1%	67.3%	52.1%	6,089
Refund - Actual	88.0%	91.0%	95.2%	85.3%	81.7%	66.7%	68.6%	61.1%	77.7%	39.3%	70.3%	94.8%	1,978
Deferred Benefits	79.1%	60.9%	95.7%	76.9%	95.1%	92.6%	87.8%	86.0%	83.8%	84.6%	87.9%	97.8%	6,391
Transfer In (Active) - Quote	73.8%	84.7%	91.8%	59.4%	56.6%	97.4%	93.9%	77.1%	60.0%	42.2%	64.9%	58.9%	859
Transfer In (Active) - Actual	55.6%	66.8%	48.0%	51.4%	79.2%	0.0%	56.4%	50.0%	100.0%	63.9%	47.7%	78.6%	379
Transfer Out (Active/Deferred) - Quote	26.2%	16.9%	42.5%	12.1%	46.6%	35.9%	2.8%	9.8%	30.4%	34.8%	27.2%	43.5%	2,359
Transfer Out (Active/Deferred) - Actual	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	83.3%	100.0%	33.3%	100.0%	85.4%	100.0%	240
Employer Estimate - Quote	77.8%	95.0%	94.4%	91.7%	80.8%	94.5%	100.0%	97.5%	92.0%	76.4%	86.4%	90.2%	452
Member Estimate - Quote	92.9%	90.0%	86.9%	98.7%	100.0%	91.9%	97.5%	94.3%	96.3%	87.1%	100.0%	90.9%	1,463
Joiner	100.0%	99.7%	100.0%	100.0%	100.0%	99.6%	100.0%	99.6%	99.8%	99.8%	100.0%	95.4%	25,570
Weighted Average	89%	88%	91%	89%	91%	87%	89%	83%	79%	82%	85%	85%	

Total KPI's outstanding – Oct 2023 to Jul 2025

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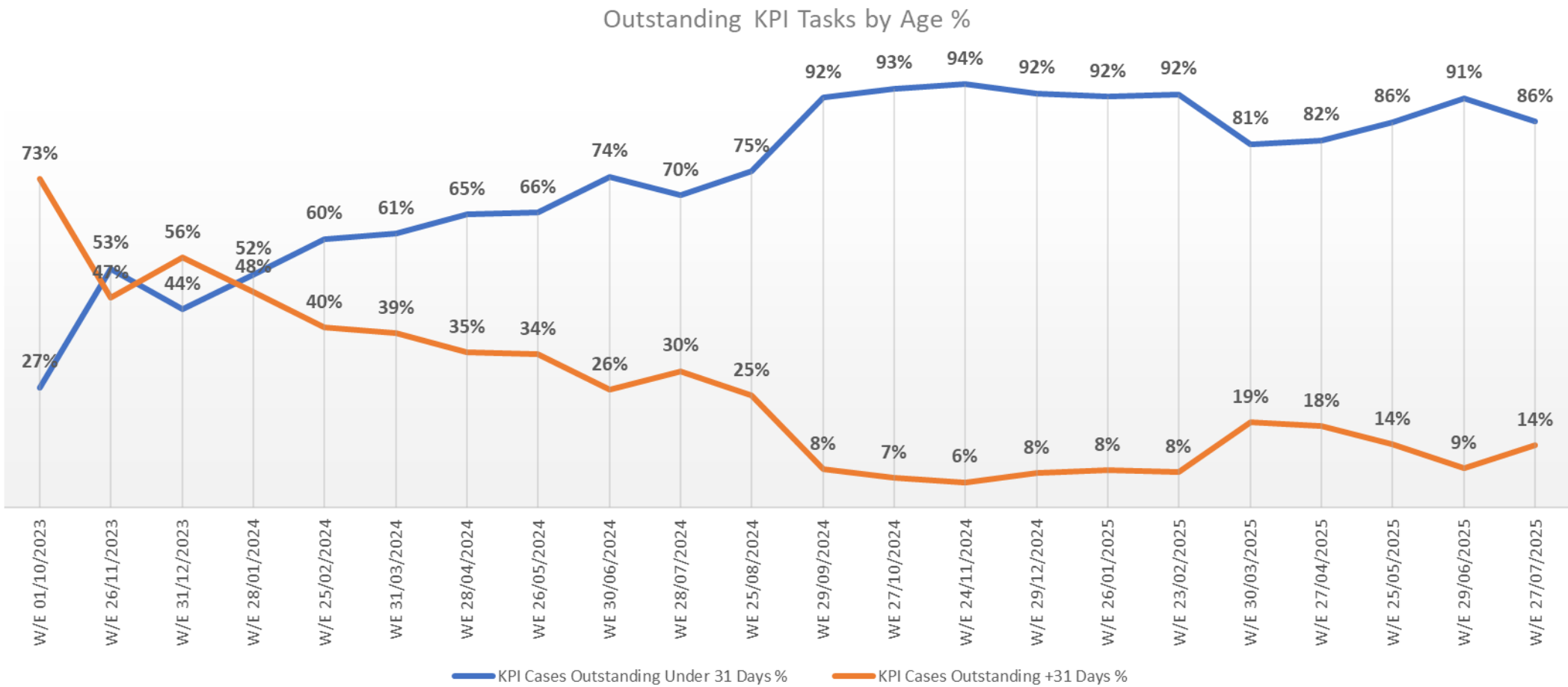


KPI's outstanding over 31 days – Oct 2023 to Jul 2025



KPI's case by age % - Oct 2023 to Jul 2025

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Annex 1 – TPR Errors by Member Numbers

	Mar-25				Jun-25				*Trend
	Member Records	TPR Errors	% Errors	Data Score	Member Records	TPR Errors	% Errors	Data Score	
ACTIVE	40,883	74	0.18%	99.82	41,196	87	0.21%	99.79	+ 13
UNDECIDED	6,090	60	0.99%	99.01	4,549	65	1.43%	98.57	+ 5
DEFERRED	45,210	3,960	8.76%	91.24	45,666	3,617	7.92%	92.08	- 343
PENSIONERS	37,412	370	0.99%	99.01	37,782	381	1.01%	98.99	+ 11
DEPENDANTS	5,158	138	2.68%	97.32	5,190	165	3.18%	96.82	+ 27
FROZEN	8,575	1,969	22.96%	77.04	8,895	1,935	21.75%	78.25	- 34
TOTALS	143,328	6,571	4.58%	95.42	143,278	6,250	4.36%	95.64	- 321

Annex 2 – Outstanding Queries by Type (there may be multiple queries per member)

	Mar-25		Jun-25		*Trend
	TPR Errors	%	TPR Errors	%	
Age 75 Exceeded Lgps Eligibility Issue	113	1.72%	122	1.94%	+ 9
CARE pay for 2014-2015 required	1	0.02%	0	0.00%	- 1
CARE pay for 2023-2024 required	7	0.11%	2	0.03%	- 5
CARE Pay Req (add dates in task comment)	0	0.00%	34	0.54%	+ 34
Casual Hours Data Required	1	0.02%	0	0.00%	- 1
Correct Address Required	5,803	88.31%	5,366	85.24%	- 437
Correct Forenames Required	8	0.12%	8	0.13%	+ 0
Next of kin address Required?	22	0.33%	62	0.98%	+ 40
Correct date of birth required	0	0.00%	7	0.11%	+ 7
Correct Nino Required	156	2.37%	176	2.80%	+ 20
Correct Title Required ie Miss Or Mr	1	0.02%	0	0.00%	- 1
Data Required From A Previous Employer	1	0.02%	1	0.02%	+ 0
Date Joined Fund Required	1	0.02%	1	0.02%	+ 0
Historic Refund Case	447	6.80%	443	7.04%	- 4
Leaver Form Required	3	0.05%	20	0.32%	+ 17
Pay Ref Required	7	0.11%	14	0.22%	+ 7
Correct Surname Required	0	0.00%	39	0.62%	+ 39
Grand total	6,571	100%	6,295	100%	

*Trend is influenced by number of errors

Outstanding TPR Cases by Error Type



Appendix 5 - McCloud Remedy – Regulatory completion 31 August 2025

As laid down in statutory guidance all LGPS Funds are to have completed the retrospective remedy for members who qualify for protection and have an underpin payable for McCloud.

