



Local Pension Board

A meeting of the Local Pension Board will be held at the The Jeffrey Room, The Guildhall, Northampton on Tuesday 24 January 2023 at 2.00 pm

Agenda

1.	Apologies for Absence
2.	Declarations of Interest Members are asked to declare any interest and the nature of that interest which they may have in any of the items under consideration at this meeting.
3.	Minutes (Pages 5 - 10) To confirm the Minutes of the meeting of the Committee held on 3 November 2022.
4.	Chair's Announcements To receive communications from the Chair.
5.	Northamptonshire Pension Fund - Administration Report (Pages 11 - 18)
6.	Governance and Compliance Report (Pages 19 - 26)
7.	Overpayment of Pension Entitlement Policy (Pages 27 - 66)
8.	Communication Strategy and Plan (Pages 67 - 102)
9.	Pension Fund Annual Report and Statement of Accounts 2021-22 (Pages 103 - 228)

10.	Conflicts of Interest Policy (Pages 229 - 248)
11.	Valuation Update (Pages 249 - 252)
12.	Northamptonshire Pension Fund Forward Agenda Plan (Pages 253 - 254)
13.	Business Plan Update (Pages 255 - 274)
14.	<p>Exclusion of Press and Public</p> <p>The following report(s) contain exempt information as defined in the following paragraph(s) of Part 1, Schedule 12A of Local Government Act 1972.</p> <p>Paragraph 3 – Information relating to the financial or business affairs of any particular person (including the authority holding that information).</p> <p>Members are reminded that whilst the following item(s) have been marked as exempt, it is for the meeting to decide whether or not to consider each of them in private or in public. In making the decision, members should balance the interests of individuals or the Council itself in having access to the information. In considering their discretion members should also be mindful of the advice of Council Officers.</p> <p>Should Members decide not to make a decision in public, they are recommended to resolve as follows:</p> <p>“That under Section 100A of the Local Government Act 1972, the public and press be excluded from the meeting for the following item(s) of business on the grounds that, if the public and press were present, it would be likely that exempt information falling under the provisions of Schedule 12A, Part I, Paragraph(s) XXXXX would be disclosed to them, and that in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.”</p>
15.	Private minutes of the Board 3 November 2022 (Pages 275 - 278)
16.	Private Minutes of the Pension Committee 12 October 2022 (Pages 279 - 286)
17.	Risk Monitoring (Pages 287 - 318)
18.	ACCESS Update (Pages 319 - 330)
19.	<p>Urgent Business</p> <p>The Chairman to advise whether they have agreed to any items of urgent business being admitted to the agenda.</p>

--	--

Catherine Whitehead
Proper Officer
16 January 2023

Local Pension Board Members:

Councillor Ken Pritchard
Alicia Bruce
Katy Downes

Councillor Andrew Weatherill
Julie Petrie
Kevin Standish-Day

Information about this Agenda

Apologies for Absence

Apologies for absence and the appointment of substitute Members should be notified to democraticservices@westnorthants.gov.uk prior to the start of the meeting.

Declarations of Interest

Members are asked to declare interests at item 2 on the agenda or if arriving after the start of the meeting, at the start of the relevant agenda item

Local Government and Finance Act 1992 – Budget Setting, Contracts & Supplementary Estimates

Members are reminded that any member who is two months in arrears with Council Tax must declare that fact and may speak but not vote on any decision which involves budget setting, extending or agreeing contracts or incurring expenditure not provided for in the agreed budget for a given year and could affect calculations on the level of Council Tax.

Evacuation Procedure

If a continuous fire alarm sounds you must evacuate the building via the nearest available fire exit. Members and visitors should proceed to the assembly area as directed by Democratic Services staff and await further instructions.

Access to Meetings

If you have any special requirements (such as a large print version of these papers or special access facilities) please contact the officer named below, giving as much notice as possible before the meeting.

Mobile Phones

Please ensure that any device is switched to silent operation or switched off.

Queries Regarding this Agenda

If you have any queries about this agenda please contact Jeverly Findlay - Democratic Services Officer via the following:

Tel: 01327 302324

Email: jeverly.findlay@westnorthants.gov.uk

Or by writing to:

West Northamptonshire Council
One Angel Square
Angel Street
Northampton
NN1 1ED



Local Pension Board

Minutes of a meeting of the Local Pension Board held at <https://www.youtube.com/channel/UCujrRO-y6RzkN6zPQ-xNAtA> on Thursday 3 November 2022 at 10.00 am.

Present Councillor Ken Pritchard
 Councillor Andrew Weatherill
 Alicia Bruce
 Julie Petrie
 Kevin Standish-Day

Apologies for
 Absence: Katy Downes, who could not attend due to a technical issue.

Officers Mark Whitby, Head of Pensions
 Cory Blose, Employer Services and Communications Manager
 Paul Hanson, Democratic Services Manager
 Michelle Oakensen, Governance and Regulations Manager
 Scott Peasland, Audit Manager
 Jeverly Findlay, Committee Officer

61. **Declarations of Interest**

No interests were declared.

62. **Minutes**

RESOLVED: The Local Pension Board approved the minutes of the meeting held on 30 June 2022.

63. **Action Log**

Members of the Board were asked to note the Action Log (copies of which had been previously circulated).

RESOLVED: The Local Pension Board noted the action log.

64. **Internal Audit Report**

The Audit Manager presented the report and advised that the audit had assessed the adequacy of design and implementation of controls for the administration of the pension fund. Audit had given a substantial opinion assurance to the control environment in place and a satisfactory assurance opinion for compliance. In carrying

out the audit an assessment had been made of the performance on the key performance indicators, the monitoring and reporting of risks. Seven recommendations had been made to ensure compliance and these were set out in section 3.4 of the main report. One recommendation related to the key performance indicators and two recommendations were made regarding reporting of breaches. The actions had been agreed with management and were detailed in the Management Action Plan. The report had been presented to the Pensions Committee who were satisfied that the service was in a positive position going forward.

Further to an enquiry from Councillor Andrew Weatherill regarding the links to the strategic risks and assurance mapping, the Audit Manager advised that the management was undertaken by West Northants Council as clients of the scheme. The Audit team had reviewed the scope of previous audits and the terms of reference had been agreed with the Head of Pensions. Consideration was being given as to how the audit could be more risk based in the future. The Chair considered that an audit should be undertaken on the risk register. It was noted that both Chief Financial Officers signed off on both the funds and the aim was to carry out one audit in the future.

Councillor Andrew Weatherill questioned the effectiveness of the assurance, as the focus of the audit had been on administration and suggested additional expertise may be required. Councillor Weatherill also queried how long the audit had taken. The Audit Manager undertook to provide an answer outside of the meeting.

RESOLVED:

- (i) The Pension Board noted the findings from Internal Audit work during 2021-22.**
- (ii) That the Head of Pensions, the Audit Manager and the Section 151 Officers review the risk register and the actions taken to mitigate those risks.**

65. Northamptonshire Pension Fund - Administration Report

Consideration was given to a report which provided an overview of the administrative activities of the Northamptonshire Pensions Fund. It was highlighted that 100% of contributions from employers of the scheme had been received on time. The fund had been stable for the last 12 months.

A non-material breach had occurred as the annual allowance pension savings statements had not been issued by the statutory deadline of 6 October, they were however sent by 24 October.

It was noted that there was one Internal Dispute Resolution Procedure which had partially been upheld, due to the fact that Member Self Service (MSS) had allowed converted benefits options to be quoted for a pension credit member which is not permitted under the regulations. Although there was wording to this effect it was deemed appropriate to ensure additional wording was added and made more prominent.

The Governance and Regulations Manager advised that additional information on the key performance indicators was included in the appendices.

Councillor Weatherill noted the two non-material breaches for the annual pension allowance from a control perspective.

RESOLVED: The Local Pension Board noted the Northamptonshire Pensions Fund - Administration Performance Report.

66. **Governance and Compliance Report**

The Governance and Regulations Manager introduced the report and provided an update on the Pension Dashboard Regulations which had been laid before parliament and would be discussed in the House of Lords on the 15 November. The Pensions Team had a draft project plan in place and data quality underpinned the plan.

The Department for Levelling Up, Housing and Communities had now launched their Taskforce on Climate related Financial Disclosures (TCFD) consultation and this would be running until 24 November and that the Northamptonshire Pension Fund would be submitting a response.

The Board were informed that the vacant position for 'other employers' representative' to the Pensions Committee had now been filled and therefore the next Pensions Committee would be fully represented.

With regard to the pension regulator code of practice no further information had been received.

Conflict of interest training had been arranged by Officers in conjunction with Aon and the Board were asked to attend if possible. A link would be sent out to those who could not attend. It was noted that a new core module online training system was being considered.

Further to an enquiry, the Head of Pensions advised that the increased in management costs included governance and investment costs; management fees were a percentage of the Assets Under Management. The AUM was subject to fluctuations.

RESOLVED: The Local Pension Board noted the contents of the report.

67. **Business Plan Update Report**

The Head of Pensions highlighted the RAG status in the executive summary and that there were 5 ambers and 2 new activities.

Following the deterioration of the performance of Prudential, Aon had been commissioned to undertake a further review of both Standard Life and Prudential's administrative performance. The Pension Committee had approved the review at the meeting of 12 October 2022. Legal and General had recently started providing a

service for additional voluntary contributions (avc) and their performance would be monitored. The Chair welcomed another provider in the market which created competition.

The project team were processing the backlog of cases for the undecided leavers, some of the cases were now being processed in bulk which had dramatically increasing the speed of the process.

The Private Equity Review was a new activity for the team that would ensure the continued suitability of the portfolio, identify risks and opportunities that needed to be undertaken. Private equity was a complex issue and had links to the asset pool.

The variances from the forecasted investments and administration expenses were set out in appendix A of the report. The staff vacancies were expected to be filled during the next quarter. Some central costs had not yet been accounted for, such as the procurement of IT equipment, so this would create a variance.

RESOLVED: The Local Pension Board noted the Business Plan Update.

68. **Northamptonshire Pension Board Forward Agenda Plan**

The Governance and Regulations Manager reported that some activities had been moved back such as the code of practice and the good governance action plan. Additional work was being undertaken on the key performance indicators. The administration strategy had been put back to April. The results would flow through the administration strategy.

RESOLVED: The Local Pension Board noted the forward agenda plan.

69. **Exclusion of Press and Public**

RESOLVED: That Under Section 100A of the Local Government Act 1972, the Local Pension Board agreed that the public be excluded from the meeting for the following items of business on the grounds that if the public were present it would be likely that exempt information under Part 3 of Schedule 12A to the Act would be disclosed to them.

70. **Urgent Business**

RESOLVED: That the January meeting be moved to 24 January 2023.

The meeting closed at 11.45 am

Chair: _____

Date: _____

This page is intentionally left blank



West Northamptonshire Council

Local Pension Board

24/1/2023

Mark Whitby – Head of Pensions

Report Title	Northamptonshire Pension Fund – Administration Performance Report
Report Author	Michelle Oakensen Governance and Regulations Manager michelle.oakensen@westnorthants.gov.uk

Contributors/Checkers/Approvers

Head of Pensions	Mark Whitby	9/1/2023
-------------------------	-------------	----------

List of Appendices

Appendix A – Performance against key performance indicators

Appendix B – Timeliness of receipt of employee and employer pension contributions

1. Purpose of Report

-
- 1.1. To present to the Pension Board a report on the administrative performance of the Northamptonshire Pension Fund.

2. Executive Summary

-
- 2.1 This report sets out the performance of the Northamptonshire Pension Fund on the following areas of administration:
- 2.1.1 The achievement against the Key Performance Indicators for the period 1 October to 31 December 2022 (section 5.1 & appendix A). The majority of KPIs were met over the period.
- 2.1.2 Timeliness of receipt of employee and employer pension contributions for the payroll periods of December 2021 to November 2022 (section 5.2 & appendix B). 100% was achieved for September, October and November 2022.
- 2.1.3 Occurrences of breaches of the law for the period 1 October to 31 December 2022 (section 5.3). There were no material breaches in the period.
- 2.1.4 Details of any Internal Dispute Resolution Procedure cases during the period 1 October to 31 December 2022 (section 5.4). There were three new administering authority disputes raised during the period and three determinations (stage 1 & 2). There were no employer disputes raised during the period.

3. Recommendations

3.1 The Pension Board is asked to note the contents of the report.

4. Report Background

4.1 One of the core functions of the Pension Board is to ensure the effective and efficient governance and administration of the Northamptonshire Pension Fund. This report demonstrates a number of key areas of administration performance for consideration by the Pension Board.

5. Issues and Choices

5.1 Key Performance Indicators

5.1.1 The Pension Committee has previously agreed a set of key performance indicators (KPIs) to assess the performance of the Pensions Service in the delivery of key items of casework. The actual performance against these KPIs for the period 1 October to 31 December 2022 can be found in appendix A along with the explanations for any underperformance.

5.1.1 Over the 3-month period, service performance has been consistently good with all targets being met with the exception of 3.

5.1.2 In October the target was missed for the payment of retirement benefits from active employment due to a combination of training issues, system issues and resourcing within the team. As a result, additional training has been delivered and two additional staff members have been recruited to support the team following a period of training.

5.1.3 In November the target was missed for providing a transfer quote in for a scheme member and in December the target was missed for transfer out payments. Both targets were missed due to recalculations not being allocated and prioritised accordingly. The team which covers both areas has been reminded to highlight any additional checking required to ensure targets are met.

5.2 Receipt of employee and employer contributions

5.2.1 Scheme employers have a statutory obligation to arrange for the correct deduction of employee and employer contributions and to ensure payment reaches the Pension Fund by the 19th of the month following the month of deduction. Providing an associated monthly statement/schedule in an acceptable format.

5.2.2 The table in appendix B shows the percentage of employers in the Northamptonshire Pension Fund who paid their employee and employer contributions and/or submitted their schedules on time or late for the payroll periods 1 December 2021 to 30 November 2022.

5.2.3 In September, October and November 100% of payments were received on time. The current yearly average for payments made on time is 100% and schedules being received on time is 99.9%.

5.3 Breaches of the Law

5.3.1 There are many laws relating to the Local Government Pension Scheme, with various individuals, including the Pension Committee and Local Pension both (collectively and as individuals) having a statutory duty to report material breaches of those laws to the Regulator. The Northamptonshire Pension Fund maintains a record of both material breaches that are reported to the Pensions Regulator as well breaches that are deemed not to be of material significance and so are not reported to the Pensions Regulator.

5.3.2 For the period 1 October to 31 December 2022 the following breaches of the law occurred.

Type of breach	Detail of breach	Course of action
Material		

Type of breach	Detail of breach	Course of action
Non-material	4 refund of contribution payments were paid outside of the statutory 5-year period.	No further action at this stage, it is likely that the legislation surrounding this will be amended to remove the 5-year requirement.

5.4 Internal Dispute Resolution Procedure cases

5.4.1 Members, prospective members, and beneficiaries may not always agree with pension decisions that are made or may be unhappy that decisions have not been made, by either an administering authority or a scheme employer. The Internal Dispute Resolution Procedure (IDRP) is the route by which they may raise their concerns and challenge such decisions.

5.4.2 Disputes that are upheld at stage 1 may still progress to stage 2 if the scheme member or their representative remains unsatisfied with the overall outcome. The outcome may not fully meet the complainant's expectations – particularly if their perception is that their financial loss was greater than any compensation awarded, or the level of non-financial injustice award was not consistent with their expectation.

5.4.3 The following table details that activity undertaken during the period 1 October to 31 December 2022 with regards to administering authority disputes.

Nature of dispute	Stage 1 (Head of Pensions)	Stage 2 (Cambridgeshire County Council Monitoring Officer)
Incorrect conversion options were provided to a pension credit member on Member Self Service which allowed increased lump sum option.	Adjudication sent 5 October 2022, partially upheld for the incorrect information provided.	Adjudication sent 23 December 2022; complaint not upheld.
Non-payment of survivor's pension to co-habiting partner due to ineligibility.	Adjudication sent 14 December 2022, not upheld as Regulations do not allow a survivor's payment to be made to a cohabitee where member left Scheme before 1998	
Dispute regarding the recipients of a death grant.	Adjudication due 22/01/2023	
Claim of maladministration in paying pension and AVCs.	Adjudication due 15/02/2023	
Non-payment of ill health pension from deferred member status.	Adjudication due 17/01/2023	

5.4.4 In the period 1 October to 31 December 2022 no employing authority disputes were raised and/or responded to.

5.5 Material Data Breaches

5.5.1 None.

5.6 Significant overpayment of pension

5.6.1 None.

5.7 Employers Admissions and Cessations

5.7.1 None.

6 **Implications (including financial implications)**

6.1 **Resources and Financial**

6.1.1 There are no resources or financial implications arising from the proposals.

6.2 **Legal**

6.2.1 There are no legal implications arising from the proposals.

6.3 **Risk**

6.3.1 The mitigated risks associated with this report has been captured in the Fund's risk register as detailed below -

Risk	Residual risk rating
Information may not be provided to stakeholders as required.	Green
Those charged with governance are unable to fulfil their responsibilities effectively	Green
Failure to provide relevant information to the Pension Fund Committee/Pension Board to enable informed decision making	Green

6.3.2 The executive summary can be found on the Fund's website at the following link:

[Northamptonshire Risk Register](#)

6.4 **Relevant Pension Fund Objectives**

6.4.1 The following objectives as per the Business Plan have been considered in this report -

- To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
- To manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.
- To ensure the relevant stakeholders responsible for managing, governing and administering the Fund, understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a changing environment.
- To continually monitor and measure clearly articulated objectives through business planning.
- To continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate.
- To put in place performance standards for the Fund and its employers and ensure these are monitored and developed as necessary.
- To administer the Fund in a professional and efficient manner, utilising technological solutions and collaboration.

6.5 **Consultation**

6.5.1 Not applicable.

Appendix A – Key performance indicators October, November and December 2022

Function/Task	Indicator	Target	Month	Completed	Within Target	Over Target	% Within Target	RAG	Comments
Notify leavers of deferred benefit entitlement.	Notify leavers of deferred benefit entitlements or concurrent amalgamation within 15 working days of receiving all relevant information.	90%	October	183	180	3	98	Green	SLA target met
			November	186	183	3	98	Green	SLA target met
			December	230	215	15	93	Green	SLA target met
Payment of retirement benefits from active employment	Notify employees retiring from active membership of benefits award, from date payable or date of receiving all necessary information if later within 5 working days.	95%	October	46	40	6	87	Amber	SLA target not met*
			November	38	36	2	95	Green	SLA target met
			December	19	19	0	100	Green	SLA target met
Payment of pension benefits from deferred membership status.	Notify members retiring from deferred membership status of benefits award, from date payable or date of receiving all necessary information if later within 10 working days.	90%	October	75	68	7	91	Green	SLA target met
			November	75	72	3	96	Green	SLA target met
			December	44	41	3	93	Green	SLA target met
Award dependant benefits	Issue award within 5 working days of receiving all necessary information.	95%	October	28	28	0	100	Green	SLA target met
			November	29	29	0	100	Green	SLA target met
			December	24	24	0	100	Green	SLA target met
Provide a maximum of one estimate of benefits to employees per year on request	Estimate in agreed format provided within 10 working days from receipt of all information.	80%	October	46	42	4	91	Green	SLA target met
			November	43	38	5	88	Green	SLA target met
			December	39	35	4	90	Green	SLA target met

Appendix A – Key performance indicators October, November and December 2022

Provide transfer-in quote to scheme member	Letter issued within 10 working days of receipt of all appropriate information.	95%	October	52	51	1	98	Green	SLA target met
			November	29	26	3	90	Amber	SLA target not met**
			December	47	45	2	96	Green	SLA target met
Payment of transfer out	Process transfer out payment – letter issued within 10 working days of receipt of all information needed to calculate transfer out payment.	90%	October	69	63	6	91	Green	SLA target met
			November	24	24	0	100	Green	SLA target met
			December	27	24	3	89	Amber	SLA target not met**

* Payment of retirement benefits from active employment – the target was missed for October due to a combination of training issues, system issues and resourcing within the team. As a result, additional training has been delivered and two additional staff members have been recruited to support the team following a period of training.

** Provide transfer-in quote to scheme member (November) & payment of transfer out (December) – the respective targets were missed due to recalculations not being allocated and prioritised accordingly. The team has been reminded to highlight any additional checking required to ensure targets are met.

Green: Equal to or above Service Level Agreement (SLA) target.

Amber: If there is a statutory target - below SLA target, but all within statutory target.
If there is no statutory target - below SLA target, but number completed within target is within 10% of the SLA target.

Red: If there is a statutory target - below SLA target and not within statutory target.
If there is no statutory target - below SLA target and number completed within target is not within 10% of the SLA target.

Appendix B – Timeliness of payment of scheme employer and member pension contributions

Month/Year	% of Employers Paid on Time	% of Employers Paid Late	% of Employers that Submitted Schedule on Time	% of Employers that Submitted Schedule Late
December 2021	100	0	100	0
January 2022	100	0	100	0
February 2022	100	0	100	0
March 2022	100	0	100	0
April 2022	100	0	100	0
May 2022	100	0	99.7	0.3
June 2022	100	0	99.4	0.6*
July 2022	100	0	99.8	0.2
August 2022	100	0	100	0
September 2022	100	0	100	0
October 2022	100	0	99.5	0.5
November 2022	100	0	99.8	0.2
Average for period	100	0	99.9	0.1

*Schedules (2) were received on time but could not be reconciled.

This page is intentionally left blank



West Northamptonshire Council

Local Pension Board

24/1/2023

Mark Whitby – Head of Pensions

Report Title	Governance and Compliance Report
Report Author	Michelle Oakensen Governance and Regulations Manager michelle.oakensen@westnorthants.gov.uk

Contributors/Checkers/Approvers

Head of Pensions	Mark Whitby	19 December 2022
-------------------------	-------------	------------------

List of Appendices

Appendix A – Skills and knowledge training schedule

1. Purpose of Report

- 1.1 This is a standing report that identifies issues and developments relevant to West Northamptonshire Council's management and administration of the Northamptonshire Pension Fund.

2. Executive Summary

- 2.1 This report provides the Pension Board with information on the following significant current issues which have an impact on the governance, management and administration of the Northamptonshire Pension Fund.
- Pensions Dashboards Regulations 2022
 - Taskforce on Climate related Financial Disclosures (TCFD) consultation
 - The Pensions Regulator publishes enforcement and prosecution policies and publishes scam prevention strategy
 - Skills and knowledge opportunities

3. Recommendations

- 3.1 The Pension Board is asked to note the contents of this report.

4. Report Background

- 4.1 This report provides an update on developments and issues that impact the LGPS that members of the Pension Board need to be aware of to fulfil their responsibilities to the Fund's key stakeholders.

5. Issues and Choices

5.1 Pensions Dashboards Regulations 2022

5.1.1 Draft regulations laid for approval

5.1.1.1 In October the Department for Work and Pensions (DWP) laid draft Pensions Dashboard Regulations before each house of Parliament.

5.1.1.2 On 21 November 2022, the Department for Work and Pensions made [The Pensions Dashboards Regulations 2022](#) – the Regulations. They came into force on 12 December 2022.

5.1.1.3 The Regulations set out requirements for relevant occupational pension schemes to connect to pensions dashboards, and what organisations must do to provide a qualifying pensions dashboard service.

5.1.2 TPR consultation on dashboard enforcement

5.1.2.1 On 24 November 2022, the Pensions Regulator (TPR) launched a consultation on its draft dashboards compliance and enforcement policy.

5.1.2.2 TPR is responsible for ensuring that occupational pension schemes comply with their dashboard duties. The draft policy sets out how it intends to do so. The policy covers:

- the key risk areas it will focus on
- what it expects schemes to do when complying with their dashboard duties
- how it will monitor compliance
- how it will approach non-compliance.

5.1.2.3 The policy reiterates the powers TPR has to deal with non-compliance. This includes compliance notices and penalty notices. These can also be issued to third parties, such as employers, administrators and Integrated Service Providers (ISPs). The policy also includes illustrative scenarios, setting out how it may approach particular examples of non-compliance.

5.1.2.4 The consultation closes on 24 February 2023 and can be found [here](#).

5.1.3 Further response to consultation

5.1.3.1 On 17 October the DWP responded to the further consultations which ran between 28 June and 19 July 2022 and confirmed that they will:

- give pension schemes six months' notice of the point at which pensions dashboards will be available to the public, the 'Dashboard Available Point'. This is an increase to the 90 days proposed in the consultation.
- go ahead with the second proposal allowing the Money and Pensions Service (MaPS) and the Pensions Regulator (TPR) to share information about dashboards.

5.1.4 Research on public value of dashboards

5.1.4.1 The Pension Dashboard Programme (PDP) has published the results of research carried out by Ipsos. PDP commissioned Ipsos to carry out quantitative research into the value that people attach to pension dashboards and their likelihood to use them.

5.1.4.2 Ipsos undertook online interviews with 1,960 individuals forming a representative sample of the UK population aged between 18 and 75. Differences in the likelihood of the public to use dashboards and their willingness to pay for them are explored across demographic and pension characteristics such as type and number of pensions, and levels of pension engagement.

5.1.4.3 PDP will use the results to inform development of the central digital architecture.

5.1.4.4 The full results and press release can be found [here](#).

5.1.5 Update on connecting early participants to the dashboard ecosystem & updated standards

- 5.1.5.1 The PDP have also provided an update on testing for early participants, the first stage now that the central digital architecture is complete to start to test with real pension data using their two non-commercial suppliers (the State Pension & Money Helper Dashboard, built by the Money and Pensions Service). The second stage is for participants who have volunteered to help test and develop the service to being testing and work towards completing their connection journey in the new year. The third stage is for those participants to go live and will play an essential part in the process of preparing for compulsory staging, when pension providers and schemes will start to connect to dashboards in the order specified by the regulations and rules. Their experiences will feed into the development of the connection process and will help improve the experience for the rest of the pensions industry.
- 5.1.5.2 On 16 November 2022, the PDP published its revised standards for connecting to the dashboards ecosystem. They cover the technical and operational detail that underpins dashboards legislation. The revised standards incorporate feedback from the consultation published in July 2022. The revised standards can be found [here](#).
- 5.1.5.3 Although the revised standards are pending final approval by the Secretary of State for Work and Pensions, they have been published to give schemes advance notice of the duties that they will need to comply with.
- 5.1.5.4 PDP also confirmed the process for updating the standards going forward, including the principles for decision-making and the notice period for industry.
- 5.1.5.5 A consultation on the draft design standards for qualifying pensions dashboards will take place in the winter.

5.2 Taskforce on Climate related Financial Disclosures (TCFD) consultation

- 5.2.1 The Department for Levelling Up, Housing and Communities issued their TCFD consultation on 1 September 2022 for the LGPS in England and Wales.
- 5.2.2 The proposed requirements are similar to the current requirements for private pension schemes, although is slightly simplified and applies to LGPS of all sizes (rather than a phased approach for private pension schemes). The requirements will therefore apply to all LGPS funds from 2023/24 regardless of fund size.
- 5.2.3 The regulations are expected to be in force by April 2023 with the deadline for the first report being 1 December 2024.
- 5.2.4 The consultation closed on the 24 November 2022 and the Cambridgeshire Pension Fund provided a response which broadly agreed with the proposals. The Board will be updated with the outcome of the consultation following release from the Department for Levelling Up, Housing and Communities in due course.
- 5.2.5 In addition, the Scheme Advisory Board (SAB) response to the consultation can be found [here](#).

5.3 The Pensions Regulator

5.3.1 Enforcement and prosecution policies

- 5.3.1.1 In October the Pensions Regulator (TPR) published a revised enforcement policy, updated prosecution policy and new enforcement strategy with the aim of providing clarity on what those who are subject to enforcement action can expect from TPR.
- 5.3.1.2 The enforcement policy sets out TPR's approach to investigating cases and any subsequent enforcement action. It is web-based and divided into standalone chapters, each with links to other relevant documents. The policy also consolidates previous policies in respect of defined benefit, defined contribution and public service pension schemes.

- 5.3.1.3 The prosecution policy explains how TPR will approach prosecuting workplace pension criminal offences. The policy has been brought up to date to reflect the new criminal powers in the Pensions Schemes Act 2021 and other developments.
- 5.3.1.4 The enforcement strategy sets out the overarching aims of TPR's enforcement work (excluding automatic enrolment). It also provides an insight into the framework TPR applies when selecting cases for enforcement action.
- 5.3.1.5 The full documents are available at the following links:
[revised enforcement policy](#)
[updated prosecution policy](#)
[new enforcement strategy](#)
- 5.3.2 Scam prevention strategy
- 5.3.2.1 The Pensions Regulator has published a new strategy to combat pension scams, it aims to tackle the issue by:
- educating savers about the threat scams present
 - encouraging higher standards and preventing practices that lead to saver harm
 - fighting fraud through prevention, disruption and punishment of criminality
- 5.3.2.2 In line with TPR Corporate Strategy, Joint Regulatory Strategy and with the Financial Conduct Authority main objective is to for individuals not to lose some, or all of their pension savings to scammers. The reasons that this may occur is categorised into three areas:
- savers not being enabled to make good decisions
 - practices by schemes, advisors and providers which lead to saver harm
 - pensions fraud and other criminality
- 5.3.2.3 Some examples of how TPR will be enacting the policy are as follows –
- encourage industry to use anti-scam messaging on all annual benefit statements and touchpoints that savers have with their provider
 - continue to support and amplify the messages of the FCA's ScamSmart campaign adapting messaging to deal with new and emerging threats
 - continue to encourage industry to go beyond minimum compliance and engage savers with their pensions, and work to improve the pensions consumer journey including a review of guidance on member communications for scam-prevention messaging
- 5.3.2.4 Full details can be found - [Our strategy to combat pension scams | The Pensions Regulator](#)
- 5.3.2.5 The Northamptonshire Pension Fund has ensured that letters/forms in relation to transferring to another pension arrangement contain the appropriate pension scam wording with links to the associated documentation. Information is also published on the Pension Service website and is included in newsletters. The Fund will be reviewing the new strategy in detail to establish if there are any areas of compliance that need to be achieved.
- 5.4 Skills and knowledge opportunities
- 5.4.1 The Public Services Pensions Act 2013 and the Pensions Regulator's Code of Practice (Governance and administration of public service pension schemes) require all members of the Pension Committee and Board to maintain the necessary skills and knowledge to undertake their role effectively.
- 5.4.2 In order to facilitate the acquisition of skills and knowledge for members of the Pension Committee and Board, appendix A lists the main events that are deemed useful and appropriate.
- 5.4.3 If members of the Pension Board would like to attend any of the events listed in appendix a please contact a member of the Fund's governance team who will make the necessary arrangements if an invitation has not already been sent.

6 Implications (including financial implications)

6.1 Resources and Financial

- 6.1.1 There are no resources or financial implications arising from the report.

6.2 Legal

6.2.1 The Fund has consulted with its Governance advisors, Aon, to understand the legislative requirements to comply with Pensions Dashboards regulations.

6.3 Risk

6.3.1 This report ensures on-going compliance with the above and that the Pension Board is up to date with:

- New or amending legislation affecting the LGPS;
- Relevant activities of the LGPS Scheme Advisory Board and the Pensions Regulator that concern the governance of the (LGPS) on a national and local basis; and
- Skills and knowledge opportunities.

6.3.2 The risks associated with the Pension Board not having the required level of knowledge and understanding have been captured in the Fund's risk register as detailed below.

Risk	Residual risk rating
Those charged with governance of the Fund and Scheme are unable to fulfil their responsibilities effectively	Green
Failure to administer the scheme in line with regulations and guidance.	Green
Failure to provide relevant information to the Pension Fund Committee to enable informed decision making.	Green

The Fund's full risk register can be found on the Fund's website at the following link:
[Northamptonshire Risk Register](#)

6.4 Relevant Pension Fund Objectives

6.4.1 The following objectives as per the Business Plan have been considered in this report –

- To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
- To manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.
- To ensure that the relevant stakeholders responsible for managing, governing and administering the Fund, understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a changing environment.
- To continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate.

6.5 Consultation

6.5.1 Not required.

This page is intentionally left blank

Northamptonshire Pension Fund

Appendix A

Training plan 2022/23

Date	Training	Method of delivery	Delivered by	Target audience	Additional Information
JANUARY	Governance Conference	Conference – hybrid	Local Government Association (LGA)	Committee, Board & Officer	Events Local Government Association
FEBRUARY	Reporting breaches of the Law	Virtual training session	Officers	Officers	Postponed – awaiting guidance
	Investment Strategy	Virtual training session	Schroders/Mercer	Committee & Board	Exact date to be confirmed
MARCH	Valuation – Rates and Adjustment Certificate	Presentation - hybrid	Hymans	Committee & Board	Presentation to be delivered as part of the March Committee meeting
	Investment Seminar	Conference – face to face	Local Government Chronicle (LGC)	Committee, Board & Officer	30-31 LGC Investment Seminar 2023 - Home Page (lgcplus.com)

Northamptonshire Pension Fund

Appendix A

Training plan 2023/24

Date	Training	Method of delivery	Delivered by	Target audience	Additional Information
APR					
MAY					
JUN	Local Authority Conference 2023	Conference – face to face	Pension and Lifetime Savings Association (PLSA)	Committee, Board & Officer	26-28 Local Authority Conference PLSA
JULY					
AUGUST					
SEPTEMBER	Investment and Pensions Summit	Conference – face to face	Local Government Chronicle (LGC)	Committee, Board & Officer	TBC
OCTOBER					
NOVEMBER					
DECEMBER	Annual Conference 2022	Conference – face to face	Local Authority Pension Fund Forum (LAPFF)	Committee, Board & Officer	6-8 – details TBC
JANUARY	Governance Conference	Conference – hybrid	Local Government Association (LGA)	Committee, Board & Officer	TBC
FEBRUARY					
MARCH					



West Northamptonshire Council

Local Pension Board

24/1/2023

Mark Whitby – Head of Pensions

Report Title	Northamptonshire Pension Fund – Overpayment of Pension Entitlement Policy
Report Author	Michelle Oakensen Governance and Regulations Manager michelle.oakensen@westnorthants.gov.uk

Contributors/Checkers/Approvers

Head of Pensions	Mark Whitby	10/1/2023
-------------------------	-------------	-----------

List of Appendices

Appendix A – Proposed Overpayment of Pension Entitlement Policy 2023 tracked

Appendix B – Proposed Overpayment of Pension Entitlement Policy 2023 clean

1. Purpose of Report

1.1. To present the Overpayment of Pension Entitlement Policy to the Pension Fund Board.

2. Executive Summary

2.1 Overpayments of pension can occur for a variety of reasons. It is important that the Fund has a clear policy on how overpayments of pension entitlements are managed once they are identified.

2.2 The Policy covers types of overpayments and the approach the Fund will take when overpayments occur. This review has also taken into account the management of lump sum overpayments in addition to pension overpayments in previous versions.

2.3 Northamptonshire Pension Fund recognises the need to take a pro-active approach to identifying potentially fraudulent activity and overpayments.

3. Recommendations

3.1 The Pension Board is asked to review the Overpayment of Pension Entitlement .

4. Report Background

4.1 It is important for the Fund to have a policy on how overpayments of pension and lump sums are managed once identified. Such a policy will provide assurance to the Fund’s stakeholders that all overpayments are treated in a fair and equitable manner and that the Fund seeks to

recover overpayments and has in place steps to prevent and also investigate potentially fraudulent activity.

4.2 An Overpayment of Pension Policy also strengthens the Fund’s position should a complaint be made using the Internal Dispute Resolution Procedure (IDRP) which if exhausted without resolution, can be referred by the scheme member or their representative to the Pensions Ombudsman.

4.3 An Overpayment of Pensions Policy was initially agreed by the Pension Fund Committee in October 2015, with subsequent reviews in June 2018 and March 2019. It is now deemed an appropriate time to review this policy to ensure it remains fit for purpose.

5. Issues and Choices

5.1 Proposed changes to the existing Policy

5.1.1 As a result of the review, the following changes are being proposed –

Section	Proposed change
Title of Policy	- Overpayment of Pension Entitlement Policy 2023, to encompass lump sum overpayments
Throughout	- Removal of LGSS
8 - Managing overpayments of pension entitlement following incorrect information supplied by the employer in respect of the scheme member	- To provide clarity on the process in place for recovering lump sum overpayments.
9 - Managing overpayments of pension as a result of the incorrect rate of pension paid by the Fund and the member can be said to be reasonably aware of the overpayment.	- To provide clarity on the process in place for recovering lump sum overpayments. - To extend the table in 9.1 on types of overpayments to include – ‘Administration error upon calculation/payment of pension scheme lump sum’.
10 - Managing overpayments of pension following an incorrect rate of pension entitlement being paid by the Fund and it can be said that the member cannot have known of the overpayment	- To provide clarity on the process in place for recovering lump sum overpayments. - To include ‘Pension Credit members’ as an example of type of overpayment in table 10.1. - To extend the table in 10.1 on types of overpayments to include – ‘Administration error upon calculation/payment of pension scheme lump sum’.

5.2 Next steps

5.2.1 The Policy will be presented to the Pension Fund Committee in March 2023 and following approval will be published on the Pensions Service website.

6 Implications (including financial implications)

6.1 Resources and Financial

6.1.1 There are no resources or financial implications arising from the proposals.

6.2 Legal

6.2.1 There are no legal implications arising from the proposals.

6.3 Risk

6.3.1 The mitigated risks associated with this report has been captured in the Fund's risk register as detailed below -

Risk	Residual risk rating
Those charged with governance are unable to fulfil their responsibilities effectively.	Green
Risk of fraud and error	Green
Incorrect/poor quality data held on the Pension Administration and Payroll platforms or delays with receiving information leading to incorrect information/delayed provision of information to members and stakeholders	Green
Incorrect production of accounts, notices, publications and management reports leading to possible financial and reputational damage.	Green
Failure to understand and monitor risk compliance.	Green
Lack of understanding of employer responsibilities which could result in statutory and non-statutory deadlines being missed	Green

6.3.2 The executive summary can be found on the Fund's website at the following link:
[Northamptonshire Risk Register](#)

6.4 Relevant Pension Fund Objectives

6.4.1 The following objectives as per the Business Plan have been considered in this report -

- Have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
- Manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.
- Ensure the relevant stakeholders responsible for managing, governing and administering the Fund, understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a changing environment.
- Continually monitor and measure clearly articulated objectives through business planning
- Deliver consistent plain English communications to stakeholders.
- Seek and review regular feedback from all stakeholders and use the feedback appropriately to shape the administration of the Fund.
- Ensure cash flows in to and out of the Fund are timely and of the correct amount.

6.5 Consultation

6.5.1 Not applicable.

This page is intentionally left blank

Overpayment of Pension Entitlement Policy 2023



Contents

1. Introduction	3
2. Policy objectives	3
3. Purpose of the policy	3
4. Effective date and reviews.....	3
5. Scope.....	4
6. Managing overpayments of pension on the death of a scheme member	4
7. Managing overpayments of children’s pensions failing to cease at the appropriate time	5
8. Managing overpayments of pension entitlement following incorrect information supplied by the employer in respect of the scheme member	5
9. Managing overpayments of pension as a result of the incorrect rate of pension paid by the Fund and the member can be said to be reasonably aware of the overpayment.	6
10. Managing overpayments of pension following an incorrect rate of pension entitlement being paid by the Fund and it can be said that the member cannot have known of the overpayment	7
11. Overpayments resulting from an error with Guaranteed Minimum Pension (GMP).....	8
12. Discretion to write off overpayments	8
13. Recovery	9
14. Length of time to recover overpayment.....	9
15. Claims of inability to repay overpayments	9
16. Monitoring repayments	10
17. Authority to write off overpayments	10
18. Reporting to the HM Revenue and Customs and effects on the Fund and individual.....	10
19. Prevention	11
Appendix 1 – Limitation Period Examples	12
Appendix 2 - Examples of HM Revenue and Customs ‘genuine errors’	14

1. Introduction

- 1.1 This is the Overpayment of Pension Entitlement Policy for Northamptonshire Pension Fund, which is managed by Northamptonshire County Council (the Administering Authority).
- 1.2 Overpayments of pension can occur for a variety of reasons. It is important that the Fund has a clear policy on how overpayments of pension entitlements are managed once they are identified.
- 1.3 Northamptonshire Pension Fund recognises the need to take a pro-active approach to identifying potentially fraudulent activity and overpayments.

2. Policy objectives

2.1 The policy objectives aim to ensure the Fund:

- Have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
- Manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.
- Ensures benefits are paid to, and income collected from, the right people at the right time in the right amount;
- Identifies errors as soon as possible;
- Rectifies overpayments with the co-operation of the individual;
- Encourages individuals to take an active role in checking payslips/payments for obvious errors; and
- Avoids the Internal Dispute Resolution Procedure (IDRP), where possible, by managing the process effectively.

3. Purpose of the policy

3.1 The policy is designed to provide assurance to the Fund's stakeholders that:

- all overpayments are treated in a fair and equitable manner;
- the Fund seeks to recover overpayments that have occurred, but, acknowledges that there may be legal reasons and/or other circumstances which mean that an overpayment may not, in practice, be able to be recovered (in whole or in part); and
- has steps in place to prevent and also investigate potentially fraudulent activity.

4. Effective date and reviews

4.1 This policy was first approved by the Pension Committee on 31st July 2015 and was effective from 1st August 2015. The policy has since been subject to the following reviews:

Date of review by Pension Committee	Policy effective date:
22 June 2018	23 June 2018
22 March 2019	23 March 2019
<u>29 March 2023</u>	

4.2 This policy will be reviewed annually and, if necessary, more frequently to ensure it remains accurate and relevant.

5. Scope

5.1 The policy applies to:

- All members and former members, which in this policy includes survivor and pension credit members of the Northamptonshire Pension Fund who have received one or more payments from that Fund;
- Executors of the ~~e~~Estates of deceased Northamptonshire Pension Fund members
- Beneficiaries of Northamptonshire Pension Fund members where those beneficiaries have received one or more payments from that Fund
- Administrators of the scheme; and
- The Pension Fund Committee.

6. Managing overpayments of pension on the death of a scheme member

6.1 Understandably, notification of a death of a pensioner member of the scheme does not always happen immediately and as such it is not always possible to stop payment of the pension after a point in the payroll month and so an overpayment can occur.

6.2 Should an overpayment of pension occur ~~following as a result of~~ the death of a scheme member, the Fund will generally seek to recover overpayments that are greater than £250.00 (gross) in value unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 or less in the instance of the death of a scheme member has been deemed by the Fund as uneconomical to pursue. In such circumstances, the Fund's approach will be that the sum written off is treated as a liability against the scheme member's former employer.

6.3 All correspondence regarding an overpayment will be handled sensitively in the initial stages due to the circumstances surrounding how the overpayment has occurred.

6.4 An invoice will be raised by the Fund to recover an overpayment which is greater than £250.00 upon the death of a scheme member.

7. Managing overpayments of children's pensions failing to cease at the appropriate time

- 7.1 An eligible child, as defined by the LGPS Regulations 2013, is entitled to receive a pension until such a time as their circumstances change and they are no longer eligible to receive a pension from the Fund.
- 7.2 In these cases, the individual in receipt of the pension is responsible for informing the Pensions Service ~~LGSS Pensions~~ of a change in circumstances to ensure the pension is ceased at the appropriate time; failure to do so would result in an overpayment.
- 7.3 Should an overpayment of pension occur as a result of a late notification of change of circumstances, the Fund will generally seek to recover overpayments that are greater than £250.00 (gross) in value, unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 or less has been deemed by the Fund as uneconomical to pursue. In such circumstances, the Fund's approach will be that the sum written off is treated as a liability against the scheme member's former employer.
- 7.4 An invoice will be raised by the Fund to recover the overpayment which is greater than £250.00 as a result of the late notification of the change in circumstances. The invoice will be sent to the individual whose bank account the child's pension was being paid into.

8. Managing overpayments of pension entitlement following incorrect information supplied by the employer in respect of the scheme member

- 8.1 Should an overpayment of pension occur as a result of inaccurate information provided by the scheme member's employer on retirement, the Fund will generally seek to recover monies that are greater than £250.00 in value unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 (gross) or less has been deemed by the Fund uneconomical to pursue due to the administrative time involved.
- 8.2 Overpayments that are greater than £250.00 in value will generally be recovered through the scheme member's ongoing pension as this allows for the appropriate adjustment for tax. The pension will be reduced to the correct level for the next available monthly pension payment after a 6 week notice period. The scheme member will be notified in writing of the error and the course of action to be taken.
- 8.3 Where there is no ongoing pension from which to deduct the overpaid amount, an invoice will be arranged by the Fund to recover any the overpayment which is greater than £250.00 in value. The invoice will be sent to the individual who received the pension payment(s).
- 8.4 Where an overpayment of the lump sum has occurred following inaccurate information provided by the employer; an invoice will be arranged by the Fund to recover any overpayment which is

over £250.00 in value. The invoice will be sent to the individual who received the lump sum payment.

9. Managing overpayments of pension as a result of the incorrect rate of pension paid by the Fund and the member can be said to be reasonably aware of the overpayment.

9.1 There are a number of reasons why a pension could be paid at an incorrect higher rate. The most common reasons are detailed in the table below, but it should be noted that this is not an exhaustive list.

	Type of overpayment	How overpayment has occurred
1	Administration error upon creation of payroll record	Incorrect (overstated) rate of pension inputted onto payroll record, but, member informed in writing of the correct rate of pension to be paid.
2	Administration error upon calculation/payment of pension scheme lump sum	Incorrect (miscalculated/overstated) lump sum paid to member but member informed in writing of the correct value of the lump sum to be paid.
3	Re-employment where abatement affects rate of pension due	Re-employment not notified and within the terms of the Administering Authority policy on the exercise of their discretion relating to abatement, the member's annual pension should have been reduced or suspended due to the level of earnings in the new employment. Identified through <u>National Fraud Initiative</u> exercise or other means.
4	Entitlement to pension ceasing	Non notification that a child's pension is no longer payable as the child aged 18 or above is no longer in full time education or vocational training.
5	Entitlement to current rate of pension ceasing	A Pension Sharing Order or Earmarking Order being received after the implementation date meaning that the pension has been overpaid since that implementation date.
6	Failure to action an alteration to the payroll record/reduction in pension	Failing to implement the change from the higher short-term dependents pension to the lower long-term rate.
7	Failure to action an alteration to the payroll record/reduction in pension	Failing to implement a reduction to a pension as a result of National Insurance Modification (at State Pension Age for those members who both left the LGPS before 1 April 1998 and had membership before 1 April 1980).

9.2 If the scheme member has been notified of the correct rate of pension and/or lump sum in writing and is receiving/has received a higher amount, it can be said that the member can reasonably be aware that they are being/have been over paid as the scheme member has been notified of the correct rate in writing.

- 9.3 The Fund will, therefore, generally seek to recover monies that are greater than £250.00 gross in value, unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 or less has been deemed by the Fund as uneconomical to pursue due to the administrative time involved.
- 9.4 The amount of overpaid pension will generally be recovered from the scheme member's ongoing pension as this allows for the appropriate adjustment for tax. The pension will also be reduced to the correct level for the next available monthly pension payment after a 6 week notice period and will be notified in writing of the error and the course of action to be taken.
- 9.5 Where there is no ongoing pension from which to deduct the overpaid amount, OR the pension scheme lump sum has been overpaid, an invoice will be arranged by the Fund to recover the overpayment which is greater than £250.00 in value. The invoice will be sent to the individual who received the pension/lump sum payment.

10. Managing overpayments of pension following an incorrect rate of pension entitlement being paid by the Fund and it can be said that the member cannot have known of the overpayment

- 10.1 The table below illustrates how an overpayment of a member's pension can occur without the member being aware. It should be noted that the table below is not an exhaustive list;

	Type of overpayment	How overpayment has occurred
1	Administration error upon calculation and notification of benefit entitlement (includes dependants' pensions <u>and Pension Credit members</u> .)	Incorrect (overstated) rate of pension inputted onto payroll record and member informed in writing of the, incorrect, rate of pension to be paid.
2	<u>Administration error upon calculation and notification of pension scheme lump sum entitlement</u>	<u>Incorrect (overstated) pension scheme lump sum paid to the member and member informed in writing of the incorrect lump sum to be paid</u>
3	Pensions Increase	Pensions Increase inaccurately applied to the elements of a pension in payment.

- 10.2 In these circumstances the Fund will generally seek to recover monies that are greater than £250.00 gross in value unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 or less has been deemed by the Fund as uneconomical to pursue due to the administrative time involved.
- 10.3 The amount will be recovered from the scheme member's ongoing pension as this allows for the appropriate adjustment for tax. The pension will also be reduced to the correct level for the next available monthly pension payment after a 6 week notice period. The scheme member will be notified in writing of the error and the course of action to be taken.

10.4 Where there is no ongoing pension from which to deduct the overpaid amount, or an overstated pension scheme lump sum has been paid, an invoice will be arranged by the Fund to recover any ~~the~~ overpayment which is greater than £250.00 in value. The invoice will be sent to the individual who received the pension/lump sum payment.

11. Overpayments resulting from an error with Guaranteed Minimum Pension (GMP)

11.1 Overpayments can also occur as a result of an the incorrect or non-application of the GMP element of a member's pension as detailed in the table below.