The statutory guidance states that for members, the McCloud implementation period ends on 31 August 2025 and at the end of the implementation period:

- all retrospective amendments to members' pensions and other rights should be concluded, as a consequence of the regulation amendments from 1 October 2023 (LGPS (Amendment) (No. 3) Regulations 2023).
- records for members who qualify for the McCloud remedy but have not yet taken their pensions should be accurate.

Where are Avon Pension Fund with McCloud remedy?

APF have completed a significant number of retrospective calculations, and have finalised the following cohorts of membership:

- Pensioners – circa 400 including ill-health retirements
- Death cases and subsequent widow(s) pensions – 24 cases
- Trivial Commutation cases – 42 cases
- Non-Club Transfer out cases – 55 cases
- Club transfer out cases – 69 of which 7 need an additional payment to be made to the other remedy scheme.

Still outstanding are some of the club transfer cases. The calculations for these are more complex and for any transfers that have been received into the LGPS, we are awaiting additional details from the other remedy scheme to finalise these. This only affects deferred and active members and the number of cases outstanding are 33.

Also outstanding are the divorce debit cases, where regulation needs amendment and guidance is still awaited. In total we have 36 of these cases.

Where are Avon Pension Fund with issuing Annual Benefit Statements with McCloud?

APF have successfully incorporated the mandatory and some additional McCloud data into their annual benefit statements for 2025 for both deferred and active members.

The statements for 2025 will differ depending on a members McCloud protection.

Group 1 – These are members who are protected by McCloud and have an underpin value greater than £0.01.

Group 2 – These are members who are protected by McCloud but whose underpin value is equal to £0.00.

Group 3 – These are members that are protected by McCloud but for whom we cannot confirm the value of the underpin in 2025. These are our club transfer in members and divorce debit members.

Group 4 - These are members that are not protected by McCloud for they do not have qualifying service.

In terms of communication to members protected by McCloud, it is the Group 3 members that will not have an underpin value confirmed in the 2025 ABS.

The numbers impacted are 21 deferred members and 46 active members.

There are a further 62 deferred members whose statements were excluded as there was a query on the eligibility for McCloud. These members will all get a statement generated and sent in October 2025 confirming the correct protection.

Conclusion

As Avon Pension Fund have not been able to fully complete McCloud remedy or include an underpin value in all 2025 benefit statements where a member is protected, we are exercising our discretion before the 31 August 2025 as is detailed in Regulation 2(6) of The Local Government Pension Scheme (Information) Regulations 2024 (SI 2024/880).

Avon Pension Fund will report these as internal breaches and will monitor accordingly. The determination will be discussed with the Pension Board and Committee, and with a plan of action to fully complete McCloud remedy by 31 August 2026 to be compliant with regulation.

Bath & North East Somerset Council		
MEETING	AVON PENSION FUND COMMITTEE	
MEETING	26 September 2025	Agenda Item Number
		11
TITLE:	Update on Legislation	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report:		
Appendix 1 – Latest position of regulatory changes		

1 THE ISSUES

- 1.1 The purpose of this report is to update the Pension Committee on the latest position concerning the Local Government Pension Scheme [LGPS] and any proposed regulatory matters that could affect scheme administration.

2 RECOMMENDATION

The Committee is asked to:

- 2.1 Note the current position regarding the developments that could affect the administration of the fund.

3 FINANCIAL IMPLICATIONS

- 3.1 There are no financial considerations as this report is for information only.

4 THE REPORT

- 4.1 The table below provides a summary of the main regulatory updates since the last meeting, including brief comment on what the implications are for the Fund and what the next steps will be.

5 RISK MANAGEMENT

- 5.1 An effective governance structure, defining clear responsibilities, and ensuring that the decision-making body has an adequate level of knowledge and access to expert advice, is a key aspect of the risk management process.

6 EQUALITIES STATEMENT

- 6.1 A proportionate equalities impact assessment has been carried out using corporate guidelines and no significant issues have been identified.

7 CLIMATE CHANGE

- 7.1 The Fund is implementing a digital strategy across all its operations and communications with stakeholders to reduce its internal carbon footprint in line with the Council's Climate Strategy. The Fund acknowledges the financial risk to its assets from climate change and addresses this through its strategic asset allocation to Paris Aligned Global Equities, Sustainable Equities and renewable energy opportunities. The strategy is monitored and reviewed by the Committee.

8 OTHER OPTIONS CONSIDERED

- 8.1 None

9 CONSULTATION

- 9.1 The report and its contents have been discussed with the Head of Pensions representing the Avon Pension Fund and the Director of Financial Services, Assurance & Pensions, representing the administering authority.

Contact person	Nicky Russell – Technical and Compliance Manager; Tel 01225 395389
Background papers	LGA Bulletins SAB Meeting Minutes National Technical Group Meeting Minutes
Please contact the report author if you need to access this report in an alternative format	

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APPENDIX 1 – REGULATORY UPDATE

Item	Latest Position	Relevant Links	Action by Fund / Next Steps
<div style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 241</div> Pensions Review	<p>Consultation Response On 29 May 2025 government issued its response to the “Fit for the Future” consultation alongside a final report on the Pensions Investment Review – the reforms will be legislated for in the forthcoming Pension Schemes Bill and supporting legislation.</p> <p>The response confirmed the government’s intentions to take the core proposals around pooling and governance from the consultation forward (including confirmation to not reduce the number of pools below six). In addition, backstop powers will be introduced that provides government with the ability to direct funds to participate in a particular pool, or perhaps, depending on concerns around governance, enforce a compulsory merger.</p> <p>Alongside confirming requirements around pooling, local investment and pool governance, in relation to fund governance, the response confirms that funds will be required to</p> <ul style="list-style-type: none"> • appoint a senior LGPS officer, • prepare strategies on governance, knowledge and training (to include a conflicts of interest policy), and administration, • undertake a triennial independent governance review, • ensure pension committee members meet new knowledge and understanding standards, • appoint an independent advisor (non-voting) to the pension committee. <p>The SAB issued its own statement following the Government response.</p> <p>Pensions Commission & State Pension Age Review On 21 July 2025 government revived the Pensions Commission (originally established in 2002) to build on work carried out previously to review the UK pension system as a whole. The revised Commission will focus on:</p> <ul style="list-style-type: none"> • Outcomes and risks for future cohorts of pensioners • How to improve retirement outcomes • Role of private pension provision and wider savings • Long-term challenges of an ageing population • Proposals for change beyond the current parliament. <p>At the same time the third review of the State Pension Age was also launched by government, followed by a call for evidence on 18 August 2025.</p>	<p>https://www.gov.uk/government/consultations/local-government-pension-scheme-england-and-wales-fit-for-the-future/outcome/local-government-pension-scheme-england-and-wales-fit-for-the-future-government-response#pooling-1</p> <p>https://www.gov.uk/government/publications/pensions-investment-review-final-report</p> <p>https://lgpsboard.org/index.php/welcome</p> <p>https://www.gov.uk/government/news/government-revives-landmark-pensions-commission-to-confront-retirement-crisis-that-risks-tomorrows-pensioners-being-poorer-than-todays</p> <p>https://www.gov.uk/government/collections/third-state-pension-age-review</p> <p>https://www.gov.uk/government/calls-for-evidence/third-state-pension-age-review-independent-report-call-for-evidence?utm_medium=email&utm_campaign=govuk-notifications-topic&utm_source=8a5f2848-b1c1-4238-969f-5c765c275234&utm_content=daily</p>	<p>The pooling proposals in the consultation, and the impact on the Fund, will be considered further by the Head of Pensions and Investment Manager, alongside advisors and the Brunel pool. These will be reported separately.</p> <p>The recommendations and requirements relating to governance will be considered further by the governance team (when a response to the consultation is published) alongside ongoing work associated with ensuring compliance with the TPR General Code.</p> <p>Any further changes to the State Pension Age will need to be considered in terms of the impact on the administration team through member communications, benefit calculations and the impact on employer contribution rates and cost. Developments in the review will be monitored.</p>
Pension Schemes Bill	<p>On 5 June 2025, government introduced the Pension Schemes Bill 2025 in the House of Commons and published a roadmap for the implementation of the various reforms. The introduction of the Bill is the Government’s first step towards implementing many of these announcements from the Fit for the Future consultation and the full Bill can be found here alongside supporting explanatory notes.</p>	<p>https://www.gov.uk/government/news/20-million-workers-set-to-benefit-from-new-pension-schemes-bill?utm_medium=email&utm_campaign=govuk-notifications-topic&utm_source=a04c99aa-7d07-4daa-ab9d-32e844b88ad9&utm_content=immediately</p>	<p>The Bill will have implications for how the outcomes of the Fit for the Future consultation are implemented and so will impact the investment and governance teams, in particular. Developments will be monitored by these teams and the impact considered further should any changes be made and/or further details are released.</p>