1	GMP not included in the pension being paid	New information from HMRC or a review of the member's record shows that a GMP should have been included within the pension, but, has not. Due to the different way cost of living increases are applied to GMP and the excess over GMP, means that, overall, a lower level of pensions increase should have been paid.
2	Incorrect level of GMP being paid	New information from HMRC or a review of the member's record leads to a revised rate of GMP to be used which, due to the different way cost of living increases are applied to GMP and the excess over GMP, means that, overall, a lower level of pensions increase should have been paid.
3	GMP not accurately split between pre 88 and post 88	New information from HMRC or a review of the member's record shows that a GMP has not been apportioned correctly. Due to the different way cost of living increases are applied to pre 88 GMP and post 88 GMP, means that, overall, a lower level of pensions increase should have been paid.

11.2 The application of GMP to a member's pension requires a high degree of technical understanding that can only reasonably be expected of a pensions practitioner. As such, and where there has been no explicit communication to the member that would mean that they could have known that their pension was being paid incorrectly as a result of the non or misapplication of GMP, the overpayment of any value should be written off without the requirement for authorisation as detailed in 17.1.

11.3 The pension will be reduced to the correct level for the next available monthly pension payment after a 6 week notice period. The scheme member will be notified in writing of the error and the course of action to be taken.

12. Discretion to write off overpayments

12.1 For all scenarios mentioned above, Officers have the ability to exercise discretion in the event of legal reasons and/or exceptional circumstances and to ensure no individual is unfairly treated. If the pursuing recovery of an overpayment was to cause significant distress and/or if there are legal

reasons as to why the overpayment may not be recovered (in whole or in part) this would be taken into account as would the cost effectiveness of recovery. All applications made to write off of an overpayment will be investigated on a case by case basis and final decision will be made by the appropriate officer listed in section 17, dependent upon the amount potentially being written off.

- 12.2 The Northamptonshire Pension Fund has authority to automatically write off any amount up to £250.00 in line with HM Revenue and Customs authorised payments limits and analysis of the cost effectiveness of pursuing amounts up to this value.

13. Recovery

- 13.1 The Limitation Act 1980 states that *“An action founded on simple contract shall not be brought after the expiration of six years from the date on which the cause of action accrued”*. However, section 32(1) of the Act effectively ‘postpones’ the date by which an administering authority may make a claim to recover monies in certain circumstances. It states *“the period of limitation shall not begin to run until the plaintiff has discovered the fraud, concealment or mistake (as the case may be) or could with reasonable diligence have discovered it”*. The potential effect of section 32(1) in relation to any overpayment and its recovery will be considered on a case-by-case basis.
- 13.2 Therefore, the Fund will generally seek to recover overpayments that have been discovered within the last 6 years, with the relevant postponement applied, if applicable, in line with the Limitation Act unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part).
- 13.3 Examples of limitation periods and how they operate in relation to overpayments are included in appendix 1 of this policy.
- 13.4 It should be borne in mind that where the Fund seeks to recover overpayments, there may be arguments raised as to why the overpayment should not be recovered (in whole or in part). These will need to be considered on a case-by-case basis and, if successful, may affect the ability of the Fund to recover the overpayment (in whole or in part).

14. Length of time to recover overpayment

- 14.1 The Fund will allow a pension overpayment to be recovered over the same amount of time as the overpayment occurred. For example, if overpayments were made over a 3 month period, the recovery period to repay the overpayment will be over 3 months. In the event that reasonable arguments are advanced that the recovery period should be extended, the Fund can at its discretion allow an extension based on the individual’s circumstances.

15. Claims of inability to repay overpayments

- 15.1 In cases where it is claimed that an overpayment cannot be repaid, officers of the Fund will enter into negotiations with the scheme member/next of kin and an analysis of the cost effectiveness of pursuing the overpayment will be undertaken on a case-by-case basis. For large overpayments,

where appropriate, the Fund will seek legal advice. This approach will reduce the number of Internal Dispute Resolution Procedures applications and referrals to the Pensions Ombudsman. For any cases that do reach the Pensions Ombudsman, Northamptonshire Pension Fund would have demonstrated engagement and negotiation with the complainant.

16. Monitoring repayments

- 16.1 In cases where recovery is not being made through the payroll and an invoice has been raised, the responsibility for chasing the payment rests with the [West Northamptonshire Council LGSS Debt Recovery Team](#). If a final reminder is issued, officers are notified and a decision is made by the Head of Pensions as to whether to take legal action, taking into consideration the amount and circumstances against the potential of legal action.

17. Authority to write off overpayments

- 17.1 In line with the County Council's Scheme of Delegation, the Fund will apply the following levels of authority when writing off overpayments:

Total value of overpayment*	Authority to write off overpayment
No more than £250.00 (gross) on death of a pensioner and any other overpayment type	Officers
Up to no more than £10,000 (gross)	Head of Pensions (in the absence of the Head of Pensions authority will move to the Section 151 Officer)
£10,000+ (gross)	Section 151 Officer
*Subject to a full evidence-based report produced by Officers of the Fund	

18. Reporting to the HM Revenue and Customs and effects on the Fund and individual

- 18.1 Administering authorities are obliged to correct any error they discover within a reasonable period of time. To do otherwise would render payments unauthorised under Section 14 of the Registered Pension Scheme (Authorised Payments) Regulations 2009. The HM Revenue and Customs have a clear steer with regards to timing, in so much that "*When a scheme discovers an overpayment it immediately becomes unauthorised and is subject to an unauthorised tax charge*".

- 18.2 Regulation 13 [states](#) that a payment made in error will be an authorised payment if the:

- Payment was genuinely intended to represent the pension payable to the person;
- Administering authority believed the recipient was entitled to the payment and;
- Administering authority believed the recipient was entitled to the amount of pension that was paid in error.

- 18.3 In addition to the above, there is a further exemption where the overpayment is a 'genuine error' and the aggregate overpayment (paid after 5th April 2006) is less than £250. In such circumstances, if the overpayment is not recovered it remains an unauthorised payment, but, it

does not have to be reported to HM Revenue and Customs and HM Revenue and Customs will not seek to collect tax charges on it.

- 18.4 Examples of HM Revenue and Customs 'genuine errors' are in appendix 2 of this policy.
- 18.5 The Finance Act 2004 also sets out a list of the payments which a registered pension scheme is authorised to make to members. Payments which do not fall within the list will become unauthorised payments and could result in up to three tax charges applying: 1) an authorised payments charge on the recipient of the payment; 2) an unauthorised payments surcharge on that recipient; and 3) a scheme sanction charge on the scheme.
- 18.6 Payments made in the period between notifying the member of an overpayment and the point at which the correction to the right level of pension is made will be regarded under the above legislation as an unauthorised payment. If the total amount of pension paid at the incorrect rate from point of notification to date of reduction to the correct rate is greater than £250 (gross) it would be subject to tax charges 1) and 3) and possibly 2 as set out in section 18.5.

19. Prevention

- 19.1 The Fund has in place processes in order to minimise the risk of overpayments occurring.
- 19.2 The National Fraud Initiative is conducted every two years; it compares files of pensioners with the Department for Work and Pensions database of the deceased and highlights matches for investigation. Northamptonshire Pension Fund actively participates in this initiative.
- 19.3 Northamptonshire Pension Fund participates in overseas life existence checks to ensure only legitimate pensions are being paid and to reduce the likelihood of fraudulent activity.
- 19.4 A report is run periodically on the pension administration system to identify individuals in receipt of a child's pension, further investigations are then carried out for children that are identified as over the age of 18 to ensure they are still entitled to receive a pension.
- 19.5 Northamptonshire Pension Fund includes reminders in its correspondence that the Fund must be advised of changes in circumstances or the death of a scheme member. The Fund also investigates any returned pensioner payslips and pension payments returned by banks and building societies to ensure the welfare of the scheme member and to protect payment of the Fund's money.
- 19.6 Fund officers have a robust system in place for identifying changes to the payroll that need to be processed for a particular payroll month. The process incorporates payroll deadlines and ensures changes are made in a correct and timely manner. This would be in circumstances such as a change from a short-term dependant's pension to a long-term pension.

Appendix 1 – Limitation Period Examples

Scenario	Limitation Period	Overpayment Period which can be claimed*
<ul style="list-style-type: none"> • Overpayments began in April 2008 (the first Mistake Date) • Overpayments discovered, or could have been discovered with reasonable due diligence, in August 2010 (the Discovery Date under Section 32 of the Limitation Act 1980) • Overpayments made for period between April 2008 and August 2010 • Formal claim** for recovery made in January 2015 (the Cut Off Date as referred to in <i>Webber v Department for Education</i>) 	<ul style="list-style-type: none"> • No issues in principle with the Limitation Period as formal claim for recovery commenced within 6 year period after the Discovery Date • Claims are therefore valid and should proceed 	<ul style="list-style-type: none"> • Overpayments back to when they began in April 2008 until August 2010 may be claimed
<ul style="list-style-type: none"> • Overpayments began in April 2003 (the first Mistake Date) • Overpayments discovered, or could have been discovered with reasonable due diligence, in November 2009 (the Discovery Date under Section 32 of the Limitation Act 1980) • Overpayments made from April 2003 to November 2009 • Formal claim for recovery made in December 2011 (the Cut Off Date as referred to in <i>Webber</i>) 	<ul style="list-style-type: none"> • No issues in principle with the Limitation Period as formal claim for recovery commenced within 6 year period after the Discovery Date • Claims are therefore valid and should proceed 	<ul style="list-style-type: none"> • Overpayments back to when they began in April 2003 until November 2009 may be claimed
<ul style="list-style-type: none"> • Overpayments began in January 1999 (the first Mistake Date) • Overpayments discovered or could have been discovered with reasonable due diligence in September 2016 (when the date was received from HM Treasury in relation to the GMP equalisation) 	<ul style="list-style-type: none"> • No issues in principle with the Limitation Period as formal claim for recovery commenced within 6 year period after the Discovery Date 	<ul style="list-style-type: none"> • Overpayments back to when they began in January 1999 until September 2016 may be claimed

<p>exercise) (the Discovery Date under Section 32 of the Limitation Act 1980)</p> <ul style="list-style-type: none"> • Overpayments made for the period from January 1999 to September 2016 • Formal claim for recovery made in February 2017 (the Cut Off Date as referred to in <i>Webber</i>) 	<ul style="list-style-type: none"> • Claims are therefore valid and should proceed 	
<ul style="list-style-type: none"> • Overpayments began in April 2006 (the first Mistake Date) • Overpayments discovered, or could have been discovered with reasonable due diligence, in August 2009 (the Discovery Date under Section 32 of the Limitation Act 1980) • Overpayments made for period between April 2006 and August 2009 • Formal claim for recovery made in January 2017 (the Cut Off Date as referred to in <i>Webber</i>) 	<ul style="list-style-type: none"> • Issue with the Limitation Period as formal claim for recovery commenced more than 6 years after the Discovery Date • Claims are therefore out of time and should not proceed • 	<ul style="list-style-type: none"> • Overpayments cannot be claimed back as the formal claim for recovery was made more than 6 years after the Discovery Date

* whilst this refers to the period which can be claimed, this is not the same as the period which will definitely be recovered in light of the other defences which are available to scheme members who face such claims for repayments of overpayment.

** reference to formal claim in this appendix means the commencement of formal proceedings to recover the overpayment.

Appendix 2 - Examples of HM Revenue and Customs 'genuine errors'

Genuine error - example 1

Apart from the case of pensions continuing under a 'term certain' guarantee, pensions are supposed to stop accruing on the death of the pensioner. If payments that accrued inappropriately after the death continue to be made, they will be unauthorised unless they fall within the limited conditions of regulation 15 of The Registered Pension Schemes (Authorised Payments) Regulations. The main feature of those conditions is that instalments can be paid within 6 months of the member's death providing the payer was reasonably unaware the pensioner had died.

Clearly then, once the 6 month time limit has passed, the tax rules will regard any future instalments as unauthorised member payments, and the fact the payer might remain unaware of the member's death does not change the essential character of any payment made. When the death comes to light the payer can see that the payments made more than 6 months after death were made in error.

Genuine error - example 2

The tax rules normally require that a pension being paid to a dependent who is child of a deceased member must stop when the recipient reaches age 23. If the recipient does not qualify for any of the exceptions that would allow for the continuation of their pension after that time, for example because of a disability, then the payer must make adequate arrangements to stop the pension in time. To this end they may give a clear and timely warning to the bank to stop payments from the necessary date but it can happen that the bank fails to act on those instructions and payments continue to be made in error.

In both of these examples, if the error was spotted and rectified (pension overpayments were repaid) as soon as reasonably possible, the inadvertent pension instalments (in the case of Example 1, only in respect of the instalments paid after the 6 month limit where the conditions otherwise apply) would not be unauthorised member payments.

However, there would be an unauthorised member payment if, despite the error being spotted, it is decided the repayment of the inadvertently overpaid pension instalments will not be pursued or the scheme does attempt recovery (in the case of Example 1, only in respect of the instalments paid after the 6 month limit where the conditions otherwise apply) but is unsuccessful and eventually decides to write off the overpayment (even though the decision might be taken on administration costs grounds or out of sensitivity). The exception to this will be if - as may often be the case - one of the categories of authorised payments introduced by the Registered Pension Schemes (Authorised Payments) Regulations 2009 can then be looked to in relation to payments made in genuine error but left in place.

The date of the unauthorised payment for the purpose of having to make a report of that payment would be the date that the decision is made not to seek recovery of the overpayment or the date the decision is taken to no longer seek recovery of the overpayment, as the case may be.

Where the overpayment is not pursued or, otherwise, not successfully pursued and the total of such overpaid pension instalments paid after 5 April 2006 (overpaid instalments paid before 6 April 2006 do not count for this purpose) to, or in respect of, a particular member does not exceed £250:

- for its own reasons of cost administration, under its Collection and Management powers, HM Revenue & Customs will not seek to collect the tax that, in strictness, is due in respect of the unauthorised payment (although the payment remains an unauthorised payment), and
- the scheme administrator does not have to report the unauthorised payment to HM Revenue & Customs, and
- the unauthorised payment does not have to be returned on the recipient's Self-Assessment tax return or, otherwise, be notified to HM Revenue & Customs.

If the aggregate overpayment exceeds £250, then all of the overpayment is chargeable as an unauthorised payment (i.e. one cannot deduct £250 as if it were an allowance, which it is not).

For this purpose, the £250 threshold applies to the aggregate of the overpayments actually received by, or in respect of, the member.

Where the conditions would otherwise apply in respect of pension instalments paid later than 6 months after the death of a pensioner except that the pension instalments have been paid later than 6 months after the pensioner's death, the £250 threshold applies in respect of the aggregate of the pension instalments paid after the expiry of the 6 month time limit only. The pension instalments paid up to the 6 month time limit would not be.

Overpayment of lump sums

The conditions described above apply equally where an overpayment of a lump sum occurs, such as a pension commencement lump sum or serious ill-health lump sum. So the limit of £250 will apply, but any lump sum in excess of that amount, where recovery cannot be made, will be an unauthorised payment to the extent that the amount is not an authorised payment.

For example, a pension commencement lump sum of £100,000 is due to be paid under the scheme rules, but £105,000 is paid in error. The scheme administrator is unable to affect a recovery of the excess. Under the tax rules, the pension commencement lump sum of £100,000 is the permitted maximum, so the whole excess of £5,000 is an unauthorised payment (i.e. one cannot deduct £250 as if it were an allowance, which it is not).

Note that a payment of a lump that is intended to be a pension commencement lump sum but ends up exceeding the permitted maximum may still be an authorised member payment if certain conditions are met.

Example

A pension commencement lump sum must be paid within an 18 month period starting 6 months before and ending 12 months after the member becomes entitled to the lump sum and linked pension. However, due to an error within the administration department of the pension scheme, the lump sum payment is not made by that deadline. If the lump sum is paid after the deadline it will not be a pension commencement lump sum and (unless it falls within the definition of one of the other authorised lump sums) will be an unauthorised member payment.

DRAFT

DRAFT

Overpayment of Pension Entitlement Policy 2023



Contents

1. Introduction	3
2. Policy objectives	3
3. Purpose of the policy	3
4. Effective date and reviews	3
5. Scope.....	4
6. Managing overpayments of pension on the death of a scheme member	4
7. Managing overpayments of children’s pensions failing to cease at the appropriate time	5
8. Managing overpayments of pension entitlement following incorrect information supplied by the employer in respect of the scheme member	5
9. Managing overpayments of pension as a result of the incorrect rate of pension paid by the Fund and the member can be said to be reasonably aware of the overpayment.	6
10. Managing overpayments of pension following an incorrect rate of pension entitlement being paid by the Fund and it can be said that the member cannot have known of the overpayment	7
11. Overpayments resulting from an error with Guaranteed Minimum Pension (GMP)	8
12. Discretion to write off overpayments	8
13. Recovery	9
14. Length of time to recover overpayment	9
15. Claims of inability to repay overpayments	9
16. Monitoring repayments	10
17. Authority to write off overpayments.....	10
18. Reporting to the HM Revenue and Customs and effects on the Fund and individual.....	10
19. Prevention	11
Appendix 1 – Limitation Period Examples	12
Appendix 2 - Examples of HM Revenue and Customs ‘genuine errors’	14

1. Introduction

- 1.1 This is the Overpayment of Pension Entitlement Policy for Northamptonshire Pension Fund, which is managed by Northamptonshire County Council (the Administering Authority).
- 1.2 Overpayments of pension can occur for a variety of reasons. It is important that the Fund has a clear policy on how overpayments of pension entitlements are managed once they are identified.
- 1.3 Northamptonshire Pension Fund recognises the need to take a pro-active approach to identifying potentially fraudulent activity and overpayments.

2. Policy objectives

- 2.1 The policy objectives aim to ensure the Fund:
 - Have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
 - Manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.
 - Ensures benefits are paid to, and income collected from, the right people at the right time in the right amount;
 - Identifies errors as soon as possible;
 - Rectifies overpayments with the co-operation of the individual;
 - Encourages individuals to take an active role in checking payslips/payments for obvious errors; and
 - Avoids the Internal Dispute Resolution Procedure (IDRP), where possible, by managing the process effectively.

3. Purpose of the policy

- 3.1 The policy is designed to provide assurance to the Fund's stakeholders that:
 - all overpayments are treated in a fair and equitable manner;
 - the Fund seeks to recover overpayments that have occurred, but, acknowledges that there may be legal reasons and/or other circumstances which mean that an overpayment may not, in practice, be able to be recovered (in whole or in part); and
 - has steps in place to prevent and also investigate potentially fraudulent activity.

4. Effective date and reviews

- 4.1 This policy was first approved by the Pension Committee on 31st July 2015 and was effective from 1st August 2015. The policy has since been subject to the following reviews:

Date of review by Pension Committee	Policy effective date:
22 June 2018	23 June 2018
22 March 2019	23 March 2019
29 March 2023	

4.2 This policy will be reviewed annually and, if necessary, more frequently to ensure it remains accurate and relevant.

5. Scope

5.1 The policy applies to:

- All members and former members, which in this policy includes survivor and pension credit members of the Northamptonshire Pension Fund who have received one or more payments from that Fund;
- Executors of the estates of deceased Northamptonshire Pension Fund members
- Beneficiaries of Northamptonshire Pension Fund members where those beneficiaries have received one or more payments from that Fund
- Administrators of the scheme; and
- The Pension Fund Committee.

6. Managing overpayments of pension on the death of a scheme member

6.1 Understandably, notification of a death of a pensioner member of the scheme does not always happen immediately and as such it is not always possible to stop payment of the pension after a point in the payroll month and so an overpayment can occur.

6.2 Should an overpayment of pension occur following the death of a scheme member, the Fund will generally seek to recover overpayments that are greater than £250.00 (gross) in value unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 or less in the instance of the death of a scheme member has been deemed by the Fund as uneconomical to pursue. In such circumstances, the Fund's approach will be that the sum written off is treated as a liability against the scheme member's former employer.

6.3 All correspondence regarding an overpayment will be handled sensitively in the initial stages due to the circumstances surrounding how the overpayment has occurred.

6.4 An invoice will be raised by the Fund to recover an overpayment which is greater than £250.00 upon the death of a scheme member.

7. Managing overpayments of children's pensions failing to cease at the appropriate time

- 7.1 An eligible child, as defined by the LGPS Regulations 2013, is entitled to receive a pension until such a time as their circumstances change and they are no longer eligible to receive a pension from the Fund.
- 7.2 In these cases, the individual in receipt of the pension is responsible for informing the Pensions Service of a change in circumstances to ensure the pension is ceased at the appropriate time; failure to do so would result in an overpayment.
- 7.3 Should an overpayment of pension occur as a result of a late notification of change of circumstances, the Fund will generally seek to recover overpayments that are greater than £250.00 (gross) in value, unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 or less has been deemed by the Fund as uneconomical to pursue. In such circumstances, the Fund's approach will be that the sum written off is treated as a liability against the scheme member's former employer.
- 7.4 An invoice will be raised by the Fund to recover the overpayment which is greater than £250.00 as a result of the late notification of the change in circumstances. The invoice will be sent to the individual whose bank account the child's pension was being paid into.

8. Managing overpayments of pension entitlement following incorrect information supplied by the employer in respect of the scheme member

- 8.1 Should an overpayment of pension occur as a result of inaccurate information provided by the scheme member's employer on retirement, the Fund will generally seek to recover monies that are greater than £250.00 in value unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 (gross) or less has been deemed by the Fund uneconomical to pursue due to the administrative time involved.
- 8.2 Overpayments that are greater than £250.00 in value will generally be recovered through the scheme member's ongoing pension as this allows for the appropriate adjustment for tax. The pension will be reduced to the correct level for the next available monthly pension payment after a 6 week notice period. The scheme member will be notified in writing of the error and the course of action to be taken.
- 8.3 Where there is no ongoing pension from which to deduct the overpaid amount, an invoice will be arranged by the Fund to recover any overpayment which is greater than £250.00 in value. The invoice will be sent to the individual who received the pension payment(s).
- 8.4 Where an overpayment of the lump sum has occurred following inaccurate information provided by the employer; an invoice will be arranged by the Fund to recover any overpayment which is

over £250.00 in value. The invoice will be sent to the individual who received the lump sum payment.

9. Managing overpayments of pension as a result of the incorrect rate of pension paid by the Fund and the member can be said to be reasonably aware of the overpayment.

9.1 There are a number of reasons why a pension could be paid at an incorrect higher rate. The most common reasons are detailed in the table below, but it should be noted that this is not an exhaustive list.

	Type of overpayment	How overpayment has occurred
1	Administration error upon creation of payroll record	Incorrect (overstated) rate of pension inputted onto payroll record, but, member informed in writing of the correct rate of pension to be paid.
2	Administration error upon calculation/payment of pension scheme lump sum	Incorrect (miscalculated/overstated) lump sum paid to member but member informed in writing of the correct value of the lump sum to be paid.
3	Re-employment where abatement affects rate of pension due	Re-employment not notified and within the terms of the Administering Authority policy on the exercise of their discretion relating to abatement, the member's annual pension should have been reduced or suspended due to the level of earnings in the new employment. Identified through National Fraud Initiative exercise or other means.
4	Entitlement to pension ceasing	Non notification that a child's pension is no longer payable as the child aged 18 or above is no longer in full time education or vocational training.
5	Entitlement to current rate of pension ceasing	A Pension Sharing Order or Earmarking Order being received after the implementation date meaning that the pension has been overpaid since that implementation date.
6	Failure to action an alteration to the payroll record/reduction in pension	Failing to implement the change from the higher short-term dependents pension to the lower long-term rate.
7	Failure to action an alteration to the payroll record/reduction in pension	Failing to implement a reduction to a pension as a result of National Insurance Modification (at State Pension Age for those members who both left the LGPS before 1 April 1998 and had membership before 1 April 1980).

9.2 If the scheme member has been notified of the correct rate of pension and/or lump sum in writing and is receiving/ has received a higher amount, it can be said that the member can reasonably be aware that they are being/have been over paid as the scheme member has been notified of the correct rate in writing.

- 9.3 The Fund will, therefore, generally seek to recover monies that are greater than £250.00 gross in value, unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 or less has been deemed by the Fund as uneconomical to pursue due to the administrative time involved.
- 9.4 The amount of overpaid pension will generally be recovered from the scheme member's ongoing pension as this allows for the appropriate adjustment for tax. The pension will also be reduced to the correct level for the next available monthly pension payment after a 6 week notice period and will be notified in writing of the error and the course of action to be taken.
- 9.5 Where there is no ongoing pension from which to deduct the overpaid amount, OR the pension scheme lump sum has been overpaid, an invoice will be arranged by the Fund to recover the overpayment which is greater than £250.00 in value. The invoice will be sent to the individual who received the pension/lump sum payment.

10. Managing overpayments of pension following an incorrect rate of pension entitlement being paid by the Fund and it can be said that the member cannot have known of the overpayment

- 10.1 The table below illustrates how an overpayment of a member's pension can occur without the member being aware. It should be noted that the table below is not an exhaustive list;

	Type of overpayment	How overpayment has occurred
1	Administration error upon calculation and notification of benefit entitlement (includes dependants' pensions and Pension Credit members)	Incorrect (overstated) rate of pension inputted onto payroll record and member informed in writing of the, incorrect, rate of pension to be paid.
2	Administration error upon calculation and notification of pension scheme lump sum entitlement	Incorrect (overstated) pension scheme lump sum paid to the member and member informed in writing of the incorrect lump sum to be paid
3	Pensions Increase	Pensions Increase inaccurately applied to the elements of a pension in payment.

- 10.2 In these circumstances the Fund will generally seek to recover monies that are greater than £250.00 gross in value unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part). A value of £250.00 or less has been deemed by the Fund as uneconomical to pursue due to the administrative time involved.
- 10.3 The amount will be recovered from the scheme member's ongoing pension as this allows for the appropriate adjustment for tax. The pension will also be reduced to the correct level for the next available monthly pension payment after a 6 week notice period. The scheme member will be notified in writing of the error and the course of action to be taken.

10.4 Where there is no ongoing pension from which to deduct the overpaid amount, or an overstated pension scheme lump sum has been paid, an invoice will be arranged by the Fund to recover any overpayment which is greater than £250.00 in value. The invoice will be sent to the individual who received the pension/lump sum payment.

11. Overpayments resulting from an error with Guaranteed Minimum Pension (GMP)

11.1 Overpayments can also occur as a result of an the incorrect or non-application of the GMP element of a member’s pension as detailed in the table below.

1	GMP not included in the pension being paid	New information from HMRC or a review of the member’s record shows that a GMP should have been included within the pension, but, has not. Due to the different way cost of living increases are applied to GMP and the excess over GMP, means that, overall, a lower level of pensions increase should have been paid.
2	Incorrect level of GMP being paid	New information from HMRC or a review of the member’s record leads to a revised rate of GMP to be used which, due to the different way cost of living increases are applied to GMP and the excess over GMP, means that, overall, a lower level of pensions increase should have been paid.
3	GMP not accurately split between pre 88 and post 88	New information from HMRC or a review of the member’s record shows that a GMP has not been apportioned correctly. Due to the different way cost of living increases are applied to pre 88 GMP and post 88 GMP, means that, overall, a lower level of pensions increase should have been paid.

11.2 The application of GMP to a member’s pension requires a high degree of technical understanding that can only reasonably be expected of a pensions practitioner. As such, and where there has been no explicit communication to the member that would mean that they could have known that their pension was being paid incorrectly as a result of the non or misapplication of GMP, the overpayment of any value should be written off without the requirement for authorisation as detailed in 17.1.

11.3 The pension will be reduced to the correct level for the next available monthly pension payment after a 6 week notice period. The scheme member will be notified in writing of the error and the course of action to be taken.

12. Discretion to write off overpayments

12.1 For all scenarios mentioned above, Officers have the ability to exercise discretion in the event of legal reasons and/or exceptional circumstances and to ensure no individual is unfairly treated. If the pursuing recovery of an overpayment was to cause significant distress and/or if there are legal reasons as to why the overpayment may not be recovered (in whole or in part) this would be

taken into account as would the cost effectiveness of recovery. All applications made to write off of an overpayment will be investigated on a case by case basis and final decision will be made by the appropriate officer listed in section 17, dependent upon the amount potentially being written off.

- 12.2 The Northamptonshire Pension Fund has authority to automatically write off any amount up to £250.00 in line with HM Revenue and Customs authorised payments limits and analysis of the cost effectiveness of pursuing amounts up to this value.

13. Recovery

- 13.1 The Limitation Act 1980 states that *“An action founded on simple contract shall not be brought after the expiration of six years from the date on which the cause of action accrued”*. However, section 32(1) of the Act effectively ‘postpones’ the date by which an administering authority may make a claim to recover monies in certain circumstances. It states *“the period of limitation shall not begin to run until the plaintiff has discovered the fraud, concealment or mistake (as the case may be) or could with reasonable diligence have discovered it”*. The potential effect of section 32(1) in relation to any overpayment and its recovery will be considered on a case-by-case basis.
- 13.2 Therefore, the Fund will generally seek to recover overpayments that have been discovered within the last 6 years, with the relevant postponement applied, if applicable, in line with the Limitation Act unless there are legal reasons and/or other circumstances which mean that the overpayment may not, in practice, be able to be recovered (in whole or in part).
- 13.3 Examples of limitation periods and how they operate in relation to overpayments are included in appendix 1 of this policy.
- 13.4 It should be borne in mind that where the Fund seeks to recover overpayments, there may be arguments raised as to why the overpayment should not be recovered (in whole or in part). These will need to be considered on a case-by-case basis and, if successful, may affect the ability of the Fund to recover the overpayment (in whole or in part).

14. Length of time to recover overpayment

- 14.1 The Fund will allow a pension overpayment to be recovered over the same amount of time as the overpayment occurred. For example, if overpayments were made over a 3 month period, the recovery period to repay the overpayment will be over 3 months. In the event that reasonable arguments are advanced that the recovery period should be extended, the Fund can at its discretion allow an extension based on the individual’s circumstances.

15. Claims of inability to repay overpayments

- 15.1 In cases where it is claimed that an overpayment cannot be repaid, officers of the Fund will enter into negotiations with the scheme member/next of kin and an analysis of the cost effectiveness of pursuing the overpayment will be undertaken on a case-by-case basis. For large overpayments, where appropriate, the Fund will seek legal advice. This approach will reduce the number of Internal Dispute Resolution Procedures applications and referrals to the Pensions Ombudsman.

For any cases that do reach the Pensions Ombudsman, Northamptonshire Pension Fund would have demonstrated engagement and negotiation with the complainant.

16. Monitoring repayments

- 16.1 In cases where recovery is not being made through the payroll and an invoice has been raised, the responsibility for chasing the payment rests with the West Northamptonshire Council Debt Recovery Team. If a final reminder is issued, officers are notified and a decision is made by the Head of Pensions as to whether to take legal action, taking into consideration the amount and circumstances against the potential of legal action.

17. Authority to write off overpayments

- 17.1 In line with the County Council’s Scheme of Delegation, the Fund will apply the following levels of authority when writing off overpayments:

Total value of overpayment*	Authority to write off overpayment
No more than £250.00 (gross) on death of a pensioner and any other overpayment type	Officers
Up to no more than £10,000 (gross)	Head of Pensions (in the absence of the Head of Pensions authority will move to the Section 151 Officer)
£10,000+ (gross)	Section 151 Officer
*Subject to a full evidence-based report produced by Officers of the Fund	

18. Reporting to the HM Revenue and Customs and effects on the Fund and individual

- 18.1 Administering authorities are obliged to correct any error they discover within a reasonable period of time. To do otherwise would render payments unauthorised under Section 14 of the Registered Pension Scheme (Authorised Payments) Regulations 2009. The HM Revenue and Customs have a clear steer with regards to timing, in so much that *“When a scheme discovers an overpayment it immediately becomes unauthorised and is subject to an unauthorised tax charge”*.
- 18.2 Regulation 13 states that a payment made in error will be an authorised payment if the:
- Payment was genuinely intended to represent the pension payable to the person;
 - Administering authority believed the recipient was entitled to the payment and;
 - Administering authority believed the recipient was entitled to the amount of pension that was paid in error.
- 18.3 In addition to the above, there is a further exemption where the overpayment is a ‘genuine error’ and the aggregate overpayment (paid after 5th April 2006) is less than £250. In such circumstances, if the overpayment is not recovered it remains an unauthorised payment, but, it does not have to be reported to HM Revenue and Customs and HM Revenue and Customs will not seek to collect tax charges on it.

- 18.4 Examples of HM Revenue and Customs 'genuine errors' are in appendix 2 of this policy.
- 18.5 The Finance Act 2004 also sets out a list of the payments which a registered pension scheme is authorised to make to members. Payments which do not fall within the list will become unauthorised payments and could result in up to three tax charges applying: 1) an authorised payments charge on the recipient of the payment; 2) an unauthorised payments surcharge on that recipient; and 3) a scheme sanction charge on the scheme.
- 18.6 Payments made in the period between notifying the member of an overpayment and the point at which the correction to the right level of pension is made will be regarded under the above legislation as an unauthorised payment. If the total amount of pension paid at the incorrect rate from point of notification to date of reduction to the correct rate is greater than £250 (gross) it would be subject to tax charges 1) and 3) and possibly 2 as set out in section 18.5.

19. Prevention

- 19.1 The Fund has in place processes in order to minimise the risk of overpayments occurring.
- 19.2 The National Fraud Initiative is conducted every two years; it compares files of pensioners with the Department for Work and Pensions database of the deceased and highlights matches for investigation. Northamptonshire Pension Fund actively participates in this initiative.
- 19.3 Northamptonshire Pension Fund participates in overseas life existence checks to ensure only legitimate pensions are being paid and to reduce the likelihood of fraudulent activity.
- 19.4 A report is run periodically on the pension administration system to identify individuals in receipt of a child's pension, further investigations are then carried out for children that are identified as over the age of 18 to ensure they are still entitled to receive a pension.
- 19.5 Northamptonshire Pension Fund includes reminders in its correspondence that the Fund must be advised of changes in circumstances or the death of a scheme member. The Fund also investigates any returned pensioner payslips and pension payments returned by banks and building societies to ensure the welfare of the scheme member and to protect payment of the Fund's money.
- 19.6 Fund officers have a robust system in place for identifying changes to the payroll that need to be processed for a particular payroll month. The process incorporates payroll deadlines and ensures changes are made in a correct and timely manner. This would be in circumstances such as a change from a short-term dependant's pension to a long-term pension.

Appendix 1 – Limitation Period Examples

Scenario	Limitation Period	Overpayment Period which can be claimed*
<ul style="list-style-type: none"> • Overpayments began in April 2008 (the first Mistake Date) • Overpayments discovered, or could have been discovered with reasonable due diligence, in August 2010 (the Discovery Date under Section 32 of the Limitation Act 1980) • Overpayments made for period between April 2008 and August 2010 • Formal claim** for recovery made in January 2015 (the Cut Off Date as referred to in <i>Webber v Department for Education</i>) 	<ul style="list-style-type: none"> • No issues in principle with the Limitation Period as formal claim for recovery commenced within 6 year period after the Discovery Date • Claims are therefore valid and should proceed 	<ul style="list-style-type: none"> • Overpayments back to when they began in April 2008 until August 2010 may be claimed
<ul style="list-style-type: none"> • Overpayments began in April 2003 (the first Mistake Date) • Overpayments discovered, or could have been discovered with reasonable due diligence, in November 2009 (the Discovery Date under Section 32 of the Limitation Act 1980) • Overpayments made from April 2003 to November 2009 • Formal claim for recovery made in December 2011 (the Cut Off Date as referred to in <i>Webber</i>) 	<ul style="list-style-type: none"> • No issues in principle with the Limitation Period as formal claim for recovery commenced within 6 year period after the Discovery Date • Claims are therefore valid and should proceed 	<ul style="list-style-type: none"> • Overpayments back to when they began in April 2003 until November 2009 may be claimed
<ul style="list-style-type: none"> • Overpayments began in January 1999 (the first Mistake Date) • Overpayments discovered or could have been discovered with reasonable due diligence in September 2016 (when the date was received from HM Treasury in relation to the GMP equalisation) 	<ul style="list-style-type: none"> • No issues in principle with the Limitation Period as formal claim for recovery commenced within 6 year period after the Discovery Date 	<ul style="list-style-type: none"> • Overpayments back to when they began in January 1999 until September 2016 may be claimed



<p>exercise) (the Discovery Date under Section 32 of the Limitation Act 1980)</p> <ul style="list-style-type: none"> • Overpayments made for the period from January 1999 to September 2016 • Formal claim for recovery made in February 2017 (the Cut Off Date as referred to in <i>Webber</i>) 	<ul style="list-style-type: none"> • Claims are therefore valid and should proceed 	
<ul style="list-style-type: none"> • Overpayments began in April 2006 (the first Mistake Date) • Overpayments discovered, or could have been discovered with reasonable due diligence, in August 2009 (the Discovery Date under Section 32 of the Limitation Act 1980) • Overpayments made for period between April 2006 and August 2009 • Formal claim for recovery made in January 2017 (the Cut Off Date as referred to in <i>Webber</i>) 	<ul style="list-style-type: none"> • Issue with the Limitation Period as formal claim for recovery commenced more than 6 years after the Discovery Date • Claims are therefore out of time and should not proceed • 	<ul style="list-style-type: none"> • Overpayments cannot be claimed back as the formal claim for recovery was made more than 6 years after the Discovery Date

* whilst this refers to the period which can be claimed, this is not the same as the period which will definitely be recovered in light of the other defences which are available to scheme members who face such claims for repayments of overpayment.

** reference to formal claim in this appendix means the commencement of formal proceedings to recover the overpayment.

Appendix 2 - Examples of HM Revenue and Customs 'genuine errors'

Genuine error - example 1

Apart from the case of pensions continuing under a 'term certain' guarantee, pensions are supposed to stop accruing on the death of the pensioner. If payments that accrued inappropriately after the death continue to be made, they will be unauthorised unless they fall within the limited conditions of regulation 15 of The Registered Pension Schemes (Authorised Payments) Regulations. The main feature of those conditions is that instalments can be paid within 6 months of the member's death providing the payer was reasonably unaware the pensioner had died.

Clearly then, once the 6 month time limit has passed, the tax rules will regard any future instalments as unauthorised member payments, and the fact the payer might remain unaware of the member's death does not change the essential character of any payment made. When the death comes to light the payer can see that the payments made more than 6 months after death were made in error.

Genuine error - example 2

The tax rules normally require that a pension being paid to a dependent who is child of a deceased member must stop when the recipient reaches age 23. If the recipient does not qualify for any of the exceptions that would allow for the continuation of their pension after that time, for example because of a disability, then the payer must make adequate arrangements to stop the pension in time. To this end they may give a clear and timely warning to the bank to stop payments from the necessary date but it can happen that the bank fails to act on those instructions and payments continue to be made in error.

In both of these examples, if the error was spotted and rectified (pension overpayments were repaid) as soon as reasonably possible, the inadvertent pension instalments (in the case of Example 1, only in respect of the instalments paid after the 6 month limit where the conditions otherwise apply) would not be unauthorised member payments.

However, there would be an unauthorised member payment if, despite the error being spotted, it is decided the repayment of the inadvertently overpaid pension instalments will not be pursued or the scheme does attempt recovery (in the case of Example 1, only in respect of the instalments paid after the 6 month limit where the conditions otherwise apply) but is unsuccessful and eventually decides to write off the overpayment (even though the decision might be taken on administration costs grounds or out of sensitivity). The exception to this will be if - as may often be the case - one of the categories of authorised payments introduced by the Registered Pension Schemes (Authorised Payments) Regulations 2009 can then be looked to in relation to payments made in genuine error but left in place.

The date of the unauthorised payment for the purpose of having to make a report of that payment would be the date that the decision is made not to seek recovery of the overpayment or the date the decision is taken to no longer seek recovery of the overpayment, as the case may be.

Where the overpayment is not pursued or, otherwise, not successfully pursued and the total of such overpaid pension instalments paid after 5 April 2006 (overpaid instalments paid before 6 April 2006 do not count for this purpose) to, or in respect of, a particular member does not exceed £250:

- for its own reasons of cost administration, under its Collection and Management powers, HM Revenue & Customs will not seek to collect the tax that, in strictness, is due in respect of the unauthorised payment (although the payment remains an unauthorised payment), and
- the scheme administrator does not have to report the unauthorised payment to HM Revenue & Customs, and
- the unauthorised payment does not have to be returned on the recipient's Self-Assessment tax return or, otherwise, be notified to HM Revenue & Customs.

If the aggregate overpayment exceeds £250, then all of the overpayment is chargeable as an unauthorised payment (i.e. one cannot deduct £250 as if it were an allowance, which it is not).

For this purpose, the £250 threshold applies to the aggregate of the overpayments actually received by, or in respect of, the member.

Where the conditions would otherwise apply in respect of pension instalments paid later than 6 months after the death of a pensioner except that the pension instalments have been paid later than 6 months after the pensioner's death, the £250 threshold applies in respect of the aggregate of the pension instalments paid after the expiry of the 6 month time limit only. The pension instalments paid up to the 6 month time limit would not be.

Overpayment of lump sums

The conditions described above apply equally where an overpayment of a lump sum occurs, such as a pension commencement lump sum or serious ill-health lump sum. So the limit of £250 will apply, but any lump sum in excess of that amount, where recovery cannot be made, will be an unauthorised payment to the extent that the amount is not an authorised payment.

For example, a pension commencement lump sum of £100,000 is due to be paid under the scheme rules, but £105,000 is paid in error. The scheme administrator is unable to affect a recovery of the excess. Under the tax rules, the pension commencement lump sum of £100,000 is the permitted maximum, so the whole excess of £5,000 is an unauthorised payment (i.e. one cannot deduct £250 as if it were an allowance, which it is not).

Note that a payment of a lump that is intended to be a pension commencement lump sum but ends up exceeding the permitted maximum may still be an authorised member payment if certain conditions are met.

Example

A pension commencement lump sum must be paid within an 18 month period starting 6 months before and ending 12 months after the member becomes entitled to the lump sum and linked pension. However, due to an error within the administration department of the pension scheme, the lump sum payment is not made by that deadline. If the lump sum is paid after the deadline it will not be a pension commencement lump sum and (unless it falls within the definition of one of the other authorised lump sums) will be an unauthorised member payment.

DRAFT

DRAFT



West Northamptonshire Council

Local Pension Board

24/01/2023

Mark Whitby – Head of Pensions

Report Title	Northamptonshire Pension Fund – Communications strategy
Report Author	Sharon Grimshaw, Communications Officer sharon.grimshaw@westnorthants.gov.uk

Contributors/Checkers/Approvers

Head of Pensions	Mark Whitby	9 January 2023
-------------------------	-------------	----------------

List of Appendices

Appendix 1 – Communications strategy

Appendix 2 – Communications plan

Appendix 3 – Website review update

1. Purpose of report

-
- 1.1. To present to the Pension Board a report on updates to the communications strategy, communications plan and website review project for 2023.

2. Executive summary

-
- 2.1 This report gives an update on the communications strategy, communications plan, and website review project for 2023.
- 2.2 Our communications strategy has been updated to reflect current membership and employer numbers, to include a new section on lifestyle communications, and to reflect technological updates on our methods of communication.
- 2.3 Our communications plan will focus on our key projects like McCloud, the pensions dashboard and our website review in addition to statutory communications and promotion of the online pension account for members.
- 2.4 From the research we conducted in our website review we've agreed to focus on restructuring the content of the website.
- Testing a personalised approach with different search and navigation options.
 - Creating prototypes and testing with members, employers, and the Pensions team.

3. Recommendations

-
- 3.1 The Pension Board is asked to review the contents of the report.

4. Report background

- 4.1 Regulation 61 of the Local Government Pension Scheme Regulations 2013 state that an administering authority must prepare, maintain and publish a written statement setting out its policy concerning communications with members and scheme employers.
- 4.2 Our communications strategy has been updated for 2023 and outlines our strategic approach to communications. It can be found in appendix 1. Our communications plan for 2023/24 details the communications activities to be undertaken within the scheme year and can be found in appendix 2.
- 4.3 The Committee previously approved a review of the Fund’s website. Officers have worked with the West Northamptonshire Council Digital team to carry out a user led review of the website. An update on the project and final recommendations for improvement are provided within this report.

5. Issues and choices

- 5.1 We’ve made the following changes to our communications strategy for 2023 in appendix 1:
- 5.1.1 Introduction – the number of employers has been updated from 321 to 319 and members from over 62,000 to over 76,000. The reason for the increase in members is because we decided to include those members that are classed as ‘undecided leavers’ to be consistent with the annual report and accounts, whereas in the previous strategy these members were left out.
- 5.1.2 The members per category were updated as follows:

Category	Previous strategy	2023 communications strategy
Active members	21,916	24,055
Deferred members	23,917	34,759
Pensioner members	17,057	17,705

- 5.1.3 We added a new section on lifestyle communications to reflect how we’re trying to make our communications more engaging by linking them around different life events, like getting married, moving in with a partner, starting a family, buying their first home, or getting a promotion.
- 5.1.4 We added a new section on performance indicators which we plan to benchmark against other Funds once this information becomes available. The key information that we are monitoring is the proportion of members that have registered for their online pension account and the proportion of members that have opted out of electronic communications.
- 5.1.5 Under methods of communication we removed references to Skype as this is no longer used and added in videos and MS Teams.

- 5.2 Our communications plan included as appendix 2 outlines our planned communication activities for 2023/24, on a monthly basis, for each of our stakeholders.
- 5.3 The communications plan shows the completion of our valuation activities, communication for key projects like McCloud and the pensions dashboard and our focus around increasing engagement about pensions in general by supporting activities like Pensions Awareness Week and the Pension Attention campaign.
- 5.4 It will also include the implementation phase of our website project once the milestones have been agreed with the digital team.
- 5.5 The plan also includes timings for issuing statutory communications and cyclical newsletters, surveys, and employer training.
- 5.6 Our website review project (see appendix 3 for more detail) aims to decide whether our member and employer websites still meet the best user needs and will give recommendations on how to improve, move or replace both sites. We've held detailed interviews with members and employers to highlight any issues with the websites' navigation and surveyed over 1,700 people to find out what members and employers most wanted to know about pensions.
- 5.7 From the findings we've agreed to focus on restructuring the content of the website.
- Testing a personalised approach with different search and navigation options.
 - Creating prototypes and testing with members, employers, and the Pensions team.

6. Implications (including financial implications)

6.1 Resources and financial

- 6.1.1 There are no direct finance and resourcing implications of the communications plan in general. Ongoing communication costs are picked up in the administration budget. The cost of any communications activities connected with the business plan activities will be included with the costings in the business plan.
- 6.1.2 Our drive to increase electronic communications should save costs in the long term.
- 6.1.3 At the time of publication the final specification and costs of the website review project had not been agreed. Costs will be reported in the 2023/34 business plan.

6.2 Legal

- 6.2.1 Not applicable.

6.3 Risk

- 6.3.1 We are required by legislation to prepare, maintain and publish a written statement setting out our policy concerning communications with members and scheme employers.

The mitigated risks associated with this report have been captured in the Fund's risk register as detailed below -

Risk No.	Risk	Residual risk rating
7	Information may not be provided to stakeholders as required.	Green

Risk No.	Risk	Residual risk rating
17	Failure to administer the scheme in line with regulations and guidance	Green

The Fund's full risk register can be found on the Fund's website at the following link:
<https://pensions.northamptonshire.gov.uk/governance/key-documents/northamptonshire/>

6.4 Relevant Pension Fund objectives

6.4.1 The following objectives have been considered in this report:

- To promote the scheme as a valuable benefit.
- To deliver consistent plain English communications to stakeholders.
- To provide scheme members with up to date information about the scheme in order that they can make informed decisions about their benefits.
- To seek and review regular feedback from all stakeholders and use the feedback appropriately to shape the administration of the Fund.

6.5 Consultation

6.5.1 Not applicable.

Communications Strategy

Published by:
Pensions Service
West Northamptonshire Council
One Angel Square
Angel Street
Northampton
NN1 1ED

01604 366537
pensions@westnorthants.gov.uk
pensions.westnorthants.gov.uk

Contents

1. Introduction	3
2. Communication strategy	3
Regulatory framework	3
Key objectives	4
Effective date	4
Review	4
Stakeholders	4
Brand identity	5
Confidentiality	5
Disclosure	5
Cyber security	5
Equality and accessibility	5
Freedom of information	6
Digital communications	6
Lifestyle communications	6
Implementation of communication key objectives	8
Performance indicators	9
Methods of communication and key messages/objectives for stakeholders	10
Self-service	10
Electronic notifications	10
Videos	11
MS Teams	11
Secure web portals	11
3. Further information	16

1. Introduction

This is the communications strategy for the Northamptonshire Local Government Pension Fund managed by West Northamptonshire Council (the administering authority).

The Fund has around 319 employers with contributing members and over 76,000 scheme members. These members are split into the following categories and with the following approximate numbers of members in each category:

Category	Northamptonshire Pension Fund
Active scheme members	24,055
Deferred scheme members	34,759
Pensioner members	17,705

This document outlines our strategic approach to communications and is effective from 1 April 2023. It gives detail of how we're moving towards more digital based communications and how we plan to use technology to enhance our service and reduce costs where appropriate. We want as many people as possible to be able to access our communications and try to meet the needs all of our stakeholders. We would actively encourage any feedback where people do not find them to be accessible.

2. Communication strategy

Regulatory framework

This document has been produced in accordance with regulation 61 of the Local Government Pension Scheme regulations 2013. The regulation requires administering authorities to:

- Prepare, maintain and publish a written statement setting out their policy concerning communications with:
 - scheme members (active, deferred, retired and dependant)
 - representatives of scheme members
 - prospective scheme members
 - scheme employers
- Set out their policy on:
 - the provision of information and publicity about the scheme
 - the format, frequency and method of distributing such information or publicity
 - the promotion of the scheme to prospective scheme members and their employers.
- Keep the statement under review and make such revisions as are appropriate following a material change in the policy on any of the matters included. If revisions are made, a revised statement must be published.