	<p>Chapter 1 of the Bill relates to the LGPS specifically and includes provisions relating to:</p> <ul style="list-style-type: none"> • The use of “asset pool companies” • FCA authorisation • Asset management in the LGPS • Local investments • Governance <p>The Bill also refers to amendments to:</p> <ul style="list-style-type: none"> • The Procurement Act 2023 with regard to investment management activities undertaken by the pools, and • The Public Service Pensions Act 2013 to extend the Secretary of State’s powers to include the power to make regulations about the merger of two or more LGPS funds, including compulsory merger <p>The Bill is now at Committee stage in the House of Commons and a call for evidence has been published.</p>	<p>https://assets.publishing.service.gov.uk/media/68960008e7be62b4f06431bf/workplace-pensions-roadmap.pdf</p> <p>https://publications.parliament.uk/pa/bills/cbill/59-01/0255/240255.pdf</p> <p>https://publications.parliament.uk/pa/bills/cbill/59-01/0255/en/240255en.pdf#:~:text=The%20Bill%20provides%20for%20consolidation%20in%20the%20pensions,Government%20Pension%20Scheme%20%28LGPS%29%20in%20England%20and%20Wales.</p> <p>https://bills.parliament.uk/bills/3982</p>	
<p>McCloud Judgment</p> <p>Page 242</p>	<p>For the August 2025 ABS exercise, the team have only had to use the discretion available to them to issue statements without quoting the protection for 46 active members, and 21 deferred members. Verbal approval to the use of this discretion was provided by the Board. A statement was issued by TPR on 19 June 2025 setting out their expectations in this area.</p> <p>Administering authorities have also received reassurance recently around the sharing of member data with other schemes (without member consent) for the purpose of implementing the remedy, and also member contact details where necessary through the NI database.</p> <p>The Access and Fairness consultation above also included proposals linked to the implementation of the remedy.</p>	<p>https://www.thepensionsregulator.gov.uk/en/public-service-pension-schemes/remediable-service-statements-delivery-lgps</p>	<p>The team is continuing to work towards implementing the remedy in full, and now that a determination has been made exercising the Funds discretion, the deadline date has been put back to 31 August 2026.</p> <p>Aside from the position on annual benefit statements, the remaining areas of the remedy that need to be considered and implemented include: Divorce debits and credits, club transfer in’s and the Teachers excess service.</p> <p>The number of cases to be actioned are small and the Fund do not see any issues with the completion of these before 31 August 2026, providing guidance is provided imminently.</p>
<p>Access and Fairness Consultation</p>	<p>On 15 May 2025, MHCLG launched its “Access and Fairness” consultation for the LGPS. The proposed changes are intended to improve fairness and access to the LGPS and include proposals relating to:</p> <ul style="list-style-type: none"> • Survivor benefits and death grants • Gender pensions gap benefits and reporting • Opt-outs • Forfeiture • McCloud remedy • Abolition of LTA changes • Other miscellaneous changes <p>The consultation closed on 7 August 2025. The LGA, SAB and Avon Pension Fund have issued responses to this consultation.</p>	<p>https://lgpsboard.org/images/Consultations/Access%20and%20Fairness%20SAB%20response%20final.pdf</p> <p>https://lgpslibrary.org/assets/cons/lgpsew/2025%20Access%20and%20Fairness%20response%20final.pdf</p>	<p>Whilst supportive of many of the proposals outlined in the consultation, concerns have been raised in relation to the potential implications on administration teams around rectification of survivor benefits.</p> <p>Avon Pension Fund have a large membership and changes to survivor benefit regulations will be retrospective. This will create yet another administrative burden to identify and remedy these cases.</p> <p>Government have been urged to seriously consider timescales for implementation, and ensure there is clear guidance upfront.</p>
<p>Pensions Dashboard</p>	<p>Administering authorities can now register themselves with the MaPS’ governance register once they receive their registration code in May. Instructions on how to register will be provided and further information can be found in TPR’s hot topic article.</p>		<p>The Fund are still working to comply with the timelines for Dashboard connection.</p>

	<p>Various publications/updates relating to forthcoming Pension Dashboards including updated support for LGPS Funds to comply with the necessary requirements have been released and are summarised below.</p> <p>TPR</p> <ul style="list-style-type: none"> - Hot topic articles around working with AVC providers and registration codes. - Updated dashboards guidance on various subjects. - Short videos from savers as part of a campaign to get the pension industry dashboard ready. <p>PDP</p> <ul style="list-style-type: none"> - 6 month progress report to December 2024. - Blogs around reporting standards, ecosystem connections and third parties along with associated guidance. <p>LGA</p> <ul style="list-style-type: none"> - Updated guidance to reflect changes to data accuracy and provision, ecosystem connection and data provision timescales, MaPS registration and compliance and enforcement. 		A separate update will be provided on this item in the administration report in relation to what actions have/are being taken by the Fund.
Pension Taxation Page 243	<p>On 21 July 2025, HMT published a response its consultation on proposed changes to Inheritance Tax from October 2024 alongside draft clauses that will be included in the Finance Bill 2025-26. A consultation on the draft clauses will run to 15 September 2025. A draft explanatory memorandum and policy paper were also published. A further consultation will take place on the new reporting processes that are required.</p> <p>The key changes to emerge from the original consultation proposals, based on the feedback submitted by many across the industry were:</p> <ul style="list-style-type: none"> • All death-in-service benefits from registered pension schemes, including the LGPS, will be excluded from the value of an individual's estate for IHT purposes, regardless of whether scheme discretionary or non-discretionary. • Pension Scheme Administrators (PSAs) will not be responsible for reporting and paying any IHT due on pension benefits. Instead, personal representatives (PRs) will have this responsibility. PSAs will have a duty to support PRs in this process. • Support for PRs and beneficiaries who may struggle to pay IHT on pensions. <p>Tools and guidance will be published by Government to support PRs, PSAs and beneficiaries ahead of implementation in April 2027.</p>	<p>https://www.gov.uk/government/consultations/inheritance-tax-on-pensions-liability-reporting-and-payment/outcome/inheritance-tax-on-pensions-liability-reporting-and-payment-summary-of-responses</p> <p>https://www.gov.uk/government/publications/reforming-inheritance-tax-unused-pension-funds-and-death-benefits/draft-legislation-accessible-version</p> <p>https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F687dfb06312ee8a5f0806be2%2FM6002_explanatory_note.odt&wdOrigin=BROWSLINK</p> <p>https://www.gov.uk/government/publications/reforming-inheritance-tax-unused-pension-funds-and-death-benefits/inheritance-tax-on-unused-pension-funds-and-death-benefits</p>	<p>The response to the consultation is welcomed, in particular the exclusion of death in service benefits from registered pension schemes and the requirement for PRs to be responsible for the reporting and payment of IHT, not PSAs given the additional burden this would have placed on the administration team when dealing with death cases.</p> <p>The Fund await further updates in relation to the current/further consultations that will take place to consider the potential impact of the new legislation and reporting processes.</p>
Annual Report and Accounts	<p>Linked to the reporting of investment management fees and costs on 14 July 2025 a consultation was launched by SAB on proposed changes to the LGPS Code of Transparency. The Code requires signatories to provide consistent data to LGPS funds and pools on investment management fees and costs, which will then be used in reporting by funds where necessary.</p> <p>The consultation closed on 15 August 2025.</p>	<p>https://lgpsboard.org/index.php/board-publications/board-consultations</p>	<p>The Fund will monitor the progress of this consultation and the implications this may have on the reporting of investment management fees and costs in the annual report and accounts.</p>