The regulations also state that, before ceasing postal communications, Funds are required to write to members by post on multiple occasions informing them of their intention to move to digital communications as standard and offering them the option of opting out of receiving digital communications.

Key objectives

The communications of Northamptonshire Pension Fund will be delivered in line with the following objectives as outlined in our business plan.

- To promote the scheme as a valuable benefit.
- To deliver consistent plain English communications to stakeholders.
- To provide scheme members with up to date information about the scheme so they can make informed decisions about their benefits.

You can see how we're measuring these objectives in the 'Implementation of Communication Key Objectives' section.

It also helps to deliver these further objectives.

- To manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.
- To administer the Fund in a professional and efficient manner, utilising technological solutions and collaboration.

Effective date

This policy was approved by the Pension Committee on 21 October 2014 and has been subject to the following reviews:

Date of review	Effective date	Type of review
24 March 2017	25 March 2017	Full review
27 January 2020	28 January 2020	Full review

Review

Our communications strategy will be reviewed every 3 years to make sure it remains accurate and relevant. Our communications plan will be updated on an annual basis.

Stakeholders

There are several categories of stakeholder as detailed below:

- Active scheme members
- Prospective scheme members
- Deferred scheme members
- Retired and dependant scheme members
- Scheme employers
- Staff
- Pension Fund committee
- Northamptonshire tax payers
- Members of the public
- Scheme advisory board
- Local pension board
- External bodies:
 - Trades Unions
 - Her Majesty's Revenue & Customs (HMRC)
 - Ministry of Housing, Communities and Local Government (MHCLG)

- The Pensions Regulator (TPR)
- National Fraud Initiative (NFI)
- Audit Commission
- HM Treasury
- Department of Work and Pensions (DWP)

Brand identity

We recognise that our visual identification is one of our most powerful assets. It tells people who we are and influences how they remember and relate to us. Our branding increases our reputation whilst uniting us visually. When branding our communications, it's important that:

- We have an individual Fund identity that is distinct from the County Council identities.
- The look and feel of a communication should be identical where possible, but with separate Fund branding – e.g. newsletters should be identical where possible but would clearly display separate Fund branding on the front cover and only refer to the relevant Fund throughout the text.
- If it's unreasonable to produce different materials (e.g. cost difference, logistical challenges, etc) a joint brand is to be considered.
- The pension Fund board will be required to sign off high-level branding decisions.
- The brand will need to be adaptable to other Funds that may join in the future.

Confidentiality

The Fund is registered under the Data Protection Act 1998 as part of West Northamptonshire Council. Information will be shared between Cambridgeshire County Council and West Northamptonshire Council for the purposes of pensions' administration. Information regarding scheme members and organisations is treated with respect by all our staff.

Disclosure

We may, if we choose, pass certain details to a third party, if the third party is carrying out an administrative function for us, for example, our notification providers. When exchanging data with third parties we use secure portals. Our full privacy notice is published on our website:

- pensions.westnorthants.gov.uk

by clicking on Governance and then Key Documents.

Cyber security

We take the security of personal information very seriously. Most pension records are held electronically, and many pension scheme members can now access their own pension records online. The Data Protection Act 2018, along with guidance from The Pensions Regulator, sets out rules that pension Funds must follow to make sure that they have good cyber security (protection for computers and communications networks).

We work closely with our suppliers to make sure the systems that hold personal information are protected. We have procedures in place to check that processes and people are kept up to date. We also regularly and thoroughly test systems to make sure that they stay secure and that the risk of a security incident is reduced. We make sure that our suppliers have certificates which prove they meet the expected cyber-security standards and that the certificates are kept up to date.

Equality and accessibility

We are committed to ensuring our communications are accessible to everyone. We give all members the option to opt out of electronic communications or to receive them in the best format for them eg braille, audio CD, alternative languages or other reasonable adjustments. We also make sure that our communications are easy to

understand through use of Plain English accreditation and readability scores and never use colour as the only way to convey information.

A scheme member can opt out of electronic communications, at any time, by informing us in writing or by email that they wish to do so.

In addition; for web based communications:

- Our website navigation works in a consistent way throughout our website.
- We use a standard web font to make it easy to read.
- Any images we use also include a text description to explain what they are unless they're only descriptive.
- We write our links so that they make sense when screen readers analyse them.

Freedom of information

This communications strategy identifies the classes of information that we publish or intend to publish in compliance with the Freedom of Information Act. Anyone has a right under the Freedom of Information Act to request any information held by us which is not already made available. Requests should be made in writing to the head of pensions at the address at the end of this document.

A fee may be charged, and we reserve the right to refuse a request if the cost of providing the information is disproportionately high; if following prompting the request is unclear; and when the requests are vexatious or repeated.

Digital communications

In an increasingly digital world, it's important for us to use the latest technology to adopt new ways of communicating with our stakeholders and make sure:

- stakeholders have a better experience when interacting with us
- our officers have the skills, knowledge and tools available to communicate with stakeholders in the most secure and efficient ways possible
- we can deliver on its communications objectives as effectively as possible by using the communication channels most likely to get through to stakeholders
- the cost and time spent communicating with stakeholders is reduced
- communications are secure by default.

This communications strategy provides information about how we'll use digital communication technologies to implement the communications strategy and meet its communication objectives.

Digital communications offer many benefits over paper:

- environmentally friendly by being paper-free with no printing or physical distribution needed
- quicker, more reliable, more secure and less costly than postal communication
- information is easily available to stakeholders whenever they need it
- documents are stored digitally in one place and available at all times eliminating the need to print and store documents
- easier to engage in bulk communications with stakeholders
- increases engagement by mirroring the way that people communicate at home.

Lifestyle communications

Our aim is to make pensions more engaging by tuning into other events that are happening in our members lives and explaining what actions they may need to take at these different stages. For example, for someone that's getting married or moving in with their partner, we'd suggest they should:

- check their death grant nomination

- update us if there's a change of name
- update us if there's a change of address.

Or for someone starting a family or buying their first home and looking to save money, rather than opt out of the pension scheme we may suggest they think about the 50:50 scheme. Or for someone that's recently been promoted they may want to think about paying more into their pension.

Implementation of communication key objectives

This table sets out the implementation of the delivery of our key communication objectives.

The agreed objectives with measures for success that form the communication strategy are:

Objective	Digital implementation	Measures of success	Review process
Promote the scheme as a valuable benefit	<ul style="list-style-type: none"> • Emails (through 3rd party bulk notification systems) • Texts (through 3rd party bulk notification systems) • Electronic newsletters • Self-service portals • Digital materials provided to employers for publication via: <ul style="list-style-type: none"> ○ Intranet communications ○ Website content ○ Video walls (where available) ○ Meeting room pads (where available) ○ Blogs 	<ul style="list-style-type: none"> • Reduction in number of members opting out of the scheme • Positive feedback from stakeholders • Communications promote the scheme as a valuable benefit in a way that it understood by the audience 	<ul style="list-style-type: none"> • Monitor opt out rates annually • Surveys and polls on websites • Review scheme communications for effectiveness • Online rating of document usefulness • Obtain Plain English Accreditation • Bulk email engagement ratings (% opened & clicked links)
Provide scheme members with up to date information about the scheme so they can make informed decisions about their benefits.	<ul style="list-style-type: none"> • Emails (through 3rd party bulk notification systems) • Texts (through 3rd party bulk notification systems) • Electronic newsletters • Website content • Self-service portals 	<ul style="list-style-type: none"> • Communication includes information and changes to the scheme that supports all stakeholder understanding • Communication is delivered via the most appropriate media to the audience with a focus on electronic communication where possible • Effective promotion of new media or change of processes to all stakeholders 	<ul style="list-style-type: none"> • Surveys and polls (on websites and by email/post). Focus groups • Surveys and polls on websites. Focus groups. Monitor hits on website. Record and review method of communication used. Use appropriate media to convey relevant messages • Bulk email engagement ratings (% opened & clicked links) • Surveys and polls on websites. Focus groups. Monitor incoming telephone call and email volumes • Bulk email engagement ratings (% opened & clicked links)

Objective	Digital implementation	Measures of success	Review process
Deliver consistent plain English communications to stakeholders	<ul style="list-style-type: none"> • Emails (through 3rd party bulk notification systems) • Texts (through 3rd party bulk notification systems) • Electronic newsletters • Self-service portals • Digital materials provided to employers for publication via: <ul style="list-style-type: none"> ○ Intranet communications ○ Website content ○ Video walls (where available) ○ Meeting room pads (where available) ○ Blogs 	<ul style="list-style-type: none"> • Effective and timely communications to be sent to all stakeholders in clear language • that is understood and relevant • Feedback from all audiences on the quality and language used in the communication sent • Feedback on the simplicity, relevance and impact of the communication sent 	<ul style="list-style-type: none"> • Monitor enquiries from stakeholders following key events and communications. (Reduced enquiries mean effective delivery) • Bulk email engagement ratings (% opened & clicked links) <ul style="list-style-type: none"> • Surveys and polls on websites. Focus groups. • Surveys and polls on websites. Focus groups. • Submit all standard communications for plain English assessment with the aim of achieving plain English accreditation.

Performance indicators

Proportion of members registered for their online pension account

Member type	31/12/2021	06/12/2022	% change
All members	26.80%	29.81%	+11%
Pensioners	28.6%	34.9%	+22%
Deferreds	29.0%	31.12%	+7%
Actives	23.6%	25.1%	+6%

Member type	06/01/2023
All members	3.02%
Actives	1.94%
Deferreds	1.51%
Pensioners	7.54%

Proportion of members opted out of electronic communications

We also plan to measure ourselves against other Funds once this information becomes available.

Proportion of members opted out is a base line for this year which we can measure against next year.

Methods of communication and key messages/objectives for stakeholders

We aim to use the most appropriate method of communication when dealing with stakeholders. This may involve more than one communication method.

We hope that our website will be the first port of call for most stakeholders where appropriate. We're committed to using technology to enhance our service and reduce costs, where appropriate, and have switched to electronic communication as our primary means of contact for most stakeholders. We will continue to explore and develop further use of electronic communications through our website, emails, webinars and self-service.

Self-service

All members of the Fund have been offered access to a personal online pension account. This gives members controlled access to their own details, allowing them to review and update their personal information, view information about their pension benefits and carry out benefit projection calculations.

We aim to move to a position where most communications are sent to members through their online pension account, with electronic notifications used to inform them that these are available online, replacing postal communications.

Both active and deferred members already receive their annual benefit statements through their online account each year and it is also planned to provide payslips and P60s to pensioner members via their online account.

Electronic notifications

We use bulk notification systems to manage and deliver bulk communication to both members and employers. We'll use these systems to manage communication campaigns, by email and text message, to provide important information and increase member and employer engagement.

Emails will be used for promotional campaigns and important scheme updates to both members and employers and to notify members that documents, and other communications are available through their online pension account. Text messaging will be used solely to notify members and employers that documents and other communications are available through their online pension accounts.

These communication methods will provide a better, more secure experience for both members and employers, increase efficiency and reduce the cost and time of communicating with these particular stakeholders.

We will measure the success of these communications using reporting tools within the notification systems which provides us with valuable information on how many:

- emails were delivered
- emails were opened
- links were clicked on

This enables us to determine how engaging a communication is and to make changes or send follow-up communications where appropriate.

A scheme member can opt out of electronic communications, at any time, by informing us in writing or by email that they wish to do so.

Videos

We use videos in a variety of ways, for example with bite size employer training videos and LGPS member pensions made simple videos.

MS Teams

MS Teams allows users to have virtual meetings, make calls, video calls or engage in chat over the Internet. We use this application to:

- communicate with team members working remotely
- deliver training webinars to employers
- have conference calls with employers, other pension Funds and other third parties.

The use of MS Teams enables us to work smarter by eliminating travel time, reducing costs and increasing capacity.

Secure web portals

We accept and share data with employers and other third parties securely through the use of web based data portals. These include:

- **i-connect** – i-connect facilitates the monthly collection of data from employers either through uploading an i-connect extract through the portal, or direct input via a web-form based within the portal itself. This will improve the experience for employers by providing a streamlined approach to providing data. It also improves the experience for members who will have access to more up to date information through their online account.
- **Tell Us Once** – this site shares registered death information by local authorities on behalf of the Department for Work and Pensions (DWP). We receive and provide data for the use of Tell Us Once.
- **National Insurance database** – this enables us to check whether members are entitled to refunds. We receive and provide data for use of the database.
- **The National Fraud Initiative (NFI)** this portal helps us to match electronic data within and between public and private sector bodies to prevent and detect fraud.

The table shows our main methods of communicating with the different stakeholder groups, other than the 'usual' day to day communications, plus the key messages and objectives we hope to achieve:

Stakeholder	Communication	Key message/objective
Active scheme members	Annual newsletter (electronic) Annual benefit statements (electronic) Calculations and costings (e.g. estimates) Short guide to LGPS Website (in particular 'Latest news' page) Member self service External training sessions as requested by employer Roadshows Direct mailings Videos	Key messages: <ul style="list-style-type: none"> • Your pension is a valuable benefit • You need to make sure you're saving enough for retirement Objectives: <ul style="list-style-type: none"> • To improve understanding of how the LGPS works • To inform scheme members of their rights and benefits • For queries and complaints to be reduced • To make pensions information more readily available
Scheme employers	Quarterly newsletters Pension bulletins Ad hoc email alerts Biannual forums Website (in particular 'Latest news' page) Webinars/workshops Bespoke/targeted ad hoc training sessions Induction packs Fact sheets Videos	Key messages: <ul style="list-style-type: none"> • You need to be aware of your responsibilities regarding the LGPS • The Fund is a valuable benefit for scheme members and is a good tool for retention of staff Objectives: <ul style="list-style-type: none"> • To increase understanding of how the Fund works and the effects on scheme members of any legislation changes • To improve relationships • Continue to improve the accuracy of data being provided to us To make pensions information more readily available

Stakeholder	Communication	Key message/objective
Prospective scheme members and opt-outs	Information on website Scheme information leaflets Promotional material distributed through employers Videos	Key messages: <ul style="list-style-type: none"> • The pension benefits are a valuable part of your reward package • The LGPS is still one of the best pension arrangements available Objectives: <ul style="list-style-type: none"> • To improve take up of the LGPS • To decrease opt out rate and increase understanding of contribution flexibility i.e. 50/50 option • To increase understanding of how the scheme works and what benefits are provided • To make pensions information more readily available
Deferred scheme members	Annual benefit statements (electronic) Annual newsletter (electronic) Calculations and costings (e.g. estimates) Scheme information leaflets Videos	Key messages: <ul style="list-style-type: none"> • It is important to keep in touch e.g. provide us with address changes • The LGPS is still a valuable part of your retirement package Objective: <ul style="list-style-type: none"> • To improve understanding of how the LGPS works • To make pensions information more readily available
Retired/dependant scheme members	Retirement packs Website Annual newsletter Payslips (when criteria is met) P60	Key messages: <ul style="list-style-type: none"> • It is important to keep in touch e.g. provide us with address changes • The LGPS is still a valuable part of your retirement package

Stakeholder	Communication	Key message/objective
	Lifetime allowance Calculations and costings (e.g. estimates) Videos	Objectives: <ul style="list-style-type: none"> • To improve understanding of how the LGPS works To make pensions information more readily available
Staff	Monthly service meetings Team meetings Ad hoc meetings Consultations 1:1 / Appraisals Training & development Quarterly newsletters	Objectives: <ul style="list-style-type: none"> • To ensure staff are kept up to date with important information regarding the service, the employing authority and the wider world of pensions as a whole • For staff to feel a fully integrated member of the team • For management to feedback to staff regarding their individual progress • To give staff a chance to feedback their views and suggestions
Pension Fund Committee	Committee papers Presentations Consultations Agendas Minutes	Objectives: <ul style="list-style-type: none"> • To update on the implementation of a policy • To monitor success against the agreed measures

Stakeholder	Communication	Key message/objective
<p>External authorities</p> <ul style="list-style-type: none"> • Trade Unions • Her Majesty's Revenue & Customs (HMRC) • Ministry of Housing, Communities and Local Government (MHCLG) • The Pensions Regulator (TPR) • National Fraud Initiative (NFI) • Audit Commission • HM Treasury • Department of Work and Pensions (DWP) 	<p>Response to enquiries and consultations.</p> <p>Response to changes in legislation.</p>	<p>Objectives:</p> <ul style="list-style-type: none"> • To respond to enquiries/statutory requirements.

3. Further information

If you have any queries about this communications strategy, please get in touch:

Pensions Service
West Northamptonshire Council
One Angel Square
Angel Street
Northampton
NN1 1ED

01604 366537

pensions@westnorthants.gov.uk

pensions.westnorthants.gov.uk

Communications plan 2023/24

Month	Active members	Scheme employers	Prospective members	Deferred members	Retired & dependant members	Fund staff
APR	Member survey Reminder communication for new starters eg transfers in, beneficiaries etc Website user testing	Employer training New contribution rates reminder Employer newsletter McCloud communication Website user testing		Member survey Reminder communication to update beneficiaries, address etc Website user testing	Member survey Website user testing	Staff newsletter Sharing the comms strategy, comms plan and reinforcing brand guidelines Website user testing
MAY	Member survey	Employer training		Member survey	Payslip – online pension Member survey	Pensions service meeting
JUN	Member survey Website user testing	Employer training Website user testing		Member survey Annual benefit statement Online pension account promotion Newsletter McCloud communication	Member survey Website user testing	Website user testing

Month	Active members	Scheme employers	Prospective members	Deferred members	Retired & dependant members	Fund staff
				Anti-Fraud communication Website user testing		
JUL	Online pension account promotion Member survey	Employer training Employer newsletter McCloud communication	Online pension account promotion	Member survey	Member survey	Pensions service meeting Staff newsletter
AUG	Annual benefit statement communication Online pension account promotion Anti-Fraud communication McCloud communication Newsletter Member survey	Active annual benefit statement comms materials for employers Anti-Fraud communication McCloud communication Pensions dashboard communication	Online pension account promotion	Member survey	Member survey	
SEPT	Online pension account promotion Member survey Pension attention campaign Website user testing	Employer training Active annual benefit statement comms materials for employers Pension attention campaign Website user testing	Online pension account promotion Pension attention campaign	Member survey Pension attention campaign Website user testing	Member survey Pension attention campaign Website user testing	Pensions service meeting Website user testing

Month	Active members	Scheme employers	Prospective members	Deferred members	Retired & dependant members	Fund staff
OCT	Member survey Pension saving statements McCloud communication	Employer training Employer newsletter McCloud communication		Member survey McCloud communication	Member survey Reminder communication to update beneficiaries, address etc McCloud communication	Staff newsletter
NOV	Member survey Website user testing	Employer training Website user testing		Member survey Website user testing	Member survey Website user testing	Pensions service meeting Website user testing
DEC	Member survey	Employer forum Pensions dashboard communication McCloud communication		Member survey	Member survey	
JAN	Member survey	Employer training Employer newsletter Pensions dashboard communication McCloud communication Employer survey		Member survey	Member survey	Pensions service meeting Staff newsletter

Month	Active members	Scheme employers	Prospective members	Deferred members	Retired & dependant members	Fund staff
FEB	Member survey	Employer training		Member survey	Member survey	
MAR	Member survey Website promotion	Employer training Website promotion	Website promotion	Member survey Website promotion	Newsletter – All schemes Anti-fraud communication Payslip – online pension promotion Member survey Website promotion	Pensions service meeting Website promotion
Ad hoc Comms	Website updates	Training Workshops Pension Bulletins Website updates Valuation Report (every 3 yrs)	Promotional Posters Website updates	Website updates	Website updates	Website updates



West
Northamptonshire
Council

Pensions website insights

Digital Services

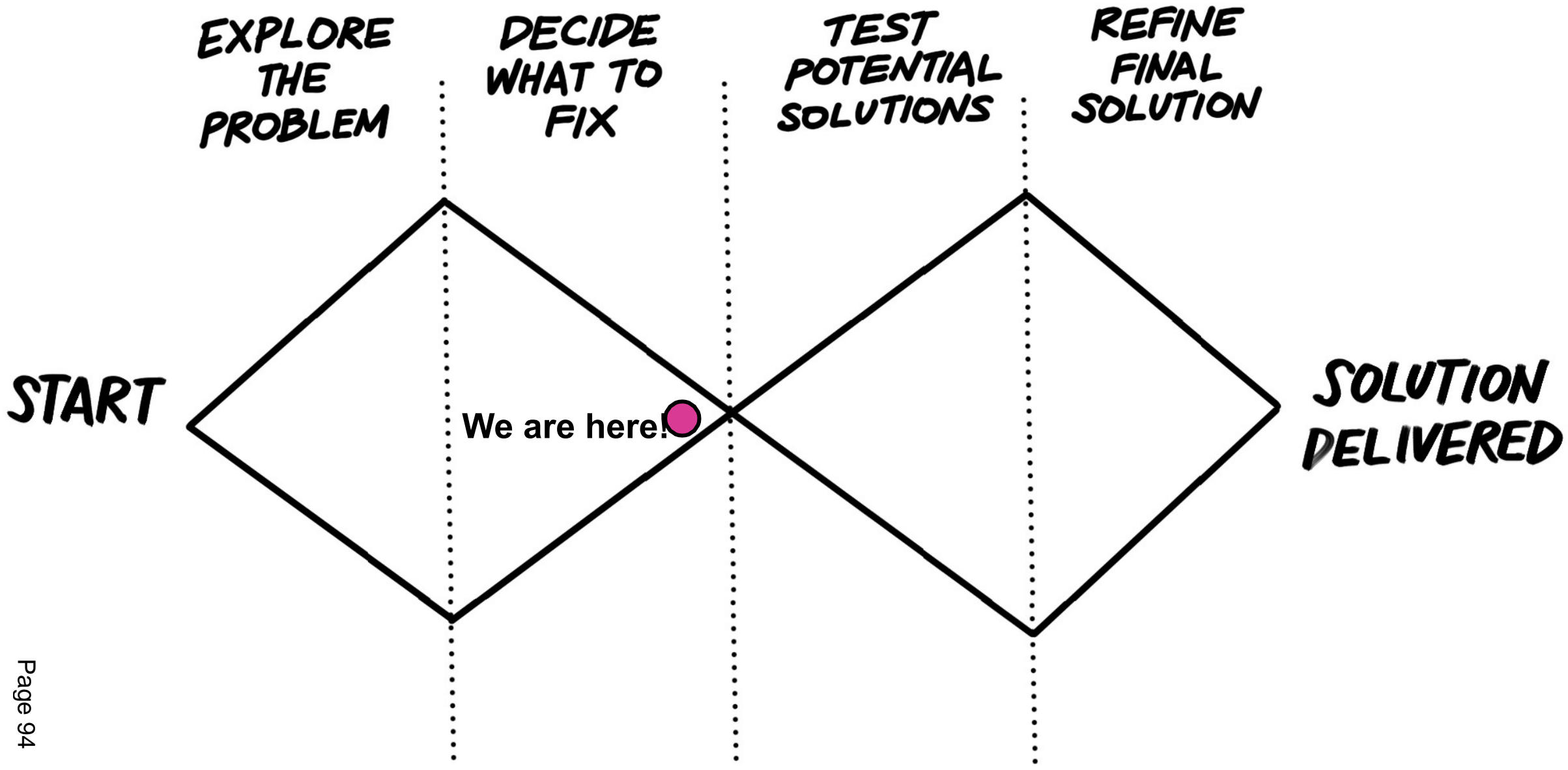
Ultimate goal

Assess the members' and employers' websites to **decide whether they meet the best user need**, with a view to **increasing digital uptake** and **releasing avoidable contact** from the service desk.

This includes a recommendation on options for how to **improve, move or replace both sites**.

Objectives for phase 1

- Do **members** get what they need?
 - Do **employers** get what they need?
 - Do the **pensions team** get what they need?
-
- Is the **website secure** from cyber attacks?
 - Is the website **accessibility compliant**?
 - Is the website hosted and maintained in the most **cost efficient and resilient** way?



Activity	Background	Key Milestones
<p>Review of website and digital communications during 2022/23</p>	<p>The Fund maintains two websites for engagement with scheme members and employers. The current websites were developed in 2015, with the employer website hosted locally using WordPress and the member’s website hosted by the Fund’s administration software provider, Heywood, alongside the member self-service facility.</p> <p>A review of our web offering will be carried out with support from the digital services team at West Northamptonshire Council. The review will assess whether the website is still fit for purpose and alternative options available to meet the needs of the Fund’s stakeholders. This includes deciding whether to continue hosting the employer and member websites separately.</p>	<p>Initial engagement with key stakeholders and agreement of project objectives (July 2022 – Aug 2022)</p> <p>Key insights and user mapping of complex journeys (Aug 2022 – Sep 2022)</p> <p>Investigation into any identified “pain points” identified by user groups and identification of any further areas for improvement (September 2022 - October 2022)</p> <p>Stakeholder demonstration of new user journeys and prototype web pages/functions (October 2022 – November 2022)</p> <p>Presentation of key recommendations to officers (November 2022 – December 2022)</p> <p>Present outcomes and recommendations paper to Committee (March 2023)</p>



What have we been up to?

- 2 focus groups
- 7 interviews with members
- 6 interviews with employers
- Technical options analysis
- Accessibility analysis

Hot topics from the members focus group

Focus group

Members

Searching



Personalised information



Website accessibility



Navigation



User accounts



Pension statements



Hot topics from the employers focus group

	Focus group	Employers
--	-------------	-----------

Searching	✓	✓
-----------	---	---

Website accessibility	✓	✓
-----------------------	---	---

Navigation	✓	✓
------------	---	---

iConnect	✓	✓
----------	---	---

Problematic forms	✓	✓
-------------------	---	---

Chasing for information	✓	✓
-------------------------	---	---

Employer duties		✓
-----------------	--	---

Comms with the pensions team		✓
------------------------------	--	---

Pensions information our personas need



Matt, 35

- Username / password
- Current amount
- Changing jobs / leaving public sector
- What he'll get at age 60
- Spouse's pensions



Paula, 57

- Idea of what her post-retirement life will be like
- Amount she'll get if she retires now / next year / next 5 years
- Ill health
- Impact of taking a lump sum



Roberto, 68

- Pre-retirement: "What sort of retirement do I want?"
- Where is the money invested? Is it ethical?
- Information to help his son and grandson



**Ellie
(employer)**

- Information for members and employers
- Assistance with processes that she doesn't do regularly
- Easy access to the most up-to-date forms
- Reassurance that she has calculated something correctly

Other areas that came up...

- Getting to the right website
- Searching
- Confidence in what members read / employers need to provide
- Informative content – just hard to find
- Webinars success!

We also surveyed over 1,700 people

Members were most interested in:

- How much they'll get?
- How much is in their pension pot?
- Understanding their pension statement
- Accessing their pension details

Employers were most interested in:

- Calculations - benefits statements
- Benefit projections
- Early retirement
- Ill health retirement
- Pension regulations

Next steps - phase 2

Restructure content

- Test a personalised approach with different search and navigation options
- Create prototypes and test with members, employers and the Pensions team

Item no:



West Northamptonshire Council

Local Pension Board 26/01/2023

Mark Whitby – Head of Pensions

Report Title	Pension Fund Annual Report and Statement of Accounts 2021-22
Report Author	Ben Barlow, Ben.Barlow@Westnorthants.gov.uk

Contributors/Checkers/Approvers

Head of Pensions	Mark Whitby	11/1/2023
-------------------------	-------------	-----------

List of Appendices

Appendix 1 - Final Annual Report and Statement of Accounts 2021-22

Appendix 2 – ACCESS Annual Report

Appendix 3 – Grant Thornton’s ISA260 Audit Results Report 2021-22

1. Purpose of Report

- 1.1 To present the final Annual Report and Statement of Accounts of the Pension Fund and audit results report for the 2021-22 financial year.

2. Executive Summary

- 2.1 The report covers the contents of the final Annual Report and key highlights from the Statement of Accounts. The Fund’s assets have risen to £3,367.7m, following strong financial growth during the year with a net increase of £264.3m, mainly due to the outperformance of pooled investments. Contributions, Benefits, Management Expenses and Investment income have also increased since last year.
- 2.2 The report covers the findings of the external audit for the Northamptonshire Pension 2021-22. The external auditor’s opinion is that “the Pension Fund’s financial statements give a true and fair view of the financial position of the Pension Fund and its income and expenditure for the year”.

3. Recommendations

- 3.1 The Pension Board is asked to note the report.

4. Reason for Recommendations

4.1 This is an information paper only.

5. Report Background

- 5.1 The Pension Fund's Statement of Accounts (SOA) form part of the Council's Statement of Accounts. These are audited by the Council's external auditor Grant Thornton (GT). The auditor confirms whether, in their opinion, the SOA reflect a true and fair view of the financial position of the authority (and the Fund within it) for the financial year 1st April to 31st March and that the SOA is free from material mis-statement.
- 5.2 The accounts are based on transactions accounted for within the Fund's financial ledger, information received from Investment Managers and the Fund's Custodian Northern Trust, and assumptions and estimations utilising the professional judgement of officers and Fund professional advisers in order to give a true and fair statement of the Fund's financial position.
- 5.3 The Chartered Institute of Public Finance and Accountancy (CIPFA) has issued the Code of Practice on Local Authority Accounting in the United Kingdom 2021-22 (the Code), which governs the preparation of the financial statements for Local Government Pension Scheme funds. A CIPFA template is used each year to ensure that the reporting meets the requirements of the Code and is compliant with International Financial Reporting Standards (IFRS).
- 5.4 The publication of the Accounts is an essential feature of public accountability and stewardship as it provides information on how the Fund has used the members' funds for which it is responsible.
- 5.5 The structure and content of the Annual Report is governed by guidance issued by the CIPFA in compliance with Regulation 57 of The Local Government Pension Scheme Regulations 2013 (as amended).

6. Annual Report

- 6.1 The Annual Report and Statement of Accounts contents are set out over eight sections: -
- 6.1.1 Preface - provides an introduction to the Annual Report framing the arrangements for the management of the Fund, a statement of responsibilities and listing key third parties.
- 6.1.2 Scheme Administration - describes the scheme framework, how the Fund is administered, the Administering Authority's role, membership movements and Pension Committee and Local Pension Board membership. In addition, it sets out the key policies and strategies of the Fund and key policy changes through the financial year.
- 6.1.3 Management and Financial Performance - describes the management of the Fund and sets out how decisions are made, the structure of the Pensions Service and sections on risk management and performance of the service. In addition, this section lists employer establishments, their contributions and status.
- 6.1.4 Investment Policy and Performance - describes the legislation under which investment of Fund assets is undertaken, the Fund's investment strategy and performance including commentary on asset pooling. In addition, it includes savings generated by pooling of investment assets and cost transparency. The Fund's investment consultant reviews the economic market background for the year and the future outlook.

- 6.1.5 Actuarial Information - describes how the Fund has complied with the Local Government Pension Scheme Regulations 2013 and the Fund's key funding principles adopted in the Funding Strategy Statement. This section describes the most recent triennial valuation and the key assumptions applied.
- 6.1.6 Audit Opinion – Audit opinion issued by the Fund's auditors confirms the SOA reflect a true and fair view of the financial position for the financial year 1st April to 31st March and that the SOA is free from material mis-statement.
- 6.1.7 Pension Fund Accounts - accounting statements and notes to the accounts and is approved as a section within the Administering Authority's SOA
- 6.1.8 Glossary
- 6.2 The Annual Report will be subject to further refinement, external auditor oversight and accessibility checks.

7. Highlights – Statement of Accounts 2021-22

- 7.1 The Fund Account and the Net Asset Statement provide a summary of the financial activity with the notes to the accounts providing further information.
- 7.2 The net increase for the year was £264.3m, with the Fund's net assets rising to £3,367.7m reflecting strong financial growth during the year mainly due to the outperformance of pooled investments.
- 7.3 Contribution receipts increased slightly from £116.3m to £122.8m. The increase in contributions payments reflects the increase in the average contribution rate for 2021-22.
- 7.4 Benefit payments have increased from £96.2m to £103.4m. The increase in pension payments reflects the growth in the number of pensioners during the year and CPI uplifts to benefits in payment.
- 7.5 Management expenses are broken down in Note 11. Administration expenses have decreased from the previous year due to projects carried out and completed in 2020-21. Oversight and Governance costs have increased due to higher actuarial, ACCESS and audit fees paid during 2021-22. Investment Management fees have increased during the year due to positive performance and the fees being based on increased assets under management (AUM).
- 7.6 The one-year investment return as at 31st March 2022 was a net market gain of £229.4m.
- 7.7 Investment income increased from £23.4m to £28.9m mainly due to an increase in pooled property income and two large distributions from LionTrust UK Equities and JP Morgan Infrastructure. Investment income is impacted by market performance however the main returns are reflected in market value increases.

8. Findings and feedback from External Audit fieldwork

- 8.1 The Pension Fund Statement of Accounts has been subject to external audit fieldwork and GT have offered a separate audit opinion on the Pension Fund's Annual Report and Statement of Accounts within the ISA260 document, this is set out on page 3 of the Audit report.

“Under International Standards of Audit (UK) (ISAs) and the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to report whether, in our opinion:

- *the Pension Fund's financial statements give a true and fair view of the financial position of the Pension Fund and its income and expenditure for the year; and*

- *have been properly prepared in accordance with the CIPFA/LASAAC code of practice on local authority accounting and prepared in accordance with the Local Audit and Accountability Act 2014.”*

- 8.2 The Pension Fund’s opinion cannot be finalised until the Council’s audit has concluded.
- 8.3 There is one uncorrected misstatement identified during the audit. The investment asset balances included a number of estimated asset valuations for Level 3 assets, these are based on December 2021 actual valuations adjusted for cash flows to the 31 March 2022. The actual valuations received for these assets showed the investment asset balance was understated by £8.5m. This value is below materiality thresholds.
- 8.4 There have been a small number of disclosure amendments show in Appendix C of the results report and one recommendation for management in Appendix A of the report.
- 8.5 The Final version of the Annual Report and Statement of Accounts will be published on the Fund’s website.

9. Implications (including financial implications)

9.1 Resources and Financial

- 9.1.1 There are no resources or financial implications arising from this paper.

9.2 Legal

- 9.2.1 There are no legal implications arising from the proposals.

9.3 Risk

- 9.3.1 The mitigated risks associated with this report has been captured in the Fund’s risk register as detailed below –

Risk	Residual risk rating
Contributions to the Fund are not received on the correct date and/or for the correct amount	Amber
Fund assets are not sufficient to meet obligations and liabilities.	Amber
Information may not be provided to stakeholders as required	Green
Those charged with governance are unable to fulfil their responsibilities effectively	Green
Custody arrangements may not be sufficient to safeguard Pension Fund assets.	Green
Failure to administer the scheme in line with regulations and guidance.	Green
Pension Fund investments may not be accurately valued.	Green
Investment decisions and portfolio management may not achieve the return required or be performed in accordance with instructions provided.	Green

9.3.2 The Fund's full risk register can be found on the Fund's website at the following link:
[Northamptonshire Risk Register](#)

9.4 **Relevant Pension Fund Objectives**

9.4.1 The following objectives have been considered in this report –

- To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
- To manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.
- To ensure the relevant stakeholders responsible for managing, governing and administering the Fund, understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a changing environment.
- To continually monitor and measure clearly articulated objectives through business planning.
- To continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate.
- To provide scheme members with up-to-date information about the scheme in order that they can make informed decisions about their benefits.
- To seek and review regular feedback from all stakeholders and use the feedback appropriately to shape the administration of the Fund.

9.5 **Consultation**

9.5.1 The Pension Fund Accounts are produced utilising information and advice provided by Investment Managers, the Fund's Custodian Northern Trust and the Fund's Actuary, Hymans Robertson.

9.6 **Communications**

9.6.1 The final Annual Report and Statement of Accounts will be made available to the public by publication on the Fund's website. The documents will also be shared with the Local Government Association.

10. **Background Papers**

10.1 Not applicable

This page is intentionally left blank



Northamptonshire Pension Fund
Annual Report and Statement of Accounts
Year Ended 31st March 2022

Contents

1. PREFACE

Chairperson's Foreword	Page 3
Statement of Responsibilities	Page 4
Scheme Management, Advisors & Partners	Page 5

2. SCHEME ADMINISTRATION

Pension Fund Administration	Page 7
Membership	Page 7
Scheme Administration Tools	Page 7
Scheme Framework	Page 8
Committee & Board Membership	Page 10
Policies & Strategy Statements	Page 11

3. MANAGEMENT AND FINANCIAL PERFORMANCE

The Team	Page 12
Complaints and Appeals	Page 12
Managing Decision Making	Page 13
Risk Management	Page 14
Financial Performance	Page 15
Performance Indicators	Page 16
Contributors to the Fund	Page 18

4. INVESTMENT POLICY AND PERFORMANCE

Investment Policy	Page 26
Pooling	Page 27
Asset Allocation	Page 29
Investment Performance	Page 31
TCFD Reporting	Page 33
Investment Consultants Annual Review	Page 38

5. ACTUARIAL INFORMATION

Report by Actuary	Page 43
-------------------	-------------------------

6. AUDIT OPINION

Report by Auditors	Page 46
--------------------	-------------------------

7. PENSION FUND ACCOUNTS

Pension Fund Account and Notes	Page 48
--------------------------------	-------------------------

8. GLOSSARY

Glossary of Terms	Page 82
-------------------	-------------------------

Chairperson's Foreword

It gives me great pleasure to introduce the Northamptonshire Pension Fund Annual Report and Statement of Accounts for 2021-22.

Staff responsible for the management and administration of the Northamptonshire Pension Fund have striven to deliver continuing high standards of performance to our scheme members, scheme employers and other stakeholders throughout the year.

Our scheme members increased to over 76,000 active, pensioner and deferred members of the scheme from the previous year's figure of over 73,000. Scheme members rely on us to look after their valuable pension rights during their lifecycle of scheme membership.

The Fund has seen further growth of 8.5%, ending this year with a fund valuation of £3.37bn as of 31st March 2022, compared to £3.10bn as at 31st March 2021.

This is despite the volatile market situation caused by the Russian invasion of Ukraine at the end of the financial year. Whilst first and foremost a human tragedy, the ongoing war in Ukraine is likely to lead to high inflation and challenging times for the Fund over the next year, with the effects not fully felt during 2021-22.

The Fund has worked hard to develop an enhanced responsible investment (RI) policy, which forms part of our overall investment strategy. The new RI policy sets out our approach to sustainable responsible investment and will help us manage the carbon and climate risks impacting our investments better.

The Fund has carefully chosen an ambitious decarbonisation pathway for its portfolio of investments that will enable the Fund to reach net zero carbon emissions by 2050 or earlier whilst still ensuring its ability to pay benefits when they fall do is not compromised. Further information on this important work can be found in section Investment Policy and Performance of this annual report and within the investment

pages on the Fund's website.

The Fund has continued to progress work within the ACCESS pool, increasing our pooled assets to 75% as of 31st March 2022, with further assets in the pipeline to be pooled in the future.

The Fund has also been busy preparing, collating and analysing data in preparation for the next 3 year valuation cycle.

After another successful year for the Fund I would like to once again thank the hard work of the Pension Fund Committee and its Investment Sub-Committee, members of the Local Pension Board, the Chief Finance Officer, the Head of Pensions and all the staff involved in the administration and management of the Northamptonshire Pension Fund.

Councillor Malcolm Longley

Chairman of the Northamptonshire Pensions Committee.

Dated: xxxxxxxx 2022

Statement of Responsibilities

Introduction

This Annual Report and Statement of Accounts sets out the arrangements by which the Local Government Pension Scheme operates, reports changes which have taken place and reviews the investment activity and performance of the West Northamptonshire Council Pension Fund ("Fund") during the year.

The Statement of Accounts has been prepared in accordance with the CIPFA/LASAAC Code of Practice for Local Authority Accounting in the United Kingdom 2021-22.

The accounts summarise the transactions of the Fund and deal with the net assets at the disposal of the Pension Committee members. The accounts do not take account of the obligation to pay future benefits which fall due after year end. The actuarial position of the Fund which takes into account these obligations is available on the Fund's website,

[Northamptonshire Pension Fund Valuation Report](#)

The Council's Responsibilities in respect of the Pension Fund

The West Northamptonshire Council is required to:

- Make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this Council that officer is the Chief Finance Officer;
- Manage its affairs to secure economic, efficient and effective use of resources and safeguard its assets; and
- Approve the Statement of Accounts which form part of the Council's Statement of Accounts.

The Chief Finance Officer's Responsibilities

The Chief Finance Officer is responsible for the preparation of the Council's statement of accounts in accordance with proper practices as set out in the *CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom (the Code)*.

In preparing this statement of accounts, the Chief Finance Officer has:

- Selected suitable accounting policies and then applied them consistently;
- Made judgments and estimates that were reasonable and prudent; and
- Complied with the Code.

The Chief Finance Officer has also:

- Kept proper accounting records which are up to date; and
- Taken reasonable steps for the prevention and detection of fraud and other irregularities.

Certificate of Accounts

I certify that this Statement of Accounts presents a true and fair view of the financial position of the Pension Fund at 31 March 2022 and of its income and expenditure for the year 2021-22, and authorise the accounts for issue.




























Mr M Henry

Chief Finance Officer

(Section 151 Officer)

Dated: xx xxxxxx 2021

Scheme Management, Advisors and Partners

Partners		Asset Managers (Continued)	
 ACCESS <small>Effective • Collective • Investment</small>	ACCESS (Pension Pool)	 CATAPULT Ventures	Catapult
 Aon <small>Empower Results*</small>	AON (Consultants)	 CBRE	CBRE Global
 BARCLAYS	Barclays (Bank)	 HARBOURVEST	Harbour Vest Partners (UK)
David Crum (Independent Advisor)	David Crum (Independent Advisor)	 ifm investors	IFM Investors
 Grant Thornton	Grant Thornton (Auditors)	 J.P.Morgan	JP Morgan
 HYMANS ROBERTSON	Hymans Robertson (Actuary)	 LIONTRUST <small>COURAGE • POWER • PRIDE</small>	Lion Trust*
 Mercer	Mercer (Investment Consultants)	 LINK Group	Link Fund Solutions (Access)
 NORTHERN TRUST	Northern Trust (Custodian)	 LONGVIEW PARTNERS	Longview Partners*
 Pathfinder Legal Services Ltd	Pathfinder (Legal Advisor)	 M &G	M&G Investments*
 SQUIRE PATTON BOGGS	Squire Patton Boggs (Legal Advisors)	 NEWTON Investment Management	Newton*
Asset Managers		 UBS	UBS Asset Management
 Adams Street	Adams Street Partners	AVC Providers	
 Allianz	Allianz Global Investors	 PRUDENTIAL	Prudential
 ARES	Ares Asset Management	 Standard Life	Standard Life
 BAILLIE GIFFORD	Baillie Gifford & Co*	<i>*Sub-funds managed by Link Fund Solutions in the ACCESS pool (page 27)</i>	
 BlueBay Asset Management	Blue Bay Asset Management		

Scheme Management & Key Officers

The Key Officers of the Fund during the year were:

Mark Whitby – Head of Pensions

Ben Barlow – Investments and Fund Accounting Manager

Richard Sultana – Systems and Projects Manager

Akhtar Pepper – Operations Manager

Cory Blose – Employer and Communications Manager

Joanne Kent – Governance and Compliance Manager

Further information regarding the accounts and investments can be obtained from:

Ben Barlow

Investments and Fund Accounting Manager,
Pensions Service

Email: Ben.Barlow@westnorthants.gov.uk

Telephone: 07831 123167



Enquiries relating to management and administration should be directed to:

Mark Whitby

Head of Pensions, Pensions Service

Email: Mark.Whitby@westnorthants.gov.uk

Telephone: 07990 556197



Registered Pension Scheme Number: 10079143

Scheme Administration

Introduction

West Northamptonshire Council is responsible for administering the Northamptonshire Pension Fund, which is available to employees of the Council, organisations with a statutory right to be in the scheme (scheduled bodies) and organisations, such as charities, which the Council has admitted under its discretionary powers (admitted bodies). As well as organisations that can admit their employees to the LGPS by passing their resolution (nominate employees for access to the LGPS).

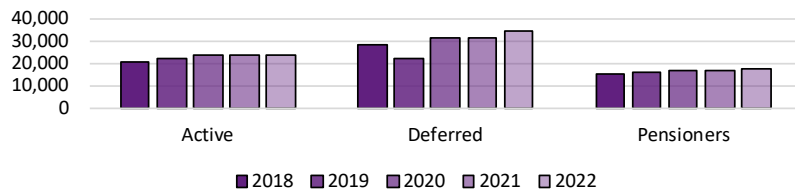
The Fund is a qualifying scheme under the automatic enrolment regulations and can be used by employers to automatically enroll eligible employees, and every three years re-enrol anyone who opts out of the scheme.

A shared service partnership between West Northamptonshire Council and Cambridgeshire County Council provides pension administration services to the Northamptonshire Pension Fund.

Membership

Membership of the Fund increased by 4.7% from the previous year.

On 31 March 2022 there were 24,055 active, 34,759 deferred and 17,705 pensioner members in the Fund. The deferred figure is inclusive of 10,133 open cases that may change status (undecided leavers).



Pension Fund Administration

There are 77 staff members (73.56 full time equivalent) within the Pensions Team, providing all aspects of service to both the Northamptonshire and Cambridgeshire Funds, with an average staff to member ratio of 1:2,299 (total members for Northamptonshire and Cambridgeshire Pension Funds divided by full time equivalent staff members).

Internal audit perform risk based audit procedures to assess the effectiveness and efficiency of administration services, and the Pensions Team have been awarded the national standard for excellence in customer service (CSE) since 2016.

The requirements of the General Data Protection Regulations (GDPR) are recognised and feature in the design of the Fund's administration processes. The Fund has in place a GDPR compliant privacy notice, conducts privacy impact assessments for all new activities involving personal data and has in place a Register of Processing Activities and Information Asset Register.

Unitary Authority

On the 1st April 2021 Northamptonshire County Council ceased and was replaced by two unitary authorities West Northamptonshire and North Northamptonshire. West Northamptonshire Council has become the administering authority for the Northamptonshire Pension Fund.

Scheme Administration Tools

The Pensions website contains detailed information for all the Fund's stakeholders and has dedicated pages for both members and employers. There is a comprehensive suite of forms and factsheets for members, prospective members and employers.

Support for members and employers can be accessed via the website or by contacting the Helpline on 01604 366537.

[Member Self Service](#) is an online platform which allows members to securely access their records, amend their personal information, perform benefit projections and view their annual benefits statement.

[Employer Self Service](#) is available to all employers in the scheme and gives access to the pension database remotely and securely, allowing them to view, create and amend their employees' data, run reports and perform benefit calculations.

i-Connect is a system used which allows employers to securely upload monthly payroll data into the pension database, improving efficiency and accuracy of data and ensuring timely record maintenance.

Scheme Administration (continued)

Scheme Framework

The Local Government Pension Scheme is a statutory funded pension scheme. The operation of the West Northamptonshire Council Pension Fund is principally governed by the Local Government Pension Scheme Regulations 2013 (as amended) and the Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended) which have been made within the context of the primary legislation of the Public Service Pensions Act 2013.

The Scheme covers eligible employees of the Unitary authorities, the Police Authority, Police and Crime Commissioner and Academies within the county area other than teaching staff, police officers and fire-fighters for whom separate statutory arrangements exist. A number of other bodies are also members of the scheme.

Employers' contribution rates are set by the Fund's Actuary every three years following the valuation of the Fund, in order to maintain the solvency of the Fund. The last valuation took place as at 31 March 2019. The results of the valuation were a funding level of 93% (31 March 2016: 28%) and an average primary employer contribution rate of 19% (31 March 2016: 17.1%). The primary rate includes an allowance of 0.8% (31 March 2016: 0.7%) of the pensionable pay for the Fund's expenses. The average employee contribution rate is 6.3% (31 March 2016: 6.3%) of pensionable pay.

On 1 April 2014, the new Local Government Pension Scheme 2014 came into effect, allowing more flexibility around paying into the scheme and drawing benefits in comparison to the 2008 scheme. Normal pension age is linked to the state pension age but benefits can be drawn earlier or later, between age 55 and 75. The normal retirement age is the age a member can access their pension in full; if it is accessed before that date benefits will usually be reduced and if accessed after normal retirement age benefits may increase. All service built up to 31 March 2014 in the LGPS is fully protected and will continue to be based on a member's final year annual pay when the individual leaves the LGPS (2008 scheme).

Benefits built up before April 2014 also retain their protected Normal Pension Age, which for most members is 65, although certain members have a retirement age of 60 for all or part of their membership.

There is an additional protection known as the 'underpin' for members who were active on 31 March 2012 and were within ten years of their Protected Normal Pension Age on 1 April 2012. These members will get a pension at least equal to the pension they would have received in the LGPS had it not changed on 1 April 2014, subject to meeting certain criteria.

In December 2018 the Court of Appeal ruled against the Government in two linked cases relating to the Judicial Pension Scheme and the Firefighters' Pension Schemes. This ruling is generally referred to as the McCloud judgment, or simply McCloud.

In essence, the Court held that the transitional protections afforded to older members of these schemes when their reformed schemes were introduced in 2015 constituted unlawful age discrimination.