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Bath & North East Somerset Council	
MEETING:	AVON PENSION FUND COMMITTEE
MEETING DATE:	26 September 2025
TITLE:	Risk Management Process & Risk Register
WARD:	ALL
AN OPEN PUBLIC ITEM	
List of attachments to this report: Appendix 1 – Risk Register Appendix 2 – Risk Framework & High Level Summary	

1. THE ISSUE

- 1.1. The purpose of this report is to update the Committee with the quarterly review of the risk register.

2. RECOMMENDATION

- 2.1. That the Committee notes the report.

3. FINANCIAL IMPLICATIONS

- 3.1. There are no direct implications related to the Committee in connection with this report.

4. REPORT – RISK MANAGEMENT PROCESS & RISK REGISTER

- 4.1. The Fund has in place a documented risk management policy setting out the Fund's approach to risk, process for review and update of the risk register. It also sets out the roles and responsibilities of all those involved in the management of risk within the Fund including the role of the Pension Board and Pension Committee.
- 4.2. The risk framework introduced to assist risk owners to assess the risk and score is attached as appendix 2.
- 4.3. A high level matrix showing the distribution of risks by score is attached as appendix 2.
- 4.4. The complete risk register is attached as appendix 1.
 - The risk register identifies risks which could have material impact on the APF in terms of service, value, reputation, or compliance. It also sets out mitigating actions.
 - The risk register is reviewed quarterly by APF management and reported to the Pension Committee and Pension Board every quarter.

- All risks are also reviewed quarterly or when there has been a material change to the risk.
- Risks fall into the following categories, owned by the relevant member of the APF management team:

Category of Risk	Risk Owner
Administration	Pensions Manager
Regulatory	Technical & Compliance Advisor
Governance	Governance & Risk Advisor
Employers (Funding)	Funding & Valuation Manager
Employers (Data)	Employer Services Manager
Investments	Investments Manager
Finance	Finance & Systems Manager

5. QUARTERLY REVIEW OF RISK REGISTER

- 5.1. The quarterly review of the risk register has taken place and a couple of changes have been made to scores for this quarter. Some amendments have also been made to current impacting factors.
- 5.2. Risk NR02 – Regulatory Changes. The likelihood has been increased from possible to almost certain to reflect the expected regulatory changes following the Access & Fairness consultation.
- 5.3. NR03 – Pension Committee cannot operate effectively. The wording has been revised to include the Pension Board and recent difficulties recruiting new board members.
- 5.4. NR16 – Cashflow profile is maturing. The Fund has increased the cash buffer from £20m to £25m to meet increasing monthly outflows.
- 5.5. NR17 – Late/incorrect contributions from employers. Increased checks and reconciliations have been introduced.
- 5.6. Our top 3 risks have been updated to reflect the change of score to the regulatory risk:
 - NR06 – the loss of IT including cyber attack and loss of power. The fund has completed the move to a Heywood hosted solution and Heywood have provided its Disaster Recovery plan.
 - NR01 – Poor service levels below agreed standards. The current factors impacting this risk are set out in the Pension Fund Administration report.
 - NR02 – Regulatory Changes – expected regulatory changes and remedial work following the Access & Fairness consultation

6. EQUALITIES

- 6.1. A proportionate equalities impact assessment has been carried out using corporate guidelines and no significant issues have been identified.

7. CLIMATE CHANGE

7.1. The Fund is implementing a digital strategy across all its operations and communications with stakeholders to reduce its internal carbon footprint in line with the Council's Climate Strategy. The Fund acknowledges the financial risk to its assets from climate change and is addressing this through its strategic asset allocation to Paris Aligned Global Equities, Sustainable Equities and renewable energy opportunities. The strategy is monitored and reviewed by the Pensions Committee.

8. OTHER OPTIONS CONSIDERED

8.1. None

9. CONSULTATION

9.1. The Director of Financial Services, Assurance & Pensions has had the opportunity to input to this report and has cleared it for publication.

Contact person	Carolyn Morgan, Governance and Risk Advisor 01225 395240
Background papers	None
Please contact the report author if you need to access this report in an alternative format	

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Number	Function	Risk	Impact	Pre Mitigants			Mitigating Actions / Control Framework	Current Impacting Factors	Post Mitigants			
				Impact	Likelihood	Score			Impact	Likelihood	Score	Trend
NR06	Governance	Loss of IT, including cyber attack & loss of power	Fund is unable to operate Members do not receive pension payment on time	Critical	Almost Certain	25	<ul style="list-style-type: none"> - Business continuity plan reviewed and tested - B&NES cyber security policy and system defence - Implementation of internal cyber audit findings - Heywood Business Continuity plan in place 	Hosted server arrangement with Heywood Implementation of General Code of Practice Requirements	Critical	Likely	20	→
NR01	Admin	Poor service levels below agreed standards	Service standards not met Poor member outcomes Breach of regulations	Critical	Almost Certain	25	<ul style="list-style-type: none"> - KPIs and complaints monitored and acted on - Plan to digitise will improve self-serve and operations efficiency - Actions to improve staff recruitment and retention - Process improvements being identified and implemented - Review of Top 10 Process Controls - Plan to minimise effects of key people/resources - Business Continuity and Crisis Communications Plan in place 	Digital transformation project Recruitment, skills and experience of staff McCloud Remedy Implementation of internal controls following review Pensions Dashboard	High	Likely	16	→
NR02	Regs	Regulatory changes	Breach of regulations Poor member outcomes Increased workloads for officers	High	Likely	16	<ul style="list-style-type: none"> - Regulatory changes monitored via LGA and professional advisors - Officers attend SWAPOG/Tech Group/working groups - Regulatory projects included in service plans - Officers respond to consultations - Software providers are more responsive to regulatory change 	McCloud Remedy Pensions Dashboard Resource implications of access and fairness regulations	Medium	Almost certain	15	↓
NR19	Investments	Move to new asset pool	Uncertain outcome Challenging timeline Significant increase in workload Risk to staff retention in pool Potential impact to investment strategy Government driven change removes control for the Fund Increased costs due to transition of assets plus possible wind down of Brunel Ltd	High	Almost Certain	20	<ul style="list-style-type: none"> - Work with pool to assess options to move as pool/sub group of pool - Advisors to assess options as pool and for APF individually so have analysis for decision - Prioritise work until Sept, when initial decision should be made by APF - Disruption within pool minimised as external managers in each portfolio manage the assets 	Project team set up in Brunel to lead strategy/discussions on pool basis Have strategic advisor and will get legal advice regarding implications of dismantling Brunel pool	Medium	Almost certain	12	→
NR05	Governance	Failure to manage personal data per regulations	Personal data corrupted or illegally shared Member detriment Fines and reputational damage	Critical	Almost Certain	25	<ul style="list-style-type: none"> - One West is Data Protection Officer for Fund and advises on data protection matters - Record of processing and privacy notice set out how data is managed - Processes reviewed and updated following minor breaches - Regular officer training - Data sharing/transfer agreements and DPIAs implemented for all relevant projects - Hybrid mail implementation 	Skills and experience of staff Electronically submitted data Introduce bulk processes Potential updates to telephone system	High	Possible	12	→
NR12	Investments	Failure to achieve decarbonisation targets	Government climate policies not moving fast enough or sufficiently enforced Significant reputational and financial risks to value of investments	Critical	Almost Certain	25	<ul style="list-style-type: none"> - Climate exposure assessed annually - climate risk analysis embedded into strategic decisions - Net Zero target of 2045 - by 2030 will divest from high emission companies that are not aligning to NZ targets to reduce emissions by 2025 and 2030 - programme to engage with companies and policymakers - Brunel's comprehensive climate change policy and approach to investing underpins each portfolio 	Limited ability to control systemic risk Public policy is not driving agenda	Medium	Likely	12	→
NR10	Investments	Failure to earn investment returns as per Funding Strategy	Employer contributions need to rise	Critical	Likely	20	<ul style="list-style-type: none"> - Diversified asset allocation - Professional and independent investment advice - Risk management strategy supports funding strategy - FRMG & Investment Panel monitor performance and risk - Periodic strategic investment review 	Heightened geo political risk Lower global growth and higher inflation/interest rates	High	Possible	12	→
NR11	Investments	Brunel fails to deliver client objectives regarding service delivery	Affects Fund's ability to achieve investment objectives	Critical	Possible	15	<ul style="list-style-type: none"> - Brunel governance framework for strategic and operational decision making - Robust performance reporting - Avon-Brunel working group (internal) 	Future of pooling is strategic challenge for pool, focus needs to be on BAU	High	Possible	12	→
NR07	Employers Data	Employers do not comply with regulatory responsibilities, LGPS regulations or the Funding Strategy Statement	Poor member data Fines and greater scrutiny by TPR Employer liabilities incorrect if data is incorrect Non-compliance with the FSS and funding policies Reputational risk of litigation	Critical	Likely	20	<ul style="list-style-type: none"> - Management of employers set out in admin strategy/MOU - Employer KPIs recorded and monitored vs TPR standards - Employer training - Reconciliation of Iconnect and Accounts in regards to contributions and data provided - Specialist legal and actuarial advice needed to resolve employer issues - Clear policies in FSS set out process and employer obligations 	TPR General Code of Practice Currently drafting new administration strategy and data improvement plan	Medium	Possible	9	→