The Government sought permission to appeal to the Supreme Court and it was announced on 27 June 2019 that the application had been refused.

A written ministerial statement followed on 15 July 2019 to confirm that, as transitional protection was provided in all public service schemes upon their reform, the McCloud judgment had implications for all those schemes, including the LGPS in England and Wales.

Primary legislation required in relation to the McCloud remedy has now been put in place as The Public Service Pensions and Judicial Offices Bill received Royal Assent in March 2022, becoming the Public Service Pensions and Judicial Offices Act 2022.

While there was a MHCLG (now DLUHC) consultation in 2020 on proposed amendments to the LGPS Regulations necessary to remedy the specific unlawful age discrimination in the LGPS, no actual amendments have been made as yet. A fresh DLUHC consultation, which will include draft LGPS amendment regulations, is expected to take place in Summer 2022. The intention is that these amendment Regulations will come into effect on 1 October 2023, retrospective to 1 April 2014 (i.e. when the reformed LGPS, and therefore the transitional protection, was introduced).

Scheme Administration (continued)

The below table compares the 2008 and the 2014 schemes.

	LGPS 2008	LGPS 2014
Basis of Pension	Final Salary	Career Average Revaluated Earnings (CARE)
Accrual Rate	1/60 th	1/49 th
Revaluation Rate	Based on Final Salary	Consumer Prices Index (CPI)
Pensionable Pay	Pay excluding non contractual overtime and non pensionable additional hours	Pay including non-contractual overtime and additional hours
Employee Contribution Rates	Between 5.5% and 7.5%	Between 5.5% and 12.5%
Contribution Flexibility	No	Option to pay 50% contributions for 50% of pension benefit
Normal Pension Age	65	Equal to individuals state pension age
Lump Sum Trade Off	Trade £1 of pension for £12 lump sum	Trade £1 of pension for £12 lump sum
Death in Service Lump Sum	3 x Pensionable Pay	3 x Pensionable Pay
Death in Service Survivor Benefits	1/160 th accrual based on Tier 1 ill health pension enhancement Tier 1 – Immediate payment with service enhanced to Normal Pension Age (65)	1/160 th accrual based on Tier 1 ill health pension enhancement Tier 1 – Immediate payment with service enhanced to Normal Pension Age
Ill Health Provision	Tier 2 – Immediate payment with 25% service enhancement to Normal Pension Age (65) Tier 3 – Temporary payment of pension for up to 3 years	Tier 2 – Immediate payment with 25% service enhancement to Normal Pension Age Tier 3 – Temporary payment of pension for up to 3 years
Indexation of Pension in Payment	CPI (RPI for pre-2011 increases)	CPI
Vesting Period	3 months	2 years

Scheme Administration (continued)

Pension Committee and Local Pension Board Membership

The following table shows the attendance of Committee and Board members at applicable Pension Committee, Investment Sub-Committee and Local Pension Board meetings during 2021-22, training undertaken in year, including; including; Training days, Conferences and Strategic Workshops.

Councillor/Member Name	Committee/Board	Meetings Attended	Training Undertaken (In person and virtual)
Councillor Malcolm Longley	Pension Committee Investment Sub Committee	5 meetings out of 5 4 meetings out of 4	5 sessions attended
Councillor Charles Morton	Pension Committee Investment Sub Committee	4 meetings out of 5 2 meetings out of 4	9 sessions attended
Councillor Phil Bignell	Pension Committee Investment Sub Committee	5 meetings out of 5 1 meetings out of 4	3 sessions attended
Councillor Catharine Russell	Pension Committee Investment Sub Committee	4 meetings out of 5 3 meetings out of 4	9 sessions attended and 1 external conference
Councillor Graham Lawman	Pension Committee Investment Sub Committee	5 meetings out of 5 4 meetings out of 4	9 sessions attended
Robert Austin	Pension Committee Investment Sub Committee	2 meetings out of 5 3 meetings out of 4	7 sessions attended and 1 external conference
Peter Borley-Cox	Pension Committee Investment Sub Committee	5 meetings out of 5 3 meetings out of 4	8 sessions attended
Councillor Paul Joyce	Pension Committee	3 meetings out of 5	6 sessions attended
Councillor Peter Matten	Pension Committee	1 meetings out of 5	4 sessions attended
Councillor Jamie Lane	Pension Committee	4 meetings out of 5	1 session attended
Councillor Lloyd Bunday	Pension Committee	5 meetings out of 5	9 sessions attended
John Wignall	Pension Committee	3 meetings out of 4*	8 sessions attended
Councillor Ken Pritchard	Local Pension Board	3 meetings out of 3	7 sessions attended
Julie Petrie	Local Pension Board	2 meetings out of 3	9 sessions attended and 1 external webinar
Kevin Standishday	Local Pension Board	1 meetings out of 3	2 sessions attended and 1 external webinar
Katy Downes	Local Pension Board	1 meetings out of 2*	10 sessions attended and 1 external webinar and one conference
Alicia Bruce	Local Pension Board	2 meetings out of 2*	2 sessions attended and 1 external webinar

*Not in appointment for the entire period.

Scheme Administration (continued)

Policies and Strategy Statements

Information about the Fund's policies and procedures can be found on the Fund's website:

[Northamptonshire Pension Fund Key Documents](#)

The following policies were in place during the financial year

- Administering Authority Discretions
- Administration Strategy
- Admitted Bodies Scheme Employers and Bulk Transfers Policy
- Annual Business Plan & Medium Term Strategy 2021-2024
- Anti-Fraud and Corruption Policy
- Cash Management Strategy
- Communications Plan
- Communications Strategy
- Conflict of Interest Policy for Northamptonshire Pension Fund Board
- Data Improvement Policy
- Employer Data Retention Policy
- Funding Strategy Statement
- Governance Policy and Compliance Statement
- Investment Strategy Statement
- Northamptonshire Pension Fund Training Strategy
- Overpayment of Pension Policy
- Payment of Pension Contributions Policy
- Reporting Breaches of the Law to the Pensions Regulator Policy
- Risk Register
- Risk Strategy

Statement/Policy Changes in 2021-22

The following strategies and policies have been reviewed and updated accordingly in 2021-22:

- Admission Bodies, Scheme Employers and Bulk Transfer Policy
- Anti-Fraud and Corruption Policy
- Communications Plan
- Training Strategies
- Investment Strategy Statement
- Payment of Employee and Employer Contributions Policy

The Fund also developed a Cyber Strategy during the year, however this is not published due to its sensitive nature.

Management and Financial Performance

The Team

The Pensions Service is based in Northampton and consists of the following teams:

- **Operations** – maintain member records, calculate benefits and pensions payable.
Email: Pensions@westnorthants.gov.uk
- **Employers** – contact point for employers of the scheme and those wanting to join. Deliver training sessions to employers and payroll providers covering the systems available to assist them in efficiently participating in the Fund.
Email: PenEmployers@westnorthants.gov.uk
- **Systems** – ensure internal systems are operating efficiently and provide support to maintaining accurate member records.
Email: PenSystems@westnorthants.gov.uk
- **Investments** – oversee the governance of Fund assets and support the Investment Sub-Committee.
Email: PenInvestments@westnorthants.gov.uk
- **Governance** – support all Committees in governing the Fund effectively, develop and monitor policies and practices to improve data quality and ensure regulatory compliance.
Email: Pensions@westnorthants.gov.uk
- **Accounting** – record and reconcile contributions paid into the Fund and accounts for fund expenses. Provide financial monitoring and reporting of functions such as debt management and cash requirements and investment accounting.
Email: PenContributions@westnorthants.gov.uk
- **Projects** – is responsible for delivering a wide range of projects that are required to be delivered across the service.
Email: PenProjects@westnorthants.gov.uk

Complaints

Should you have a complaint about the service, we will do our best to put things right. To access support, please email Pensions@westnorthants.gov.uk, telephone 01604 366537, or write to:

Pensions Service – Governance Team
One Angel Square,
Angel Street
Northampton
NN1 1ED

Appeals

The LGPS regulations provide Internal Dispute Resolution Procedures (IDRP), details of which can be accessed via [the website](#).

Stage 1 disputes are decided by Head of Pensions if the complaint concerns an administering authority decision, or by an adjudicator appointed by the Employer if an Employer decision.

At Stage 2, the complaint is considered by West Northamptonshire Council’s Monitoring Officer, and if the complainant is still unhappy with the decision they may formally refer the case to The Pensions Ombudsman.

At any stage a scheme member may contact The Pensions Ombudsman for assistance with their complaint, but for a formal complaint to be raised with them both Stages of the IDRP would normally need to be completed first. More information can be found on [The Pensions Ombudsman website](#).

The following formal disputes have arisen and/or been resolved during the year:

Nature of dispute	Stage 1	Stage 2
Benefits awarded lower than estimated	Not upheld	Not upheld
Lump sum paid less than quoted	Partially upheld (in 2020/2021)	Not upheld
Transfer out reinstatement/compensation	Not Upheld (in 2020/2021)	Not upheld
Refusal of early payment of deferred benefits on ill health grounds	Not Upheld (in 2020/2021)	Not upheld

Management and Financial Performance (continued)

Managing Decision Making

West Northamptonshire Council has established a Pension Committee (PC) and Investment Sub-Committee (ISC) having strategic and operational investment decision making powers, respectively.

Membership of both bodies consist of elected members, and non-elected employer and scheme member representatives. All members of the ISC sit on the PC.

The PC's business covers all Fund matters with the exception of non-strategic investment issues, which are delegated to the ISC. Officers across the operations, investment, transactions, corporate and governance functions support the PC and ISC as required. All meetings of the PC and ISC are duly minuted.

PC members and ISC members are required to attain a desired level of skills and knowledge, to ensure decisions being made on behalf of West Northamptonshire Council Pension Fund are made with full understanding of the impact and therefore mitigating the risk of unfounded decisions.

The Committee members must at all times be conscious of their accountability to stakeholders. The PC is responsible for determining the nature and extent of any significant risks taken on by the Administering Authority in the pursuit of its strategic objectives. Risk management should be dynamic and comprehensive, considering operational, reputational and environmental, social and governance (ESG) risks in addition to financial risks.

The Northamptonshire Full Council acknowledged the establishment of the ACCESS Joint Committee (AJC) delegating powers to this body in response to the Government's pooling agenda. The Chairman of the PC represent the Fund on the AJC, supported by Fund officers working in the ACCESS Officers Working Group (OWG).

The Local Pension Board (LPB) was established on 1 April 2015, providing an additional layer of governance for the Fund. The LPB is non-decision making but has the responsibility of assisting the Administering Authority to:

- Secure compliance with the Local Government Pension Scheme (LGPS) regulations and other legislation relating to the governance and administration of the LGPS and also the requirements imposed by the Pensions Regulator in relation to the LGPS; and
- Ensure the effective and efficient governance and administration of the LGPS.

The LPB has provided a separate annual report of its activities to Council for this financial year.

Management and Financial Performance (continued)

Risk Management

The Northamptonshire Pension Fund has both a risk strategy and a risk register in place to identify, evaluate, mitigate and monitor risks associated with the activities that the Fund carries out. Risk is managed through regular reporting to both the Pensions Committee and Local Pension Boards which have appropriate authorisation from the West Northamptonshire Council's Monitoring Officer and Section 151 Officer. This ensures that risks are integrated within the governance structure of West Northamptonshire Council and all follow a consistent approach.

Identified risks are recorded in the Risk Register, a copy of which can be found at: [Risk Register](#)

The aim of the Risk Register is to ensure that an informed decision can be made on whether a risk can, or should be accepted. Risk appetite is informed by an understanding of any existing controls and will also be influenced by the expected reward or outcome. Once risks have been identified the Fund assesses the impact and likelihood of a risk to enable effective decision making.

Risks recorded in the Risk Register are linked and managed in line with the Pension Fund objectives to ensure relevance and are reviewed by the Pension Committee twice a year and the Local Pension Board quarterly. New risks are therefore identified promptly and current risks are monitored on a regular basis, with risk ratings revised where necessary. The accompanying Risk Strategy is reviewed on an annual basis to ensure it remains relevant to support the Risk Register.

Third party risks are managed through the Risk Register and associated policies, such as the Payment of Pension Contributions Policy. Mitigations are put in place to minimise third party risks and, in particular, the risks associated with Scheme Employers and effective covenant monitoring.

Investment Risk

The Fund's Investment Strategy Statement, which is reviewed annually, sets out the Fund's investment strategy which incorporates evaluation of key investment risks.

In addition the Statement of Accounts section of this document, provides further information about Investment risks and how they apply to the Investment Assets held by the Fund.

There are many risks inherent in investments. The Fund addresses these in the following ways:

Market Risk – investments will reduce in value due to fluctuations in prices, interest rates, exchange rates and credit spreads.

The Fund invests in different markets across the world and in different types of investment to reduce the risk of the portfolio reducing in value due to adverse market conditions and to smooth returns.

Price Risk – investments may be incorrectly valued due to price fluctuations or estimates used in pricing.

Investments are valued at published prices, where available. Investments that are not sold on a market are valued by specialist Investment Managers. Notes 16, 17 and 18 in the Statement of Accounts gives information about how investments are valued and gives an indication of the value of investments subject to an element of estimation.

At year end all Investment Managers, including Link Fund Solutions who are the operator of the ACCESS pool (page 27), are required to provide ISAE 3402 (Service Organization Control Reports) which are made available to external audit.

Risk Assurance

The objective of an internal audit is to educate management and employees about how they can improve business operations and efficiencies while giving reliability and credibility to the financial reports that go to Pension Committee and the Local Pension Board. Internal audit awarded the Fund substantial assurance following its testing within the year.

Management and Financial Performance (continued)

Financial Performance

The financial performance of the Fund is monitored against budgeted performance on a regular basis throughout the year by the Pension Fund Committee.

Performance Indicators	2021-22 Forecast £000	2021-22 Actual £000
Contributions	-107,000	-122,777
Transfers in from other funds	-7,000	-12,203
Total Income	-114,000	-134,980
Benefits payable	100,000	103,413
Payments to and for leavers	7,000	9,696
Total Benefits	107,000	113,109
Surplus of contributions over benefits	-7,000	-21,871
Management Expenses		
Administrative Costs	2,247	2,268
Investment Management Expenses	445	12,884
Oversight and Governance Costs	675	812
Total Management Expenses	3,367	15,964
Total Income less Expenses	-3,633	-5,907
Investment Income	-35,000	-28,920
Taxes on Income	0	0
(Profit)/loss on disposal and changes in market value of investments	-117,000	-229,429
Net return on investments	-152,000	-258,349
Net (increase)/decrease in assets during the year	-155,633	-264,256

Management expenses per active member are shown below:

Cost Per Active Member	2020-21	2021-22
Active Members	23,868	24,055
	£	£
Administrative Cost	99.38	94.28
Investment Management Expenses	457.85	535.61
Oversight and Governance Costs	29.66	33.76

Variance Analysis

- Contributions and benefits are in line with current membership numbers.
- Transfers in and payments out are demand led.
- Investment Management expenses forecast is understated as this does not include pooled fees deducted from market value.
- The 2021-22 forecast for profit/loss on disposal and changes in market value of investments assumed the actuaries target would be achieved. The actual market experience is explained in the independent investment advisors report (page 38).

Details of non-investment assets and liabilities of the Fund can be found in the Statement of Accounts in Notes 21 to 22.

Management and Financial Performance (continued)

Performance Indicators

The Fund has developed a number of Key Performance Indicators (KPIs) to monitor service delivery, these KPIs are reviewed internally on a monthly basis to monitor and inform where delivery is met or remedial action is required. The Pension Fund Committee receives quarterly performance updates within a Business Plan update.

The below table shows the number and trend of the top 7 types of scheme administration cases demonstrating both workload and efficiency in meeting internal KPI and external legal requirements.

	Cases completed in the year	Cases completed within KPI target	% of Cases completed within KPI target
Deaths – initial letter acknowledging death of member <i>KPI: 5 working days, Legal requirement: 2 months</i>	541	541	100
Deaths – letter notifying amount of dependant’s pension <i>KPI: 5 working days, Legal requirement: 2 months</i>	327	327	100
Estimates – letter notifying estimate of retirement benefits to employee <i>KPI: 15 working days, Legal requirement: 2 months</i>	529	504	95
Retirements – process and pay pension benefits on time <i>KPI: 5 working days, Legal requirement: 2 months</i>	486	462	95
Deferment – calculate and notify deferred benefits <i>KPI: 15 working days, Legal requirement: N/A</i>	1,454	1,371	94
Transfers in – Letter detailing transfer in (actual) <i>KPI: 10 working days, Legal requirement: 2 months</i>	427	421	99
Transfers out – letter detailing transfer out (quote) <i>KPI: 10 working days, Legal requirement: 3 months</i>	415	406	98

Management and Financial Performance (continued)

Contributions

The Fund works closely with employers to collect contributions on time.

The following table shows the amount of regular employee and employer contributions paid during the year and the value and percentage of which were paid both on time and after the deadline of the 19th day of the month following deduction.

Contributions	Total Paid in 2021-22 £000	Total Paid On Time £000	% Paid On Time	Total Paid Late £000	% Paid Late
Employer	98,109	97,526	99	583	1
Employee	24,668	24,480	99	188	1
Total	122,777	122,006	99	771	1

The Fund did not apply any additional charges or levies in respect of contributions received late, and no reports were made to The Pensions Regulator in respect of late contributions during the year.

Recovery of Overpayments of Pension

The Fund participates in the National Fraud Initiative which is a biennial process undertaken in conjunction with the Audit Commission. The necessary recoveries arising from identified overpayments are being pursued.

Annual Pensioner Payroll (£) ¹	83,682,381
Total write off amount (£)	£1,845
Write offs amount as % of payroll	0.0

¹Excludes additional pension awarded by the employer.

The following tables show the analysis of pension overpayments that occurred during the last five years:

Year	Overpayment £	Recovered/in progress £	Written Off £
2017-18	74,764	55,518	17,518
2018-19 ²	516,269	379,396	136,873
2019-20	136,830	47,180	89,650
2020-21	45,998	5,297	40,701
2021-22	11,326	9,481	1,845

²Overpayments in 2018-19 appear particularly high, as in addition to usual activity, the Fund undertook a significant reconciliation project during the year in which a number of overpayments were identified.

Overpayments identified with a value of under £250 are automatically written off, in line with the Fund's Overpayments Policy.

Management and Financial Performance (continued)

Contributors to the Fund

Active Employers as at 31 March 2022

Type Of Body	Number of Active Employers
Administering (AA)	1
Scheduled (S)*	253
Admitted (Ad)	64
Total	318

LEA schools are included within Scheduled Bodies but not in the above figures as they belong to their responsible local authorities, and in table below are shown in Body column as S

The table to the left, shows the number of employers in the Fund as at 31 March 2022. The breakdown of contributions by employer shown in the table below will show a different number of employers when compared to the left, as employers joined and left the fund throughout the year. An active or ceased column has been added to show this movement. Where contributions exist for ceased employers, these represent prior year adjustments that have been made within 2021-22, or contribution receipts recorded within the period.

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Abbey C of E Academy (Daventry)	7,565	24,967	32,532	S	
Abbeyfield School	51,120	161,610	212,730	S	
Abington Vale Primary (Academy)	27,784	98,927	126,711	S	
ABM (St Mary's CE Primary)	614	3,697	4,311	Ad	
ABM Catering (Duston Eldean Primary School)	678	3,160	3,837	Ad	
ABM Catering (Lyncrest Primary)	483	2,248	2,731	Ad	
ABM Catering Limited (Innovate MAT)	1,133	3,977	5,110	Ad	
ABM Catering Limited - 2016 PDET	2,763	12,359	15,122	Ad	
ABM Catering Limited (2018 PDET)	1,240	5,086	6,326	Ad	
ABM Catering Limited (Montsaye Academy)	2,929	9,851	12,780	Ad	
Alfred Street Junior School	8,955	40,643	49,598	S*	
All Saints C of E VA Primary School	16,601	75,322	91,923	S*	
Alliance in Part' (Magdalen C)	501	2,150	2,651	Ad	
AMEY Ltd	12,717	42,536	55,253	Ad	
Ashby Fields Primary School	24,228	93,136	117,364	S	

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Aspens - DSLV Academy (Dantre & Southbrook)	1,699	9,612	11,311	Y	Ad
Aspens Services Ltd (Southfield School for Girls Kettering)	339	1,285	1,624		Ad
Badby Primary Academy	10,245	35,979	46,224		S
Balfour Beatty-St Lighting	4,176	9,534	13,710		Ad
Barby & Olney Parish Council	707	3,155	3,861		S
Barby Academy	4,809	18,894	23,703		S
Barry Road Primary (NCC)	32,241	194,001	226,243		S*
Beanfield Primary School	59,153	187,616	246,769		S
Billing Brook Academy	89,417	283,866	373,283		S
Birkin Cleaning Services (Elizabeth Woodville)	7,265	44,984	52,248		Ad
Bishop Stopford Academy	56,300	187,284	243,585		S
Blackthorn Primary (Academy)	19,637	67,038	86,675		S
Blakesley C of E Primary	5,458	22,121	27,578		S
Boddington C of E Primary Academy	3,154	12,388	15,542		S
Boothville Primary School (NCC)	40,012	185,613	225,625		S*

Management and Financial Performance (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Boughton Primary Academy	11,134	36,114	47,248		S
Bozeat Community Primary Academy	8,614	36,183	44,798		S
Brackley Town Council	21,704	89,868	111,572		S
Brambleside Primary School	17,761	66,744	84,505		S
Braunston Academy	11,909	42,967	54,876		S
Briar Hill Primary Academy	16,768	56,957	73,725		S
Bridgewater Primary School	43,334	198,122	241,456		S*
Brightn Ltd (Braunston Primary School)	314	1,141	1,455		Ad
Brinton Primary school	6,142	27,087	33,228		S*
Brixworth CEVC Primary Sch. (NCC)	29,275	132,111	161,386		S*
Brixworth Parish Council	1,387	5,420	6,808		S
Brooke Weston Academy	122,637	349,052	471,688		S
Broughton Primary School (NCC)	12,688	57,238	69,926		S*
Buckton Fields Primary School	2,933	11,879	14,812		S
Bugbrooke Comm Primary Sch. (NCC)	19,065	86,921	105,986		S*
Byfield Academy	8,573	27,944	36,517		S
Campion School	66,549	211,619	278,167		S
Caroline Chisholm (Academy)	90,437	283,265	373,702		S
Castle Primary Academy	32,815	115,962	148,777		S
Caterlink Ltd (Eastfield Academy)	160	639	799		Ad
Caterlink Ltd (The Grange Academy)	522	2,064	2,586		Ad
Cedar Road Primary (Academy)	13,325	46,898	60,223		S
Chacombe CEVA Primary Academy	6,734	24,901	31,635	Y	S
Change-Grow-Live (previously known as CRI Probation)	1,302	5,128	6,431		Ad
Chenderit School (Academy)	36,178	119,108	155,286		S
Chipping Warden Primary Academy	6,306	27,542	33,848		S

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Cleantec (Chenderit School)	1,794	6,394	8,189		Ad
Cleantec (The Parker E-ACT)	9,266	31,202	40,467		Ad
Cleantec Services (Grange Primary)	310	1,607	1,918		Ad
Clipton Primary (NCC)	6,248	28,589	34,836		S*
Collingtree C of E Primary School	4,309	17,550	21,860		S
Compass Contract Services (Eastfield Academy and Rockingham Primary School)	1,024	3,257	4,281		Ad
Compass Contract Services (Fairfields School)	1,627	7,217	8,844		Ad
Compass Contract Services (The Abbey Primary School and Standens Barn Primary School)	-	1,195	5,206	-	6,402 Ad
Complementary Education (Academy)	51,013	168,199	219,211	Y	S
Consortium Audit (Warks)	286	3,124	3,409		Ad
Coombs Catering (Thomas Beckett Catholic Academy)	5,187	22,709	27,895	Y	Ad
Corby Borough Council	-	-	9,422	-	9,422 S
Corby Business Academy	67,728	208,893	276,621		S
Corby Old Village School (NCC)	12,726	58,803	71,529		S*
Corby Primary Academy	30,029	99,290	129,320		S
Corby Technical School	39,373	115,866	155,240		S
Corby Town Council	695	2,780	3,475		S
Cottingham C of E Primary Academy	6,757	23,986	30,743		S
Cranford C of E Academy	4,734	17,186	21,919		S
Croughton All Saints C of E Primary (NCC)	6,706	30,069	36,775		S*
Croyland Pri (Well'boro) (NCC)	41,564	190,711	232,275	Y	S*
CSN Resources Limited	21,725	82,306	104,031		S

Management and Financial Performance (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Cucina Restaurants (Elizabeth Woodville School)	4,073	16,021	20,094		Ad
Culworth C of E Primary Academy	5,379	22,788	28,167		S
Danesholme Infants Academy	15,737	63,982	79,719		S
Danesholme Junior Academy	16,263	76,135	92,397	Y	S
Daventry District Council	-	53,345	53,345		S
Daventry Hill School	62,924	192,384	255,309		S
Daventry Norse Limited	23,590	106,719	130,309		Ad
Deanshanger Parish Council	1,260	5,518	6,778		S
Deanshanger Primary	22,227	102,552	124,779		S*
Delapre Primary School	36,968	168,265	205,233		S*
Denfield Park Primary (NCC)	28,593	130,108	158,700		S*
Denton Primary School	11,412	51,552	62,963		S*
Desborough Town Council	2,235	8,733	10,968		S
DSL V E-ACT Academy	37,259	132,388	169,647		S
Duston Eldean Primary (NCC)	27,177	124,780	151,957		S*
Duston Parish Council	10,355	41,529	51,884		S
Earls Barton Parish Council	1,390	6,087	7,477		S
East Hunsbury Parish Council	4,010	11,218	15,228		S
East Hunsbury Primary Academy	33,121	131,166	164,287	Y	S
East Midlands MAT HQ	-	-	-		S
Eastfield Academy	10,766	35,476	46,242		S
Easy Clean (Campion Sch)	1,756	6,224	7,979		Ad
Easy Clean Contractors Limited (St Thomas More Catholic Primary)	216	979	1,195		Ad
Easy Clean Contractors Ltd (St Brendan Pri)	513	3,318	3,830		Ad
Ecton Brook Primary (Academy)	40,802	146,045	186,846		S

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Ecton Village Academy	3,782	15,140	18,922		S
Elizabeth Woodville Academy	42,327	157,856	200,183		S
emPSN Services Ltd (pre. EMBC)	22,611	55,436	78,047		Ad
Exeter - a learning community	43,190	138,126	181,316		S
Fairfields Special (NCC)	62,175	283,805	345,980		S*
Falconers Hill Academy	9,527	35,543	45,070		S
Falconers Hill Infant School	14,108	54,304	68,412		S
Farthinghoe Primary School	2,952	11,021	13,973		S
Finedon Infants School	11,528	43,796	55,323		S
Finedon Mulso CEVA Junior School	9,748	37,010	46,758		S
Finedon Town Council	1,476	6,720	8,195		S
Freemans Endowed Church of England Junior School	16,271	55,616	71,887		S
Fresh Start Catering Limited	631	2,787	3,418		Ad
Friars Academy	41,794	146,669	188,463		S
Futures Housing Group	27,065	315,660	342,725		Ad
Gateway School (NCC)	26,473	116,150	142,624		S*
Gayton Church Of England Primary School	7,876	35,159	43,035		S
Glaphthorn Church of England Primary School	6,310	22,972	29,281		S
Grand Union Housing Group	69,478	340,256	409,735		Ad
Grange Park Parish Council	2,004	7,750	9,754		S
Grange Primary Academy	18,992	70,465	89,457		S
Great Addington CEVA Academy	5,148	19,287	24,435		S
Greatwell Homes	30,496	14,513	45,009		Ad
Green Oaks Academy	14,615	57,611	72,227		S

Management and Financial Performance (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Greenfields Primary School and Nursery	22,102	72,887	94,989		S
Greenfields School & Sports College	46,576	159,916	206,492		S
Greens Norton Primary School	9,245	34,388	43,633		S
Gretton Primary School	7,915	26,625	34,541		S
GSO Limited (Prince William and Stimpson Avenue)	2,002	8,227	10,229		Ad
Guildenbury CEVA Primary School	8,495	33,072	41,567		S
Guildenbury School (Academy)	55,181	179,669	234,849		S
Hall Meadow Primary School	21,719	65,763	87,482		S
Hardingstone Academy	10,991	38,091	49,082		S
Harlestone Primary School (NCC)	3,881	18,062	21,943		S*
Hartwell Primary (Academy)	10,237	34,288	44,525		S
Havelock Infants	15,689	57,907	73,596		S
Havelock Junior	17,980	66,946	84,925		S
Hawthorn Community Primary	14,209	53,218	67,427		S
Hazel Leys Primary & Nursery School	17,539	78,235	95,774		S
Headlands Primary (Academy)	49,851	185,286	235,137		S
Henry Chichele Primary School (NCC)	21,510	99,420	120,930		S*
Higham Ferrers Junior School (NCC)	18,913	85,200	104,113		S*
Higham Ferrers Nur & Inf sch (NCC)	19,240	86,241	105,481		S*
Higham Ferrers Town Council	3,510	13,112	16,622		S
Hopping Hill Primary (NCC)	24,448	110,433	134,880		S*
Hospital and Outreach Education PRU	19,849	69,717	89,566		S
Hunsbury Park Primary (NCC)	22,257	107,622	129,879		S*
Huxlow Science College	45,801	172,657	218,458		S
IDVerde	38,296	92,263	130,559		Ad

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Innovate Services Ltd (Campion School)	2,101	10,518	12,619		Ad
Irchester Primary	23,250	96,943	120,194		S
Irthlingborough Junior School	27,197	100,287	127,483		S
Irthlingborough Nursery & Infants School	16,784	63,873	80,657		S
Irthlingborough Town Council	8,545	34,583	43,128		S
Isebrook College Academy	107,860	337,112	444,971		S
Isham C of E Primary Academy	4,213	20,018	24,231		S
Just Ask Estate Services Limited	6,532	28,849	35,381		Ad
Kettering Buccleuch Academy	83,308	245,994	329,302		S
Kettering Park Infants Academy	12,886	63,171	76,056		S
Kettering Park Junior Academy	20,949	82,375	103,324		S
Kettering Science Academy (including Compass Primary)	94,719	293,300	388,019		S
Kier (May Gurney Fleet & Passenger)	24,387	119,106	143,493		Ad
Kier (May Gurney Ltd)	27,943	50,779	78,722		Ad
Kier (May Gurney Nordis)	16,502	55,201	71,703		Ad
Kilsby Academy	5,883	20,021	25,903		S
Kings Heath Primary Academy	18,256	61,085	79,341		S
Kings Sutton Primary Academy	8,002	29,379	37,381		S
Kingsley Primary School	18,864	71,945	90,809		S
Kingsley Special Academy	65,055	245,602	310,657		S
Kingsthorpe College	61,930	240,222	302,153		S
Kingsthorpe Grove P (NCC)	34,288	156,305	190,592		S*
Kingswood Catering (Bridgstock Lathams)	363	1,689	2,052		Ad
Kingswood Catering (Little Harrowden Primary)	387	1,323	1,710		Ad

Management and Financial Performance (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Kingswood Primary Academy	16,547	70,202	86,749	S	
Kingswood Secondary Academy	73,633	293,969	367,603	S	
Kislingbury C of E Primary Academy	6,689	27,276	33,965	S	
Latimer Arts College (NCC)	49,397	215,933	265,330	S*	
Legacy Leisure Ltd	997	5,263	6,260	Ad	
Lings Primary (Academy)	21,725	70,930	92,655	S	
Little Harrowden Community Primary School	10,644	35,874	46,519	S	
Loatlands Primary Academy	25,507	94,529	120,037	S	
Loddington C of E Primary School	7,276	24,132	31,408	S	
Lodge Park Academy	42,434	159,912	202,346	S	
Lumbertubs Primary Academy	14,573	52,553	67,126	S	
Magdalen College (Academy)	66,266	251,791	318,058	S	
Maid Marions Ltd	299	1,118	1,417	Ad	
Malcolm Arnold Academy	47,347	148,319	195,666	S	
Malcolm Arnold Prep (DRET)	14,857	47,181	62,038	S	
Manor School Sports College	63,099	208,808	271,907	S	
Maplefields Academy	44,429	156,254	200,683	S	
Mawsley Primary (NCC)	17,031	76,897	93,928	S*	
Maxim Facilities Management Ltd	1,951	7,492	9,443	Ad	
Meadowside Primary School	26,256	117,521	143,776	S*	
Mears Ashby C of E Endowed School	4,534	14,570	19,104	S	
Middleton Cheney Academy	20,115	70,060	90,175	S	
Millbrook Infant (NCC)	15,694	71,238	86,932	S*	
Millbrook Junior School	26,681	121,770	148,450	S*	
Milton Parochial Primary School	4,733	19,318	24,051	S	
Miquill South LTD (Whitefriars School)	916	4,264	5,180	Ad	

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Mitie Care & Custody Ltd	37,571	123,540	161,111	Ad	
Montsaye Academy	63,635	194,124	257,759	S	
Moulton College	233,801	833,404	1,067,206	S	
Moulton Parish Council	9,353	34,601	43,953	S	
Moulton Primary School (NCC)	33,232	151,865	185,097	S*	
Moulton School and Science College	69,957	222,066	292,023	S	
Naseby Academy	3,569	12,848	16,416	S	
Newnham Primary Academy	5,569	22,777	28,346	S	
Newton Road School	23,262	76,044	99,306	S	
Nicholas Hawksmoor Primary School	59,421	219,993	279,414	S	
North Northants Council	4,763,248	21,680,080	26,443,328	S	
Northampton Academy	74,573	214,291	288,864	Y S	
Northampton Borough Council	-	56,754	56,754	S	
Northampton College	378,692	1,411,597	1,790,289	S	
Northampton High School (Girl's Day School Trust)	18,668	123,546	142,214	Ad	
Northampton International Academy	76,268	280,074	356,343	S	
Northampton Partnership Homes Ltd	564,179	3,056,686	3,620,864	S	
Northampton School for Boys	83,060	263,526	346,586	S	
Northampton School for Girls Academy	58,221	296,609	354,831	S	
Northampton Theatres Trust LTD	11,981	151,464	163,445	Ad	
Northampton Town Council	13,060	43,813	56,873	Y S	
Northamptonshire County Council	38,198	526,834	565,032	AA	
Northamptonshire Carers	5,860	21,142	27,002	Ad	
Northamptonshire Fire & Rescue Service	150,299	401,612	551,912	S	
Northamptonshire Sport	35,995	89,461	125,456	Ad	

Management and Financial Performance (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Northants Chief Constable	1,900,444	6,103,564	8,004,008		S
Northants Music & P/A Trust	5,116	-	5,116		Ad
Northants Police & Fire Crime Commissioner	113,833	310,778	424,611		S
Northgate Sch Arts (Academy)	102,807	317,186	419,992		S
NSL Ltd	2,624	-	2,624		Ad
Oakley Vale Primary School	16,894	54,791	71,685		S
Oakway Academy	21,296	88,036	109,332		S
Old Stratford Primary School	9,876	40,081	49,957		S
Olympic Primary School Academy	17,729	65,799	83,528		S
Oundle C of E Primary School	18,800	67,009	85,809		S
Oundle Town Council	3,572	14,052	17,624		S
Our Lady Immaculate Catholic Academies Trust HQ staff	20,083	54,348	74,431		S
Our Lady of Walsingham Catholic Primary School	21,525	75,214	96,740		S
Our Ladys Catholic Primary School	26,546	136,543	163,089		S
Overstone Primary School	8,962	40,422	49,383		S*
Park Junior School	21,080	93,531	114,611		S*
Parklands Primary School	15,655	61,013	76,668		S
Parkwood Leisure Ltd (formerly The Castle Theatre)	1,077	4,093	5,171		Ad
Pathfinder Legal Services Ltd (NCC)	112,308	388,204	500,512		S
Paulerspury C of E Primary (NCC)	6,788	30,086	36,875		S*
Pboro Diocese Ed. Trust (HQ)	52,889	126,190	179,079		S
Pineham Barns Primary School (Free School)	14,935	48,367	63,303		S
Pitsford Primary School	3,739	17,403	21,141		S*

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Places For People Leisure Management Ltd	6,879	-	6,879		Ad
Polebrook C of E Primary School	4,829	22,182	27,011		S
Preston Hedge's Primary (Academy)	31,758	97,581	129,340		S
Prince William Academy	21,737	96,129	117,866		S
Priors Hall - A Learning Community	19,186	72,631	91,817		S
Prospects Services	8,973	-	8,973		Ad
Purple Oaks Academy	31,115	113,765	144,880		S
Pytchley Endowed CEVA Primary School	4,839	22,093	26,932		S
Queen Eleanor Primary Academy	14,292	51,928	66,219		S
Raunds Park Infant School	6,069	29,070	35,138		S
Raunds Town Council	6,593	27,829	34,422		S
Rectory Farm Primary Academy	15,463	56,076	71,539		S
Red Kite Academy	50,921	160,520	211,441		S
Redwell Primary School	18,472	92,552	111,024	Y	S
Redwell Primary School (NCC)	14,334	65,299	79,633		S*
Ringstead C of E Primary Academy	11,204	37,227	48,431		S
Road Primary School	16,167	73,726	89,894		S*
Rockingham Forest Trust	4,343	9,731	14,074		Ad
Rockingham Primary Academy	15,332	53,100	68,431		S
Rothwell Junior School	17,469	65,276	82,745		S
Rothwell Town Council	1,079	4,504	5,583		S
Rothwell Victoria Infants School	15,292	56,222	71,514		S
Rowan Gate Primary (NCC)	91,604	409,467	501,071		S*
Rushden Academy	43,870	153,294	197,164		S
Rushden Primary Academy	21,032	71,135	92,168		S
Rushden Town Council	16,734	61,593	78,326		S

Management and Financial Performance (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Rushton Primary Academy	5,646	21,233	26,879		S
Ruskin Infant and Nursery School	16,328	66,415	82,744		S
Ruskin Junior Academy	15,805	66,629	82,434		S
Shaw Healthcare	9,503	-	9,503		Ad
Silverstone C of E Primary Academy	12,319	48,056	60,375		S
Silverstone UTC	32,971	84,321	117,292		S
Simon de Senlis Primary Academy	23,727	94,725	118,452		S
Sir Christopher Hatton Academy	75,872	230,379	306,251		S
South End Infant School	20,295	92,219	112,515		S*
South End Junior School (NCC)	19,552	89,506	109,057	Y	S*
South Northants Council	42,106	96,911	139,017		S
Southfield Primary Academy	9,959	40,538	50,496		S
Southfield School for Girls	47,134	160,260	207,393		S
Sponne School (Academy)	87,703	281,275	368,978		S
Sports & Leisure Management (Everyone Active)	2,415	6,689	9,104		Ad
Spratton C of E Primary School	2,795	11,204	13,999		S
Spring Lane Primary School	19,372	70,871	90,243		S
St Andrews Primary Academy	19,899	66,267	86,166		S
St Barnabas	10,946	39,469	50,415		S
St Brendan's Catholic Primary School	11,716	61,191	72,907		S
St Edwards Catholic Primary	11,523	48,111	59,633		S
St Gregory's Catholic Primary School	19,841	78,698	98,539		S
St James C of E Primary School	37,860	132,705	170,565		S
St James Infant School	14,558	48,461	63,019		S
St Loy C of E Primary Academy	2,817	11,421	14,238		S
St Lukes CEVA Primary School Academy	18,500	74,529	93,029		S
St Marys Catholic Primary School	11,097	49,073	60,171		S

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
St Mary's CEVA Pri Acad Kettering	18,729	71,229	89,958		S
St Mary's Pri Acad, Burton Latimer	17,197	60,467	77,664		S
St Particks Primary (NCC)	14,690	65,973	80,663		S*
St Peters's C of E Academy	8,539	30,180	38,719		S
St Thomas More Catholic Primary School	10,599	47,270	57,870		S
Standens Barn Primary School	18,205	69,380	87,585		S
Stanwick Academy	8,608	36,938	45,547		S
Stanwick Parish Council	1,102	4,826	5,928		S
Staverton C of E Pri Academy	7,100	33,970	41,070		S
Stimpson Avenue Primary Academy	17,425	67,148	84,573		S
Stoke Bruerne Church Of England School	3,976	18,508	22,484		S
Studfall Infant School & Nursery Academy	27,754	138,406	166,160		S
Studfall Junior School Academy	28,209	123,928	152,138		S
Sunnyside Primary (Academy)	12,301	48,284	60,586		S
Sywell CEVA Primary School	5,025	20,792	25,816		S
Taylor Shaw (Ferrers School)	2,670	10,486	13,157		Ad
The Abbey Primary School	15,399	60,026	75,425		S
The Arbours Primary (Academy)	17,076	55,639	72,715		S
The Avenue Infants School (NCC)	13,728	61,772	75,500		S*
The Bramptons Primary School	4,219	19,717	23,936		S*
The Children's Trust	2,004,810	5,999,745	8,004,555	Y	S
The Coombs Catering Partnership (The Good Shepherd Primary Academy)	382	1,793	2,176		Ad
The Duston School (Academy)	81,138	225,084	306,222		S
The Ferrers School Academy	44,799	150,461	195,260		S
The Good Shepherd Catholic Primary School	15,766	83,615	99,381		S
The Parker E-ACT Academy	199,639	450,358	649,997		S

Management and Financial Performance (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
The Spires Academy	12,347	45,650	57,997		S
The University of Northampton	1,207,203	4,618,315	5,825,517		S
Thomas Becket Catholic School	30,233	134,743	164,976		S
Thorplands Primary (Academy)	17,067	58,927	75,994		S
Tharptston Primary (NCC)	30,574	137,752	168,325		S*
Thrapston Town Council	2,911	10,875	13,787		S
Tiffield Church of England Voluntary Aided Primary School	4,385	20,004	24,389		S
Towcester C of E Primary School (Acad)	16,951	82,045	98,996		S
Towcester Town Council	4,668	18,836	23,504		S
Trinity C of E Primary School	6,005	23,691	29,696	Y	S
TTC 2000 Limited	726	2,268	2,994		Ad
Uni of Northampton Enterprises	25,073	-	25,073		Ad
UNITY LEISURE TRUST	50,716	18,915	69,631		Ad
Upton Meadows	28,892	103,836	132,728		S
Upton Parish Council	907	3,682	4,589		S
Veolia UK Ltd	67,762	225,503	293,265		Ad
Vernon Terrace Primary (NCC)	20,027	92,109	112,136		S*
Victoria Primary Academy	25,589	85,929	111,518		S
Voice for Victims and Witnesses Ltd	20,275	65,489	85,764		Ad
Walgrave Primary School	9,566	44,502	54,068		S*
Wallace Road Nursery School	-	26,497	26,497		S*
Warwick Primary Academy	18,713	57,090	75,803		S
Waynflete Infants' (Academy)	7,088	33,210	40,298		S
Weavers Academy	64,142	240,449	304,590		S
Weedon Bec Parish Council	1,348	5,999	7,347		S
Weedon Bec Primary School	22,790	76,612	99,402	Y	S
Weldon Parish Council	-	5,000	5,000		S
Weldon Primary Academy	9,276	42,799	52,075		S

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased	Body
Welford, Sibbertoft and Sulby Endowed School	3,103	13,097	16,200		S
Wellingborough Norse Limited	66,745	-	66,745		Ad
Wellingborough Town Council	5,214	15,463	20,677		S
Welton C of E Primary (Academy)	6,807	22,832	29,639		S
West Haddon Parish Council	1,783	8,428	10,211		S
West Northants Council	5,093,162	23,600,930	28,694,092		AA
Weston Favell Academy	66,090	227,956	294,046		S
Weston Favell C of E Primary School	29,236	105,657	134,893		S
Whitefriars Primary School	24,857	112,090	136,947		S*
Whitehills Primary (NCC)	21,072	97,023	118,096		S*
Whittlebury Church of England Primary School	4,401	20,291	24,692		S
Wilbarston Primary Academy	6,989	19,898	26,887		S
Windmill Primary School	20,324	75,664	95,988		S
Wollaston Primary School	12,021	47,105	59,126		S
Wollaston School (Secondary)	61,324	249,823	311,147		S
Woodford C of E Primary School	6,367	26,816	33,183		S
Woodford Halse C of E Primary Academy	15,180	51,835	67,015		S
Woodland View Primary Academy	19,648	75,973	95,622		S
Woodnewton - A Learning Community	62,425	190,845	253,270		S
Woodvale Primary (Academy)	26,450	85,515	111,965		S
Wootton Parish Council	7,236	26,989	34,225		S
Wootton Park School	60,395	171,318	231,714		S
Wootton Primary (Academy)	23,465	81,010	104,475		S
Wren Spinney Community Academy	42,513	187,061	229,575		S
Wrenn School	71,525	263,801	335,326		S
WSP Management Services LTD	30,601	-	30,601		Ad
Yardley Hastings Primary	8,017	37,372	45,389		S*
Grand Total	24,667,626	98,109,147	122,776,773		

Investment Policy and Performance

Introduction

The Fund's approach to its investment arrangements is set out in its Investment Strategy Statement, (ISS) as required by Regulation 7 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 ("the Regulations") that requires the Fund to create and maintain an approach to investments that includes, amongst other things:

- a requirement to invest fund money in a wide variety of investments;
- the Fund's assessment of the suitability of different types of investments;
- the Fund's approach to risk, including the ways in which risks are assessed and managed;
- the Fund's approach to pooling investments;
- the Fund's policy on how social, environmental and corporate governance considerations are taken into account; and
- the Fund's policy on the exercise of the rights (including voting rights) attaching to investments.

The Pensions Committee (PC) approves investment policies and strategy and an Investment Sub-Committee (ISC), which is supported by the Fund's Advisors, to implement these investment policies and strategy, which includes the appointment and dismissal of Investment Managers and monitoring of performance.

The Fund adopts a long-term perspective, focussing its investment strategy to generate sustainable returns on a risk adjusted basis to grow the Fund's assets to reflect its equally long-term future liabilities. The Pensions Committee, Local Pensions Board, Fund officers and professional advisors have worked hard to develop an enhanced responsible investment (RI) policy, which forms part of our overall investment strategy. The new RI policy sets out our approach to sustainable responsible investment and will help us manage the carbon and climate risks impacting our investments better.

The RI policy was agreed following a consultation that was open to scheme members and scheme employers. You can find a copy of the summary consultation responses and an updated investment strategy statement on our [key documents page](#).

The revised RI policy will inevitably mean some changes to our underlying investments over time. In February 2022, the Investment Sub Committee approved decarbonisation targets to reduce the carbon emissions of listed equities by 25% by 2024 and by 59% by 2030 together with a climate action plan for 2022, 2023 and beyond.

The Fund intends decarbonising the portfolio at the same rate as the European Policy Curve (EPC) meaning the Funds decarbonisation pathway would align with Paris Accord and achieve the ambitions target to reach net zero by 2050 or earlier.

Progress against these targets will be reviewed regularly via a climate dashboard setting out key carbon metrics which will be measured and tracked over time. Regular communication will be provided on how the Fund is progressing on its journey to achieve net zero.

You can find copies of the Funds climate action plan, decarbonisation pathway, and climate dashboard on the [key documents page](#).

The Fund is a member of the Local Authority Pension Fund Forum (LAPFF), which is a voluntary association of LGPS funds that seeks to protect and enhance the value of its members' shareholdings by way of shareholder engagement, by action on corporate governance issues and by seeking to promote the highest standards of corporate social responsibility at the companies in which LAPFF members invest. Through LAPFF, the Fund exercises its belief that engagement with company management to promote improvements in SRI practices is more powerful than divesting from the company's shares.

The Fund will continue to support the principles of the UK Stewardship Code (the "Stewardship Code") in the following year.

Information about Investment Manager voting is available at [Northamptonshire Pension Fund Key Documents](#)

Investment Policy and Performance (continued)

Role of Investment Managers

Each Investment Manager relationship is governed by an Investment Management Agreement, which sets out how much they can invest, the asset class in which the Fund has employed them to invest, the expected target return and how much the Fund will pay for this service.

Active focus

The Fund with the exception of the passive Global Equity mandate and passive index-linked bonds, favours “active” briefs to outperform agreed specific benchmarks.

Custodian

The Fund’s Custodian is Northern Trust. The Custodian is responsible for ensuring that the Fund has good title to all investments, that all trades instructed by Investment Managers are settled on time and that all income due to the Fund is received and recorded accurately. Northern Trust also maintain the investment accounting records for the Fund.

Asset Pooling

The Fund is working with ten like-minded LGPS funds to implement the ACCESS asset pool in response to the Government’s LGPS reform agenda. The main aim is to encourage LGPS Funds to work together to form asset pools to “pool investments to significantly reduce costs, while maintaining investment performance.” Individually, the participating funds have a strong performance history and potential for substantial benefits for a group of successful, like-minded authorities collaborating and sharing their collective expertise. Collectively as at 31st March 2022, the ACCESS Pool has significant scale with assets of £60bn (of which 58.5% has been pooled) serving 3,500 employers with 1.2 million members including 310,000 pensioners.

The roles and decision-making relationship between the eleven funds is informed by an Inter Authority Agreement. The ACCESS pool is governed by the ACCESS Joint Committee (AJC) comprising the Chairmen of the eleven constituent funds. The AJC have appointed Link Fund Solutions Ltd (Link) as operator of the pool and the LF ACCESS Authorised Contractual Scheme (ACS).

The Fund’s passive equity investments are invested with UBS Asset Management under a collaborative arrangement with fellow ACCESS funds, which has generated significant fee savings for the Fund.

At 31 March 2022, the Northamptonshire Fund had invested £1,494m in sub-funds of the ACCESS Authorised Contractual Scheme and £1,031m in the UBS passive arrangement resulting in £2,525m of assets under pool management representing 75.3% of the Fund’s assets.

During 2022-23 the Fund expects further investment in fixed income sub-funds of the ACS when they become available. The focus for ACCESS in 2022-23 is to continue work performed in 2021-22 to develop a pooled solution for Alternative asset classes. In December 2021, MJ Hudson were appointed implementation advisor for the Pool’s alternative assets.

The ACCESS Support Unit (ASU) has been created to manage the Operator contract against specified KPIs and provide technical and secretariat support services to the AJC and Officer Working Group (OWG).

In addition to the savings in Investment Management fees through joint investments, there are other tangible benefits from pooling including a governance dividend (potential for reduced risk due to manager diversification achieved at pool level) and tax savings.

More information about the ACCESS asset pool can be found on their website: [ACCESS Pool](#). The ACCESS Annual Report can be found at Appendix A to the Annual Report.

Investment Policy and Performance (continued)

The Costs of Pooling

The costs of the pool are collected by a nominated ACCESS authority and re-charged in equal shares to the eleven ACCESS funds.

Northamptonshire's share of costs is reported within Oversight and Governance Costs in Note 11 to the Statement of Accounts and comprises the following:

Operational Costs	2021-22 £000	2015-16 to 2021-22 Cumulative £000
Strategic & Technical	32.6	161.6
Legal	15.0	112.0
Project Management	0.0	81.1
ACCESS Support Unit	44.9	160.5
Other	2.7	29.4
Total Operational Costs	95.2	544.6

Cost Transparency - continued

	Asset Pool			Non- Asset Pool			Fund Total	
	Direct	Indirect	Total	Direct	Indirect	Total		
	£000	£000	£000	£000	£000	£000	£000	£000
Investment Management Fee	5,542	338	5,880	3,684	1,624	5,308	11,188	
Performance Fee	0	0	0	2,015	2,191	4,206	4,206	
Transaction taxes	0	0	0	299	138	437	437	
Broker commissions	0	182	182	43	25	68	250	
Other explicit costs	0	492	492	58	27	85	577	
Implicit/indirect transaction costs	0	316	316	-2	570	568	884	
Administration	300	0	300	268	638	906	1,206	
Governance and Compliance	21	0	21	132	233	365	386	
Other	-13	40	27	537	1,890	2,427	2,454	
Total	5,850	1,368	7,218	7,034	7,336	14,370	21,588	

Cost Savings

The fee savings for the 2021-22 financial year resulting from the asset pooling agenda exceed £2.114m.

Cost Transparency

The analysis below shows the investment expenses incurred during financial year 2021-22 between expenses incurred in respect of Pooled Assets held in the ACCESS Pool and those assets held outside of the pool. Direct costs include invoiced costs and costs deducted from the value of fund, or from income generated, in accordance with the fee agreement in place with each manager and explicit transaction costs. Indirect costs include implicit costs and third-party fees and charges. These are indicative estimates provided by Investment Managers as the reporting practices for the Cost of Transparency are still evolving.

Investment Policy and Performance (continued)

Investment Allocation and Performance

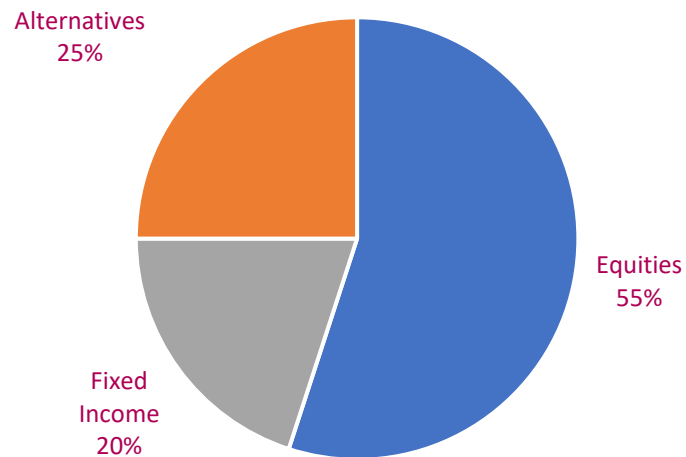
The Pension Fund Committee is responsible for approving the Strategic Asset Allocation proposed by the Investment Sub-Committee (ISC). The ISC performed a full review of the Strategic Asset Allocation during 2018-19 in conjunction with the Fund's Investment Consultants, Mercer Ltd and independent Investment Advisor. The review assessed the appropriateness of the current strategy and any changes necessary to increase the likelihood of meeting the Fund's objectives, namely:

- To reach full funding and be in a position to pay benefits as they fall due; and
- To ensure contributions remain affordable to employers

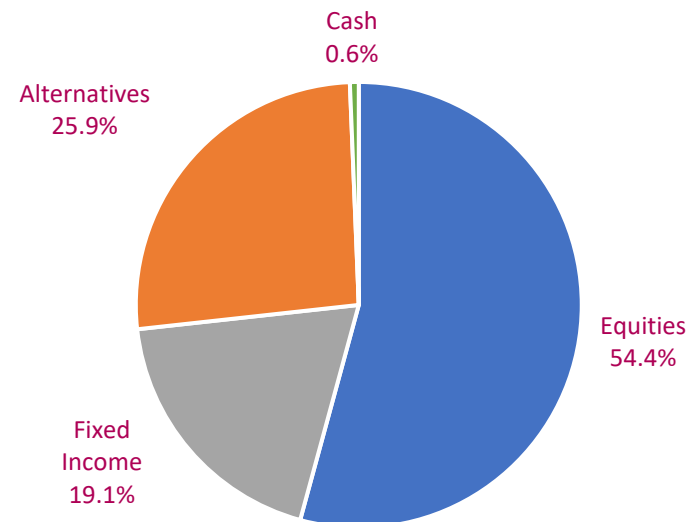
The strategy approved by the Pension Committee in December 2018 aimed to reduce the Fund's reliance upon, and the associated risks, of a large allocation to equities whilst retaining sufficient exposure to growth assets. The strategy focused on a reduction in equities and an increase in Alternative assets (such as Private equity and Infrastructure) and a flexible allocation to fixed income. The ISC subsequently reviewed the regional mix within the equity allocation and as a result reduced the exposure to UK Equities in conjunction with the roll-out of sub-funds offered by the ACCESS pool ACS.

The charts below show the Strategic Asset Allocation at the close of the financial year compared to the actual allocation of assets as at 31 March 2022.

Strategic Allocation at 31 March 2021



Asset Allocation at 31 March 2022



Investment Policy and Performance (continued)

Value of Investments held by each of the Fund's Investment Managers on 31 March 2021 and 31 March 2022:

Manager	31 March 2021		31 March 2022	
	£million	% of Total	£million	% of Total
Equities				
Majedie UK Equity	278.3	9.0	293.9	8.8
UBS UK Passive Equity	24.5	0.8	27.4	0.8
Newton Global Equity	284.1	9.2	313.7	9.4
Baillie Gifford - Long Term Global Growth	259.5	8.4	223.3	6.7
Longview Global Equity	250.7	8.1	286.5	8.5
UBS Passive Global Equity	634.7	20.5	676.5	20.2
Fixed Income				
UBS Index Linked Gilts	311.8	10.1	327.1	9.8
BlueBay	143.1	4.6	157.1	4.7
M&G Alpha Opportunities	142.3	4.6	154.6	4.6
Alternatives				
CBRE Property	204.5	6.6	248.5	7.4
Baillie Gifford – Diversified Growth	214.4	7.0	221.7	6.6
M&G Real Estate	44.5	1.4	60.8	1.8
HarbourVest	68.9	2.2	104.6	3.1
Adams Street	44.0	1.4	82.3	2.5
AMP Capital	38.1	1.2	34.7	1.0
Allianz	20.1	0.7	17.1	0.5
IFM Infrastructure	48.1	1.6	58.3	1.7
JP Morgan	45.6	1.5	44.7	1.3
Catapult	0.5	0.0	0.5	0.0
Cash				
	33.8	1.1	21.5	0.6
Total	3,091.5	100.0	3,354.8	100.0

Investment Policy and Performance (continued)

Total Fund Performance

The total investment return for the Fund over the financial year was 8.2% net of fees compared with a weighted benchmark return of 10.8%. In the previous year the total investment return was 27% compared with a weighted benchmark of 22.9%. The Fund's total investment return was 9.6% p.a over the three years to 31 March 2022, 7.7% p.a over the five years to 31 March 2022, and 9.3% p.a over the ten years to 31 March 2022.

Performance of Managers

The ISC continues to monitor the Investment Managers' performance against their benchmark at their quarterly meetings. All managers are measured against market-based performance benchmarks with bespoke outperformance targets set for active managers which are expected to be met over a three to five year period. Net of fees performance of each manager compared to benchmark over one, three and ten years is shown in the table below.

Asset Class /Manager	1 year (% p.a)			3 year (% p.a)			10 year (% p.a)		
	Return	Benchmark	Variance	Return	Benchmark	Variance	Return	Benchmark	Variance
Majedie UK Equity	5.6	13.0	-7.4	3.3	5.3	-2.0	7.1	7.2	-0.1
Newton – Global Equity	10.8	12.4	-1.6	13.9	13.4	0.5	13.2	12.1	1.1
Baillie Gifford - Long Term Global Growth	-13.9	12.4	-26.3	n/a	n/a	n/a	n/a	n/a	n/a
Longview Global Equity	14.6	12.4	2.2	n/a	n/a	n/a	n/a	n/a	n/a
UBS – Passive Equity	10.4	10.3	0.1	11.7	11.6	0.1	12.4	12.5	n/a
UBS Index Linked Gilts	4.8	4.8	0.0	2.2	2.2	0.0	n/a	n/a	n/a
BlueBay	-0.8	0.1	-0.9	n/a	n/a	n/a	n/a	n/a	n/a
M&G Alpha Opportunities	0.3	4.1	-3.8	n/a	n/a	n/a	n/a	n/a	n/a
Baillie Gifford - DGF	3.4	3.7	-0.3	3.7	3.9	-0.2	n/a	n/a	n/a
CBRE - Property	19.4	13.1	6.3	4.8	8.1	-3.3	6.3	8.1	-1.8
M&G – Residential Property	4.4	6.0	-1.6	2.4	6.0	-3.6	n/a	n/a	n/a
HarbourVest – Private Equity	6.6	19.8	-13.2	92.2	19.8	72.4	n/a	n/a	n/a
Adams Street – Private Equity	73.9	19.8	54.1	47.8	19.8	28.0	n/a	n/a	n/a
AMP Capital – Infrastructure Debt	11.7	10.0	1.7	5.1	10.0	-4.9	n/a	n/a	n/a
Allianz – Infrastructure Debt	-7.3	4.0	-11.3	3.0	4.0	-1.0	n/a	n/a	n/a
IFM Infrastructure	21.2	10.0	11.2	n/a	n/a	n/a	n/a	n/a	n/a
JP Morgan	3.9	10.0	-6.1	n/a	n/a	n/a	n/a	n/a	n/a

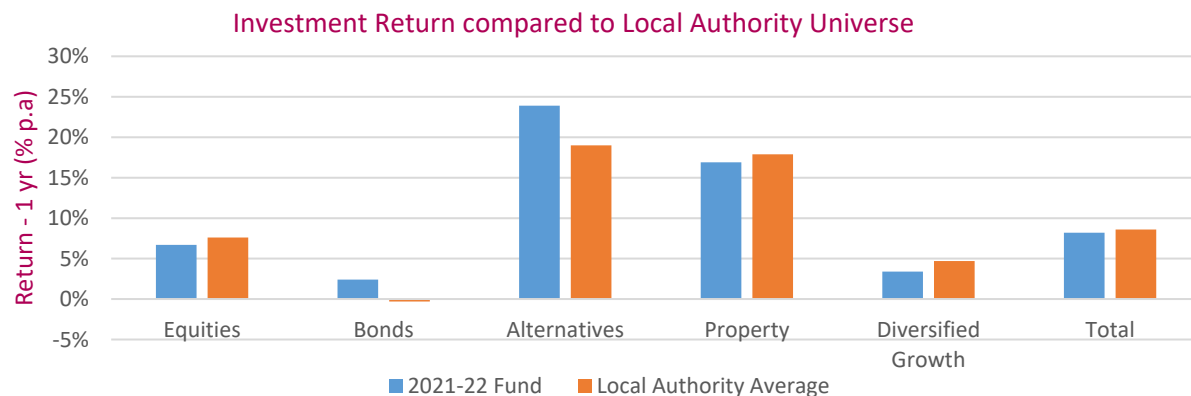
n/a = Not invested for the full period therefore no meaningful performance measure is available

Investment Policy and Performance (continued)

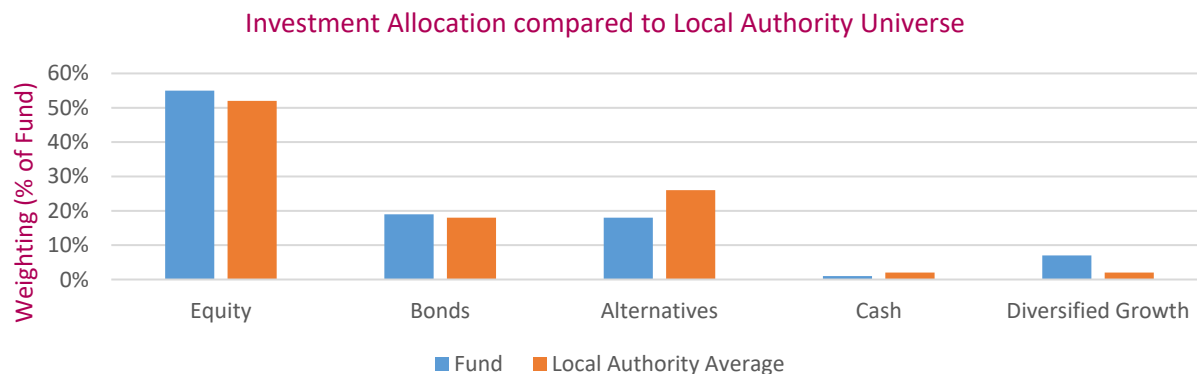
Performance in Comparison with Local Authority Universe

The Local Authority Universe is a national scheme consisting of 63 pension funds collated by PIRC Ltd that provides benchmarking of local authority pension funds investment performance.

In 2021-22 the Fund's performance of 8.2% net of fees over the financial year was ranked 49th percentile out of the 63 Funds participating in the Universe. The investment return achieved was influenced by the Fund's holding of a higher proportion of pooled investments.



The Fund's current strategy has a higher allocation to Equities and a lower allocation to Alternatives when compared to the Local Authority Universe.



Investment Policy and Performance (continued)

Climate Change Report

Executive summary

The Fund recognises the systemic risk associated with climate change and the views and aspirations of other scheme employers and scheme members.

In order to manage this systemic risk and to align with its support of the Paris Agreement and a “just transition”, the Fund currently expects that its investment portfolio will be net carbon neutral by 2050, in line with UK Government’s targets.

The Fund is working to produce climate change reporting that complies with the Task Force on Climate-Related Financial Disclosures (TCFD) framework, expected to become mandatory for LGPS Funds in the coming years. This report provides a summary of the Fund’s position as it relates to climate change, assessed across the four pillars under the TCFD Framework:

- **Governance:** How the Pension Fund Committee maintains oversight and incorporates climate change into its decision making;
- **Strategy:** How potential future climate warming scenarios could impact the Fund;
- **Risk Management:** How climate-related risk is incorporated in the Fund’s broader risk management processes; and
- **Metrics and Targets:** How the Committee measures, and monitors progress against different climate related indicators known as metrics and targets.

Governance

The Administering Authority has delegated to the Pension Fund Committee (“Committee”) the power to determine and maintain the

Fund’s strategies, policies and procedures. Implementation of the strategy and the monitoring of performance is delegated to the Investment Sub-Committee (“ISC”), for which the membership is drawn from the Committee.

Research into how climate-related risks and opportunities impact financial markets is constantly evolving and expanding. The Committee or its ISC receives training on a regular basis to keep up-to-date with developments and will allocate time on meeting agendas to cover items such as climate-change scenario analysis or reporting of metrics.

During the Fund year, the Committee or ISC received various training sessions covering climate-related investment risks and reporting requirements in line with the TCFD recommendations. The Committee acknowledges that the reporting of climate-related risk is relatively new and the collective experience of the Committee and ISC will grow over time.

Climate change will form an explicit agenda item at least annually for the Committee or ISC when the Fund’s annual climate change / TCFD report is updated. It will also be covered as part of other agenda items as part of a wider discussion of funding or investment strategy, or as part of the investment manager appointment and review discussions.

Strategy

Given the uncertainty around the timing and impact of climate-related transition and physical risks, the ISC considered three climate scenarios or ‘warming pathways’ i.e. the expected degrees of warming of the atmosphere by the end of the century relative to pre-industrial levels, to help test the resiliency of the Fund’s investment strategies at the strategic level.

Investment Policy and Performance (continued)

Whilst a lower warming pathway (2°C scenario) is one in which governments, businesses and society should aim for as a minimum, there is a possibility that a failure to reduce GHG emissions quickly enough could set off irreversible feedback loops that significantly warms the planet (as modelled by 3°C and 4°C scenarios).

The Fund will be impacted by climate change, regardless of the scenario that unfolds.

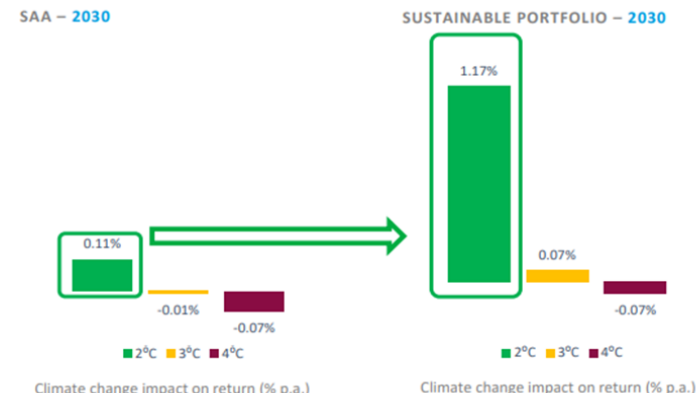
Resilience of the Fund's investment strategy

The table below shows how a 2°C scenario leads to enhanced projected returns for the Fund's investment strategy versus 3°C or 4°C scenarios, with the greatest Impact over the period to 2030.

Warming pathway scenario	Year	Climate change impact on return (% per year)
2°C	2030	0.11%
2°C	2050	-0.05%
2°C	2100	-0.07%
3°C	2030	-0.01%
3°C	2050	-0.06%
3°C	2100	-0.09%
4°C	2030	-0.07%
4°C	2050	-0.13%
4°C	2100	-0.16%

Transition opportunities emerge from a 2°C scenario

The graphic to the right illustrates the benefits of investing sustainably (i.e. in a portfolio broadly aligned with the Fund's investment strategy but where asset class exposures are mapped to sustainable equivalents).



Under the 2°C scenario, to 2030, the Sustainable Portfolio is expected to benefit by up to +15.0% on a cumulative basis, compared with the Fund's current investment strategy.

Key findings of the analysis

Investing for a 2°C scenario is both an imperative and an opportunity the Fund should address.

- An imperative, since, for nearly all asset classes and timeframes, a 2°C scenario leads to enhanced projected returns versus 3°C or 4°C and a better investment outcome.
- An opportunity, since, although incumbents can suffer losses in a 2°C scenario, there are many notable investment opportunities enabled in a low-carbon transition, including sustainability themed investments in listed and private equities to infrastructure and fixed income.

Climate scenario analysis is an ever evolving space and, as such, the scenarios modelled and reported may be subject to review in future periods. It is important to note that the modelling may understate the true level of risk due to the uncertainty around the future economic impacts of climate change.

Investment Policy and Performance (continued)

Risk Management

This section summarises the primary climate-related risk management processes and activities carried out for the Fund. These assist with understanding the materiality of climate-related risks, both in absolute terms and relative to other risks that the Fund is exposed to.

Governance	<p>The Fund recognises the systemic risk associated with climate change and the views and aspirations of other scheme employers and scheme members.</p> <p>The Fund has acknowledged the risk to the Fund of climate change in its Risk Register: “As long-term investors, the Fund believes climate risk has the potential to significantly alter the value of the Fund’s investments.”</p> <p>The Officers maintain a Climate Action Plan which is reviewed and updated on a regular basis. This document forms part of the ISC’s wider business plan and summarises the progress, actions and outcomes of scheduled climate-related investment projects and tasks.</p>
Strategy	<p>The Fund’s advisers will take climate-related risks and opportunities into account as part of the wider strategic investment advice provided to the Committee and ISC. This includes highlighting the expected change in climate-risk exposure through proposed asset allocation changes, both from the top-down level (via climate scenario analysis) and bottom-up (via climate-related metrics). Climate scenario analysis for the investments of the Fund will be reviewed periodically.</p>

Reporting	<p>The ISC will receive an annual climate dashboard providing an update on climate-related metrics and progress against targets in respect of the assets held in the Fund. The ISC may use the information to engage with the Fund’s investment managers.</p> <p>A quarterly stewardship monitoring report is being introduced in 2022-23 which summarises how the investment managers choose to vote and engage on climate-related issues (among other key engagement priorities).</p>
Manager selection and retention	<p>The ISC, with advice from its advisers, will consider an investment manager’s firm-wide and strategy-specific approach to managing climate-related risks and opportunities when either appointing a new manager, in the ongoing review of a manager’s appointment, or as a factor when considering the termination of a manager’s appointment.</p>

What are the climate-related risks and opportunities?

The Fund has considered two types of climate-related risks and opportunities in its climate scenario analysis:

1. Transition risks and opportunities

This covers the potential financial and economic risks and opportunities from the transition to a low-carbon economy (i.e. one that has a low or no reliance on fossil fuels), in areas such as:

- Policy and legislation
- Market
- Technology
- Reputation

Investment Policy and Performance (continued)

Risks include the possibility of future restrictions, or increased costs, associated with high carbon activities and products.

There are also opportunities, which may come from the development of low-carbon technologies. In order to make a meaningful impact on reducing the extent of global warming, most transition activities need to take place over the next decade and certainly in the first half of this century.

2. Physical risks and opportunities

The higher the future level of global warming, the greater physical risks will be in frequency and magnitude. Physical risks cover:

- Physical damage (storms; wildfires; droughts; floods)
- Resource scarcity (water; food; materials; biodiversity loss)

Physical risks are expected to be felt more as the century progresses though the extent of the risks is highly dependent on whether global net zero greenhouse gas emissions are achieved by 2050.

There are investment opportunities, for example, in newly constructed infrastructure and real estate that are designed to be resilient to the physical impacts of climate change, as well as being constructed and operated in a way that have low or no net carbon emissions. There are also opportunities for investment in those companies or industries that focus on energy conservation and resource efficiency.

Metrics and targets

Metrics

The primary metrics that are used by the Fund to measure climate-related impact are:

- Absolute emissions. This is the total emissions of seven major GHGs associated with the investments held (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulphur hexafluoride and nitrogen trifluoride).

- Carbon footprint. This is the total emissions per million pounds invested.
- Weighted average carbon intensity (WACI). This is the total emissions per million pounds of sales

Limitations of emissions data

The Fund is aware of issues around data quality, in particular carbon data for many private companies, governments and asset classes is not currently sufficiently robust to set targets against. The Fund has therefore focused on the listed equity portfolio initially, given data quality is more robust within this asset class and it comprises a majority of the Fund's strategic investment portfolio. The Fund will seek to include other asset classes in its carbon reporting as this data quality improves over time.

The Fund is also aware that Scope 3 emissions data, i.e. covering indirect emissions from the value chain such as those embedded in material inputs or freight, is an area that needs development and as such it is not included in the Fund's target-setting process. However, the Fund will continue to collect this data to inform its engagement with investment managers.

Targets

The Fund's overall climate-related objective is to align its portfolio with a 'pursue efforts towards 1.5°C' objective - i.e. net zero by 2050.

The Fund uses absolute emissions as the base line measure for a de-carbonisation pathway as it:

- Gives a 'real world' measure of the amount of carbon the Fund's portfolio is responsible for emitting
- Less likely to be susceptible to skews from carbon offsetting
- Less impacted by other external factors such as corporate sales due to changes in wholesale prices e.g. oil and gas prices

Investment Policy and Performance (continued)

On this basis, the Fund has also set interim targets for the listed equity portfolio in order to make progress towards the Fund's overall climate objective:

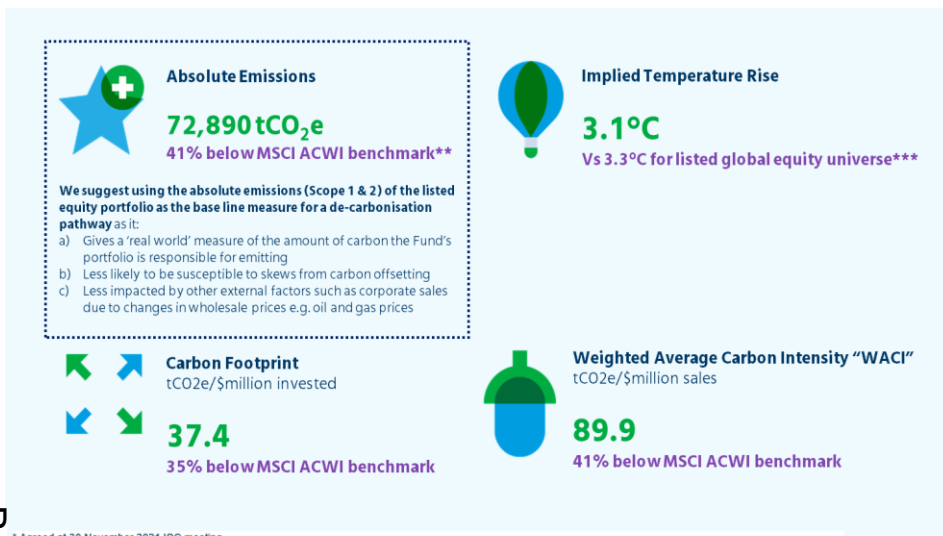
1. Emissions reductions of 25% (from the 2021 baseline) by 2024
2. Emissions reductions of 59% (from the 2021 baseline) by 2030

Carbon reporting dashboard

The Fund's metrics, initially measured in 2021 and to be used as a baseline for future targets, are set out in a publicly available carbon reporting dashboard¹ :

The 2021 metrics are based on Scope 1 and 2 emissions data for the listed equity portfolio.

The dashboard will be updated on an annual basis.



* Agreed at 30 November 2021 ISC meeting
© 2021 Mercer Limited. All rights reserved.
© 2021 MSCI ESG Research LLC. Reproduced by permission.

¹ <https://pensions.northamptonshire.gov.uk/app/uploads/2022/04/CarbonReportingDashboardNPF.pdf>

Investment Policy and Performance (continued)

Investment Review – Financial Year to 31st March 2022

David Crum ASIP, May 2022

Ukraine

As the Fund's financial year was drawing to a close, we saw the worst of human behaviour in action, following Russia's invasion of Ukraine. This unjustified and wholly unwarranted aggression against a sovereign nation has had tragic consequences for Ukraine and Ukrainians, has potentially tragic consequences for a wider group of poorer nations that rely on Ukrainian wheat exports, and has seen a concerted effort by a significant number of countries to marginalise and punish President Putin's Russia.

Setting aside the horrific human tragedy and wanton destruction occurring on a daily basis in Ukraine, the financial punishment being meted out to Russia is unprecedented in its scope in recent history. Whilst President Putin may well have expected some consequences for his invasion, it's doubtful that he would have expected the breadth and depth of sanctions and other punitive actions that have taken place. For Europe to be considering a ban on the import of Russian oil and gas by the end of 2022 is nothing short of seismic, and along with many Russian banks being excluded from global capital markets and the SWIFT interbank payment system, these steps have left Russia in a much-weakened position, both economically and in terms of influence.

It is hard to see how President Putin / Russia can achieve any kind of demonstrable victory in Ukraine. Having laid bare to the world the shortcomings of the Russian army, equipment and tactics when faced with a determined and externally supported defender, what happens next is likely to dictate the duration of Russian isolation. From all evidence to date, it seems unlikely that Russia will withdraw from Ukraine any time soon, and so a drawn-out war of attrition seems a very real possibility. The financial impact of this war on the Russian economy has been, and will continue to be, severe and Russia will remain a pariah state from an investment perspective for some time to come. From the Fund's perspective, it held relatively little in the way of direct Russian investments, As at March 2022, direct exposure to Russian, Ukrainian and Belarusian investments was estimated at £0.8m across the Northamptonshire Fund's pooled and non-pooled investments. This represents 0.02% of the Fund's assets.

Economic Background & Market Review

Region / Asset Class	Index	12 months % return GBP
UK	FTSE All Share	13.0
Europe	FTSE Europe X UK	6.5
US	S&P 500	21.2
Japan	TOPIX	-2.7
Asia	MSCI AC Asia ex Japan	-10.6
Emerging Markets	MSCI Emerging Markets	-7.1
UK Government Bonds	FTSE A Over 15 Year Gilts Index	-7.2
UK Index Linked Bonds	FTSE A Over 5 Year Index Linked Gilts Index	4.8
Global Bonds	Merrill Lynch Global Broad Market Corporate index	-1.7
UK Property	MSCI All Balanced Property Funds Index	23.1

Source: Thomson Reuters Datastream

The 2021/22 financial year got off to a relatively positive start in investment terms, with equity markets around the world continuing to recover from the Covid-induced lows seen at the end of March 2020, in part driven by company earnings being higher than forecast. Investors saw an improving economic environment, with sentiment becoming increasingly positive as Covid vaccination efforts ramped up across many (but not all) countries. A path out of the lockdowns and associated restrictions in travel seemed within grasp, and markets responded accordingly to this perceived positive outcome. However, as the year progressed, inflation concerns - and associated monetary policy tightening by central banks to try to contain it - grew, affecting bond valuations. This resulted in higher yields and was negative for longer duration bonds. The events in Ukraine sent markets tumbling in February 2022, and whilst that negative market impact appeared to dissipate towards the end of March 2022, the invasion amplified investor concerns of increasing inflation and rising interest rates.

Investment Policy and Performance (continued)

Inflation

Having had a historically benign inflationary environment for a number of years, we saw inflationary pressures build relatively rapidly during the Fund's financial year. Real world issues, as diverse as lockdown-caused microchip shortages for new cars and the post-lockdown demand bounce back on oil and gas, started to impact many businesses and consumers alike. Here in the UK, the Consumer Prices Index including owner occupiers' housing costs (CPIH) rose by 6.2% in the 12 months to March 2022. The largest upward contributions to the annual CPIH inflation rate in March 2022 came from housing and household services (1.49 percentage points, principally from electricity, gas and other fuels, and owner occupiers' housing costs) and transport (1.47 percentage points, principally from motor fuels and second-hand cars). However, it has been the increase in the costs of oil and gas that have arguably been the most dramatic:



Brent Crude Oil



UK Natural Gas

It seems hard to believe that Brent Oil was trading at \$25 a barrel at the end of March 2020. At the start of April 2021, it was trading at just under \$65, and ended the financial year at almost \$105 a barrel – an increase of over 60% during the year. Natural gas had an even more stratospheric rise in price, from a cost of £46 a therm at the end of March 2021 to just over £257 at the end of March 2022 – an increase of over 550%. There are a number of reasons as to why energy prices have spiked so markedly, but the key ones relate to climate change-influenced supply/capacity decisions, the post-lockdown resumption of economic activity and Russia's invasion of Ukraine. With this significant increase in the price of energy supplies, it was inevitable that the increasing operating cost for businesses would be passed through to consumers where possible. The increase in the cost of oil & gas (and the knock-on effect of the cost of electricity generation) is having a material impact not only on businesses and the Fund's investee companies, but also on individuals, especially those who live in 'fuel poverty', with no immediate relief on the horizon.

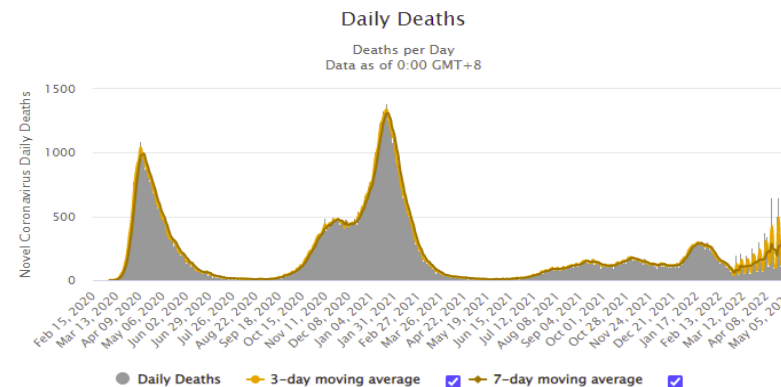
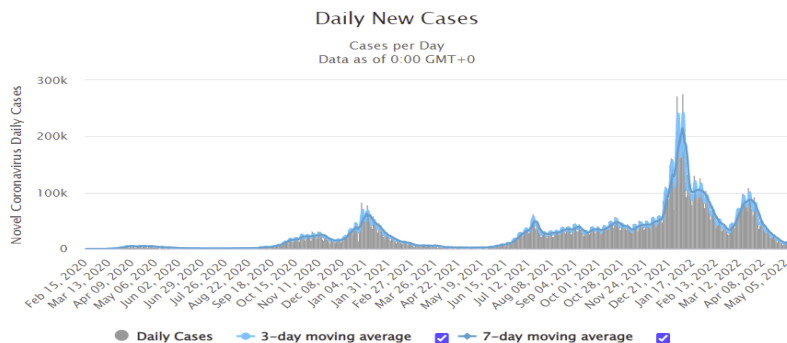
Investment Policy and Performance (continued)

Interest Rates

Due to these increasing inflationary pressures, both the Bank of England (Bank) in the UK and the Federal Reserve (Fed) in the US moved to try to contain inflation by raising interest rates. Having both acted quickly to reduce rates at the start of the pandemic in 2020, the Bank and the 'Fed' had to adjust their respective monetary policies in an attempt to prevent the UK and US economies from overheating. During the financial year, the Bank of England base rate rose from 0.1% to 0.75%, and the US federal funds rate from 0.25% to 0.5% (with another 0.5% increase taking place in early May 2022, bringing the US rate to 1% at the time of writing). In Europe, the European Central Bank (ECB), which last raised its deposit rate in 2011, left that rate unchanged at -0.5%, but it seems likely to follow the UK and the US by increasing the rate in the coming months.

It remains to be seen if inflationary pressures can be contained through rate rises, not least due to the fact that workers (not unreasonably) expect pay settlements to reflect the increasing cost of living. The generally held view is that the Bank of England, the Fed and the ECB have relatively little scope to increase interest rates markedly, given the current state of household finances. It also remains to be seen if the inflationary pressure is as temporary as some commentators hope.

COVID



At the time of writing the last Investment Review, we have had a year of living with Covid, and the consequences it had wrought on our lives and our way of living. We had also seen significant falls in the value of equity markets across the world, followed by their gradual recovery over time as we grappled with the challenges presented by the virus.

The arrival of the Omicron mutation of the Covid-19 virus in the UK towards the end of 2021 saw a significant increase in new daily cases, but thankfully the (what can now be seen as) successful rollout of the UK vaccination programme seemed to be the key factor in ensuring that deaths did not reach the levels that they had in Q4 2020. As a result, the financial impact on the UK economy was not as large as the initial impact of Covid. This may also be in part due to other factors – e.g., working from home – which have added some resilience to some sectors of the economy in the face of a public health crisis.

However, many countries have not had such a comprehensive vaccine rollout as the UK, and so Covid remains an ongoing threat not just to personal health and wellbeing, but to global economic activity, and is likely to continue to impact investment returns, particularly in countries who are still in the early stages of rolling out their vaccination programmes.

Investment Policy and Performance (continued)

COP26

The COP26 international climate conference took place in Glasgow from 31 October to 12 November 2021. The main conference goal was to secure global 'net zero' greenhouse gas emissions by mid-century and keep a maximum of +1.5 C degrees of warming within reach. A new global agreement - the Glasgow Climate Pact - was reached at the summit which set the global agenda on climate change for the next decade:

Emissions: it was agreed countries would meet in 2022 to pledge further cuts to emissions of carbon dioxide. Current pledges, if met, will only limit global warming to about 2.4C.

Coal: For the first time at a COP conference, there was an explicit plan to reduce the use of coal - which is responsible for c.40% of annual CO2 emissions. However, countries only agreed a weaker commitment to "phase down" rather than "phase out" coal after a late intervention by China and India.

Developing countries: The agreement pledged to significantly increase money to help poor countries cope with the effects of climate change and make the switch to clean energy. There was also the prospect of a \$1 trillion a year fund from 2025 (despite a previous pledge for richer countries to provide \$100bn a year by 2020 being missed).

Fossil fuel subsidies: conference attendees agreed to phase-out subsidies that artificially lower the price of coal, oil, or natural gas. However, no firm dates were set.

The relatively slow progress in relation to addressing man-made climate change is not the only pressing environmental challenge we face that has the potential to impact the Fund's investments. Published in 2009 and updated regularly, the Planetary Boundaries Framework demarcates a safe operating space for humanity, beyond which civilization could collapse, and life as we know it is significantly altered. The 9 boundaries cover climate change, biosphere integrity (functional and genetic), land-system change, freshwater change, biogeochemical flows (nitrogen and phosphorus), ocean acidification, atmospheric aerosol pollution, stratospheric ozone depletion, and release of novel chemicals (which includes pollution by plastics and other humanmade substances).

From an investment perspective, it is of critical importance that Environmental, Social and Governance ('ESG') factors are increasingly taken into account by the Fund's external investment managers, in terms of the investments they buy and hold on behalf of the Fund and the scheme beneficiaries. These same asset managers are on the front line in terms of influencing investee company and lender behaviour. It seems entirely sensible that successful investment appraisal should consider all risk and opportunity factors, which means moving beyond just financial considerations.

Investors are increasingly looking to their asset managers to attempt to 'internalise' these ESG 'externalities' into their investment appraisal processes, and to report back on their results. The Fund's new Responsible Investment Policy was approved during the year, and work is ongoing in terms of assessing and understanding how the Fund's managers are identifying and integrating ESG factors into their respective investment processes, and how they might best communicate this information to investors such as the Fund.

Fund Investment Performance

	1 Year Performance	3 Year Performance (p.a.)	5 Year Performance (p.a.)
Northamptonshire Pension Fund	8.2%	9.6%	7.7%
Fund Benchmark	10.8%	9.2%	7.6%

The Fund returned 8.2% for the year to 31st March 2022, underperforming the benchmark return of 10.8%. This underperformance was primarily due to the majority of the Fund's active equity managers trailing their specific benchmarks to a greater or lesser extent. The total performance of the Fund's equity investments was 6.6% versus a benchmark return of 11.8%. In terms of specific manager performance, Baillie Gifford, who had had such a stellar year in 2020/21, delivered a return of -13.9% against a benchmark return of 12.4% for their Global Equities mandate.

Investment Policy and Performance (continued)

The Fund's fixed interest allocation modestly underperformed when compared against its benchmark (2.4% actual return vs 3.6% benchmark return), with only the passive investments managed by UBS matching their benchmark return. The relatively newly appointed 'Multi-Asset Credit' managers, BlueBay and M&G, both had a challenging year, delivering below benchmark returns.

The Fund's Alternatives exposure, however, performed well, returning 16.2% against a benchmark of 13.4%. In aggregate, the Fund's infrastructure investments performed strongly, as did the Private Equity investments. The Fund's commercial property investments returned 19.4% for the financial year, underperforming the benchmark return of 23.1%.

In conclusion, whilst the Fund's investment performance did not beat the benchmark for the most recent 1-year period, the Fund remains ahead of its benchmark over the 3-year (9.6% p.a. vs 9.2% p.a.) and 5-year (7.7% p.a. vs 7.6% p.a.) time periods. It is worthwhile remembering that we judge success over the longer term, and expect there to be fluctuations in investment returns over shorter time periods.

Investment Strategy

Having reached 31st March 2022, it is now time for the Fund to undertake the triennial Actuarial Valuation, to create an up-to-date position of the Fund's pension liabilities. After the Actuarial Valuation exercise has been completed, attention will turn to the Fund's investment strategy, to consider whether it remains in tune with the scheme's liabilities. It would be wrong to prejudge the formal Investment Strategy Review, but what seems reasonable to say is that the Fund's investment approach is likely to continue to reflect a sensible diversification of investment risk, keeping the need to generate sufficient returns to pay the benefits in mind, and also being mindful of the long-term nature of investing whilst addressing the increasing ESG challenges we face.

Outlook

The war in Ukraine remains a worrying factor, and there is not insignificant risk that an increasingly cornered Russia may lash out, widening the conflict in Europe. Whilst the war may have shown China how not to go about the

'reunification' of Taiwan, it could perversely be seen as a green light to attempt to do so by Beijing. Despite the recent potentially encouraging steps the Chinese government has taken to "clean up" the Chinese real estate sector, continuing pressure on the sector is likely as the credit turmoil associated with China's second-largest property developer seems set to continue. It still remains to be seen if Brexit will be good or bad for the UK, in both a political and economic sense - whilst other events have pushed it down the agenda, it has not gone away.

The drive in Europe to move away from Russian oil and gas is likely to have a beneficial effect in terms of investment opportunities in renewable energy sources, and greater energy independence and security for the region. There are also challenges ahead, not least of which may well be the providers of replacement oil and gas to whom Europe turns.

The biggest challenges investors face over the coming year are likely to continue to be linked to inflation. Long-term investors such as the Fund can ride out periods of higher inflation, in part due to the fact that long-term equity returns have historically outpaced inflation. The Fund also benefits from having specific investments where the return is linked to prevailing inflation – for example, the Fund's allocation to Index Linked bonds. However, inflation also impacts the Fund's liabilities, as pensions have inflation increases built in. Central banks have their work cut out in trying to manage inflationary pressures via monetary policies that have little headroom for significant interest rate rises, and the relative indebtedness of households means that consumer demand could falter as finances continue to be squeezed.

Actuarial Information

Northamptonshire Pension Fund (“the Fund”) Actuarial Statement for 2021-22

This statement has been prepared in accordance with Regulation 57(1)(d) of the Local Government Pension Scheme Regulations 2013. It has been prepared at the request of the Administering Authority of the Fund for the purpose of complying with the aforementioned regulation.

Description of Funding Policy

The funding policy is set out in the Administering Authority’s Funding Strategy Statement (FSS), dated March 2020. In summary, the key funding principles are as follows:

- to ensure the long-term solvency of the Fund using a prudent long-term view. This will ensure that sufficient funds are available to meet all members’/dependants’ benefits as they fall due for payment;
- to ensure that employer contribution rates are reasonably stable where appropriate;
- to minimise the long-term cash contributions which employers need to pay to the Fund, by recognising the link between assets and liabilities and adopting an investment strategy which balances risk and return (this will also minimise the costs to be borne by Council Tax payers);
- to reflect the different characteristics of different employers in determining contribution rates. This involves the Fund having a clear and transparent funding strategy to demonstrate how each employer can best meet its own liabilities over future years; and
- to use reasonable measures to reduce the risk to other employers and ultimately to the Council Tax payer from an employer defaulting on its pension obligations.

The FSS sets out how the Administering Authority seeks to balance the conflicting aims of securing the solvency of the Fund and keeping employer contributions stable. For employers whose covenant was considered by the Administering Authority to be sufficiently strong, contributions have been stabilised to return their portion of the Fund to full funding over 20 years if the valuation assumptions are borne out. Asset-liability modelling has been carried out which demonstrate that if these contribution rates are paid and future contribution changes are constrained as set out in the FSS, there is still at least a 70% likelihood that the Fund will return to full funding over 20 years.

Funding Position as at the last formal funding valuation

The most recent actuarial valuation carried out under Regulation 62 of the Local Government Pension Scheme Regulations 2013 was as at 31 March 2019. This valuation revealed that the Fund’s assets, which at 31 March 2019 were valued at £2,502 million, were sufficient to meet 93% of the liabilities (i.e. the present value of promised retirement benefits) accrued up to that date. The resulting deficit at the 2019 valuation was £176 million.

Each employer had contribution requirements set at the valuation, with the aim of achieving full funding within a time horizon and probability measure as per the FSS. Individual employers’ contributions for the period 1 April 2020 to 31 March 2022 were set in accordance with the Fund’s funding policy as set out in its FSS.

Principal Actuarial Assumptions and Method used to value the liabilities

Full details of the methods and assumptions used are described in the 2019 valuation report.

Method

The liabilities were assessed using an accrued benefits method which takes into account pensionable membership up to the valuation date; and makes an allowance for expected future salary growth to retirement or expected earlier date of leaving pensionable membership.

Actuarial Information (continued)

Assumptions

A market-related approach was taken to valuing the liabilities, for consistency with the valuation of the Fund assets at their market value.

The key financial assumptions adopted for the 2019 valuation were as follows:

Financial Assumptions	31 March 2019
Discount Rate	3.9%
Salary increase assumption	2.8%
Benefit increase assumption(CPI)	2.3%

The key demographic assumption was the allowance made for longevity. The life expectancy assumptions are based on the Fund's Vita Curves with improvements in line with the CMI 2018 model, an allowance for smoothing of recent mortality experience and a long-term rate of 1.25% p.a. Based on these assumptions, the average future life expectancies at age 65 are as follows:

	Males	Females
Current Pensioners	21.5 years	23.7 years
Future Pensioners*	22.3 years	25.1 years

*Aged 45 at the 2019 Valuation.

Copies of the 2019 valuation report and Funding Strategy Statement are available on request from the Administering Authority to the Fund.

Experience over the period since 31 March 2019

Markets were severely disrupted by COVID 19 in March 2020, but over most of 2020-21 and 2021-22 they recovered strongly. However, due to the war in Ukraine, March 2022 markets were particularly volatile, which affects values as at the accounting date. All other things being equal, the funding level of the Fund as at 31 March 2022 is likely to be better than that reported at previous formal valuation as at 31 March 2019.

It is important to note that the formal triennial funding valuation exercise is as at 31 March 2022 and this may show a different picture when the finalised position is disclosed in next year's annual report. In particular, changes in Fund membership, changes in anticipated real investment returns, and changes in demographic assumptions will affect the valuation results. The Funding Strategy Statement will also be reviewed as part of the triennial funding valuation exercise.

Robert McInroy FFA

6 May 2022

For and on behalf of Hymans Robertson LLP

Actuarial Information (continued)

Extract from the Actuarial Valuation Report

Executive Summary

We have carried out an actuarial valuation of the Northamptonshire Pension Fund (“the Fund”) as at 31 March 2019. The results are presented in this report and are briefly summarized below.

Funding Position

The table below summarizes the financial position of the Fund as at 31 March 2019 in respect of benefits earned by members up to this date (along with a comparison at the last formal valuation as at 31 March 2016).

Valuation Date	31 March 2016 (£m)	31 March 2019 (£m)
Past Service Liabilities	2,388	2,679
Market Value of Assets	1,871	2,502
Surplus/(Deficit)	(517)	(176)
Funding Level	78%	93%

The improvement in funding position between 2016 and 2019 is mainly due to strong investment performance over the inter-valuation period, coupled with the positive impact on the liabilities of actual pay and benefit growth being lower than expect.

Contribution Rates

The table below summarizes the whole fund Primary and Secondary Contribution rates at this triennial valuation. The Primary rate is the payroll weighted average of the underlying individual employer primary rates and the Secondary rate is the total of the underlying individual employer secondary rates (before any pre-payment or capitalization of future contributions), calculated in accordance with the Regulations and CIPFA guidance.

The Primary rate also includes an allowance of 0.8% of pensionable pay for the Fund’s expenses. The average employee contribution rate is 6.3% of pensionable pay.

The minimum contributions to be paid by each employer from 1 April 2020 to 31 March 2023 are shown in the Rates and Adjustment Certificate.

Primary Rate (% of pay)		Secondary Rate (£)	
1 April 20 – 31 March 23	2020-21	2021-22	2022-23
19%	£20,339,000	£20,463,000	£20,696,000

Robert McInroy FFA

Douglas Green FFA

31 March 2020

For and on behalf of Hymans Robertson LLP

Audit Opinion

Audit Opinion

Fund Account

31-Mar-21 £000	Notes	31-Mar-22 £000
Dealings with members, employers and others directly involved in the fund:		
-116,311	Contributions	-122,777
-7,759	Transfers in from other pension funds	-12,203
-124,070		-134,980
96,190	Benefits	103,413
8,958	Payments to and on account of leavers	9,696
105,148		113,109
-18,922	Net (additions)/withdrawals from dealing with members	-21,871
14,008	Management expenses	15,964
-4,914	Net (additions)/withdrawals including fund management expenses	-5,907
Returns on investments:		
-23,433	Investment income	-28,920
14	Taxes on income	0
-670,914	(Profit) and losses on disposal of investments and changes in the value of investments	-229,429
-694,333	Net return on investments	-258,349
-699,247	Net (increase)/decrease in the net assets available for benefits during the year	-264,256
-2,404,243	Opening net assets of the scheme	-3,103,490
-3,103,490	Closing net assets of the scheme	-3,367,746

Notes on pages 50 to 81 form part of the financial statements.