NR04	Governance	Governance of Fund not in accordance with APF policies Controls not adequate	Member detriment Additional costs for Fund Fines for non-compliance Disciplinary issues and reputational risk	High	Almost Certain	20	<ul style="list-style-type: none"> - Internal Audit plan in place - Fund policies regularly reviewed - Media enquiries dealt with per B&NES policy - Contracts in place with legal advisors and PR professionals - Media monitoring undertaken - Action plan in place for TPR GCOP - Partial implementation of SAB Good Governance requirements 	SAB Good Governance Review TPR General Code of Practice Review of internal controls	Medium	Possible	9	→
NR08	Employers Funding	Employers unable to meet financial obligations to Fund	Financial cost to other employers in the Fund	High	Likely	16	<ul style="list-style-type: none"> - Policies on employer financial stability set out in FSS and ISS - Strong covenant management and information gathering processes - Quarterly review and mitigating action 	Challenging public sector funding environment Valuation in progress	Medium	Possible	9	→
NR09	Investments	Operational risks of investment managers, custodian and other investment suppliers	Loss of assets Inability to trade is assets inaccessible	High	Possible	12	<ul style="list-style-type: none"> - Due diligence and audits of service providers, managers - Controls embedded in investment management agreements - Diversification across different asset managers - Quarterly service & risk review with Brunel and suppliers 	Data management and cyber risk	Medium	Possible	9	→
NR16	Finance	Cashflow profile is maturing	Not enough cash in bank to meet pension payments	Critical	Almost Certain	25	<ul style="list-style-type: none"> - Monthly monitoring & forecast of cashflow - Increased the cash buffer from £20m to £25m to meet increasing monthly outflows - Tradeable assets can be swiftly sold 	Increased the cash balance that can be held in money market funds	High	Unlikely	8	→
NR14	Investments	An increase in leverage materially reduces capital value leading to an unplanned and significant deviation in strategic asset allocation	LDI strategy may have to be unwound if insufficient collateral Inability to raise hedge ratio	High	Likely	16	<ul style="list-style-type: none"> - Maintain collateral at prudent level with materia buffer vs risks - Set hedge ratio at level that can be adequately collateralised - Auto pause when LDI hedge ratio hits 40% - Offsetting nature of synthetic equity and equity protection strategies dampens leverage requirements - Simplification of LDI programme post 2025 ISR makes monitoring leverage and collateral easier 	UK gilt market environment. Currently have high collateral buffer	High	Unlikely	8	→
NR03	Governance	Pension Committee and Pension Board cannot operate effectively	Delays in decision making by the Pension Committee Limited oversight from the Pension Board Failure to meet MIFID & TPR regulations	Medium	Almost Certain	15	<ul style="list-style-type: none"> - Representation set out in Fund's representation policy - Knowledge requirements in Training policy - Compliance vs regulations defined in Compliance Statement - Decisions responsibilities set out in decision matrix - Terms of Reference set out governance framework 	Recruitment for Pension Board	Medium	Unlikely	6	→
NR13	Investments	Treasury investments	Loss of capital or income on cash Delayed return of principle or investment income	Medium	Possible	9	<ul style="list-style-type: none"> - Adopt B&NES Treasury management policy - Due diligence on banks - Diversification across multiple suppliers - Consultation with treasury management advisors 	Increased number of money market funds to invest in	Medium	Unlikely	6	→
NR17	Finance	Late / incorrect contributions from employers	Cashflow shortfalls Employer funding Deficits / Default TPR breach	Medium	Possible	9	<ul style="list-style-type: none"> - Monthly reconciliations of contributions - Management reviews and action - Mercer funding monitor tool - Larger employers pre pay contributions 	Employer budgets stretched by insufficient funding Increased reconciliations and additional checks	Low	Possible	6	→

CURRENT RISKS - SUMMARY

		LIKELIHOOD				
		Rare	Unlikely	Possible	Likely	Almost Certain
IMPACT	Critical	0	0	0	1	0
	High	0	2	3	1	0
	Medium	0	2	4	1	2
	Low	0	0	1	0	0
	Negligible	0	0	0	0	0

RISK FRAMEWORK

	Rare	Unlikely	Possible	Likely	Almost Certain
Critical	5	10	15	20	25
High	4	8	12	16	20
Medium	3	6	9	12	15
Low	2	4	6	8	10
Negligible	1	2	3	4	5

ASSESSMENT OF LIKELIHOOD

1	Rare	0 – 5% probability
2	Unlikely	6 – 20% probability
3	Possible	21 – 50% probability
4	Likely	51 – 80% probability
5	Almost Certain	81 – 100% probability

ASSESSMENT OF IMPACT

		Service/ Operational	Assets	Legal Obligations	Project	Duty of Care – Clients & Staff
1	Negligible	Minimal disruption not impacting on an important service which can be resolved	Capital loss potential up to 1% of assets	Litigation, claims or fines Services up to £10k Corporate £25k	Minimal impact on APF delay < 1 month	Minimal or no impact on Services Duty of Care requirements.
2	Low	Brief disruption of important service /service area	Capital loss potential up to 5% of assets	Litigation, claims or fines Services up to £25k Corporate £50k	Some impact on APF delay < 3 months	Consideration required re. Duty of Care unlikely to have adverse impact meeting overall requirements.
3	Medium	Major effect to an important service area	Capital loss potential up to 15% of assets	Litigation, claims or fines Services up to £50k Corporate £100k	Adverse impact on APF significant slippage > 3 months	Duty of Care issues may have impact meeting requirements.
4	High	Complete loss of an important service area	Capital loss potential up to 25% of assets	Litigation, claims or fines Services up to £125k Corporate £250k	Significant impact on APF major delay of 6+ months	Significant impact on meeting Duty of Care responsibilities.
5	Critical	Major loss of whole service	Capital loss potential > 25% of assets	Litigation, claims or fines Services up to £250k Corporate £500k	Complete failure of project extreme delay > 12 months	Not meeting legal responsibilities placing individuals at risk.