Net Asset Statement

31-Mar-21			31-Mar-22
£000		Notes	£000
3,091,885	Investment assets		3,357,279
-390	Investment liabilities		-2,521
3,091,495	Total net investments	Note 14	3,354,758
17,977	Current assets	Note 21	18,564
-5,982	Current liabilities	Note 22	-5,576
11,995	Net current assets		12,988
3,103,490	Closing net assets of the scheme	Note 17a	3,367,746

Notes on pages 50 to 81 form part of the financial statements.

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

Notes to the Pension Fund Accounts

1. DESCRIPTION OF THE FUND

The Northamptonshire Pension Fund is part of the Local Government Pension Scheme (LGPS) and is administered by West Northamptonshire Council. The Council is the reporting entity for this Pension Fund. The following description of the Fund is a summary only. For more detail, reference should be made to the Annual Report 2021-22 on pages 1 to 45 and the underlying statutory powers underpinning the scheme.

General

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

- the LGPS Regulations 2013 (as amended);
- the LGPS (Transitional Provisions, Savings and Amendments) Regulations 2014 (as amended);
- the LGPS (Management and Investment of Funds) Regulations 2016;
- The Local Government Pension Scheme (Amendment) Regulations 2018.

The Fund is a contributory defined benefit pension scheme administered by West Northamptonshire Council to provide pensions and other benefits for pensionable employees of West Northamptonshire Council and a range of other Scheduled and Admitted Bodies within the county area. Teachers, Police Officers and Firefighters are not included as they come within other national pension schemes. The Fund is overseen by the Northamptonshire Pension Committee, which is a committee of West Northamptonshire Council.

Membership

Membership of the LGPS is voluntary and employees are free to choose whether to join the scheme, remain in the scheme or make their own personal arrangements outside the scheme. Organisations participating in the Northamptonshire Pension Fund include:

- Scheduled bodies - local authorities and similar bodies whose staff are automatically entitled to be members of the Fund;

- Admitted bodies - other organisations that participate in the Fund under an admission agreement between the Fund and the relevant organisation. Admitted bodies include voluntary, charitable and similar bodies or private contractors undertaking a local authority function following outsourcing to the private sector.
- Resolution/Designated bodies – These are organisations that can admit their employees to the LGPS by passing their resolution (nominate employees for access to the LGPS) Parish/Town Council are under this category.

As at 31 March 2022 there are 318 (2021: 314) active employers within the Northamptonshire Pension Fund, including the Council itself.

	31-Mar-21	31-Mar-22
Number of employers with active members	314	318

The Fund has over 76,000 individual members, as detailed below:

	31-Mar-21	31-Mar-22
Number of employees in scheme:		
Administering Authority	8,067	5,010
Other employers	15,801	19,045
Total	23,868	24,055
Number of pensioners:		
Administering Authority	8,918	9,002
Other employers	8,128	8,703
Total	17,046	17,705
Deferred pensioners:		
Administering Authority	14,228	13,688
Other employers	9,733	10,938
Total	23,961	24,626
Undecided leavers:		
Administering Authority	3,570	3,986
Other employers	4,633	6,147
Total	8,203	10,133
Total members	73,078	76,519

Notes to the Pension Fund Accounts (continued)

Funding

Benefits are funded by contributions and investment earnings. Currently the level of contribution income is sufficient to fund regular benefit payments. Contributions are made by active members of the Fund in accordance with the LGPS Regulations 2013 and range from 5.5% to 12.5% of pensionable pay for the financial year ended 31 March 2022. Employers' contributions are set as part of the triennial actuarial funding valuation. The last such valuation was at 31 March 2019. Employers' contributions comprise a percentage rate on active payroll between 1.8% and 35% and deficit payments of fixed cash amounts set for each employer as part of the triennial funding valuation.

Benefits

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

	Service pre 1 April 2008	Service 1 April 2008 to 31 March 2014
Pension	Each year worked is worth 1/80 x final pensionable salary.	Each year worked is worth 1/60 x final pensionable salary.
Lump Sum	Automatic lump sum of 3 x pension. In addition, part of the annual pension can be exchanged for a one-off tax-free cash payment. A lump sum of £12 is paid for each £1 of pension given up.	No automatic lump sum. Part of the annual pension can be exchanged for a one-off tax-free cash payment. A lump sum of £12 is paid for each £1 of pension given up.

Career Average Revalued Earnings (CARE)

From 1 April 2014, the scheme became a career average scheme, whereby members accrue benefits based upon their pensionable pay in that year at an accrual rate of 1/49th or 1/98th for those members who have taken up the 50/50 option and pay proportionately lower contributions. Accrued pension is updated annually in line with the Consumer Price Index.

There are a range of other benefits provided under the scheme including early retirement, ill health pensions and death benefits. For more details, please refer to the Full Guide which can be found in the member section on the Pension's Fund website. [Member - Pension Details](#)

2. BASIS OF PREPARATION

The statement of accounts summarises the fund's transactions for the 2021-22 financial year and its financial position at 31 March 2022. The accounts have been prepared in accordance with the *Code of Practice on Local Authority Accounting in the United Kingdom 2021-22* (the Code), which is based upon International Financial Reporting Standards (IFRS), as amended for the UK public sector. The accounts have been prepared on a going concern basis.

The accounts report on the net assets available to pay pension benefits. They do not take account of obligations to pay pensions and benefits that fall due after the end of the financial year nor do they take into account the actuarial present value of promised retirement benefits. The Code gives administering authorities the option to disclose this information in the net assets statement, in the notes to the accounts or by appending an actuarial report prepared for this purpose. The pension fund has opted to disclose this information in Note 20.

Notes to the Pension Fund Accounts (continued)

3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Fund Account – Revenue Recognition

Contribution Income

Normal contributions, both from the members and from the employer, are accounted for on an accruals basis at the percentage rate recommended by the actuary in the payroll period to which they relate. Employer deficit funding contributions are accounted for on the due date on which they are payable under the schedule of contributions set by the scheme actuary or on receipt if earlier than the due date. Employers' augmentation contributions and pensions strain contributions are accounted for in the period in which the liability arises. Any amount due in the year but unpaid will be classed as a current financial asset.

Transfers to and from Other Schemes

Transfer values represent the amounts received and paid during the year for members who have either joined or left the Fund during the financial year and are calculated in accordance with the Local Government Pension Scheme Regulations (see Notes 8 and 10). Individual transfers in/out are accounted for on a cash basis. Transfers in from members wishing to use the proceeds of their additional voluntary contributions (see page 79) to purchase scheme benefits are accounted for on an accruals basis and are included in Transfers In (see Note 8). Bulk (group) transfers are accounted for on an accruals basis in accordance with the terms of the transfer agreement. There have been no group transfers in during 2020-21 and 2021-22.

Investment Income

i) Interest income

Interest income is recognised in the Fund Account as it accrues, using the effective interest rate of the financial instrument as at the date of acquisition or origination. Income includes the amortisation of any discount or premium, transaction costs (where material) or other differences between the initial carrying amount of the instrument and its amount at maturity calculated on an effective interest rate basis.

ii) Dividend income

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

iii) Distributions from pooled funds

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

iv) Movement in the net market value of investments

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

Fund Account – Expense Items

Benefits Payable

Pensions and lump sum benefits payable include all amounts known to be due as at the end of the financial year. Any amounts due but unpaid are disclosed in the Net Asset Statement as current liabilities and paid in the following month.

Taxation

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

Notes to the Pension Fund Accounts (continued)

Management Expenses

The Code does not require any breakdown of pension fund administrative expenses. However, in the interests of greater transparency, the Fund discloses its pension fund management expenses in accordance with CIPFA's Accounting for Local Government Pension Scheme Management Expenses (2016).

Administrative Expenses

All administrative expenses are accounted for on an accruals basis. All staff costs of the pension's team are charged to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund in accordance with Council policy.

Oversight and Governance Costs

All oversight and governance expenses are accounted for on an accruals basis. The costs of obtaining legal and consultancy advice are charged direct to the Fund. The cost of the Pool are charged direct to the Fund.

Investment Management Expenses

Investment Management expenses are accounted for on an accruals basis.

Fees of external Investment Managers and the Custodian are agreed in the respective mandates governing their appointments. Broadly, these are based on the market value of the investments under their management and therefore increase or reduce as the value of these investments change.

Where an Investment Manager's fee note has not been received by the year end date, an estimate based upon the market value of their mandate as at the end of the year is used for inclusion in the Fund Account. In 2021-22, £0.1m of fees are based upon such estimates (2020-21: £ 0.1m). In addition, manager fees deducted from pooled funds of £12.5m (2020-21: £9.3m) are based upon information received from fund managers.

Net Asset Statement

Financial Assets

Financial assets are included in the Net Asset Statement on a fair value basis, except for assets held at amortised cost.

Assets held at amortised cost includes contributions owing from employers and cash deposits. These are initially recognised at fair value and subsequently measured at amortised cost. A financial asset is recognised in the Net Asset Statement on the date the Fund becomes party to the contractual acquisition of the asset.

Investment assets, other than cash held by Investment Managers on the Fund's behalf, are initially recognised at fair value and are subsequently measured at fair value with gains and losses recognised in the Fund Account. The values of investments as shown in the Net Asset Statement have been determined at fair value in accordance with the requirements of the Code and IFRS13 (see Note 16). For the purposes of disclosing levels of fair value hierarchy, the Fund has adopted the classification guidelines recommended in Practical Guidance on Investment Disclosures (PRAG/Investment Association, 2016).

Foreign Currency Transactions

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

Notes to the Pension Fund Accounts (continued)

Derivatives

The Fund uses derivative financial instruments to manage its exposure to specific risks arising from its investment activities. The Fund does not hold derivatives for speculative purposes (see Note 15). Purchases and sales of derivatives are recognised as follows:

Forward currency contracts settlements are reported as gross receipts and payments.

Cash and Cash Equivalents

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

Cash equivalents are held for the purpose of meeting short-term cash commitments rather than for investment or other purposes.

Financial Liabilities

The Fund initially recognises financial liabilities at fair value and subsequently measures them at amortised cost. A financial liability is recognised in the Net Asset Statement on the date the Fund becomes party to the liability.

Actuarial Present Value of Promised Retirement Benefits

The actuarial present value of promised retirement benefits is assessed on an annual basis by the scheme actuary in accordance with the requirements of IAS 19 and relevant actuarial standards. As permitted under the Code, the Fund has opted to disclose the actuarial present value of promised retirement benefits by way of a note to the Net Asset Statement (see Note 20).

Additional Voluntary Contributions

The Fund provides an additional voluntary contributions (AVC) scheme for its members, the assets of which are invested separately from those of the Pension Fund. The Fund's AVC providers are Prudential and Standard Life as its AVC providers. AVCs are deducted from the individual member's pay and paid to the AVC provider by employers and are specifically for

providing additional benefits for individual contributors. Each AVC contributor receives an annual statement showing the amount held in their account and the movements in the year.

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

Contingent Assets and Liabilities

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

A contingent liability arises where an event has taken place prior to the year-end giving rise to a possible financial obligation whose existence will only be confirmed or otherwise by the occurrence of future events.

Contingent liabilities can also arise in circumstances where a provision would be made, except that it is not possible at the balance sheet date to measure the value of the financial obligation reliably.

Contingent assets and liabilities are not recognised in the Net Asset Statement but are disclosed by way of a narrative in the notes.

Prior Period Adjustments, changes in accounting policies and estimates and errors

Prior period adjustments may arise as a result of a change in accounting policies or to correct material error. Changes in accounting estimates are accounted for prospectively, i.e. in the current and future years affected by the change and do not give rise to a prior period adjustment.

Change in accounting policies are only made when required by proper accounting practices or the change provides more reliable or relevant information about the effect of transactions, other events and conditions on the Fund's financial position or financial performance.

Notes to the Pension Fund Accounts (continued)

Where a change is made, it is applied retrospectively (unless stated otherwise) by adjusting opening balances and comparative amounts for the prior period as if the new policy had always been applied.

Material errors discovered in prior period figures are corrected retrospectively by amending opening balances and comparative amounts for the prior period.

4. CRITICAL JUDGEMENT IN APPLYING ACCOUNTING POLICIES

It has not been necessary to make any material critical judgements in applying the accounting policies in 2021-22.

5. ASSUMPTIONS MADE ABOUT THE FUTURE AND OTHER MAJOR SOURCES OF ESTIMATION UNCERTAINTY

The preparation of financial statements requires management to make judgements, estimates and assumptions that affect the amounts reported for assets and liabilities at the Balance Sheet date and the amounts reported for the revenues and expenses during the year.

Estimates and assumptions are made taking into account historical experience, current trends and other relevant factors. However, the nature of estimation means that the actual outcomes could differ from the assumptions and estimates.

The items in the Financial Statements as 31 March 2022 for which there is a significant risk of material adjustment in the forthcoming financial year are as follows:

Pension Fund Liability

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

The estimated liability is subject to significant variances based on changes to the underlying assumptions which are agreed with the actuary and have been summarised in Note 19 (disclosure only).

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

Actuarial Present Value of Promised Retirement Benefits

In addition to the triennial funding valuation, the Fund's actuary also undertakes a valuation of the Pension Fund liabilities, on an IAS 19 basis, every year using the same base data as the funding valuation rolled forward to the current financial year, taking account of changes in membership numbers and updating assumptions to the current year.

- **Uncertainties:** Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rates at which salaries and pensions are projected to increase, changes in retirement ages, mortality rates and expected returns on Pension Fund assets. An independent firm of consulting actuaries is engaged to provide the Fund with expert advice about the assumptions to be applied. The actuary has included the McCloud judgement within their calculation shown in Note 20 (disclosure only).
- **Effect if Actual Results Differ from Assumptions:** The effects on the net pension liability of changes in individual assumptions can be measured. For instance, a 0.1% decrease in the discount rate assumption would result in an increase in the pension liability of £89m. A 0.1% increase in assumed earnings inflation would increase the value of liabilities by approximately £6m, and a 1 year increase in assumed life expectancy would increase the liability by approximately 4%.

Notes to the Pension Fund Accounts (continued)

Private Equity

- **Uncertainties:** All private equity investments are valued at fair value. These investments are not publicly listed and as such there is a degree of estimation involved in the valuation. See Note 16a.
- **Effect if Actual Results Differ from Assumptions:** Total private equity investments at fair value in the financial statements are £187.4m. There is a risk that this investment may be under or overstated in the accounts. Note 18 gives a price sensitivity of Private Equity of 31.2%, which indicates that private equity values may range from £128.9m to £245.9m.

Infrastructure

- **Uncertainties:** All infrastructure investments are valued at fair value. These investments are not publicly listed and as such there is a degree of estimation involved in the valuation. See Note 16a.
- **Effect if Actual Results Differ from Assumptions:** Total infrastructure investments at fair value in the financial statements are £201.9m. There is a risk that this investment may be under or overstated in the accounts. Note 18 gives a price sensitivity infrastructure investments of 13.3%, which indicates that infrastructure values may range from £175.0m to £228.7m

Property

- **Uncertainties:** Valuation techniques are used to determine the carrying amount of pooled property funds. Where possible management uses the best available data. Uncertainties including changes in rental growth, covenant strength for existing tenancies, discount rate could affect the fair value of the property investments.
- **Effect if Actual Results Differ from Assumptions:** Total property investments in the financial statements are £249.2m. There is a risk that this investment may be under or overstated in the accounts.
Note

18 gives a price sensitivity pooled property investments of 15.0%, which indicates that infrastructure values may range from £211.8m to £286.5m

6. EVENTS AFTER THE BALANCE SHEET DATE

There have been no events since 31 March 2022, and up to the date when these accounts were authorised that require any adjustments to these accounts.

7. CONTRIBUTIONS RECEIVABLE

By category:

31-Mar-21		31-Mar-22
£000		£000
23,431	Employees' contributions	24,668
	Employers' contributions:	
71,463	Normal contributions	77,111
21,417	Deficit recovery contributions	20,998
92,880	Total employers' contributions	98,109
116,311		122,777

By authority:

31-Mar-21		31-Mar-22
£000		£000
32,642	Administering authority	28,695
80,402	Scheduled bodies	90,886
3,267	Admitted bodies	3,196
116,311		122,777

8. TRANSFERS IN FROM OTHER PENSION FUNDS

31-Mar-21		31-Mar-22
£000		£000
7,759	Individual transfers	12,203
7,759		12,203

Notes to the Pension Fund Accounts (continued)

9. BENEFITS PAYABLE

By category:

31-Mar-21	31-Mar-22
£000	£000
80,572 Pensions	83,863
12,452 Commutation and lump sum retirement benefits	16,665
3,166 Lump sum death benefits	2,885
96,190	103,413

By authority:

31-Mar-21	31-Mar-22
£000	£000
41,593 Administering authority	24,072
47,872 Scheduled bodies	72,151
6,725 Admitted bodies	7,190
96,190	103,413

10. PAYMENTS TO AND ON ACCOUNT OF LEAVERS

31-Mar-21	31-Mar-22
£000	£000
1,120 Refunds to members leaving service	676
7,838 Individual transfers	9,020
8,958	9,696

11. MANAGEMENT EXPENSES

31-Mar-21	31-Mar-22
£000	£000
2,372 Administrative costs	2,268
10,928 Investment management expenses	12,884
708 Oversight and governance costs	812
14,008	15,964

Notes to the Pension Fund Accounts (continued)

12. INVESTMENT MANAGEMENT EXPENSES

2021/22	Management Fees £000	Performance Related Fees £000	Transaction Costs £000	Other Costs £000	Total £000
Pooled investments	6,546	0	0	398	6,944
Pooled property investments	392	0	398	473	1,263
Private equity/infrastructure	2,288	2,015	0	362	4,665
Custody	0	0	0	12	12
Total	9,226	2,015	398	1,245	12,884

2020/21	Management Fees £000	Performance Related Fees £000	Transaction Costs £000	Other Costs £000	Total £000
Equities	356	0	320	0	676
Pooled investments	5,254	0	14	312	5,580
Pooled property investments	258	0	239	15	512
Private equity/infrastructure	1,802	1,539	0	819	4,160
Total	7,670	1,539	573	1,146	10,928

13. INVESTMENT INCOME

31-Mar-21 £000	31-Mar-22 £000
3,060	19
Income from equities	
8,448	14,261
Pooled investments – unit trusts and other managed funds	
7,430	7,927
Pooled property investments	
4,462	6,694
Private equity/infrastructure income	
9	19
Interest on cash deposits	
24	0
Other – securities lending income	
23,433	28,920

Notes to the Pension Fund Accounts (continued)

14. INVESTMENTS

31-Mar-21 £000		31-Mar-22 £000
	Investment assets	
17	Equities	0
	Pooled investments	
302,803	• UK Equity Funds	321,249
1,429,039	• Global Equity Funds	1,499,989
311,751	• Index Linked Bonds	327,080
285,428	• Multi Asset Credit Funds	311,757
214,353	• Diversified Growth Funds	221,650
657	• Cash Funds	217
185,516	Pooled property investments	249,167
113,353	Private equity	187,426
196,471	Infrastructure	201,861
51,483	Cash deposits	36,374
484	Investment income due	509
530	Amounts receivable for sales	0
3,091,885	Total investment assets	3,357,279
	Investment liabilities	
-390	Amounts payable for purchases	-2,521
-390	Total investment liabilities	-2,521
3,091,495	Net investment assets	3,354,758

Notes to the Pension Fund Accounts (continued)

14(a). RECONCILIATION OF MOVEMENTS IN INVESTMENTS AND DERIVATIVES

	Market value 01-Apr-21	Purchases during the year and derivative payments	Sales during the year and derivative receipts	Change in market value during the year	Market value 31-Mar-22
	£000	£000	£000	£000	£000
Equities	17	0	-3	-14	0
Pooled investments	2,544,031	42,856	-31,750	126,805	2,681,942
Pooled property investments	185,516	36,836	-10,947	37,762	249,167
Private equity	113,353	44,527	-22,635	52,181	187,426
Infrastructure	196,471	2,402	-9,655	12,643	201,861
	3,039,388	126,621	-74,990	229,377	3,320,396
Derivative contracts:					
• Forward currency contracts	0	1	-2	1	0
	3,039,388	126,622	-74,992	229,378	3,320,396
Other investment balances:					
• Cash deposits	51,483				36,374
• Amount receivable for sales	530				0
• Investment income due	484				509
• Spot FX contracts	0				0
• Amounts payable for purchases of investments	-390				-2,521
Net investment assets	3,091,495				3,354,758

Notes to the Pension Fund Accounts (continued)

14(a). RECONCILIATION OF MOVEMENTS IN INVESTMENTS AND DERIVATIVES (CONTINUED)

	Market value 01-Apr-20	Purchases during the year and derivative payments ¹	Sales during the year and derivative receipts ¹	Change in market value during the year	Market value 31-Mar-21
	£000	£000	£000	£000	£000
Equities	160,255	67,660	-270,351	42,453	17
Pooled investments	1,821,314	602,413	-473,600	593,904	2,544,031
Pooled property investments	192,662	9,432	-11,878	-4,700	185,516
Private equity/infrastructure	192,596	94,908	-17,066	39,386	309,824
	2,366,827	774,413	-772,895	671,043	3,039,388
Derivative contracts:					
• Forward currency contracts	24	26	-58	8	0
	2,366,851	774,439	-772,953	671,051	3,039,388
Other investment balances:*					
• Cash deposits	23,975				51,483
• Amount receivable for sales	1,303				530
• Investment income due	1,284				484
• Spot FX contracts	1				0
• Amounts payable for purchases of investments	-618				-390
Net investment assets*	2,392,796				3,091,495

¹Equity sales and Pooled Investments purchases include an in-specie transfer of £209.6m into the ACCESS pool.

Notes to the Pension Fund Accounts (continued)

14(b). INVESTMENTS ANALYSED BY FUND MANAGER

Market value 31-Mar-21		Market value 31-Mar-22	
£000	% of net investment assets	£000	% of net investment assets
Investments managed under Pooled Governance:			
1,287,000	42	1,493,631	44
970,953	31	1,030,982	31
2,257,953	73	2,524,613	75
Investments managed outside Pooled Governance:			
43,979	1	82,254	2
20,105	1	17,134	1
38,077	1	34,709	1
143,083	5	157,117	5
511	0	540	0
204,514	7	248,485	7
68,860	2	104,633	3
48,136	2	58,329	2
45,644	1	44,683	1
186,853	6	60,810	2
17	0	0	0
33,763	1	21,451	1
833,542	27	830,145	25
3,091,495	100	3,354,758	100

- All the above companies are registered in the United Kingdom.

Notes to the Pension Fund Accounts (continued)

The following investments represent more than 5% of the Net Asset Statement of the scheme as at 31st March 2022.

Security	31-Mar-21	% of total fund	31-Mar-22	% of total fund
	£000	%	£000	%
LF ACCESS UK Equity - Majedie	278,300	9	293,857	9
LF ACCESS Baillie Gifford Diversified Growth Fund	214,354	9	221,650	7
UBS Asset Management Life Over 5 Year Index Linked Gilts	311,751	4	327,080	10
LF ACCESS Global Equity - Newton Investment Management	284,105	7	313,721	9
LF ACCESS Baillie Gifford Long Term Global Growth Fund	259,523	8	223,255	7
LF ACCESS Longview Global Equity	250,718	6	286,508	9
	1,598,751		1,666,071	

Notes to the Pension Fund Accounts (continued)

15. ANALYSIS OF DERIVATIVES

Objectives and Policies for Holding Derivatives

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

• Futures

There were no outstanding exchange traded future contracts at 31 March 2022 or 31 March 2021.

• Options

There were no outstanding option contracts at 31 March 2022 or 31 March 2021.

• Forward foreign currency

To maintain appropriate diversification and to take advantage of overseas investment returns, a significant proportion of the Fund's quoted equity portfolio is in overseas stock markets. To reduce the volatility associated with fluctuating currency rates, the Fund has a passive currency programme in place managed by the Fund managers.

There is no specified requirement to use currency hedging within the Fund's Investment Management Agreements. Instead, the Fund managers use their discretion as to whether any currency hedging should be used to mitigate any potential risk.

Settlement	Currency bought	Local Value	Currency sold	Local Value	Asset Value	Liability Value
		Currency		Currency		
One to six months	GBP	45,249	EUR	-53,644	0	0
Total					0	0
Net forward currency contracts at 31 March 2022						0
Prior year comparative						
Open forward currency contracts at 31 March 2021						0
Net forward currency contracts at 31 March 2021						0

Notes to the Pension Fund Accounts (continued)

16. FAIR VALUE

Valuation of Financial Instruments Carried at Fair Value

Asset and liability valuations have been classified into three levels, according to the quality and reliability of information used to determine fair values. Transfers between levels are recognised in the year in which they occur. The Fund has adopted the classification guidelines recommended in the Practical Guidelines on Investment Disclosures (PRAG/Investment Association, 2016).

- Level 1** Assets and liabilities at Level 1 are those where the fair values are derived from unadjusted quoted prices in active markets for identical assets or liabilities. Products classified as level 1 comprise quoted equities, quoted fixed securities, quoted index-linked securities and unit trusts.
- Level 2** Assets and liabilities at Level 2 are those where quoted market prices are not available; for example, where an instrument is traded in a market that is not considered to be active, or where valuation techniques are used to determine fair value. The price used is based upon inputs from observable market data.
- Level 3** Assets and liabilities at Level 3 are those where at least one input that could have a significant effect on the instrument's valuation is not based on observable market data.

The values of the investment in private equity are based on valuations provided by the general partners to the private equity funds in which the Northamptonshire Fund has invested. These valuations are prepared in accordance with the International Private Equity and Venture Capital Valuation Guidelines 2015, which follow the valuation principles of IFRS and US GAAP. Valuations are usually undertaken annually at the end of December. Cash flow adjustments are used to roll forward the valuations to 31 March as appropriate.

16(a). FAIR VALUE HIERARCHY

The following tables provides an analysis of the financial assets at fair value through profit and loss of the Pension Fund grouped into levels 1 to 3, based on the level at which the fair value is observable:

Values at March 2022	Level 1	Level 2	Level 3	Total
Financial assets at fair value through profit and loss	£000	£000	£000	£000
Pooled investments	217	2,681,725	0	2,681,942
Pooled property investments	0	0	249,167	249,167
Private equity	0	0	187,426	187,426
Infrastructure	0	0	201,861	201,861
Cash and Cash Equivalents	36,327	0	0	36,327
Net investment assets	36,544	2,681,725	638,454	3,356,723

Values at March 2021	Level 1	Level 2	Level 3	Total
Financial assets at fair value through profit and loss	£000	£000	£000	£000
Equities	17	0	0	17
Pooled investments	657	2,543,374	0	2,544,031
Pooled property investments	0	0	185,516	185,516
Private equity/infrastructure	0	0	309,824	309,824
Cash and Cash Equivalents	37,167	0	0	37,167
Net investment assets	37,841	2,543,374	495,340	3,076,555

Pooled property investments have moved from Level 2 to Level 3 in the prior year due to Level 3 being a more appropriate basis of valuation. There have been no changes to valuation techniques for these assets.

Notes to the Pension Fund Accounts (continued)

All assets have been valued using fair value techniques which represent the highest and best price at the reporting date. The fair valuation of each class of investment asset is set out below.

Description of asset	Valuation hierarchy	Basis of valuation	Observable and unobservable inputs	Key sensitivities affecting the valuations provided
Cash and cash equivalents	Level 1	Carrying value is deemed to be fair value because of the short-term nature of these financial instruments	Not required	Not required
Pooled Investments	Level 2	Net Asset Value / Bid Market Price.	Evaluated price feeds	Not required
Pooled Investments	Level 2	Average of broker prices.	Evaluated price feeds	Not required
Forward Foreign exchange derivatives	Level 2	Market forward exchange rates at theyear-end	Exchange rate risk	Not required
Property	Level 3	Valued by investment managers on a fair value basis each year using PRAG guidance	NAV-based pricing set on a forward pricing basis	
Private Equity	Level 3	Comparable valuation of similar companies in accordance with International Private Equity and Venture Capital Valuation Guidelines 2018 and the IPEV Board's Special Valuation Guidance (March 2020)	Price Earnings or EBITDA multiple	Valuations could be affected by changes to expected cashflows or by differences between audited and unaudited accounts
Infrastructure	Level 3	Comparable valuation of similar companies in accordance with International Private Equity and Venture Capital Valuation Guidelines 2018 and the IPEV Board's Special Valuation Guidance (March 2020)	Price Earnings or EBITDA multiple	Valuations could be affected by changes to expected cashflows or by differences between audited and unaudited accounts

Notes to the Pension Fund Accounts (continued)

Sensitivity of assets valued at Level 3

Having analysed historical data and current market trends, and consulted with Independent Investment Advisors, the Fund has determined that the valuation methods described above are likely to be accurate within the following ranges and has set out below the consequent potential impact on the closing value of investments held at 31 March 2022.

Asset Type	Market Value as at 31-Mar-22 £000	Assessed valuation range % (+/-)	Value on Increase £000	Value on Decrease £000
Private equity	187,426	31.2	245,903	128,949
Infrastructure	201,861	13.3	228,709	175,013
Property funds	249,167	15.0	286,542	211,792
Total Assets	638,454		761,154	515,754

16(b). RECONCILIATION OF FAIR VALUE MEASUREMENTS WITHIN LEVEL 3

Period 2021-22	Market value 01- Apr-21 £000	Purchases during the year and derivative payments £000	Sales during the year and derivative receipts £000	Unrealised gains/(losses) £000	Realised gains/(losses) £000	Market value 31-Mar-22 £000
Private Equity	113,353	44,527	-22,635	42,985	9,196	187,426
Infrastructure	196,471	2,402	-9,655	12,861	-218	201,861
Property funds	185,516	36,836	-10,947	37,465	297	249,167
Total	495,340	83,765	-43,237	93,311	9,275	638,454

All transfers between levels are recognised in the month in which they occur.

Notes to the Pension Fund Accounts (continued)

17. FINANCIAL INSTRUMENTS

17(a). CLASSIFICATION OF FINANCIAL INSTRUMENTS

The following table analyses the carrying amounts of financial assets and liabilities by category and Net Asset Statement heading. No financial assets were reclassified during the year.

31-Mar-21			31-Mar-22		
Fair value through profit and loss	Assets at amortised cost	Liabilities at amortised cost	Fair value through profit and loss	Assets at amortised cost	Liabilities at amortised cost
£000	£000	£000	£000	£000	£000
Financial assets					
17	0	0	0	0	0
2,544,031	0	0	2,681,942	0	0
185,516	0	0	249,167	0	0
309,824	0	0	187,426	0	0
	0	0	201,861		
0	0	0	0	0	0
37,167	23,478	0	36,327	8,706	0
0	1,014	0	0	509	0
0	8,815	0	0	9,905	0
3,076,555	33,307	0	3,356,723	19,120	0
Financial liabilities					
0	0	0	0	0	0
0	0	-390	0	0	-2,521
0	0	-5,982	0	0	-5,576
0	0	-6,372	0	0	-8,097
3,076,555	33,307	-6,372	3,356,723	19,120	-8,097
3,103,490			Total		
			3,367,746		

Notes to the Pension Fund Accounts (continued)

17(b). NET GAINS AND LOSSES ON FINANCIAL INSTRUMENTS

31-Mar-21	31-Mar-22
£000	£000
Financial assets:	
671,043	229,377
2	99
Financial liabilities:	
8	1
-140	-48
670,913	229,429
Total gains/(losses)	

18. NATURE AND EXTENT OF RISKS ARISING FROM FINANCIAL INSTRUMENTS

Risk and Risk Management

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

[Risk Strategy Statement](#)

Responsibility for the Fund's Risk Management Strategy rests with the Pensions Committee. Risk management policies are established to identify and analyse the risks faced by the Council's pensions operations. Policies

are reviewed regularly to reflect changes in activity and in market conditions.

a) Market Risk

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

The objective of the Fund's Risk Management Strategy is to identify, manage and control market risk exposure within acceptable parameters, whilst optimising the return on risk.

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

The Fund manages these risks in two ways:

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

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

Notes to the Pension Fund Accounts (continued)

Other Price Risk

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

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

The Fund's Investment Managers mitigate this price risk through diversification and the selection of securities and other financial instruments is monitored by the Council to ensure it is within limits specified in the Fund Investment Strategy.

Other Price Risk – Sensitivity Analysis

Following analysis of historical data and expected investment return movement during the financial year in consultation with the Fund's investment Advisors, the Council has determined that the following movements in market price risk would have reasonably been possible for the 2021-22 reporting period. The potential price changes disclosed above are broadly consistent with one-standard deviation movement in the value of the assets. The sensitivities are consistent with the assumptions contained in the investment Advisors most recent review. This analysis assumes that all other variables, in particular foreign currency exchange rates and interest rates, remain the same.

Asset Type	Potential Market Movement +/- (%p.a.)
UK pooled equities	19.9
Global pooled equities	20.1
Index linked bonds	7.3
Multi asset credit	7.4
Diversified growth	9.1
Property	15
Private Equity	31.2
Infrastructure	13.3
Cash and other investment balances	0.3

Notes to the Pension Fund Accounts (continued)

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

31-Mar-22	Value as at 31-Mar-22 £000	% (rounded) Change	Value on Increase £000	Value on Decrease £000
Asset Type				
UK pooled equities	321,249	19.9	385,178	257,320
Global pooled equities	1,499,989	20.1	1,801,487	1,198,491
Index linked bonds	327,080	7.3	350,957	303,203
Multi asset credit	311,757	7.4	334,827	288,687
Diversified growth	221,650	9.1	241,820	201,480
Property	249,167	15.0	286,542	211,792
Private Equity	187,426	31.2	245,903	128,949
Infrastructure	201,861	13.3	228,709	175,013
Cash and other investment balances	34,579	0.3	34,683	34,475
Total Assets	3,354,758		3,910,106	2,799,410

31-Mar-21	Value as at 31-Mar-21 £000	% (rounded) Change	Value on Increase £000	Value on Decrease £000
Asset Type				
UK equities	302,821	16.7	353,392	252,250
Global pooled equities	1,429,038	17.4	1,677,691	1,180,385
Index linked bonds	311,751	7.5	335,132	288,370
Multi asset credit	285,427	6.2	303,123	267,731
Diversified growth	214,354	11.9	239,862	188,846
Property	185,516	14.2	211,859	159,173
Alternatives	309,824	21.2	375,507	244,141
Cash and other investment balances	52,764	0.3	52,922	52,606
Total Assets	3,091,495		3,549,488	2,633,502

Notes to the Pension Fund Accounts (continued)

Interest Rate Risk

The Fund invests in financial assets for the primary purpose of obtaining a return on investments. These investments are subject to interest rate risks, which represent the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. The Fund's interest rate risk is routinely monitored by the Council and its investment consultant in accordance with the Fund's Risk Management strategy, including monitoring the exposure to interest rates and assessment of actual interest rates against the relevant benchmarks. The Fund's direct exposure to interest rate movements as at 31 March 2022 and 31 March 2021 is set out below. These disclosures present interest rate risk based on the underlying financial assets at fair value.

Interest Rate Risk Sensitivity Analysis

The Council recognises that interest rates can vary and can affect both income to the Fund and the value of the net assets available to pay benefits. An 80 basis point (BPS) (i.e. 0.80%) movement in interest rates is consistent with the level of sensitivity applied as part of the Fund's Risk Management strategy. The Fund's investment consultant has advised that long-term average rates are expected to move less than 80 basis points from one year to the next and experience suggests that such movements are likely. The analysis that follows assumes that all other variables, in particular exchange rates, remain constant, and shows the effect in the year on the net assets available to pay benefits of a +/- 100 BPS (1.0%) change in interest rates:

31-Mar-21	Asset Type	31-Mar-22
£000		£000
311,751	Index linked bonds	327,080
285,714	Multi asset credit	311,757
597,465	Total	638,837

Exposure to interest rate risk	Asset values at	Impact of 1%	Impact of 1%
	31-Mar-22	decrease	increase
	£000	£000	£000
Index linked bonds	327,080	330,351	323,809
Multi asset credit	311,757	314,875	308,639
Total change in assets available	638,837	645,226	632,448

Exposure to interest rate risk	Asset values at	Impact of 1%	Impact of 1%
	31-Mar-21	decrease	increase
	£000	£000	£000
Index-linked securities	311,751	314,869	308,633
Multi asset credit	285,714	288,571	282,857
Total change in assets available	597,465	603,440	591,490

Notes to the Pension Fund Accounts (continued)

Exposure to interest rate risk	Interest receivable	Value on 1% increase	Value on 1% decrease
	2021-22		
	£000	£000	£000
Cash deposits, cash and cash equivalents	19	19	19
Multi asset credit	5,459	5,514	5,404
Total	5,478	5,533	5,423

Exposure to interest rate risk	Interest receivable	Value on 1% increase	Value on 1% decrease
	2020-21		
	£000	£000	£000
Cash deposits, cash and cash equivalents	9	209	205
Fixed interest securities	531	536	526
Total	540	745	731

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

Currency Risk

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

The Fund's currency rate risk is routinely monitored by the Investment Sub Committee and its Investment Advisors in accordance with the Fund's Risk Management Strategy, including monitoring the range of exposure to currency fluctuations.

The Fund has partially hedged the currency exposures on its equity investments by transferring into currency hedged share classes of its passive equity funds.

Notes to the Pension Fund Accounts (continued)

Currency Risk – Sensitivity Analysis

Following analysis of historical data with the Fund’s Advisors, the Council considers the likely volatility associated with foreign exchange rate movements to be 9.5% (the 1 year expected standard deviation).

A 9.5% (31 March 2021: 9.8%) fluctuation in the currency is considered reasonable based on the Fund Advisors analysis of long-term historical movements in the month-end exchange rates over a rolling 36 month period. This analysis assumes that all other variables, in particular interest rates, remain constant. A 9.5% strengthening/weakening of the pound against the various currencies in which the fund holds investments would decrease/increase the net assets available to pay benefits as follows.

Assets exposed to currency risk	Value at	Potential	Value on	Value on
	31-Mar-22	market	increase	decrease
	£000	movement	£000	£000
Overseas equities - hedged	259,145	0	259,145	259,145
Overseas equities - unhedged	1,240,844	117,880	1,358,724	1,122,964
Overseas fixed income	157,117	14,926	172,043	142,191
Overseas cash fund	217	21	238	196
Total	1,657,323	132,827	1,790,150	1,524,496

Assets exposed to currency risk	Value at	Potential	Value on	Value on
	31-Mar-21	market	increase	decrease
	£000	movement	£000	£000
Overseas equities - hedged	249,314	0	249,314	249,314
Overseas equities - unhedged	1,394,078	136,620	1,530,698	1,257,458
Overseas fixed income	285,427	27,972	313,399	257,455
Overseas cash fund	657	64	721	593
Total	1,929,476	164,656	2,094,132	1,764,820

b) Credit Risk

Credit risk represents the risk that the counterparty to a transaction or a financial instrument will fail to discharge an obligation and cause the Fund to incur a financial loss. The market values of investments generally reflect an assessment of credit in their pricing and consequently the risk of loss is implicitly provided for in the carrying value of the Fund’s financial assets and liabilities. In essence the Fund’s entire investment portfolio is exposed to some form of credit risk, with the exception of the derivatives positions, where the risk equates to the net market value of a positive derivative position. However the selection of high quality counterparties, brokers and financial institutions minimises credit risk that may occur through the failure to settle a transaction in a timely manner.

Notes to the Pension Fund Accounts (continued)

Contractual credit risk is represented by the net payment or receipts that remains outstanding, and the cost of replacing the derivative position in the event of a counterparty default. The residual risk is minimal due to the various insurance policies held by the exchanges to cover defaulting counterparties.

Credit risk on over-the-counter derivative contracts is minimised as counterparties are recognised financial intermediaries with acceptable credit ratings determined by a recognized rating agency, Standard & Poor's. Deposits are not made with banks and financial institutions unless they are rated independently and meet the Council's credit criteria. The Council has also set limits as to the maximum percentage of the deposits placed with any one class of financial institution.

The Council believes it has managed its exposure to credit risk and has had no experience of default or uncollectible deposits over the past five financial years. The Fund's cash holding under its treasury management arrangements at 31 March 2022 was £45.0m (31 March 2021: £60.6m). This was held with the following institutions:-

	Rating	31-Mar-21 £000	31-Mar-22 £000
Money market funds			
Northern Trust Global Investors Global Cash Fund	AAAm	37,167	36,327
Bank deposit account			
Barclays Bank	A	9,162	8,659
Bank current accounts			
Northern Trust custody accounts	A-1+	14,316	47
Total		60,645	45,033

c) Liquidity Risk

Liquidity risk represents the risk that the Fund will not be able to meet its financial obligations as they fall due. The Fund therefore takes steps to ensure that it has adequate cash resources to meet its commitments. This will particularly be the case for cash from the cash flow matching mandates from the main investment strategy to meet the pensioner payroll costs and also cash to meet investment commitments.

The Fund has immediate access to its cash holdings, with the exception of holdings that are for a fixed term when the deposit is placed. The Fund defines liquid assets as assets that can be converted to cash within three months. Illiquid assets are those assets which will take longer than three months to convert in to cash. As at 31 March 2022 the value of illiquid assets was £638.5m, which represented 19.0% of the total Fund assets (31 March 2021: £495.3m, which represented 16.0% of the total Fund assets).

Management prepares periodic cash flow forecasts to understand and manage the timing of the Fund's cash flows. The appropriate strategic level of cash balances to be held forms part of the Fund Investment Strategy. All financial liabilities at 31 March 2022 are due within one year.

d) Refinancing Risk

A key risk for a Pension Fund is that it may be bound to replenish a significant proportion of its Pension Fund financial instruments at a time of unfavourable interest rates. The Fund does not have any financial instruments that have a refinancing risk as part of its Investment Strategy.

Notes to the Pension Fund Accounts (continued)

19. FUNDING ARRANGEMENTS

In line with the Local Government Pension Scheme Regulations 2013, the Fund's actuary undertakes a funding valuation every three years for the purpose of setting employer contribution rates for the forthcoming triennial period. The last such valuation took place as at 31 March 2019. The next valuation will take place as at 31 March 2022.

The key elements of the funding policy are:

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

The aim is to achieve 100% solvency over a maximum period of 20 years and to provide stability in employer contribution rates by spreading any increases in rates over a period of time. Solvency is achieved when the funds held, plus future expected investment returns and future contributions are sufficient to meet expected future pension benefits payable. Where an employer's funding level is less than 100%, a deficit recovery plan is put in place requiring additional contributions from the employer to meet the shortfall.

At the 2019 actuarial valuation, the Fund was assessed as 93% funded (78% at the March 2016 valuation). This corresponded to a deficit of £176m (2016 valuation: £517m) at that time.

The Contribution Objective is achieved by setting employer contributions which are likely to be sufficient to meet both the cost of new benefits accruing and to address any funding deficit relative to the funding target over the agreed time horizon. A secondary objective is to maintain where possible relatively stable employer contribution rates.

For each employer in the Fund, to meet the Contribution Objective, a primary contribution rate has been calculated in order to fund the cost of new benefits accruing in the Fund. Additionally, if required, a secondary contribution rate has also been calculated to target a fully funded position within the employer's set time horizon.

The table below summarizes the whole fund Primary and Secondary Contribution rates at the 2019 triennial valuation. These rates are the payroll weighted average of the underlying individual employer primary and secondary rates, calculated in accordance with the Regulations and CIPFA guidance.

Primary Rate %	Secondary Rate		
1 April 2020 to 31 March 2023: 19%	2020-21: £20,339,000	2021-22: £20,463,000	2022-23: £20,696,000

The Primary rate above includes an allowance of 0.8% of pensionable pay for the Fund's expenses. The average employee contribution rate is 6.3% of pensionable pay. Full details of the contribution rates payable can be found in the 2019 actuarial valuation report and the funding strategy statement on the Fund's website.

Notes to the Pension Fund Accounts (continued)

Basis of Valuation

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

Financial Assumptions

A summary of the main financial assumptions adopted for the valuation of members' benefits are shown below.

Assumption	31-Mar-16	31-Mar-19
Price Inflation (CPI)/ Pension increases	2.1%	2.3%
Pay increases - 2016	2.4%*	2.8%**

*CPI plus 0.3%

**2% until 31 March 2020 followed by CPI plus 0.5% thereafter

The next triennial valuation is due 31 March 2022 where CPI was much higher than 31 March 2019, this is included as an experience item in the valuation.

Mortality Assumptions

Future life expectancy based on the actuary's fund-specific mortality review was:

Assumed life expectancy at age 65	Active and Deferred Members		Current Pensioners	
	Male	Female	Male	Female
2016 valuation	23.9	26.1	22.1	24.2
2019 valuation	22.3	25.1	21.5	23.7

Note that the figures for active and deferred members assume that they are aged 45 at the valuation date.

Various scaling factors have been applied to the mortality tables to reflect the predicted longevity for each class of member and their dependents.

Other Demographic Valuation Assumptions:

- Retirements in ill-health** - Allowance has been made for ill-health retirements before normal pension age.
- Withdrawals** - Allowance has been made for withdrawals from service.
- Retirements in normal health** - We have adopted the retirement age pattern assumption as used for the purpose of the 2016 LGPS cost cap valuation.
- Death in Service** - Allowance has been made for death in service.
- Promotional salary increases** - Allowance has been made for promotional salary increases.
- Family details** - A varying proportion of members are assumed to have a dependant at retirement or on earlier death. For example, at age 60 this is assumed to be 90% for males and 85% for females. The dependant of a male member is assumed to be 3 years younger than him and the dependant of a female member is assumed to be 3 years older than her.
- Commutation** - 50% of future retirements elect to exchange pension for additional tax free cash up to HMRC limits for service to 1 April 2008 (equivalent 75% for service from 1 April 2008).
- 50:50 option** - 1.0% of members (uniformly distributed across the age, service and salary range) will choose the 50:50 option.

Notes to the Pension Fund Accounts (continued)

20. ACTUARIAL PRESENT VALUE OF PROMISED RETIREMENT BENEFITS

In addition to the triennial funding valuation, the Fund's actuary also undertakes a valuation of the Pension Fund liabilities, on an IAS 19 basis, every year using the same base data as the funding valuation rolled forward to the current financial year, taking account of changes in membership numbers and updating assumptions to the current year.

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

31-Mar-21		31-Mar-22
£m		£m
-4,572	Present value of promised retirement benefits	-4,418
3,103	Fair value of scheme assets (bid value)	3,368
-1,469	Net liability	-1,050

As noted above, the liabilities are calculated on an IAS 19 basis and therefore will differ from the results of the 2019 triennial funding valuation (see Note 19) because IAS 19 stipulates a discount rate rather than a rate which reflects market rates.

Assumptions Used

31-Mar-21	Assumption	31-Mar-22
% p.a.		% p.a.
2.85	Inflation/pension increase rate assumption	3.20
3.35	Salary increase rate	3.70
2.00	Discount rate	2.70

Notes to the Pension Fund Accounts (continued)

21. CURRENT ASSETS

31-Mar-21		31-Mar-22
£000		£000
Debtors:		
1,754	Contributions due – members	2,044
6,033	Contributions due – employers	6,286
1,028	Other debtors	1,575
8,815		9,905
Cash balances		
9,162		8,659
9,162		8,659
17,977		18,564

22. CURRENT LIABILITIES

31-Mar-21		31-Mar-22
£000		£000
967	Benefits payable	661
5,015	Other creditor	4,915
5,982		5,576

23. ADDITIONAL VOLUNTARY CONTRIBUTIONS

31-Mar-21		31-Mar-22
£000		£000
5,725	Prudential	5,444
642	Standard Life	645
6,367		6,089

Total contributions of £148k (2020-21: £81k) were paid directly to Prudential during the year. Total contributions of £7k (2020-21: £51k) were paid directly to Standard Life during the year.

24. AGENCY SERVICES

Agency Services represent activities administered by the Fund on behalf of scheme employers which are not included within the Fund Account but are provided as a service and are fully reclaimed from the employer bodies.

31-Mar-21		31-Mar-22
£000		£000
2,208	Unfunded pensions	2,248
2,208		2,248

25. RELATED PARTIES TRANSACTIONS

West Northamptonshire Council

The Northamptonshire Pension Fund is administered by West Northamptonshire Council. Consequently, there is a strong relationship between the Council and the Fund. The Council incurred costs of £2.2m (2020-21: £1.6m) in relation to the administration of the Fund and was subsequently reimbursed by the Fund for these expenses.

The Council is also the single largest employer of members of the Pension Fund and contributed £23.6m of employer's contributions to the Fund in 2021-22 (2020-21: £25.9m as Northamptonshire County Council). At 31 March 2022 there was £1.9m due to the Fund by the Council (31 March 2021: £263k was due to the Fund by the Council).

Governance

No Pensions Committee members declared a personal interest due to either being a member of the scheme themselves or having a family member in the scheme. Council members have declared their interests in their Register of Members' Interests. Other members of the Pensions Committee are required to declare their interests at each meeting.

Notes to the Pension Fund Accounts (continued)

25 (a). KEY MANAGEMENT PERSONNEL

The administration of the Fund is provided by West Northamptonshire Council (lead authority) in partnership with Cambridgeshire County Council. The Head of Pensions reports directly to Assistant Director of Finance at West Northamptonshire Council, whose costs are reported in the West Northamptonshire Council statement of accounts. Other key personnel include the Section 151 Officer.