Bath & North East Somerset Council	
MEETING:	AVON PENSION FUND COMMITTEE
MEETING DATE:	26 September 2025
TITLE:	GOVERNANCE UPDATE
WARD:	ALL
AN OPEN PUBLIC ITEM	
<p>List of attachments to this report:</p> <p>Appendix 1 – Committee Workplan</p> <p>Appendix 2 – Training Programme</p> <p>Appendix 3 – Service Plan Monitoring</p> <p>Appendix 4 – TPR GCOP Action Plan</p>	

1 THE ISSUE

- 1.1 Attached to this report is:
- 1.2 The workplan for the Committee is attached as Appendix 1 and the provisional training programme for 2025 is included as Appendix 2.
- 1.3 The quarterly monitoring report for the Fund's service plan is attached as Appendix 3.
- 1.4 The Fund's action plan to reach compliance with The Pension Regulator's (TPR) General Code of Practice is attached as appendix 4.
- 1.5 Details of the agreements made at the informal Pension Board meeting of 2nd September is set out in section 4.6 of this report.

2 RECOMMENDATION

- 2.1 That the committee:
 - 2.1.1 Notes the Committee workplan & training programme
 - 2.1.2 Notes the service plan monitoring report
 - 2.1.3 Notes the TPR GCOP Action Plan
 - 2.1.4 Notes the agreements made at the Pension Board informal meeting

3 FINANCIAL IMPLICATIONS

- 3.1 There are no financial considerations to consider.

4 THE REPORT

4.1 Committee Workplan

- 4.1.1 The workplan for the Committee for the year ahead is attached as Appendix 1. The purpose of the workplan is to provide members with an indication of their future workload and the associated timetable. The plans are however subject to change to reflect either a change in priorities or regulations.
- 4.1.2 Good progress has been made on the drafting of the Committee's annual report to Council. A final version will be circulated once approved by the Chair, which will be presented to Council on 20th November.

4.2 Training Programme

- 4.2.1 The provisional training programme for 2025 is also included as Appendix 2, so that members are aware of intended training sessions and workshops. The plan will be updated quarterly.
- 4.2.2 The schedule for completion of the Hymans Learning Academy modules is contained within the training programme (Appendix 2). Please note the schedule has now been refreshed and members will be contacted if they are due to complete the modules again.

4.3 Hymans LGPS Online Learning Academy (LOLA)

- 4.3.1 In order to meet the additional knowledge and skills requirements of SAB's Good Governance Review & The Pension Regulator's General Code of Practice the Fund has introduced Hymans LGPS Online Learning Academy (LOLA).
- 4.3.2 Committee members have agreed to complete all training modules within twelve months of becoming a committee member and repeat the completion of the modules every three years.
- 4.3.3 The training is split into a number of modules covering the CIPFA Knowledge & Skills Framework.
- 4.3.4 The modules are set out below:
- Committee Role & Pensions Legislation
 - Pensions Governance
 - Pensions Administration
 - Pensions Accounting and Audit Standards
 - Procurement & relationship Management
 - Investment Performance & Risk Management
 - Financial Markets & Products
 - Actuarial Methods, Standards & Practices
 - Current Issues

4.4 Service Plan Monitoring

4.4.1 Appendix 3 sets out progress against the Fund's service plan including the administration change programme.

4.5 TPR General Code of Practice (GCOP)

4.5.1 In March 2024 The Pensions Regulator (TPR) combined various codes of practice into a single General Code of Practice which is applicable to most public and private occupational pension schemes, including the LGPS.

4.5.2 The Fund has assessed its position against the code and progress against the action plan is set out in appendix 4, detailing owners and timescales with the aim of reaching compliance over the next year.

4.5.3 The full GCOP can be found by visiting TPR website
<https://www.thepensionsregulator.gov.uk/en/document-library/code-of-practice>

4.5.4 Progress against the action plan will be shared with Committee and Pension Board on a quarterly basis.

4.6 Pension Board Informal Meeting of 2nd September 2025

4.6.1 The Pension Board met informally on 2nd September and agreed the following:

- The board reviewed the Funding Strategy Statement for compliance with the LGPS Regulations 2013 and SAB/CIPFA guidance and agreed that it met regulatory compliance
- The pension board's annual report was reviewed and approved for submission to Council on 20th November
- The pension board supported the revised Pensions Administration Strategy and Communications Policy for approval by the Pensions Committee.

5 FUTURE MEETING DATES

5.1 Pension Committee meetings as currently scheduled:

2025	2026
28 March	27 March
27 June	26 June
26 September	25 September
12 December	11 December

5.2 The provisional dates for the Investment panel meetings are:

2025
26 February
4 June
3 September
26 November

6 RISK MANAGEMENT

6.1 Forward planning and training plans form part of the risk management framework.

7 EQUALITIES STATEMENT

7.1 A proportionate equalities impact assessment has been carried out using corporate guidelines and no significant issues have been identified.

8 CLIMATE CHANGE

8.1 The Fund is implementing a digital strategy across all its operations and communications with stakeholders to reduce its internal carbon footprint in line with the Council's Climate Strategy. The Fund acknowledges the financial risk to its assets from climate change and is addressing this through its strategic asset allocation to Paris Aligned Global Equities, Sustainable Equities and renewable energy opportunities. The strategy is monitored and reviewed by the Pensions Committee.

9 OTHER OPTIONS CONSIDERED

9.1 None.

10 CONSULTATION

10.1 The Director of Financial Services, Assurance & Pensions has had the opportunity to input to this report and has cleared it for publication.

Contact person	Carolyn Morgan, Governance and Risk Advisor 01225 395240
Background papers	None
Please contact the report author if you need to access this report in an alternative format.	

Appendix 1

Committee Workplan	Mar-25	Jun-25	Sep-25	Dec-25
Governance				
Pension Board minutes				
Governance Update (workplans)				
Review of Risk Register				
Annual review of risk register				
Roles & Responsibilities of the Committee, Governance Compliance Statement				
Internal Audit Plan & Reports				
Approval of Committee's Annual Report to council & PB Annual Report for noting				
Update on Legislation				
Annual audit review				
Review of General Code of Practice Compliance				
Administration & Budget				
Administration – performance indicators				
Budget & Cash flow Monitoring (as needed)				
Budget and Service Plan				
Treasury management Policy				
Review of Admin Strategy				
Investments & Funding				
Strategic Investment review				
Approve Investment Strategy Statement				
Review of Investment Strategy & Performance				
Annual Responsible Investing Report inc progress on climate targets, Stewardship Activities presentation by Brunel				
Fit 4 Future - Pooling update (as required)				
Annual Review of Risk Management Strategies				
Draft and approve Funding Strategy Statement		draft	approve final	
Annual Employer and Covenant update				
Brunel Corporate update by CEO				