31-Mar-21	31-Mar-22
£000	£000
54 Short-term benefits	56
186 Post-employment benefits	3
240	59

26. CONTINGENT LIABILITIES AND CONTRACTUAL COMMITMENTS

Outstanding capital commitments at 31 March 2022 totalled £181.4m (31 March 2021: £186.6m).

These commitments relate to outstanding call payments due on unquoted limited partnership funds held in the private equity and infrastructure parts of the portfolio. The amounts 'called' by these funds are irregular in both size and timing over a period of between three and fifteen years from the date of each original commitment.

27. CONTINGENT ASSETS

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

28. ASSET POOLING

The Northamptonshire Pension Fund has joined with ten other Local Government Pension Schemes (LGPS) Administering Authorities to form the ACCESS (A Collaboration of Central, Eastern and Southern Shires) Pool. The other members of the ACCESS Pool are:

Cambridgeshire, East Sussex, Essex, Hampshire, Hertfordshire, Isle of Wight, Kent, Norfolk, Suffolk and West Sussex.

On 31 March 2022 collectively the pool has assets of £60bn (of which 58.5% has been pooled) serving 3,500 employers with over 1.2 million members including 310,000 pensioners.

The ACCESS Pool is not a legal entity in itself but is governed by the Inter Authority Agreement (IAA) signed by each Administering Authority established in 2017. The IAA sets out the terms of reference and constitution of ACCESS.

The formal decision-making body within the ACCESS Pool is the ACCESS Joint Committee. The Joint Committee has been appointed by the 11 Administering Authorities under s102 of the Local Government Act 1972, with delegated authority from the Fund Council of each Administering Authority to exercise specific functions in relation to the Pooling of Pension Fund assets.

The Joint Committee is responsible for ongoing contract management and budget management for the Pool and is supported by the Section 151 Officers Group, Officer Working Group and the ACCESS Support Unit. More information on the ACCESS pool can be found on their website: [ACCESS Pool](#).

Notes to the Pension Fund Accounts (continued)

29. Prior Period Adjustment

There have been two prior period adjustments to the 2020-21 position. Previously, pooled property holdings £58.4m have been classified as Level 2 using fair value techniques, however they have been reclassified to Level 3 due to the valuation techniques use, Level 3 is a more appropriate classification for these assets. Additionally, £37m cash held in Money Market Funds were held at amortised cost during 2020-21, due to the nature of these assets they would require to be held at fair value through profit and loss.

Values at March 2021 - Prior year	Level 1	Level 2	Level 3	Total
Financial assets at fair value through profit and loss	£000	£000	£000	£000
Equities	17	0	0	17
Pooled investments	657	2,543,374	0	2,544,031
Pooled property investments	0	58,366	127,150	185,516
Private equity/infrastructure	0	0	309,824	309,824
Net investment assets	674	2,601,740	436,974	3,039,388

Values at March 2021	Level 1	Level 2	Level 3	Total
Financial assets at fair value through profit and loss	£000	£000	£000	£000
Equities	17	0	0	17
Pooled investments	657	2,543,374	0	2,544,031
Pooled property investments	0	0	185,516	185,516
Private equity/infrastructure	0	0	309,824	309,824
Cash and Cash Equivalents	37,167	0	0	37,167
Net investment assets	37,841	2,543,374	495,340	3,076,555

As a result of these classifications notes 16a, 16b and 17a have been amended.

Glossary

ACCRUAL An amount to cover income or spending that belongs to the accounting year, which was outstanding at the accounting date.

ACTUARY An independent company which advises on the assets and liabilities of the Fund with the aim to ensure that the payment of pensions and future benefits are met.

ACS Authorised Contractual Scheme.

ADMITTED BODIES Voluntary and charitable bodies whose staff can become members of the Local Government Pension Scheme subject to certain terms and conditions and other organisations to whom Local Government employees have been transferred under the outsourcing of Local Government services.

AJC ACCESS Join Governance Committee

AUM Assets Under Management

BENEFICIAL OWNER The true owner of a security regardless of the name in which it is registered.

BID PRICE The price at which securities are purchased by market makers.

BOND Security issued by a corporate or government body borrowing in the capital markets. Bonds promise to pay interest (coupons) during the life of the bond plus the principal sum borrowed on the redemption date. Bonds may be secured over assets of the firm or be unsecured.

CASH EQUIVALENTS Assets which are readily convertible into cash.

CIPFA Chartered Institute of Public Finance and Accountancy

COMMUTATION Giving up part or all of the pension payable from retirement in exchange for an immediate lump sum. Commutation factors (usually calculated by the Fund Actuary) are used to determine the amount of pension which needs to be given up in order to provide the lump sum.

CONTINGENT ASSETS AND LIABILITIES Are assets and liabilities that may or may not be incurred depending on the outcome of a future event.

CONVERTIBLE Unsecured loan stock (bond) which converts into equity of the issuing company. The UK Government also issues convertible gilts which convert into other government stock.

COUPON The regular payment made on bonds.

CTI Cost Transparency Initiative

CURRENT ASSETS Short-term assets such as inventories, receivables and bank balances.

CURRENT LIABILITIES Amounts owed which are due to be settled in less than one year, such as bank overdrafts and money owed to suppliers.

CUSTODIAN An external body responsible for ensuring Fund assets are registered in the name of the Fund, managing the settlement of trades entered into by the Fund, collecting income arising on Fund assets and reporting transactions and values to the Fund on a regular basis.

DEFERRED PENSION BENEFIT A pension benefit which a member has accrued but is not yet entitled to receive.

DEFICIT An outcome as a result of taking away all expenses from income. Additionally, the Fund is in deficit when the liabilities are larger than assets.

DERIVATIVE A financial instrument derived from a security, currency or commodity, or an index indicator representing any of these, the price of which will move in a direct relationship to the price of the underlying instrument. Derivatives can be used for a number of purposes - including insuring against price movements (hedging), increasing exposure to price movements for speculation or getting access to otherwise hard to trade assets or markets.

Glossary (continued)

DIVIDEND The distribution of profits by a company to its shareholders. The dividend may be passed or cut if profits fall. [See also Equities]

EQUITIES Shares representing the capital of a company issued to shareholders usually with voting rights on the way the company runs the business. Equity holders rank last in the event of the winding up of a company.

FINANCIAL INSTRUMENTS Contracts which give rise to a financial asset of one entity and a financial liability or equity instrument of another.

FINANCIAL CONDUCT AUTHORITY (FCA) The lead UK regulator. A designated agency which is not a government department.

FIXED INTEREST CORPORATE BOND A certificate of debt issued by a company or institution in return for a fixed rate interest with a promise of redemption to repay the original sum.

FTSE-100 INDEX The main UK index used to represent the approximate price movements of the top 100 shares.

FTSE All Share Index Summarises the state of the UK equity market. It covers some 900 of the major UK industrial, commercial and financial companies.

FUTURES Instruments which give a buyer the right to purchase a commodity at a future date.

GMP Guaranteed Minimum Pension

HEDGE To protect a fund from a fall in prices. This is usually accomplished by the selling of futures.

IAS International Accounting Standards

IAS19 outlines the accounting requirements for employee benefits, including short-term benefits, post-employment benefits such as retirement benefits, other long-term benefits and termination benefits.

IDRP Internal Dispute Resolution Procedures

INDEX LINKED Stock whose value is related directly to an index, usually the Retail Price Index and therefore provides a hedge against inflation.

IN-SPECIE TRANSFER Transferring an asset 'in specie' means to transfer the ownership of that asset from one person/company/entity to another person/company/entity in its current form, that is without the need to convert the asset to cash. In specie transfers involve a transfer of assets between two pension schemes.

INTEREST YIELD The annual coupon on a bond divided by the price of a bond which is quoted without accrued interest.

INTERNATIONAL FINANCIAL REPORTING STANDARDS (IFRS) Accounting Standards, Interpretations and the Framework adopted by the International Accounting Standards Board (IASB).

ISC Investments Sub-Committee

LOAN STOCK Unsecured bonds, which may be convertible if they have a warrant attached.

LPB Local Pension Board.

OFFER PRICE The price at which market makers will sell stock.

ORDINARY SHARES 'A' Shares which confer full voting and dividend rights to the Owner.

PENSION STRAIN Charges to employers to cover discretionary early retirement costs, which are the responsibility of the employer, recovered in the first year of retirement in full.

PC Pensions Committee.

Glossary (continued)

PLSA Pensions and Lifetime Savings Association.

PORTFOLIO A collection of investments. This can refer to the investments managed by a particular Investment Manager, or to describe the whole Fund's investments.

RAG Red, Amber and Green

RELATED PARTY A person or an organisation which has influence over another person or organisation.

SAB Scheme Advisory Board

SCHEDULED BODIES Local Authorities and similar bodies whose staff are entitled automatically to become members of the local Authority Pension Fund.

STOCK Shares (e.g. Common stock). However, UK Gilts are more correctly described as stock.

SURPLUS An outcome as a result of taking away all expenses from income. Additionally, the Fund is in surplus when the assets are larger than liabilities.

TRANSFER VALUES Sums which are paid either to or received from other pension schemes and relate to new and former members' periods of pensionable employment with employers participating in the scheme.

TREASURY MANAGEMENT A process which plans, organises and controls cash, investments and borrowings so as to optimise interest and currency flows, and minimise the cost of funds.

UNDECIDED LEAVER A member who has left employment but their pension benefits have yet to be calculated

UNFUNDED Pension benefits not funded by the Pension Fund. Benefits are fully reclaimed from the employer bodies.

UNIT TRUST An open-ended trust investing in a wide spread of stocks, shares and cash (subject to FSA limits). Investors buy units directly from the Investment manager to participate in a diversified portfolio. Unit trusts are subject to FSA investment and borrowing regulations.

ACCESS

Annual Report

2021/22

Contents

Foreword by Cllr Mark Kemp-Gee	3
Introduction by Kevin McDonald – Director ACCESS Support Unit	4
ACCESS Background	6
ACCESS LGPS Authorities	7
Key Performance	8
Savings	9
Business Plan Milestone 2021/22	10
Business Plan 2022/23	11
Environmental, Social and Governance	12

Foreword

As Chairman of the ACCESS Joint Committee, I am pleased to introduce the latest Annual Report for the ACCESS Pool.

The COVID-19 pandemic not only shaped the way we all work but also led to significant market volatility. This volatility has continued following the Russian invasion of Ukraine and that cruel and unwarranted event has exacerbated energy and other supply chain issues that have contributed to rampant inflationary pressures. All in all, a difficult time for investors everywhere.

The development of the ACCESS Pool continues at pace with an additional four sub-funds opened during the year to assist the authorities in achieving diversification within their investment strategies attracting an additional £3.2 billion investment into the Pool.

In January 2022 MJ Hudson were appointed as implementation adviser for the establishment of pool vehicles for illiquid assets, after a competitive call off utilising the National LGPS Frameworks.

As implementation advisor, MJ Hudson will provide support to the Pool in selecting individual investment opportunities and investment managers to build portfolios in a range of illiquid assets including private equity, private debt, infrastructure and initially, real estate.

Another key achievement during the year was the development of updated Responsible Investment guidelines for which the pool was partnered by Minerva Analytics. Once consultation has been completed the guidelines will be formally published.

In addition to its Annual Report, ACCESS also produced a Progress Update report in conjunction with its communication advisers MHP Mischief, to provide an insight to the Pool, key activities and future plans.

In the year ahead we welcome representatives of the Local Pension Boards to observe the future Joint Committee meetings. Two members from each Board will be able to attend a meeting at least once a year.

In closing I would like to thank my fellow ten Joint Committee members, each representing their respective Authorities, along with the officers who support them, and the ACCESS Support Unit.



Cllr Mark Kemp-Gee

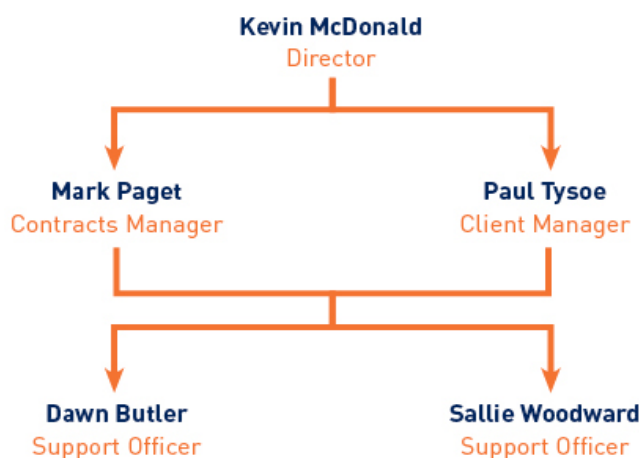
Chairman of the ACCESS Joint Committee

Chairman of the Hampshire Pension Fund Committee and Board

Introduction

It is my pleasure to introduce an overview of the work by the ACCESS Support Unit.

In 2018, the ACCESS Joint Committee agreed that a unit be established to provide day to day support for the work required to run the Pool, and that Essex County Council act as Host Authority. The ACCESS Support Unit (ASU) facilitates the Joint Committee (JC) and officer groups and has responsibility for programme management, client relationships, contract management/supplier relationships, administration and technical support services. The ASU's structure is set out below:



A business plan is developed and submitted for consideration by the JC ahead of the start of each year, prior to being recommended to each of the ACCESS Authorities. The business plan includes milestones across listed assets (both active and passive), non-listed assets and governance. The JC also determines an annual budget to support the activities within the business plan.

The ASU has responsibility to manage this development and implementation of the business plan, within budget, whilst assessing and managing the risks for the pool.

A central feature of ACCESS is the engagement of each of the eleven Authorities, and therefore the support and facilitation of stakeholder groups is key to the work of the ASU. The governance structure of the Pool ensures that dialogue with, and input from, Local Government Pension Scheme (LGPS) subject matter experts from each Authority, is gathered through the Officer Working Group (OWG) and various sub-groups. In turn, this enables the s151 Officer Group to form the recommendations that are ultimately considered by the JC.

It has long been recognised that considerable expertise exists within the LGPS officer community. The full time ASU staff are therefore supplemented by part-time Technical Leads whose work for ACCESS is part of the Pool's costs. In the last year this saw invaluable contributions from Sharon Tan, Suffolk (reporting); Samantha Andrews, Essex (budgeting) and Rachel Wood and Vickie Hampshire, West Sussex (Governance Manual).

The year ahead will see further sub-fund launches to meet the investment strategies of the Authorities, including emerging market equities, the start of the alternative asset investment platform with advice and guidance from MJ Hudson and the publication of the updated Responsible Investment guidelines.

I would like to thank my ASU colleagues, the technical leads and the officers of the Authorities for their enthusiasm, support and hard work towards the commendable progress of the Pool.



Kevin McDonald

Director of ACCESS Support Unit

ACCESS Background

ACCESS has its origins in 2016 when 11 Local Government Pension Scheme (LGPS) Authorities agreed to begin working collectively to address the requirements of the Government’s agenda for pooling LGPS investments.

The following strategic objectives are in place:

- 1** Enable the Councils to execute their fiduciary responsibilities to LGPS stakeholders, including scheme members and employers, as economically as possible.

- 2** Provide a range of asset types necessary to enable those participating Authorities to execute their locally-determined investment strategies as far as possible.

- 3** Enable the Councils to achieve the benefits of pooling investments, preserve the best aspects of what is currently done locally, and create the desired level of local decision making and control.

In order to achieve these objectives, the Councils have established a set of governing principles.

The governing principles are summarised below:

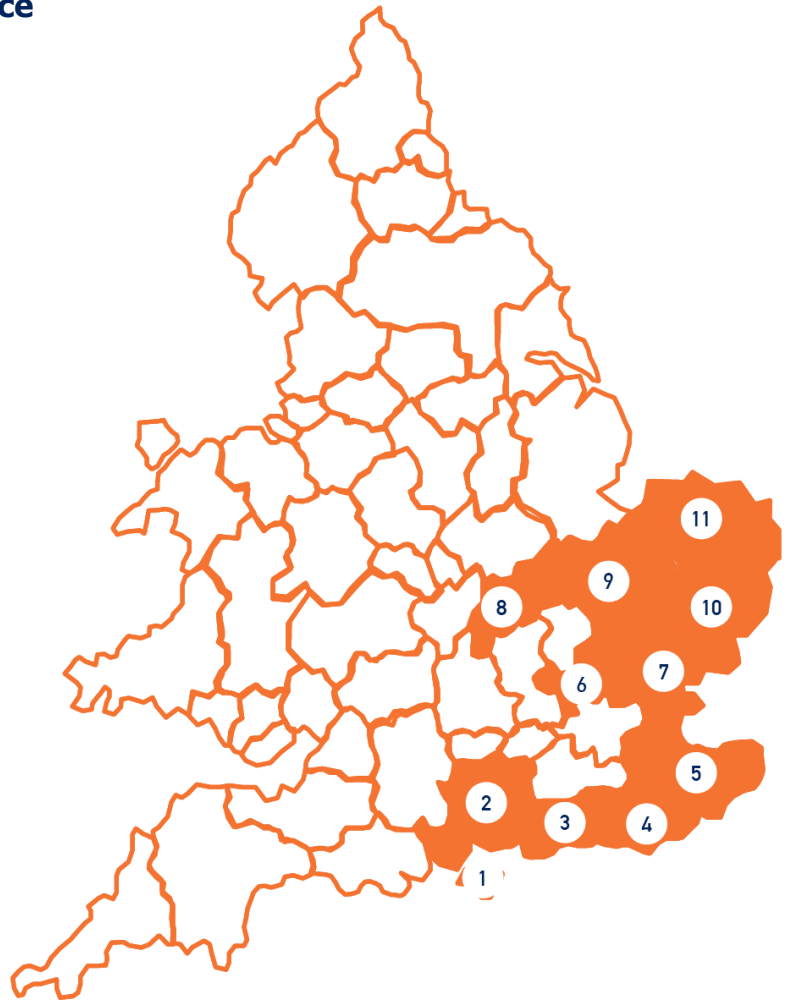
- Collaboration
- Objective evidence based decisions
- Professionalism
- No unnecessary complexity
- Value for money
- Risk management
- Equitable voice in governance
- Equitable cost sharing
- Evolution and innovation

Implicit within the above principles is the democratic accountability and fiduciary duty of the Councils as Administering Authorities.

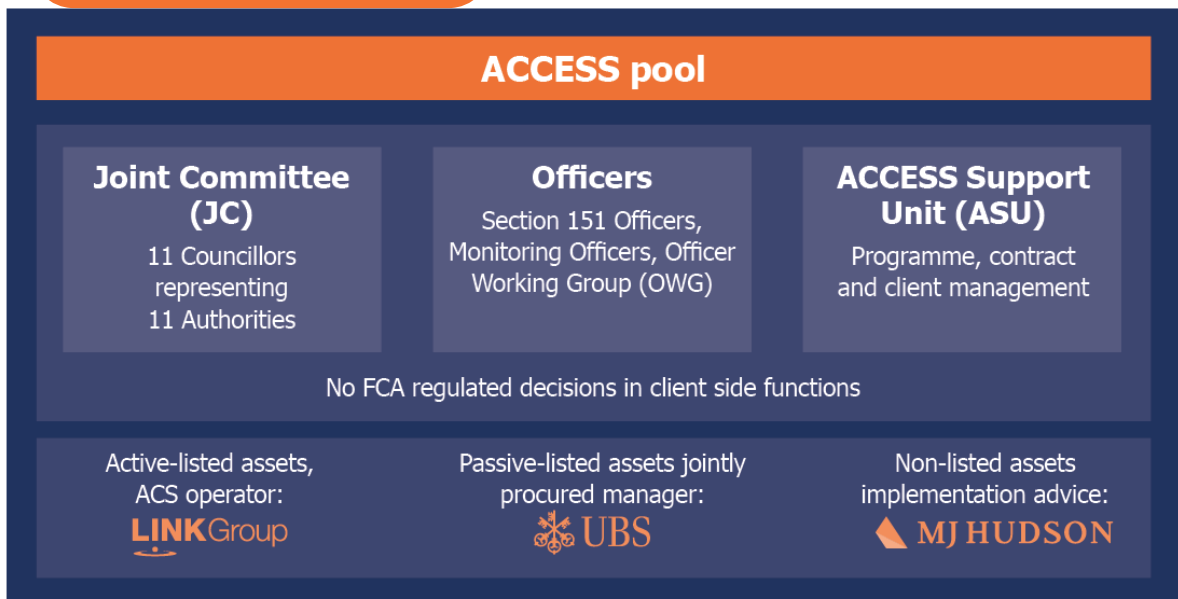
ACCESS LGPS Authorities

An overview of the Pool's governance structure is outlined below.

- | | | | |
|---|---|----|--|
| 1 |  | 7 | 
Essex County Council |
| 2 | 
Hampshire County Council | 8 | 
West Northamptonshire Council |
| 3 | 
west sussex county council | 9 | 
Cambridgeshire County Council |
| 4 | 
East Sussex County Council | 10 | 
Suffolk County Council |
| 5 | 
Kent County Council | 11 | 
Norfolk County Council |
| 6 | 
Hertfordshire | | |



3,500 Employers
1.1 million Members
310,000 Pensioners



Key Performance

Pooled Assets
As at March 2022

ACS (26 sub-funds)

£23.9_{bn}

UBS (1 jointly procured provider)

£11.2_{bn}

Pooling Progress

59%

Costs & Savings
As at March 2022

Gross Savings

£70.3_m

Costs

£21.4_m

Net Savings

£48.9_m

Savings

A budget for ongoing operational costs is set by the Joint Committee and is financed equally by each of the eleven Authorities.

2021/22 saw an underspend primarily due to lower than anticipated costs of external advice combined with an underspend in the technical lead recharge costs.

The table below summarises the financial position for 2021/22 along with the cumulative position since the commencement of ACCESS activity in early 2016.

	2021– 2022		2021 – 2022	
	Actual In Year £'000	Budget In Year £'000	Actual Cumulative to date £'000	Budget Cumulative to date £'000
Set Up Costs	-	-	1,824	1,400
Transition Costs	2,664	4,408	3,338	6,907
Ongoing Operational Costs	1,046	1,247	4,117	4,795
Operator & Depositary Costs	4,845	4,787	12,149	11,364
Total Costs	8,555	10,442	21,428	24,466
Pool Fee Savings	28,038	15,700	70,300	47,750
Net Savings Realised	19,483	5,258	48,872	23,284

A budget for ongoing operational costs is set by the Joint Committee and is financed equally by each of the eleven Authorities. 2021/22 saw an underspend primarily due to lower than anticipated costs of external advice combined with an underspend in the technical lead recharge costs.

Operator and depositary fees are payable by each Authority in relation to assets invested within the Authorised Contractual Scheme established by Link Fund Solutions as pool operator.

The 2021/22 fee savings have been calculated using the CIPFA price variance methodology and based on the average asset values over the year. This approach highlights the combined level of investment fee savings, across all ACCESS Authorities stemming from reduced charges.

In summary, since inception ACCESS has demonstrated excellent value for money, maintaining expenditure broadly in line with the original submission to Government whilst delivering an enhanced level of savings ahead of the timeline contained in the original proposal.

2021-2022 Business Plan Milestones

The Business Plan for 2021-22 was proposed by the ACCESS Joint Committee in January 2020 to the 11 LGPS Authorities.

Actively managed listed assets:

Further progress was made in pooling active listed assets within the Authorised Contractual Scheme (ACS) managed by the Pool's appointed Operator, Link Fund Solutions. Between July 2021 and February 2022, a further four sub-funds were launched.

Link's appointment of BlackRock expands the UK Equity capacity within the Pool, the appointment of Macquarie broadens the Global Equity coverage whilst the addition of ACS mandates for Fidelity and M&G extends the Fixed Income offering.

Six Authorities participated as original investors within these sub-funds which totalled £3.2bn.

Alternative/non-listed assets:

In January 2022, following a procurement via the National LGPS frameworks, ACCESS announced the appointment of MJ Hudson as implementation adviser for the pooling of illiquid assets including private equity, private debt, infrastructure and real estate.

As implementation advisor, MJ Hudson will provide support to the Pool in selecting individual investment opportunities and investment managers to build portfolios in a range of illiquid assets.

Passive assets:

Ongoing monitoring and engagement continued with jointly procured passive manager, UBS.

Responsible Investment Guidelines:

Last year, following a procurement via National LGPS frameworks, ACCESS appointed Minerva Analytics as Environmental, Social & Governance (ESG) adviser.

Having reviewed the ESG policies of and engaged extensively with officers from each of the 11 ACCESS Authorities, Minerva Analytics drafted revised and updated Responsible Investment (RI) guidelines for the Pool.

2022-2023 Business Plan

The Business Plan for 2022-23 was proposed by the ACCESS Joint Committee on 6th December 2021 to the 11 LGPS Authorities. This plan included:

Actively managed listed assets:

Further pooling active listed assets within the Authorised Contractual Scheme (ACS) managed by the Pool's appointed Operator, Link Fund Solutions which will include emerging market equity and further fixed income sub-funds.

Alternative/non-listed assets:

Launch of the Pool's first illiquid asset investment vehicles. MJ Hudson will be undertaking procurement exercises to appoint a UK Core Manager and a Global Real Estate allocator.

Initial work will commence on the planning for other illiquid asset investment platforms.

Passive assets:

Ongoing monitoring and engagement with jointly procured passive manager, UBS.

Responsible Investment Guidelines:

Following consultation with the ACCESS Authorities the updated Responsible Investment Guidelines will be published.

Work will commence on establishing criteria to develop a matrix to report on key performance indicators to demonstrate how the responsible investment guidelines have been implemented.

Environmental, Social & Governance

The ACCESS Authorities believe in making long term sustainable investments whilst integrating environmental and social risk considerations, promoting good governance and stewardship.

Whilst the participating authorities have an overriding fiduciary and public law duty to act in the best long-term interests of their LGPS stakeholders to achieve the best possible financial returns, with an appropriate level of risk they also recognise the importance of committing to responsible investment alongside financial factors in the investment decision making process.

Responsible Investment:

ACCESS appointed Minerva Analytics as its Environmental, Social & Governance (ESG) adviser. Following a review of the ESG policies, and engagement with officers from each of the Authorities Minerva Analytics drafted consolidated Responsible Investment (RI) guidelines for the Pool.

Following a period of consultation, it is expected that finalised Guidelines will be adopted by the Pool during 2022.

Voting:

The ACCESS pool has a set of voting guidelines which seeks to protect and enhance the value of its shareholdings by promoting good practice in the corporate governance and management of those companies.

The guidelines set out the principles of good corporate governance and the means by which ACCESS will seek its influence on companies. The voting activity is reported to the Joint Committee on a quarterly basis.

During the year ACCESS voted at 2,391 meetings on 32,834 resolutions.

Engagement:

Link Fund Solutions arranges regular sessions with the Investment Managers to present to the Authorities Pension Fund Officers to demonstrate how they implement environmental, social and governance into their investment strategy and decision-making process.

These also give the investment manager the opportunity to discuss the engagement activities they have undertaken, what constructive dialogue was had and how they have used their influence to encourage the adoption of best practice.

For any enquiries, please contact the Access Support Unit (ASU) on ASU@accesspool.co.uk

accesspool.org

This page is intentionally left blank

The Preliminary Audit Findings for Northamptonshire Pension Fund

Year ended 31 March 2022

Northamptonshire Pension Fund
November 2022



Contents



Your key Grant Thornton team members are:

Ciaran McLaughlin

Key Audit Partner

E Ciaran.T.McLaughlin@uk.gt.com

David Rowley

Manager

E David.M.Rowley@uk.gt.com

Ben Stevenson

Assistant Manager

E Ben.Stevenson@uk.gt.com

Section

1. Headlines
2. Financial statements
3. Independence and ethics

Appendices

- A. Action plan
- B. Follow up of prior year recommendations
- C. Audit adjustments
- D. Fees

Page

- 3
- 4
- 14
- 17
- 18
- 19
- 21

The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our audit planning process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect the Pension Fund or all weaknesses in your internal controls. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

Grant Thornton UK LLP is a limited liability partnership registered in England and Wales: No.OC307742. Registered office: 30 Finsbury Square, London, EC2A 1AG. A list of members is available from our registered office. Grant Thornton UK LLP is authorised and regulated by the Financial Conduct Authority. Grant Thornton UK LLP is a member firm of Grant Thornton International Ltd (GTIL). GTIL and the member firms are not a worldwide partnership. Services are delivered by the member firms. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions.

1. Headlines

This table summarises the key findings and other matters arising from the statutory audit of Northamptonshire Pension Fund ('the Pension Fund') and the preparation of the Pension Fund's financial statements for the year ended 31 March 2022 for those charged with governance.

Financial Statements

Under International Standards of Audit (UK) (ISAs) and the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to report whether, in our opinion:

- the Pension Fund's financial statements give a true and fair view of the financial position of the Pension Fund and its income and expenditure for the year; and
- have been properly prepared in accordance with the CIPFA/LASAAC code of practice on local authority accounting and prepared in accordance with the Local Audit and Accountability Act 2014.

Our audit work was completed remotely during June-September. Our findings are summarised on pages [x] to [x]. We have not identified any issues requiring an adjusting entry to the core financial statements. However, an unadjusted misstatement relating to timing delays in production of investment manager reports was identified. If adjusted, this would increase the value of the Fund's Net Asset Statement by £8.5m Management have opted not to amend as the value is not material. In addition, a small number of required disclosure amendments were identified. Further information on the above is provided at Appendix C. We have also raised one recommendation for management as a result of our audit work in Appendix A. Our follow up of recommendations from the prior year's audit are detailed in Appendix B.

Our work is substantially complete and there are no matters of which we are aware that would require modification of our audit opinion, subject to the following outstanding matters;

- completion of 20/21 audit and review by Grant Thornton of predecessor audit file (to obtain assurance over opening balances);
- receipt of management representation letter; and
- review of the Annual report
- review of the final set of financial statements.

We have concluded that the other information to be published with the financial statements, is consistent with our knowledge of your organisation and the financial statements we have audited.

Our anticipated audit report opinion will be unmodified. Given the likely timeline of sign off of the financial statements, a draft opinion and letter of representation will be shared with management and agreed for inclusion of the final version of the report to coincide with conclusion of the 21/22 audit of the administering authority.

2. Financial Statements

Overview of the scope of our audit

This Audit Findings Report presents the observations arising from the audit that are significant to the responsibility of those charged with governance to oversee the financial reporting process, as required by International Standard on Auditing (UK) 260 and the Code of Audit Practice ('the Code'). Its contents have been discussed with management prior to the Committee date.

As auditor we are responsible for performing the audit, in accordance with International Standards on Auditing (UK) and the Code, which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance. The audit of the financial statements does not relieve management or those charged with governance of their responsibilities for the preparation of the financial statements.

Audit approach

Our audit approach was based on a thorough understanding of the Pension Fund's business and is risk based, and in particular included:

- An evaluation of the Pension Fund's internal controls environment, including its IT systems and controls; and
- Substantive testing on significant transactions and material account balances, including the procedures outlined in this report in relation to the key audit risks

We have not had cause to alter our audit strategy, which was outlined in the plan presented to you on 25 July 2022.

Conclusion

We have substantially completed our audit of your financial statements and subject to outstanding queries being resolved and a satisfactory review of the predecessor audit file, we anticipate issuing an unqualified audit opinion to coincide with completion of the 2021/22 audit of West Northamptonshire Council. These outstanding items include are outlined on page 3.

Given the likely timing delay on completion of the West Northamptonshire Council 21/22 audit and existing delays in completion of 20/21 Fund and Administering Authority audits, this report is currently indicative and, as such, we will include a draft opinion and Letter of Representation in our final AFR, to coincide with completion of the administering authority audit for 21/22.

Acknowledgements

We would like to take this opportunity to record our appreciation for the assistance provided by the finance team and other staff. Both the engagement team and Fund staff have faced challenges stemming from the ongoing coronavirus pandemic, related staff sickness and the impact of the move to remote working in addition to the inherent challenges of a change of auditor. However, a good working relationship has been established, with working papers and supporting documentation supplied in a timely fashion and to a good standard.

2. Financial Statements

Pension Fund Amount (£) Qualitative factors considered

Materiality for the financial statements	33.6m	Materiality is calculated as approximately 1% of Net Assets per the draft accounts. We deem this to be a level above which errors or omissions would alter the economic decisions of users of the accounts.
Performance materiality	21.8m	Based on the internal control environment at the Fund we determined that 65%
Trivial matters	1.6m	We deem matters below 5% of materiality to be sufficiently, trivial not to warrant drawing to the attention of the Committee.



Our approach to materiality

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to disclosure requirements and adherence to acceptable accounting practice and applicable law.

Upon receipt and review of the draft financial statements, we revised materiality. Planning materiality reported to you in our Audit Plan on 25 July 2022 made assumptions around the impact of the ongoing conflict in Ukraine on global markets in the final quarter of 21/22 and attempted to set a prudent level of materiality against a possible downwards trend. Draft financials and our wider understanding of the sector suggested that, in practice, the impact was not as pronounced as anticipated and therefore our revised materiality was more appropriate.

We detail in the table below our determination of materiality for Northamptonshire Pension Fund.



2. Financial Statements - Significant risks

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement.

This section provides commentary on the significant audit risks communicated in the Audit Plan.

Risks identified in our Audit Plan	Commentary
<p>Management override of controls</p> <p>Under ISA (UK) 240, there is a non-rebuttable presumed risk that management override of controls is present in all entities. The Fund faces external scrutiny of its spending and stewardship of assets and this could potentially place management under undue pressure in terms of how they report performance.</p> <p>We therefore identified management override of control, in particular journals, management estimates and transactions outside the course of business as a significant risk of material misstatements.</p>	<p>We have;</p> <ul style="list-style-type: none"> - evaluated the design effectiveness of management controls over journals - analysed the journals listing and determined the criteria for selecting high risk unusual journals - identified and tested unusual journals made during the year and the accounts production stage for appropriateness and corroboration - gained an understanding of the accounting estimates and critical judgements applied by management and considered their reasonableness - Evaluated the rationale for any changes in accounting policies, estimates or significant unusual transactions. <p>Our audit procedures have not identified any issues in relation to management override of controls.</p>
<p>The revenue cycle includes fraudulent transactions</p> <p>Under ISA (UK) 240, there is a rebuttable presumed risk that revenue may be misstated due to the improper recognition of revenue.</p> <p>This presumption can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue recognition.</p> <p>As external auditors in the public sector, we are also required to give regard to Practise Note 10, which interprets the ISA in a public sector context and directs us to consider whether the assumption also applies to expenditure.</p>	<p>As reported at the planning stage, having considered the risk factors set out in ISA 240 and the nature of the revenue streams at the Fund, we have determined that the risk of fraud arising from revenue and expenditure recognition can be rebutted, because;</p> <ul style="list-style-type: none"> There is little incentive to manipulate revenue and expenditure recognition; Opportunities to manipulate revenue and expenditure recognition are very limited; and The culture and ethical frameworks of local authorities, including the administering authority, Wet Northamptonshire Council, mean that all forms of fraud are seen as unacceptable. <p>Therefore, at the planning stage we did not consider this to be a significant risk for Northamptonshire Pension Fund. We have continued our risk assessment throughout the audit and have not identified any circumstances indicating a requirement to alter this decision.</p>

2. Financial Statements - Significant risks

Risks identified in our Audit Plan

Commentary

Valuation of Level 3 investments

The Fund revalues its investments on an annual basis to ensure that the carrying value is not materially different from the fair value at the financial statement date.

By their nature, Level 3 investments valuations lack observable inputs. These valuations therefore represent a significant estimate by management in the financial statements due to the size of the numbers involved and the sensitivity of this estimate to changes in key assumptions.

Under ISA 315, significant risks often relate to significant non-routine transactions and judgemental matters. Level 3 investments by their very nature require a significant degree of judgements to reach an appropriate valuation at year end.

Management utilise the services of investment managers as valuation experts to estimate the fair value of these assets.

We therefore identified valuation of Level 3 investments as a significant risk, which was one of the most significant assessed risks of material misstatement and a key audit matter.

We have;

evaluated management's processes for valuing Level 3 investments;

reviewed the nature and basis of estimated values and considered what assurance management has over the year end valuations provided for these types of investments to ensure the requirements of the code are met;

independently requested year end confirmations from investment managers, with an additional focus on ensuring the use of appropriate IPEV (or equivalent) methodology in their valuation books, updated for most recent available guidance in relation to COVID-19;

for a sample of investments, tested the valuation by comparing the valuation per the General Ledger (typically based on investor statement as at the reporting date, or in the case of harder to value assets, the latest capital statement available adjusted for known cash movements in the final quarter of the year) to direct confirmation of capital balances from investment managers and, where available latest audited financial statements;

completed sample testing of purchases and sales to prime documentation across the period to support out reconciliation of the opening and closing balances;

analysed the Fund's holdings by sector, applying an additional layer of professional scepticism and challenge in relation to any assets with potential exposure to the pandemic or the impact of Brexit.

Per the results of our work, we are satisfied that management's process for estimating the valuation of Level 3 assets is sufficiently robust. We did not identify any instances where management did not have an appropriate basis for arriving at an estimate. A key challenge in this area is the impact of timing delays in valuation of assets. As a proportion of the Level 3 assets are held in the **Net Assets Statement at their 31 December valuation adjusted for known cash movements, there will inevitably be a variance between the Net Asset Statement and the valuations per the final 31 March capital statements, which typically are received during the course of the audit. Having assured ourselves of the reliability of valuations provided by the Investment Managers by, as described above, reviewing investor statements at the audited accounts date to gain an independent assessment of the valuations on a sample basis, we were then able to quantify the impact of this timing variance on the financial statements – this has resulted in an identified unadjusted misstatement of £8.5m This is not material but above our trivial threshold and therefore we are required to report the value to members of the Committee. Management have opted not to amend on the grounds of materiality. In our view, this is an acceptable stance – the balance is an estimate which has an inherent level of uncertainty. Our work has indicated that we can take reasonable assurance that the value is not materially misstated. As referred to previously, this is a function of the nature of LGPS Funds and therefore not attributable to any control weaknesses within the organisation.**

Our audit work has not identified any issues in respect of the valuation of Level 3 investments, pending resolution of a small number of queries as outlined on page three. We will update members via our final AFR, to be released on conjunction with the signing of the audit opinion upon completion of the prior period Fund audit and the 21/22 West Northamptonshire Council audit.

2. Financial Statements – key judgements and estimates

This section provides commentary on key estimates and judgements inline with the enhanced requirements for auditors.

Significant judgement or estimate

Summary of management's approach

Audit Comments

Assessment

Level 3 Investments – £638m

The Pension Fund holds a quantity of investment assets which are deemed to be “hard to value” (also referred to as Level 3 within the IFRS Fair Value hierarchy). These are typically funds holding private equity, infrastructure and property assets. In total these are valued on the balance sheet as at 31 March 2022 at £638m.

These investments are not traded on an open exchange or market and the valuation of the investment is highly subjective due to a lack of observable inputs. In order to determine the value, management obtains periodic valuations of these assets prepared by its fund managers. The Fund also works with advisors who take an independent view of the Fund's overall performance against the market, enabling management to identify and challenge outliers if possible. Management also obtains Service Auditor Reports for its investment managers and audited accounts for individual funds where available to add a further layer of independent assurance to the valuations provided.

The value of the Fund's holding of level 3 assets has increased by approximately £202m (PY; £436m). Part of this movement can be explained by a reclassification of assets which were previously classified as level 2 into the level 3 population and a net increase of assets of this type via investment purchases. However, we also note an increase attributable to market movements of £103m. This is consistent with our wider understanding of market conditions, as, despite an element of increased uncertainty stemming from the conflict in Ukraine in the final quarter, asset classes such as property and private equity holdings recovered as pandemic related issues began to alleviate.

As noted earlier in the report, due to the nature of these assets, valuations are frequently received in arrears and, as such, per the Fund's accounting policies a number of assets are held at the December 31 valuation (or similar), adjusted for known cash movements such as purchases or distributions. As such there will inevitably be a variance noted when management's estimate is compared to actual March 31 valuations received post year end. Working with management, we have been able to quantify this in full, noting a positive variance of £8.5m between management's estimated valuation as at the balance sheet date and updated valuations using more current investor statements. Management have not amended the accounts for this due to its non material nature.

Based on the substantive work performed, our view is that management's process for estimating the value of these assets is appropriate.

The variance noted is in line with our expectations based on our understanding of similar bodies in the sector and we do not deem it to be indicative of a control weakness internally.

2. Financial Statements - key judgements and estimates

Significant judgement or estimate	Summary of management's approach	Audit Comments	Assessment
Level 2 Investments – £2,602m	<p>The Pension Fund have investments in various pooled investment vehicles and other funds that in total are valued on the balance sheet as at 31 March 2022 at £2,602m.</p> <p>Some of the investments are not traded on an open exchange or market and the valuation of the investment is subjective. In other cases, the valuation is an aggregate of a number of underlying assets and, as such, the valuation is opaque. In order to determine the value, management uses figures provided by investment managers, supplemented by reviews of Service Auditor Reports, Audited financial statements and other market data as relevant. The value of the Fund's holding of level 2 assets has decreased by £80m approximately in 2021/22 due to a combination of reclassification of assets as level 3 and a move to holding a larger balance of level 1 cash and cash equivalents.</p>	We noted no concerns around management's processes for estimating the value of level 2 assets.	

Assessment

Dark Purple We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated

Blue We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider optimistic

Grey We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider cautious

Light Purple We consider management's process is appropriate and key assumptions are neither optimistic or cautious

2. Financial Statements - other communication requirements

We set out below details of other matters which we, as auditors, are required by auditing standards and the Code to communicate to those charged with governance.

Issue	Commentary
Matters in relation to fraud	We have not been made aware of any material or other incidents in the period and no other issues have been identified during the course of our audit procedures.
Matters in relation to related parties	We are not aware of any related parties or related party transactions which have not been disclosed.
Matters in relation to laws and regulations	You have not made us aware of any significant incidences of non-compliance with relevant laws and regulations and we have not identified any incidences from our audit work.
Written representations	A letter of representation will be requested from the Fund in conjunction with our final sign off of the Pension Fund accounts. We do not anticipate that any specific representations will be included in relation to particular areas of the accounts. We will agree a draft document with management for inclusion in the final Audit Findings Report.

2. Financial Statements - other communication requirements



Issue	Commentary
Confirmation requests from third parties	We requested from management permission to send confirmation requests to the Fund's banking and investment management partners. This permission was granted and the requests were sent. All of these requests were returned with positive confirmation.
Accounting practices	We have evaluated the appropriateness of the Pension Fund's accounting policies, accounting estimates and financial statement disclosures. Our review found no material omissions in the financial statements
Audit evidence and explanations/ significant difficulties	All information and explanations requested from management was provided.

2. Financial Statements - other communication requirements



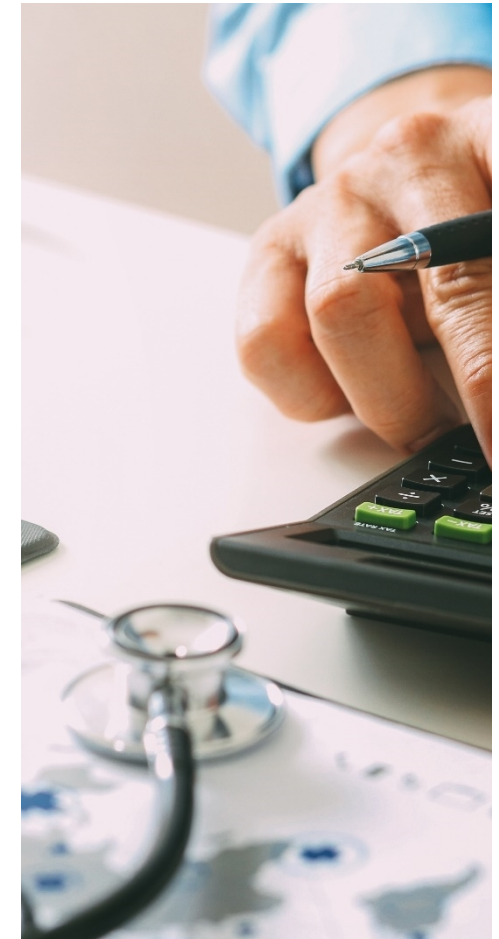
Our responsibility

As auditors, we are required to “obtain sufficient appropriate audit evidence about the appropriateness of management’s use of the going concern assumption in the preparation and presentation of the financial statements and to conclude whether there is a material uncertainty about the entity’s ability to continue as a going concern” (ISA (UK) 570).

Issue	Commentary
Going concern	<p>In performing our work on going concern, we have had reference to Statement of Recommended Practice – Practice Note 10: Audit of financial statements of public sector bodies in the United Kingdom (Revised 2020). The Financial Reporting Council recognises that for particular sectors, it may be necessary to clarify how auditing standards are applied to an entity in a manner that is relevant and provides useful information to the users of financial statements in that sector. Practice Note 10 provides that clarification for audits of public sector bodies.</p> <p>Practice Note 10 sets out the following key principles for the consideration of going concern for public sector entities:</p> <ul style="list-style-type: none"> the use of the going concern basis of accounting is not a matter of significant focus of the auditor’s time and resources because the applicable financial reporting frameworks envisage that the going concern basis for accounting will apply where the entity’s services will continue to be delivered by the public sector. In such cases, a material uncertainty related to going concern is unlikely to exist, and so a straightforward and standardised approach for the consideration of going concern will often be appropriate for public sector entities for many public sector entities, the financial sustainability of the reporting entity and the services it provides is more likely to be of significant public interest than the application of the going concern basis of accounting. <p>Practice Note 10 states that if the financial reporting framework provides for the adoption of the going concern basis of accounting on the basis of the anticipated continuation of the provision of a service in the future, the auditor applies the continued provision of service approach set out in Practice Note 10. The financial reporting framework adopted by the Pension Fund meets this criteria, and so we have applied the continued provision of service approach. In doing so, we have considered and evaluated:</p> <ul style="list-style-type: none"> the nature of the Pension Fund and the environment in which it operates the Pension Fund’s financial reporting framework the Pension Fund’s system of internal control for identifying events or conditions relevant to going concern management’s going concern assessment. <p>On the basis of this work, we have obtained sufficient appropriate audit evidence to enable us to conclude that:</p> <ul style="list-style-type: none"> a material uncertainty related to going concern has not been identified management’s use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

2. Financial Statements - other responsibilities under the Code

Issue	Commentary
Disclosures	A small number of issues have been identified but have been adequately rectified by management. We plan to issue an unmodified opinion in this respect. Further details of disclosure amendments are included in Appendices A - C
Matters on which we report by exception	We are required to give a separate opinion for the Pension Fund Annual Report on whether the financial statements included therein are consistent with the audited financial statements. Due to statutory deadlines the Pension Fund Annual Report is not required to be published until 1 December 2022 and therefore this report has not yet been produced. We have therefore not given this separate opinion at this time and are unable to certify completion of the audit of the administering authority until this work has been completed.



3. Independence and ethics

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention. We have complied with the Financial Reporting Council's Ethical Standard and confirm that we, as a firm, and each covered person, are independent and are able to express an objective opinion on the financial statements

We confirm that we have implemented policies and procedures to meet the requirements of the Financial Reporting Council's Ethical Standard and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.

Further, we have complied with the requirements of the National Audit Office's Auditor Guidance Note 01 issued in May 2020 which sets out supplementary guidance on ethical requirements for auditors of local public bodies.

Details of fees charged and mitigations in relation to possible threats to independence as a result of fees for non audit work are detailed in Appendix D

Transparency

Grant Thornton publishes an annual Transparency Report, which sets out details of the action we have taken over the past year to improve audit quality as well as the results of internal and external quality inspections. For more details see [Transparency report 2020 \(grantthornton.co.uk\)](https://www.grantthornton.co.uk/transparency-report-2020)

3. Independence and ethics

Audit and non-audit services

For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Pension Fund. The following non-audit services were identified, as well as the threats to our independence and safeguards that have been applied to mitigate these threats.

Service	Fees £	Threats identified	Safeguards
Audit related			
IAS 19 Assurance letters for Admitted Bodies	£10k + £1k per individual IAS 19 letter*	Self-interest (as a result of the recurring fee).	The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work will be small in comparison to the total fee for the audit and in particular relative to Grant Thornton UK LLP's turnover overall. Further, it is a fixed fee and there is no contingent element to it. These factors all mitigate the perceived self-interest threat to an acceptable level.

These services are consistent with the Pension Fund's policy on the allotment of non-audit work to your auditors. All services have been approved by the Pensions Committee. None of the services provided are subject to contingent fees.

*Please note – due to delayed starts to administering authority and other Northamptonshire Local Government audits we have not yet received any requests from employer engagement teams. We will report the final level of IAS 19 fees within the updated version of the AFR to coincide with final sign off of the financial statements.

Appendices

A. Action plan – Audit of Financial Statements

We have identified one recommendation for the Pension Fund as a result of issues identified during the course of our audit. We have agreed our recommendations with management and we will report on progress on these recommendations during the course of the 2022/23 audit. The matters reported here are limited to those deficiencies that we have identified during the course of our audit and that we have concluded are of sufficient importance to merit being reported to you in accordance with auditing standards.