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Type of Training	Date	Content	
Workshop	03-Jun-25	Valuation & Funding Strategy	
Workshop	TBC	Cyber Security	
Workshop	TBC	Future of LGPS/Good Governance Review	
Hymans Learning Academy	Title of Module	Date to be completed	Time Commitment
Introduction	• An Introduction to LGPS Online Learning Academy	Sep-25	2 minutes
Module 1 – Committee Role and Pensions Legislation	• An Introduction to Pensions Legislation	Sep-25	27 minutes
	• An introduction to Pensions Legislation - The Role of a Councillor		
Module 2 – Pensions Governance	• LGPS Oversight Bodies – DLUHC & GAD	Dec-25	50 minutes
	• LGPS Oversight Bodies – TPR		
	• Business Planning		
	• LGPS Governance		
Module 3 – Pensions Administration	• Introduction to Administration	Nov-25	51 minutes
	• Additional Voluntary Contributions		
	• Policies and Procedures		
Module 4 – Pensions Accounting and Audit Standards	• Pensions Accounting and Audit Standards	Nov-25	11 minutes
Module 5 – Procurement and Relationship Management	• Public Procurement	Jan-26	11 minutes
Module 6 – Investment Performance and Risk Management	• Introduction to Investment Strategy	Feb-26	48 minutes
	• LGPS Investment Pooling		
	• Performance Monitoring		
	• Responsible Investment		
Module 7 – Financial Markets and Product Knowledge	• Introduction to Financial Markets and Product Knowledge	Mar-26	33 minutes
	• Investment – MiFiD II		
Module 8 – Actuarial Methods, Standards and Practices	• Introduction to Funding Strategy	Oct-25	53 minutes
	• LGPS Actuarial Valuations – Process		
	• LGPS Valuation – Technical		
	• Employers		
Current Issues	• Understanding McCloud		Ongoing
	• Pensions Dashboards		
	• Understanding Goodwin		
	• Introduction to Cyber Risk		
	• GAD Section 13		
	• Climate Change and TCFD		
	• McCloud Consultation		
	• SAB and HM Treasury Cost Cap Mechanisms		
	• Next Steps on Investment (England & Wales) Consultation Overview		
	• Next Steps on Investment (England & Wales) Consultation Response		
	• A Brief Introduction to Taskforce on Nature-related Financial Disclosures		

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Appendix 3

Change Programme			
Project Activity	Current Phase of Project / High Level Status	Completion Date of Overall Project	Status
Annual Projects			
Year End	Year End Complete	30/06/25	Complete
Annual Benefit Statement	ABS issued	31/08/25	Complete
Pension Savings Statement / Annual Allowance	Member review in progress	06/10/25	In Progress
Payroll YE	P60s issued	30/04/25	Complete
HMRC Event Reporting	Annual Event reporting	31/12/25	Not Yet Started
National Fraud Initiative	Planning phase	31/12/25	In Planning
Regulatory/Foundation/Dashboard			
McCloud	McCloud determination made	31/08/26	In Progress
McCloud Remedy (LGPS)	Remedy for pre October 2023 cases	31/08/25	In Progress
McCloud Record Keeping	Calculation and record errors being reviewed and fixed	31/08/25	In Progress
McCloud Age - 65 Plus	Process design underway to capture information	31/08/25	In Progress
McCloud Teachers Excess	Initial Data capture coming through from Employers	31/08/25	In Progress
McCloud ABS	Design Regulatory compliant document for McCloud	31/07/25	In Planning
McCloud Other Service	Emails and Letters issue in progress	01/04/25	In Progress
GMP – remedy	Data cleansing and calculations	30/06/26	In Progress
Pensions Dashboard	Phase 1 ISP connection complete. Phase 2 in progress.	31/10/25	In Progress
Admin Strategy refresh	Draft Strategy submitted to Sept Committee for approval	31/10/25	In Progress
Data Improvement Plan	Forms part of the Admin Strategy refresh	31/10/25	In Progress
Process control framework	Planning phase & kick-off conversations underway	31/12/26	In Planning
Member tracing	Testing integrated solution complete. Planning Go-Live date	30/09/25	In Progress
Telephony upgrade - Phase 1	Phase 1 delivered	30/06/25	Complete
Telephony upgrade - Phase 2	Phase 2 improved member experience (Sep-25)	30/09/25	In Progress
Procurement			
Pension Admin System Procurement (inc Hosting)	Contract signed	30/09/25	Complete
Website hosting procurement	Moved to 2026 for joint procurement with BANES IT	30/09/26	Not Yet Started

Transformation			
Engage (My Pension Online – upgrade)	Implementation in progress	31/12/25	In Progress
Bulk processing, e.g. refunds	Process review - impact and scoping assessment	30/09/26	In Planning
New member onboarding	Improvement recommendations made - to be prioritised	31/03/26	Not Yet Started
Hosting migration	Migration to software provider solution complete	30/09/25	Complete
Digital Transformation			
Enhanced Admin to Pay	Decision on implementation timing	31/03/26	In Planning
Pre Joining Enhancements	Engagement with Key Stakeholders	30/09/25	In Progress
Go Digital enhancements	Capture member emails from I-Connect submissions	31/12/25	In Planning
iConnect Multi-factor authentication	Roll out to Employers complete	31/05/25	Complete
iConnect document integration	One-stop portal for employer document submissions	31/12/25	In Progress
Digital mail solution	Utilisation of council's digital mail solution	31/12/25	Complete
Governance			
Good Governance Review	Review any new requirements from Good Governance review once published eg - Workforce Plan	Dec-25	Not Yet Started
TPR SCOP requirements	Gap analysis & action plan for new requirements	Mar-25	Complete
	Implementation	Mar-26	In Progress
Annual Report	Produce and publish Fund's annual report	Dec-25	In Progress
	Committee's annual report to Council	Nov-25	In Progress
	Pension Board's annual report	Nov-25	In Progress
Business Continuity Plan	Review and implementation of new plan in progress	Mar-25	Complete
	Cyber Security training officers/PC/PB	Dec-25	In Progress
Pension Committee Governance arrangements	annual review of terms of reference & policies	Jun-25	Complete
Pension Board governance review	Annual review all items on governance checklist	Sep-25	Complete
Training Plan for Committee & Board members	Plan annual training programme for members	Mar-25	Complete
Recruitment for Committee & Pension Board	Recruitment & Induction Training - new PC/PB members	Jun-25	In Progress
Contract Retenders	Legal Contract	Dec-25	Complete

Finance			
Final Accounts	Prepare accounts to meet B&NES internal deadline; update regulatory requirements	May-25	In Progress
Treasury Management Policy	Draft revised policy annually	Mar-25	Complete
Investments			
Local Impact Portfolio	Assess opportunities as they arise, invest/implement	Dec-25	Complete
Natural Capital Investing	Invest via Brunel portfolio. Work with Brunel and pool.	Dec-25	Progress Delayed
Strategic Investment Review	Review risk and return objectives and asset allocation ahead of Valuation. Review climate targets. Revise ISS	Sep-25	In Progress
Impact Reporting	procure a supplier to provide Impact reporting across our portfolios	Dec-25	In Progress
Pooling: Fit 4 Future	work with Brunel and CG to agree how to merge or join another pool now that government has concluded Brunel pool cannot continue. Assessing options of acting as a pool and as individual funds. Specific to APF: how manage RMF, RI focus, local impact	Mar-26	In Progress
Funding Strategy			
2025 Valuation	Planning, data provision to Actuary, fund & employer meetings and outcomes.	Mar-26	In Progress
2025 Funding Strategy Statement	prepare and publish prior to valuation	Mar-26	In Progress

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Appendix 4 - APF Action Plan

Avon Pension Fund

The following gives an overview of the current compliance position against the General Code of Practice, and a note of the immediate actions.

All requirements on this scorecard are currently rated as 'Partially met'.

Requirements	Current Status	Actions	Responsibility	Timescale
The Governing Body: Board Structure and Activities				
Members of governing bodies to display the characteristics shown in Appendix 1 .	In Progress	Mandatory training required for several members.	Governance and Risk Advisor	Dec-25
The Governing Body: Knowledge and Understanding				
The governing body should regularly carry out an audit of its members' skills and experience to identify gaps and imbalances.	In Progress	Mandatory training required for several members.	Governance and Risk Advisor	Dec-25
Members of the pension board can work towards completing TPR public service toolkit or equivalent learning programmes.				
To enable the pension board to ensure their knowledge and understanding is established and maintained, members of a governing body should comply with the points laid out in Appendix 6 .				
The Governing Body: Advisers and Service Providers				
Follow the processes set out for appointing advisers and service providers. (see Appendix 8 for more detail)	In Progress	Check SLAs agreed for all new contracts.	Fund officers	Mar-26
Follow the processes set out for managing advisers and service providers. (see Appendix 9 for more detail)	In Progress	Review process for monitoring performance of service providers and engaging advisors and service providers, embedded Q2 2026 onwards.		
Follow the processes set out for replacing advisers and service providers. (see Appendix 10 for more detail)	In Progress	Internal procurement process to be reviewed to ensure contracts in place for all services via a compliant procurement route.		

The Governing Body: Risk Management				
The scheme manager should have in place internal controls, including; - The arrangements and procedures to be followed in the administration and management of the scheme - The systems and arrangements for monitoring that administration and management, and - Arrangements and procedures to be followed for the safe custody and security of the assets of the scheme.	In Progress	Embed 12 process improvements agreed with Simplify. Check other key processes and embed new controls if required	Head of Pensions	Mar-26
When designing internal controls governing bodies should consider TPR expectations. (see Appendix 12 for more detail)	In Planning	New projects and associated documents to be reviewed to include all TPR expectations.	Business Change Manager	Mar-26
To maintain internal controls governing bodies should consider TPR expectations. (see Appendix 13 for more detail)	In Progress	Assurance reports required from Heywood.	Head of Pensions	Oct-25
The governing body should read and understand assurance reports provided by service providers to establish if the controls used by the organisations that they outsource various functions to are adequate. This will also include assurance reports produced by the scheme's investment manager and custodian. They should consider the scope of such reports and the degree to which these are applicable. For example, whether the reports cover the specific team or office providing services to the scheme.				
Governing bodies should consider having a continuity plan that meets the requirements of Appendix 14 .	Complete	New Business Continuity Plan to be completed and tested.	Governance and Risk Advisor	Apr-25
Governing bodies should consider seeking independent legal advice, to help decide whether an actual or potential conflict of interest can be eliminated (and if so, the best way of achieving it).	Complete	Add requirement to conflicts of interest policy, applied only if a relevant case arises	Governance and Risk Advisor	Jun-25
Administration: Scheme Administration				
Every scheme must operate internal controls which should include administration.	In Progress	Embed 12 process improvements agreed with Simplify. Check other key processes and embed new controls if required	Pensions Operations Manager	Mar-26
To maintain proper administration, governing bodies should comply with the requirements set out in Appendix 22 .	In Progress	Complete new Business Continuity Plan and carry out test. Complete consistency review of procedure notes for all processes.	Pensions Operations Manager	Apr-25

Administration: Information Handling				
The scheme manager is required to establish and operate internal controls, which are adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules, and with the requirements of the law. Governing bodies should make sure financial transactions are managed as part of their internal controls.	In Progress	Finish review of Payroll audit actions including Altair admin-payroll reconciliation and Altair admin to Agresso. And embed improvements into live process	Pensions Operations Manager	Oct-25
Governing bodies should meet the record keeping requirements set out in Appendix 26 .	In Progress	Review data improvement plan and record of Processing Activities. And embed required improvements.	Pensions Operations Manager	Oct-25
Governing bodies may consider the record keeping requirements set out in Appendix 27 as best practice. [can we link to an appendix listing page 106 para 7]				
Governing bodies should retain records for as long as they are needed.	In Planning	Data Retention Policy to be reviewed. Deletion of Altair records to be reviewed. Employer data retention template to be rolled out again to employers.	Governance and Risk Advisor	Dec-25
Governing bodies should have appropriate processes in place for monitoring scheme data. (see Appendix 29 for full details)	In Progress	Reporting capabilities are improving and we will therefore review the reporting of scheme specific data.	Pensions Operations Manager	Oct-25
Governing bodies should have appropriate processes in place for reviewing scheme data. (see Appendix 30 for full details)				
Administration: IT & Cyber Security				
Governing bodies should take steps to make sure their service providers can prove they meet our expectations for maintaining IT systems as listed in Appendix 32 .	Complete	Finish the review of the business continuity plan and carry out a test. Finalise the repocurement of the software contract.	Governance and Risk Advisor	Apr-25
When assessing cyber risk governing bodies should follow the procedures set out in Appendix 33 .				
When managing cyber risk governing bodies should follow the procedures set out in Appendix 34 .				

Administration: Contributions				
Governing bodies should develop and maintain records for monitoring contribution payments to the scheme. This should include: contribution rates, date contributions are due, interest on late payments. (see Appendix 35 for full details)	In Progress	Review process for charging and recording interest for late payers.	Group Manager, Funding, Investment & Risk	Oct-25
The governing body should review current processes to detect situations where fraud may be more likely to occur and where additional checks may be needed.	In Progress	Review process of new reconciliation data with iconnect team.	Group Manager, Funding, Investment & Risk	Oct-25
Communications and Disclosure: Information to Members				
The scheme manager should comply with the requirements of the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013.	In Planning	Review the Disclosure of Information Regs to check compliance in all areas.	Technical and Compliance Advisor	Dec-25
The governing body should follow the principles set out in the section entitled "General Principles for Member Communications". TPR expectations are listed in Appendix 37	In Progress	Individual letters to members will be reviewed as part of process reviews, starting with the new member letter.	Pensions Operations Manager	Dec-25
Scheme managers should follow the principles set out in the section entitled "General Principles for Member Communications" when drafting benefit information statements. (see Appendix 38 for more detail)	In Progress	Review of statements required to include McCloud data for 2025, plus Business Change Team to look at alternative ways to support members' understanding.	Pensions Operations Manager	Dec-25
The term "reasonable period" in the phrase above should be construed as 3 months from leaving. Governing bodies should advise members where it is likely to take more than 3 months to provide the information.	In Progress	Double check KPIs to ensure all cases actioned within the three month period.	Pensions Operations Manager	Dec-25
The governing body should give members 3 months to confirm if they wish to transfer their cash transfer sum and can extend this deadline at their discretion. If the member does not respond, the governing body may arrange to pay a contribution refund after a further month.	In Progress	Check timescales and automatic refund.	Pensions Operations Manager	Dec-25

Where a member elects for a cash transfer sum the governing body should pay it within 3 months but can extend in exceptional circumstances.	In Progress	Tighter controls to be implemented for the process/potential review of process.	Pensions Operations Manager	Dec-25
Communications and Disclosure: Public Information				
Scheme managers may consider how best to publish information, making use of the principles outlined in General principles for member communications.(See appendix 37)	Complete	TPR General Principles reviewed and incorporated into APF's updated Comms Policy.	Business Change Manager	Dec-25
Scheme managers may also publish: - the employment and job title (where relevant) and any other relevant position each board members holds - details of the pension board recruitment process - who each pension board member represents - the full terms of reference for the pension board, including details of how it will operate - any specific roles and responsibilities of individual pension board members	Complete	As part of governance review check all correct	Governance and Risk Advisor	Jun-25
Scheme managers should: - Have policies and processes to monitor all published data on an ongoing basis to ensure it is accurate and complete - Ensure any out-of-date or incorrect information identified is updated as soon as possible and in any event, within one month	In Progress	APF Comms Policy reviewed and updated. Process development to monitor all published data in progress.	Business Change Manager	Dec-25
There are further considerations the governing body should make in relation to the dispute resolution process. (see Appendix 40 for further details).	In Planning	Review internal procedures & set out requirements in greater detail. Eg when a review is carried out and when advice is taken.	Technical and Compliance Advisor	Dec-25
Reporting to TPR: Reporting Breaches				
Breaches of the law must be reported as soon as reasonably practicable.				
There are other requirements placed on those running pension schemes to report to other bodies. Where the duty to report to another body coincides with the duty to report to TPR, the report to us should include details of the other bodies the matter has been reported to.				

<p>If a scheme or an individual is at risk, for example where there has been dishonesty, the reporter should not take any actions that may alert those implicated that a report has been made. Similarly, reporters should not delay their report to TPR, to check whether any proposed solutions will be effective.</p>	In Planning	Review breaches policy and process and add additional requirements	Governance and Risk Advisor	Dec-25
<p>Reports of late contribution payments should be made to us within 14 days of the trustees having reasonable cause to believe that a material payment failure exists. Members should be notified within 30 days of the report to TPR. When reporting to members, governing bodies should provide payment information that will enable them to understand what has been paid to the scheme and by whom.</p>				

Regulatory Requirement
TPR Requirement
Best Practice