Assessment	Issue and risk	Recommendations
	<p>During the course of the audit, we noted some delays in receipt of declarations of interest from members of the Pensions Committee and others with a governance link to the Fund. It is important to ensure that these returns are received and reviewed promptly to prevent the possible omission of disclosure of a previously unidentified related party which may alter the understanding of readers of the accounts.</p>	<p>The Fund should work proactively with partners within the administering authority and other stakeholders to ensure that all returns are received and reviewed promptly.</p> <p>Management response</p> <p>Officers sent initial requests in February and unfortunately did not have all forms returned in time for the onsite audit, there was one case where we did not receive the declaration after multiple chases. Officers will raise with the Chair of the Pension Committee to underline the importance of the returns. Officers will continue to work proactively with partners and administering authority to ensure that all returns are received and reviewed promptly.</p>

Controls

- High – Significant effect on financial statements
- Medium – Limited Effect on financial statements
- Low – Best practice

B. Follow up of prior year recommendations

The Auditing Standards require us to report to you on the follow up of any issues identified or recommendations raised during the prior period audit. We note that no recommendations were included in the predecessor auditor's ISA 260 report and, as such, we have nothing to report in this respect.

Assessment

Action completed

Not yet addressed

C. Audit Adjustments

We are required to report all non trivial misstatements to those charged with governance, whether or not the accounts have been adjusted by management.

Misclassification and disclosure changes

The table below provides details of misclassification and disclosure changes identified during the audit which have been made in the final set of financial statements which were sufficiently significant to warrant drawing the Committee's attention to on an individual basis. A small number of clerical and minor disclosure issues were also identified and amended.

	Auditor recommendations	Adjustment Agreed?
Per the draft accounts, capital commitments were understated by £32m (draft figure £149m, actual £181m). This is a disclosure issue only and has no impact on the Fund's financial position.	<p>Disclosure should be amended.</p> <p>Management response</p> <p>Disclosure has been amended. Improved processes on working papers are being made for the 2022-23 year end.</p>	✓
Audit procedures noted that cash and cash equivalents should be included within the Fair Value Through profit and Loss section of the Fair Value hierarchy within note 16.	<p>Disclosure and comparators should be restated and included in the Prior Period Adjustment note. Accounting policies should also be updated to include a general Prior Period Adjustment policy.</p> <p>Management response</p> <p>Disclosure change due to difference in approach from the Fund's previous auditors. A prior period adjustment note and accounting policy have been included in the 2021-22 accounts.</p>	✓
Key Management Personnel disclosures within the draft accounts included closing balances within the long term benefits line as opposed to the movement in year.	<p>Disclosure should be updated.</p> <p>Management response</p> <p>Disclosure has been amended. Improved processes on working papers are being made for the 2022-23 year end.</p>	✓
Additional disclosures in relation to the nature of the ACCESS Joint Committee should be included to aid the understanding of users of the accounts.	<p>Additional narrative around the nature of governance arrangements of the pool should be included. .</p> <p>Management response</p> <p>An additional note has been included in the accounts (Note 28) to explain the administration and governance of the ACCESS pool.</p>	✓
Investment assets with a value of £58m were reclassified from Level 2 to Level 3 within the Fund's Fair Value disclosures. The final accounts should include a Prior Period Adjustment note detailing the amendment.	<p>An additional prior period note should be included.</p> <p>Management response</p> <p>Disclosure change due to difference in approach from the Fund's previous auditors. Assets have been reclassified for prior and current year and a prior period note has been included to explain the changes to classifications.</p>	✓
Following audit review it was determined that disclosures around actuarial inflation assumptions should be enhanced to aid understanding of users of the accounts.	<p>Additional narrative should be included..</p> <p>Management response</p> <p>Narrative has been included in the accounts that inflation is substantially higher at 31 March 2022 than 31 March 2019 and this will be reflected at the next formal triennial valuation.</p>	✓
Draft Related Parties disclosures initially overstated contributions from the administering authority by £22.2m. Debtors were overstated by £1.5m. The disclosures initially included values from North Northamptonshire Council	<p>Administering Authority contributions should be adjusted downwards from £45.8m to £23.6m and Related Party debtors from £1.9m to £0.4m</p> <p>Management response</p> <p>The system has been updated to show that only West Northants is the Administering Authority and the disclosure has been</p>	✓

C. Audit Adjustments



Impact of unadjusted misstatements

The table below provides details of adjustments identified during the 2021/22 audit which have not been made within the final set of financial statements. The Audit Committee is required to approve management's proposed treatment of all items recorded within the table below.

Detail	Pension Fund Account £	Net Asset Statement £	Impact on total net assets £	Reason for not adjusting
As described earlier in the report, some of the Fund's hard to value assets are valued on a time lag basis, with the value in the accounts reflecting an investor statement balance prior to the balance sheet date adjusted for known cash movements.	(8.5m)	8.5m	8.5m	Not material.
Following audit procedures we were able to quantify this timing variance as £8.5m. This is not material and, as such, management have opted not to amend. It is above our trivial threshold and therefore we are required to draw the attention of members to the issue. In our view, this does not constitute a control weakness at the Fund as management's process for calculating the estimate has not resulted in a material misstatements.				
Overall impact	(8.5m)	8.5m	8.5m	

Impact of prior year unadjusted misstatements

There were no unadjusted misstatements noted by the predecessor auditors in the prior period.

D. Fees

We confirm below our final fees charged for the audit and provision of non-audit services. There are no reconciling items between the fees as stated here and the values recorded in the financial statements.

Audit fees	Proposed fee	Final fee
Pension Fund Audit	£51,000	£51,000
Total audit fees (excluding VAT)	£51,000	£51,000

Non-audit fees for other services	Proposed fee	Final fee
IAS 19 assurance for member employers	£9,000	£10,000 (plus £1k per individual request upon receipt)
Total non-audit fees (excluding VAT)	£9,000	TBC





West Northamptonshire Council

Pension Fund Board

24/1/23

Mark Whitby – Head of Pensions

Report Title	Northamptonshire Pension Fund Conflicts of Interest Policy
Report Author	Michelle Oakensen Governance and Regulations Manager michelle.oakensen@westnorthants.gov.uk

Contributors/Checkers/Approvers

Head of Pensions	Mark Whitby	19 December 2022
-------------------------	-------------	------------------

List of Appendices

Appendix A - Northamptonshire Pension Fund Conflicts of Interest Policy

1. Purpose of Report

- 1.1 The purpose of this report is to ensure the Northamptonshire Pension Fund has an adequate Conflicts of Interest Policy in place.

2. Executive Summary

- 2.1 This report details how actual and potential conflicts of interest are identified and managed by those involved in the management and governance of the Northamptonshire Pension Fund whether directly or in an advisory capacity.
- 2.2 The Policy applies to all members of the Pension Fund Committee, members of the Local Pension Board, and the Chief Financial Officer (Section 151 officer).
- 2.3 The Policy also applies to all advisers and suppliers to the Fund whether advising the Pension Fund Committee, Fund officers or the Local Pension Board.

3. Recommendations

- 3.1 The Pension Fund Board is asked to:
- a) Note the approval of the Northamptonshire Pension Fund Conflicts of Interest Policy.

4. Report Background

- 4.1 Along with other constitutional documents, including the various Codes of Conduct, this Policy aims to ensure that those individuals covered by the Policy do not act improperly or create a perception that they may have acted improperly. It is an aid to good governance, encouraging transparency and minimising the risk of any matter prejudicing decision making or management of the Fund otherwise.
- 4.2 In the Local Government Pension Scheme (LGPS) environment, there is the potential for conflicts of interest to arise. This reflects the fact that many of those managing or advising

LGPS funds will have a variety of other roles and responsibilities, for example as a member of the scheme, as an elected member of an employer participating in the LGPS or as an adviser to more than one LGPS administering authority. Further to this, any of those persons may have an individual personal, business or other interest which might conflict, or be perceived to conflict, with their role managing or advising LGPS funds.

- 4.3 It is generally accepted that LGPS administering authorities have both fiduciary and public law duties to act in the best interests of both the scheme beneficiaries and participating employers. This, however, does not preclude those involved in the management of the Fund from having other roles or responsibilities which may result in an actual or potential conflict of interest. The Good Governance Review recommended that each fund should have a fund-wide published conflicts of interest policy.
- 4.4 This recommendation is being considered by the Department for Levelling Up, Housing and Communities (DLUHC). In the meantime, West Northamptonshire Council as Administering Authority of the Fund considers it good practice to document within a policy, such as this, how any such conflicts or potential conflicts are to be managed in relation to Fund matters.
- 4.5 The Pension Fund Committee, Pension Fund Board and key officers were invited to a Conflicts of Interest training session conducted by Aon in November 2022 with a link to the training provided for members who were unable to attend. The training was an opportunity for members to fully understand the requirements and discuss any concerns prior to the Pension Fund Committee receiving the Conflicts of Interest Policy for approval in December 2022.
- 4.6 The Pension Fund Committee approved the Policy on 12 December 2022 and declarations will be sent to members of the Committee, Board and Chief Financial Officer by the 31 January 2023. The details provided in the completed returns will be entered onto the Fund Conflicts of Interest Register.
- 4.7 The Policy has been published on the Pension Service website.

5. Issues and Choices

5.1 Legislative and related context

- 5.1.1 The overriding requirements in relation to the management of potential or actual conflicts of interest for those involved in the administration and governance of LGPS funds are contained in various elements of legislation and guidance.
- 5.1.2 The Public Service Pensions Act 2013 requires that the scheme manager (in the case of the LGPS, this is the administering authority) must be satisfied that a Pension Board member does not have a conflict of interest at the point of appointment and from time to time thereafter. It also requires pension board members to provide reasonable information to the scheme manager for this purpose.
- 5.1.3 The Local Government Pension Scheme Regulations 2013 place a duty on each administering authority to satisfy itself that pension board members do not have conflicts of interest on appointment or whilst they are members of the board. It also requires those pension board members to provide reasonable information to the administering authority in this regard.
- 5.1.4 Regulation 109 of the Local Government Pension Scheme Regulations 2013 states that each administering authority must have regard to guidance issued by the Secretary of State in relation to pension boards. In addition, Regulation 110 provides that the national scheme advisory board has a function of providing advice to administering authorities and pension boards
- 5.1.5 The Public Service Pensions Act 2013 also added a number of provisions to the Pensions Act 2004 related to the governance of public service pension schemes and, in particular, conflicts of interest. Section 90A requires the Pensions Regulator to issue a code of practice relating to conflicts of interest for pension board members. The Pensions Regulator has issued such a code and this Conflicts of Interest Policy has been developed having regard to that code.

5.1.6 The Local Government Act 2000, The Localism Act 2011 and the Seven Principles of Public Life also provide legislative context around conflicts of interest.

5.2. Responsibility

5.2.1 West Northamptonshire Council as the Administering Authority for the Fund must be satisfied that conflicts of interest are appropriately managed. For this purpose, the Governance and Regulations Manager is responsible for ensuring the procedures outlined in the Policy are carried out.

5.2.2 However, it is the responsibility of each individual covered by the Policy to identify any potential instances where their personal, financial, business or other interests might come into conflict with their pension fund duties and to follow the requirements of the Policy appropriately

6 Implications (including financial implications)

6.1 Resources and Financial

6.1.1 There are no resources or financial implications arising from the proposals.

6.2 Legal

6.2.1 There are no legal implications arising from the proposals.

6.3 Risk

6.3.1 The Pension Committee and Pension Board are expected to ensure the Fund has an appropriate Conflicts of Interest Policy in place.

6.3.2 The risks associated with not having appropriate policies in place and acting appropriately have been captured in the Fund's risk register as detailed below.

Risk	Residual risk rating
Those charged with governance of the Fund and Scheme are unable to fulfil their responsibilities effectively	Green
Failure to administer the scheme in line with regulations and guidance.	Green
Failure to recognise and manage conflicts of interest.	Green
Risk of fraud and error	Green
Failure to understand and monitor risk compliance	Green

6.3.3 The executive summary risk register can be found on the Fund's website at the following link: [Northamptonshire Risk Register](#)

6.4 Relevant Pension Fund Objectives

6.4.1 The following objectives have been considered in this report –

- To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
- To manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.

- To ensure that the relevant stakeholders responsible for managing, governing and administering the Fund, understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a changing environment.
- To continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate.

6.5 Consultation

6.5.1 Not applicable.

Conflicts of Interest Policy 2022

Contents

Introduction	3
Aims and Objectives	3
Who does this Policy apply to?	4
Legislative and related context	5
Advisers’ Professional Standards	6
Other Administering Authority Requirements	6
ACCESS Conflict of Interest requirements	7
What is a Conflict or Potential Conflict and how will they be managed?	7
Monitoring and recording potential conflicts of interest	8
Managing and mitigating potential conflicts of interest	8
Conduct at Meetings	9
Operational procedure for officers, Pension Fund Committee members and Pension Board members	9
Table 1 – What is required?	9
Minor Gifts and Hospitality	10
Other Pension Fund Officers	10
Responsibility	10
Operational procedure for advisers	11
Key Risks	11
Costs	11
Approval, Review and Consultation	11
Further Information	12
Appendix 1 - Examples of Potential Conflicts of Interest	13
Appendix 2 - Declaration of Interests relating to the management of Northamptonshire Pension Fund administered by West Northamptonshire County Council	14
Appendix 3 - Northamptonshire Pension Fund - Register of Potential and Actual Conflicts of Interest	15

This is the Conflicts of Interest Policy (the 'Policy') for Northamptonshire Pension Fund (the 'Fund') which is managed by West Northamptonshire Council (the 'Administering Authority').

The Policy details how actual and potential conflicts of interest are identified and managed by those involved in the management and governance of Northamptonshire Pension Fund whether directly or in an advisory capacity. Along with other constitutional documents, including the various Codes of Conduct, this Policy aims to ensure that those individuals covered by the Policy do not act improperly or create a perception that they may have acted improperly. It is an aid to good governance, encouraging transparency and minimising the risk of any matter prejudicing decision making or management of the Fund otherwise.

Introduction

In the Local Government Pension Scheme (LGPS) environment, there is the potential for conflicts of interest to arise. This reflects the fact that many of those managing or advising LGPS funds will have a variety of other roles and responsibilities, for example as a member of the scheme, as an elected member of an employer participating in the LGPS or as an adviser to more than one LGPS administering authority. Further to this, any of those persons may have an individual personal, business or other interest which might conflict, or be perceived to conflict, with their role managing or advising LGPS funds.

It is generally accepted that LGPS administering authorities have both fiduciary and public law duties to act in the best interests of both the scheme beneficiaries and participating employers. This, however, does not preclude those involved in the management of the Fund from having other roles or responsibilities which may result in an actual or potential conflict of interest. The Good Governance Review¹ recommended that each fund should have a fund-wide published conflicts of interest policy. This recommendation is being considered by the Department for Levelling Up, Housing and Communities (DLUHC). In the meantime, West Northamptonshire Council as Administering Authority of the Fund considers it good practice to document within a policy, such as this, how any such conflicts or potential conflicts are to be managed in relation to Fund matters.

Aims and Objectives

The Administering Authority's objectives in relation to governance are:

- to have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance
- to ensure that the relevant stakeholders responsible for managing, governing and administering the Fund understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a challenging environment
- to manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers
- to continually monitor and measure clearly articulated objectives through business planning
- to continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate

The identification and management of potential and actual conflicts of interest is integral to us achieving these governance objectives

¹ Phase 3 report published February 2021

https://www.lgpsboard.org/images/Other/Good_Governance_Final_Report_February_2021.pdf and is being considered by DLUHC.

The purpose of this Policy is:

- to ensure that all actual and potential conflicts of interest are managed appropriately, through a robust process
- to ensure all individuals to whom this Policy applies has appropriate information for making an informed decision on whether there is a potential or actual conflict of interest.

Who does this Policy apply to?

This Policy applies to all members of the Pension Committee, members of the Local Pension Board, and the Chief Financial Officer (Section 151 officer).

The Fund's Governance and Regulations Manager will monitor potential conflicts for less senior officers involved in the daily management of the Fund and highlight this Policy to them as appropriate.

The implementation of this Policy and the management of conflicts of interest in general will have regard to each individual's role, whether this is a management, advisory or assisting role and includes responsibilities representing the Fund on other boards, committees, groups and bodies.

The Policy also applies to all advisers and suppliers to the Fund whether advising the Pension Committee, Fund officers or the Local Pension Board. In this Policy, reference to advisers includes all advisers, suppliers and other parties providing advice and services to the Administering Authority in relation to pension fund matters.

This includes but is not limited to:

- Actuaries
- Investment Consultants
- Independent advisers
- Benefits Consultants
- Governance Consultants
- Fund Managers
- Lawyers
- Custodians
- AVC providers

Where an advisory appointment is with a firm rather than an individual, reference to "advisers" is to the lead adviser(s) responsible for the delivery of advice and services to the Administering Authority rather than the firm as a whole.

In accepting any role covered by this Policy, all individuals to which this Policy applies agree that they must:

- acknowledge any actual or potential conflict of interest they may have;
- be open with the Administering Authority and any other body on which they represent the Administering Authority, on any actual or potential conflicts of interest they may have;
- adopt practical solutions to managing those conflicts, and
- plan ahead and agree with the Administering Authority how they will manage any conflicts of interest which arise in future.

The procedures outlined later in this Policy provide a framework for each individual to meet these requirements.

Legislative and related context

The overriding requirements in relation to the management of potential or actual conflicts of interest for those involved in the LGPS funds are contained in various elements of legislation and guidance. These are considered further below.

The Public Service Pensions Act 2013

Section 5 of this Act requires that the scheme manager (in the case of the LGPS, this is the Administering Authority) must be satisfied that a Local Pension Board Member does not have a conflict of interest at the point of appointment and thereafter. It also requires Board Members to provide reasonable information to the scheme manager for this purpose. The Act defines a conflict of interest as “a financial or other interest which is likely to prejudice the person’s exercise of functions as a Member of the Board (but does not include a financial or other interest arising merely by virtue of membership of the scheme or any connected scheme).”

Further, the Act requires that scheme managers must have regard to any such guidance that the national Scheme Advisory Board issues (see below).

The Local Government Pension Scheme Regulations 2013

Regulation 108 of these Regulations applies the requirements of the Public Service Pensions Act (as outlined above) to the LGPS, placing a duty on each administering authority to satisfy itself that Local Pension Board Members do not have conflicts of interest on appointment or whilst they are Members of the Board. It also requires those Local Pension Board Members to provide reasonable information to the Administering Authority in this regard. The Administering Authority will achieve this by regular monitoring and reviewing of the declarations of interest register.

Regulation 109 states that each Administering Authority must have regard to guidance issued by the Secretary of State in relation to Local Pension Boards. Further, regulation 110 provides that the national Scheme Advisory Board has a function of providing advice to Administering Authorities and Local Pension Boards. The LGPS national Scheme Advisory Board issued guidance relating to the establishment of Local Pension Boards including a section on conflicts of interest. This Conflicts of Interest Policy has been developed having regard to that guidance.

The Pensions Act 2004

Section 90A of the Pension Act 2004 requires the Pensions Regulator to issue a code of practice relating to conflicts of interest for Local Pension Board Members. The Pensions Regulator has issued such a code and this Policy has been developed having regard to that code.

Further, under section 13, the Pensions Regulator can issue an improvement notice (i.e. a notice requiring steps to be taken to rectify a situation) where it is considered that the requirements relating to conflicts of interest for Local Pension Board Members are not being adhered to.

CIPFA Investment Pooling Governance Principles for LGPS Administering Authorities Guidance

The CIPFA governance principles guidance states “the establishment of investment pooling arrangements creates a range of additional roles that committee members, representatives, officers and advisors might have.” It includes some examples of how conflicts of interest could arise in these new roles.

It highlights the need for administering authorities to:

- update their conflicts policies to have regard to asset pooling,
- remind all those involved with the management of the fund of the policy requirements and the potential for conflicts to arise in respect of asset pooling responsibilities, and

- ensure declarations are updated appropriately.

This Policy takes account of the possibility of conflicts arising in relation to asset pooling in accordance with the CIPFA governance principles guidance.

Localism Act 2011

All members and co-opted members of the Pension Committee are required by the Localism Act 2011 to register and declare 'disclosable pecuniary interests' and abide by West Northamptonshire Council Members' Code of Conduct. That Code contains provisions relating to disclosable pecuniary interests, other registerable interests, non-registerable interests and sensitive interests including their disclosure and any limitations on members' participation where they have any such interest.

The Seven Principles of Standards in Public Life

Also known as the 'Nolan Principles', the seven principles of public life apply to anyone who holds public office.

This includes people who are elected or appointed to public office, nationally and locally, and all people appointed to work in:

- the civil service,
- local government,
- the police,
- the courts and probation services,
- non-departmental public bodies, and
- health, education, social and care services.

The principles also apply to all those in other sectors that deliver public services. Many of the principles are integral to the successful implementation of this Policy.

The principles are as follows:

- selflessness,
- integrity,
- objectivity,
- accountability,
- openness,
- honesty, and
- leadership.

Advisers' Professional Standards

Many advisers will be required to meet professional standards relating to the management of conflicts of interest, for example, the Fund Actuary will be bound by the requirements of the Institute and Faculty of Actuaries.

Any Protocol or other document entered into between an adviser and the Administering Authority in relation to conflicts of interest, whether as a requirement of a professional body or otherwise, should be read in conjunction with this Policy.

Other Administering Authority Requirements

Individuals to whom this policy applies may also be required to adhere to other requirements in relation to conflicts

of interest. This includes:

Pension Fund Committee Members

In addition to the requirements of this Policy, Pension Committee members and co-opted members are required to adhere to West Northamptonshire Council Members' Code of Conduct which, in Section 3 of Part 1, includes requirements in relation to the disclosure and management of personal and prejudicial interests. This is referred to above in the Localism Act 2011 section.

Employees

In addition to the requirements of this Policy, officers of West Northamptonshire Council are required to adhere to West Northamptonshire Council Constitution which includes requirements in relation to the disclosure and management of financial and personal interests and receipt of gifts and hospitality.

Advisers

The Administering Authority appoints its own advisers. There may be circumstances where these advisers are asked to give advice to scheme employers, or even to scheme members or member representatives such as the Trades Unions, in relation to pension matters. Similarly, an adviser may also be appointed to another administering authority which is involved in a transaction involving the Fund and on which advice is required or to a supplier or organisation providing services to the Fund. An adviser can only continue to advise the Fund and another party where there is no conflict of interest in doing so.

An adviser appointed to advise the Pension Committee, Local Pension Board or Fund officers can be the same person, as long as there is no conflict of interest between the multiple responsibilities.

The key advisers are all expected to have their own policies or protocols on how conflicts of interest will be managed in their relationships with their clients, and these should be shared with West Northamptonshire Council on request.

ACCESS Conflict of Interest requirements

One of the potential areas of conflict covered by this policy is investment pooling. A proportion of Northamptonshire Pension Fund's assets are invested through the ACCESS asset pool. Any Member representative of the Fund (ordinarily the Chair or Vice-Chair of the Pension Fund Committee) and senior officers of the Fund who are members of any ACCESS officer Group must also comply with any ACCESS requirements relating to the management of actual or potential conflicts of interest for the governance of the ACCESS pool.

What is a Conflict or Potential Conflict and how will they be managed?

Identifying conflicts or potential conflicts of interest

A conflict of interest is defined in section 5(5) of the 2013 Act as a financial or other interest likely to prejudice the way in which someone carries out their role². It further specifies that a conflict does not include a financial or other interest arising merely by virtue of that person being a member of a relevant pension scheme.

Therefore, a conflict of interest may arise when an individual:

- has a responsibility or duty in relation to the management of, or provision of advice to, the LGPS fund administered by West Northamptonshire Council, and at the same time, they:
- have a separate personal interest (financial or otherwise), or

² The Public Service Pensions Act 2013 defines a conflict of interest in the context of a member of a local pension board however the definition is extracted here to apply to all stakeholders.

- have another responsibility in relation to that matter

This gives rise to a possible conflict with their first responsibility. An interest could also arise due to a family member or close colleague having a separate responsibility or interest in a matter.

West Northamptonshire Council, as Administering Authority, will:

- encourage a culture of openness and transparency
- encourage individuals to be vigilant, have a clear understanding of their role and the circumstances in which they may have a conflict of interest, and of how potential conflicts should be managed
- evaluate the nature of any dual interests or responsibilities that are highlighted and assess the impact on the Fund's operations and good governance were an actual conflict of interest to materialise.

One of the key areas of potential conflict relate to the dual roles held by employed or representing West Northamptonshire Council as the Administering Authority to the Fund and a participating employer in the Fund

Some examples of potential conflicts including relating to these dual roles are included in Appendix 1.

Further details of how potential conflicts of interest should be identified and managed are set out in table 1 below.

Monitoring and recording potential conflicts of interest

All declarations should be collated and recorded on the Fund's Register of Conflicts of Interests (see Appendix 3 for details on the format of the register).

In order for the Administering Authority to fulfil its obligations to manage and monitor potential conflicts of interests the Pension Committee and the Local Pension Board must include an item on conflicts of interest at each meeting. The Local Pension Board must also include an item on conflict of interest in its Annual Report.

The Fund's Register of conflicts of interest may be viewed by any interested party at any point in time. It will be made available on request by the Governance and Regulations Manager. To identify whether the objectives of this Policy are being met the Administering Authority will review the Register of conflicts of interest on an annual basis and consider whether there have been any potential or actual conflicts of interest that were not declared at the earliest opportunity. Further detail set out in table 1 below.

Managing and mitigating potential conflicts of interest

It is inevitable that conflicts of interest will arise, and it is important to recognise that there are various ways that conflict can be managed depending on the individual circumstances.

The three main ways to assist in resolving conflict include:

- the conflicted individual concerned abstaining from the discussion, decision-making or providing advice relating to the relevant issue,
- the conflicted individual being excluded from the relevant meeting(s) and any related correspondence or material in connection with the relevant issue (for example, a report for a Pension Committee meeting), or
- a working group or sub-committee being established which excludes the conflicted individual concerned, to consider the matter outside of the formal meeting (where the terms of reference permit this to happen).

Provided that the Administering Authority (having taken any professional advice deemed to be required) is satisfied that the method of management is satisfactory, the Administering Authority shall endeavor to avoid the need to

advise an individual to resign due to a conflict of interest or to request the appointing body to reconsider their appointment to the Board or Committee). Where a Local Pension Board Member has an actual conflict of interest as defined in the Public Service Pensions Act 2013, the individual will be required to resign from the Board.

Conduct at Meetings

There may be circumstances where a representative of employers or members wishes to provide a specific point of view on behalf of an employer (or group of employers) or member (or group of members). The Administering Authority requires that any individual wishing to speak to advocate on behalf of specific person or organisation or to represent the views of a group of such persons must state this clearly at the meeting and this will be formally recorded in the minutes.

Operational procedure for officers, Pension Fund Committee members and Pension Board members

The following procedures must be followed by all individuals to whom this policy applies.

However, it should be noted all members of the Pension Committee (including co-opted members) have a pre-eminent requirement to follow and abide by the requirements of Part 1 Section 3 of West Northamptonshire Council Members’ Code of Conduct relating to the treatment and disclosure of certain prejudicial and other interests. Accordingly, for those members, disclosures under this policy may be in addition to disclosures under the Council’s Code of Conduct.

Table 1 – What is required?

What is required	How this will be done
Step 1 - Initial identification of interests which do or could give rise to a conflict	<p>On appointment to their role or on the commencement of this Policy if later, all individuals will be provided with a copy of this Policy and be required to complete a Declaration of Interest the same or similar to that included in Appendix 3.</p> <p>The information contained in these declarations will be collated into the Pension Fund Register of conflicts of interest in a format the same or similar to that included in Appendix 2.</p>
Step 2 - Ongoing notification and management of potential or actual conflicts of interest	<p>At the commencement of any Pension Committee and Local Pension Board or other formal meeting where pension fund matters are to be discussed, the Chairperson will ask all those present who are covered by this Policy to declare any new potential conflicts of interest. These will be recorded in the Fund's Register of conflicts of interest. In addition, the latest version of the Register will be made available by the Governance and Regulations Manager to the Chairperson of every meeting prior to that meeting if required.</p> <p>At Pension Committee meetings there will also, at the start of the meeting, be an agenda item for Members to declare any interests under the Members' Code in relation to any items on that agenda.</p> <p>Any individual who considers that they or another individual has a potential or actual conflict of interest, as defined by this Policy, which relates to an item of business at a meeting, must advise the Chairperson and the Governance and Regulations Manager prior to the meeting, where possible, or state this clearly at the meeting at the earliest</p>

What is required	How this will be done
	<p>possible opportunity. The Chairperson, in consultation with the Governance and Regulations Manager, should then decide whether the conflicted or potentially conflicted individual needs to leave the meeting during the discussion on the relevant matter or to withdraw from voting on the matter.</p> <p>If such a conflict is identified outside of a meeting the notification must be made to the Governance and Regulations Manager and where it relates to the business of any meeting, also to the Chairman of that meeting in the first instance. The Governance and Regulations Manager, in consultation with the Chairperson where relevant, will consider any necessary action to manage the potential or actual conflict.</p> <p>Where information relating to any potential or actual conflict has been provided, the Governance and Regulations Manager may seek such professional advice as they think fit (such as legal advice from the Monitoring Officer) on to how to manage any identified conflicts.</p> <p>Any such potential or actual conflicts of interest and the action taken must be recorded on the Fund's Register of conflicts of interest and in the minutes of the meeting if raised during a meeting.</p>
Step 3 - Periodic review of potential and actual conflicts	<p>At least once every 12 months, the Governance and Regulations Manager will provide to all individuals to whom this Policy applies a copy of their currently declared Fund conflicts of interest to be reviewed. All individuals will complete a new Declaration of Interest (see Appendix 3) confirming that their information contained in the Register is correct or highlighting any changes that need to be made to the declaration. If necessary, the declaration will be reviewed more frequently.</p>

Minor Gifts and Hospitality

All individuals of this Policy must adhere to their appropriate Code of Conduct when considering whether they are able to accept gifts or hospitality.

Other Pension Fund Officers

It is important to ensure that other officers of the Fund, not covered by this Policy, do not carry out work where there may be a potential or actual conflict. Accordingly, all pension fund officers will be required to complete a 'Declaration of Interest' form providing the names of all scheme members that they are either related to or have a personal relationship with, where they are known to be a member of the Fund. This will be reviewed on an annual basis.

It is important for the Officers of the Fund to be aware that they should not be involved on cases to which they have a connection to the scheme member, including any professional connection.

Responsibility

West Northamptonshire Council as the Administering Authority for the Fund must be satisfied that conflicts of interest are appropriately managed. For this purpose, the Governance and Regulations Manager is responsible for ensuring the procedures outlined in this Policy are carried out.

However, it is the responsibility of each individual covered by this Policy to identify any potential instances where their personal, financial, business or other interests might come into conflict with their pension fund duties and to follow the requirements of the Policy appropriately.

Operational procedure for advisers

Key advisers to the Fund are expected to have their own policies on how conflicts of interest will be managed in their relationships with their clients, and these should have been shared with the Administering Authority.

Although this Policy applies to all advisers, the operational procedures outlined in steps 1 and 3 in the table above relating to completing ongoing declarations are not expected to apply to advisers.

Instead all advisers must:

- be provided with a copy of this Policy on appointment and whenever it is updated,
- adhere to the principles of this Policy,
- provide, on request, information to the Governance and Regulations Manager in relation to how they will manage and monitor actual or potential conflicts of interests relating to the provision of advice or services to West Northamptonshire Council as Administering Authority,
- notify the Governance and Regulations Manager immediately should a potential or actual conflict of interest arise, and
- highlight at all meetings should a potential or actual conflict of interest arise, preferably at the start of the meeting.

All potential or actual conflicts notified by advisers will be recorded in the Fund's Register of conflicts of interest.

Key Risks

The key risks to the delivery of this Policy are outlined below. All of these could result in an actual conflict of interest arising and not being properly managed. The Governance and Regulations Manager will monitor these and other key risks and consider how to respond to them.

- Insufficient training or poor understanding in relation to individuals' roles on pension fund matters,
- Insufficient training or failure to communicate the requirements of this Policy,
- Failure by an individual to follow the requirements of this Policy,
- Absence of the individual nominated to manage the operational aspects of this Policy and no one deputising, or failure of that individual to carry out the operational aspects in accordance with this Policy, and
- Failure by a chairperson to take appropriate action when a conflict is highlighted at a meeting.

Costs

All costs related to the operation and implementation of this Policy will be met directly by the Fund. However, no payments will be made to any individuals in relation to any time spent or expenses incurred in the disclosure or management of any potential or actual conflicts of interest under this Policy.

Approval, Review and Consultation

This Policy was approved on 12 December 2022 by the Pension Committee. It will be formally reviewed every three years and, if necessary, more frequently to ensure it remains accurate and relevant, including if there are any changes to the LGPS or other relevant Regulations or Guidance which need to be considered.

Further Information

If you require further information about anything in or related to this Policy, please contact:

Governance and Regulations Manager

Email: michelle.oakense@westnorthants.gov.uk

Appendix 1 - Examples of Potential Conflicts of Interest

Appendix 2 - Register of Potential and Actual Conflicts

Appendix 3 - Declaration of Interests relating to the management of the Fund administered by West Northamptonshire Council

Appendix 1 - Examples of Potential Conflicts of Interest

The examples provided below are for illustrative purposes only, please note that these are not designed to be an exhaustive list.

Examples of Pension Related Potential Conflict of Interest
An elected member on the Pension Committee may be required to provide views on a funding strategy which could result in an increase in employer contributions payable by the employer they represent.
A member of the Pension Committee is a board member of an Investment Manager that the Committee is considering appointing.
An officer of the Fund or member of the Pension Committee is on an ACCESS board/group and a matter is being considered that would benefit their originating Council or Pension Fund to a greater degree than other participating Councils or Funds.
An officer of the Fund or member of the Pension Committee accepts a dinner invitation from a Fund Manager who has submitted a bid as part of a tender process or might be in the process of preparing a bid for an open tender process.
The senior pension fund officer appointed to consider internal disputes is asked to review a case relating to a close friend or relative.
The senior pension fund officer is asked to provide technical advice to a scheme employer about an outsourcing contract. This includes questions about the impact on that employer and their employer requirements relating to the outsourcing contract. That senior pension fund officer is also (or will be) involved in similar matters from a Pension Fund perspective relating to that outsourcing.
An elected member on the Pension Committee also has a role in driving carbon reduction in their local authority area, which also happens to the administering authority for the Fund.
An elected member on the Pension Committee, who also sits on the ACCESS Joint Governance Committee, also has a role on their local authority in relation to local infrastructure, and this is a potential investment being considered by ACCESS which the Fund might invest in.
An administrator in the Fund receives a case to calculate a benefit which relates to a family member, close friend or colleague.
An employer representative on the Local Pension Board is employed by a company to which the administering authority has outsourced its pension administration services and the Local Pension Board is reviewing the standards of service provided by that company.
A Fund adviser is party to the development of a strategy which could result in additional work for their firm, for example, providing delegated or fiduciary management of Fund investments, providing assistance with monitoring the covenant of employers or where they are also advisers to the ACCESS pool.

Appendix 2 - Declaration of Interests relating to the management of Northamptonshire Pension Fund administered by West Northamptonshire County Council

I, [insert full name], am:

an officer involved in the management

Pension Fund Committee Member

Pension Fund Board Member

of Northamptonshire Pension Fund and I set out below under the appropriate headings my interests, which I am required to declare under Northamptonshire Pension Fund Conflicts of Interest Policy. I have put "none" where I have no such interests under any heading.

Responsibilities or other interests that could result in a conflict of interest (please list and continue overleaf if necessary):

Relating to me

Relating to family members or close colleagues

Undertaking:

I declare that I understand my responsibilities under Northamptonshire Pension Fund Conflicts of Interest Policy. I undertake to notify the Governance and Regulations Manager of any changes in the information set out above.

Signed _____ Date _____

Name (CAPITAL LETTERS) _____

Appendix 3 - Northamptonshire Pension Fund - Register of Potential and Actual Conflicts of Interest

Date identified	Name of Person	Role of Person	Details of conflict	Actual or potential conflict	How notified (1)	Action taken (2)	Follow up required	Date resolved

(1) E.g. verbal declaration at meeting, written conflicts declaration, etc.

(2) E.g. withdrawing from a decision-making process, left meeting, no action, etc.

This page is intentionally left blank



West Northamptonshire Council

Local Pension Board

24/01/2023

Mark Whitby – Head of Pensions

Report Title	Valuation Update
Report Author	Cory Blose, Employer Services and Communications Manager cory.blose@westnorthants.gov.uk

Contributors/Checkers/Approvers

Head of Pensions	Mark Whitby	13 January 2023
------------------	-------------	-----------------

List of Appendices

None

1. Purpose of Report

- 1.1. To provide the Board with an update on the Pension Fund Valuation

2. Executive Summary

- 2.1 This report sets out the progress made so far on completing the valuation of the Pension Fund and setting of employer contribution rates.
- 2.2 Good progress has been made with the project. Officers are currently discussing individual rates with employers where a request has been received to do so. The project is on track to complete these discussions by 31 January and all other required activities by the 31 March 2023 deadline.
- 2.3 No consultation responses were received on either the Funding Strategy Statement or the new Cessations policy. The Cessations policy was approved by the Pensions Committee, as drafted, at its December meeting. The Funding strategy statement will be presented for approval at the March meeting.

3. Recommendations

- 3.1 The Pension Board is asked to note the contents of the report.

4. Report Background

- 4.1 This report builds on previous updates to the Board and provides a summary of progress made so far on completing the valuation of the Pension Fund and setting of employer contribution rates.
- 4.2 The Funding Strategy Statement (FSS) sets out how contribution rates will be set for different employers in the Fund and a draft statement was issued to employers for consultation in November.
- 4.3 A new Cessations Policy was drafted setting out the Fund's proposed approach to calculating the funding position of employers when they stop participating in the Fund and was issued for consultation alongside the FSS and individual employer results.

5. Issues and Choices

Valuation Progress

- 5.1 The project has progressing well and officers are now in the advanced stages of setting and agreeing individual employer contribution rates. Individual draft results were issued throughout November as planned and discussions have been taking place with those employers who have requested them. A few employers who do not need to offer the LGPS to their employees are investigating exiting the Fund whilst funding levels are positive. Employers are being asked to agree their contribution rates by 31 January.
- 5.2 The FSS and new Cessations policy were both issued to employers for consultation alongside their proposed contribution rates. No responses were received regarding either document.
- 5.3 The Committee approved the new policy for immediate implementation, as originally drafted, at its December meeting. The Committee will be asked to approve the FSS at its March meeting following the end of the contribution rate consultation process. This allows scope for any unintended consequences to be discovered and the FSS updated accordingly.
- 5.4 The final Valuation report including the Rates and Adjustments certificate (certifying employer contribution rates) will also be presented to the Committee in March. The publishing of the valuation report and R&A certificate represents the end of the Valuation project and we are on track for completion by the deadline of 31 March.

6. Implications (including financial implications)

6.1 Resources and Financial

- 6.1.1 As the process for calculating the funding position of exiting employers will be more complex, the actuarial fees for this work will increase. These fees are met by the exiting employer.

6.2 Legal

- 6.2.1 There are no legal implications arising from the proposals.

6.3 Risk

- 6.3.1 The mitigated risks associated with this report has been captured in the Fund's risk register as detailed below -

Risk	Residual risk rating
Failure to respond to changes in economic conditions.	Amber
Fund assets are not sufficient to meet obligations and liabilities.	Green
Failure to administer the scheme in line with regulations and guidance	Green
Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	Green

The Fund's full risk register can be found on the Fund's website at the following link:
[Northamptonshire Risk Register](#)

6.4 Relevant Pension Fund Objectives

6.4.1 The following objectives have been considered in this report -

- To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
- To manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.
- To ensure the relevant stakeholders responsible for managing, governing and administering the Fund, understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a changing environment.
- To continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate.
- Ensure employer contributions are as stable as possible, recognising the characteristics, circumstances and affordability constraints of each employer.
- Seek and review regular feedback from all stakeholders and use the feedback appropriately to shape the administration of the Fund.

6.5 Consultation

6.5.1 Consultation with the Fund's actuarial adviser has been undertaken throughout the project.

6.5.2 Consultation with employers over the draft FSS and draft cessations policy was undertaken.

7. Background Papers

7.1 Not applicable

This page is intentionally left blank

Northamptonshire Pension Fund Board Agenda Plan

Meeting date	Agenda item	Lead officer
24/1/2023	Minutes 3/11/2022	J Findlay
	Administration Report [standing item]	M Oakensen
	Business Plan Update [standing item]	M Whitby
	Governance and Compliance Report [standing item]	M Oakensen
	Conflicts of Interest Policy [post scrutiny]	M Oakensen
	Overpayment of Pension Policy [pre scrutiny]	M Oakensen
	Communication Strategy and Plan [pre scrutiny]	C Blose
	Final accounts & ISA 260 [to note]	B Barlow
	Valuation Update	C Blose
	ACCESS Update [standing item] exempt	M Whitby
	Risk Monitoring [standing item] exempt	M Oakensen
	Pension Committee Minutes	J Findlay
27/4/2023	Minutes 24/1/2022 and Action Log	J Findlay
	Administration Report [standing item]	M Oakensen
	Business Plan Update [standing item]	M Whitby
	Governance and Compliance Report [standing item]	M Oakensen
	Annual Business Plan and Medium-Term Strategy [post scrutiny]	M Whitby

Meeting date	Agenda item	Lead officer
	Code of Practice Action Plan [to note]	M Oakensen
	Good Governance Review Action Plan [to note]	M Oakensen
	Administration Strategy [pre scrutiny]	C Blose
	Risk Monitoring [standing item] – exempt	M Oakensen
	Cyber Resilience [standing item] exempt	M Oakensen
	ACCESS Update [standing item] exempt	M Whitby



West Northamptonshire Council

Local Pension Board

24 January 2023

Mark Whitby – Head of Pensions

Report Title	Northamptonshire Pension Fund Business Plan and Medium-Term Strategy Business Plan Update report
Report Author	Michelle Oakensen Governance and Regulations Manager michelle.oakensen@westnorthants.gov.uk

Contributors/Checkers/Approvers

Head of Pensions	Mark Whitby	11/1/2023
-------------------------	-------------	-----------

List of Appendices

Appendix A – Variances against the forecast of investments and administration expenses based on original setting of assumptions.

Appendix B – Progress against Climate Action Plan

Appendix C – Progress against Cyber Resilience Action Plan – **exempt**

1. Purpose of Report

1.1. Good governance requires that updates to the pre-agreed Annual Business Plan and Medium-Term Strategy are provided to the Committee and Board on a regular basis. This update highlights the progress made on the key activities for the period and seeks approval of the recommendations set out in section 3 below.

2. Executive Summary

2.1. The Northamptonshire Pension Fund have for many years considered it good governance to have in place a Business Plan and Medium-Term Strategy that is agreed annually and regularly monitored by the Committee and Board.

2.2. The report summarises the progress made on each activity for the period under review.

2.3. Section 4 of this report provides a progress update for each business plan activity. The table below provides an overview of the RAG status of each activity.

Paragraph	Activity	RAG status
4.1	Extend the existing contract and re-tender for actuarial consultancy services	Green
4.2	Extend the existing contract and re-tender for benefits and governance consultancy services	Green
4.3	Extend existing contract and re-tender for legal services provider	Green

Paragraph	Activity	RAG status
4.4	Re-tender for pensions administration and pensioner payroll platform	Green
4.5	Continue to develop the Fund's Cyber Strategy	Amber
4.6	Review and implement changes required from the Pension Regulator's new Code of Practice	Green
4.7	Review the administrative performance of the Fund's additional voluntary contribution providers	Completed
4.8	Implement the best practice recommendations of the Scheme Advisory Board's good governance review	Green
4.9	Complete the Guaranteed Minimum Pension Rectification	Red
4.10	Application of the McCloud age discrimination remedy	Green
4.11	Processing of undecided leaver records	Amber
4.12	Complete the 2022 Valuation of the Pension Fund	Green
4.13	Prepare for the implementation of Pension Dashboards	Green
4.14	Continue development of the ACCESS asset pool	Green
4.15	Decarbonisation and improved stewardship reporting	Green
4.16	Review the Fund's Property Investment Strategy	Green
4.17	Review the Investment Strategy and Strategic Asset Allocation	Green
4.18	Private Equity Review	Green
4.19	Review of website and digital communications	Green

2.4. The tables in appendix A provide an update of the Fund account, investment and administration income and expenditure against the cash flow projection outlined in the Annual Business Plan as agreed by the Pension Committee in March 2022. There are no material variances identified.

2.5 The link to the full Business Plan approved by the Committee in March 2022 is provided in section 7 for full context and reference.

3. Recommendations

3.1. The Local Pension Board is asked to:

3.1.1. note the Business Plan Update

4. Issues and Choices

Progress made against the Business Plan

Procurement of Services

4.1 Extend the existing contract and re-tender for actuarial consultancy services

4.1.1 Activity: To extend the existing contract and re-tender for actuarial consultancy services currently with Hymans Robertson due to expire on 31 March 2024 (following extension).

4.1.2 Key milestones:

Key Milestones	Dates	On target for completion?
Extend contract	January 2023	Completed
Register to access national LGPS Frameworks	August 2023	On target

Key Milestones	Dates	On target for completion?
Draft specification of services required and associated documentation	August 2023 – September 2023	On target
Issue invitation to tender to suppliers on the Framework	October 2023	On target
Evaluate tender responses	November 2023 – December 2023	On target
Award contract	January 2024	On target

4.1.3 Update: Officers have spoken to Hymans ahead of the contract expiry date to confirm that the contract would automatically extend, if notice is not given.

4.2 Extend the existing contract and re-tender for benefits and governance consultancy services

4.2.1 Activity: To extend the existing contract and re-tender for the supplier of benefits and governance consultancy services currently with Aon due to expire 31 March 2024 (following extension).

4.2.2 Key milestones:

Key Milestones	Dates	On target for completion?
Extend contract	January 2023	Completed
Register to access national LGPS Frameworks	January 2023	Completed
Draft specification of services required and associated documentation	January 2023 – February 2023	On target
Issue invitation to tender to suppliers on the Framework	March 2023	On target
Evaluate tender responses	May 2023 – June 2023	On target
Award contract	July 2023	On target

4.2.3 Update: The extension for the contract has been enacted with Aon and access to the framework has been obtained.

4.3 Extend existing contract and re-tender for legal services provider

4.3.1 Activity: To extend the existing contract with Squire Patton Boggs to February 2024 and re-tender for a legal services provider.

4.3.2 Key milestones:

Key Milestones	Dates	On target for completion?
Extend existing contract	January 2023	On target
Register to access national LGPS Frameworks	January 2023	On target
Draft specification of services required and associated documentation	July 2023 – August 2023	On target
Issue invitation to tender to suppliers on the Framework	September 2023	On target

Key Milestones	Dates	On target for completion?
Evaluate tender responses	October 2023 - November 2023	On target
Award contract	December 2023	On target

4.3.3 Update: In discussion with Squire Patton Boggs and the National Frameworks to extend the existing contract, on track to be completed by January 2023. A new Legal Services Framework will launch on 16th January, once live, officers will register access to the framework.

4.4 Re-tender for pensions administration and pensioner payroll platform

4.4.1 Activity: To re-tender for pensions administration and pensioner payroll platform currently with Heywood that is due to cease in September 2024.

4.4.2 Key milestones:

Key Milestones	Dates	On target for completion?
Soft market testing and discussions with other Funds	April 2022 – December 2022	Completed
Obtain and complete National LGPS Framework documents	September 2022	Completed
Develop tender documents	January 2023 to March 2023	On target
Undertake framework procurement	April 2023 – September 2023	On target
Award contract to successful provider	October 2023	On target
Business process re-engineering and systems development (if new supplier)	October 2023 to September 2024	On target
Contract commences	October 2024	On target

4.4.3 Update: Development of tender documents including invitation to further competition, specification and pricing schedule well advanced. Consultation is also under way with West Northants Council's Procurement, Legal, Data Protection and IT departments.

Core governance activities

4.5 Continue to develop the Fund's Cyber Strategy

4.5.1 Activity: Cyber-crime continues to evolve and become increasingly sophisticated and as such the cyber strategy and action plan developed in 2021/22 will need to be regularly reviewed and new activities added as time goes on.

4.5.2 Key milestones:

Please see Appendix C (exempt).

4.5.3 Update:

Please see Appendix C (exempt)

4.6 Review and implement changes required from the Pension Regulator's new Code of Practice

4.6.1 Activity: The new code of practice was expected to come into force summer 2022 following a delay from the Pensions Regulator and the Fund will have six months to achieve full compliance with its contents.

4.6.2 Key milestones

Key Milestones	Dates	On target for completion?
Develop an action plan of changes required on launch of code of practice	Rescheduled to 2023. Date to be confirmed following release of the Code	Dependent upon release of the Code
Present action plan	As above	As above
Present update on progress on action plan	As above	As above

4.6.3 Update: The Pension Regulator's new code of practice was due to come into force in November 2021 and was postponed until Autumn 2022. To date, the new code has not been released with no further indication of when the new release date will be. Once the code comes into effect the Fund will have 6 months to achieve full compliance. Activity has been rescheduled and changed to a RAG status of Green.

4.7 Review the administrative performance of the Fund's additional voluntary contribution providers

4.7.1 Activity: The administrative performance of Prudential began to deteriorate in mid-2020 and in February 2022, Prudential's performance had still not improved. Aon have been commissioned to undertake a further review of both Standard Life and Prudential's administrative performance.

4.7.2 Key milestones:

Key Milestones	Dates	On target for completion?
Present to the Pension Committee the findings of the independent review alongside any recommendations for action	Estimated July 2022	Completed October 2022

4.7.3 Update: The Committee agreed to review again in 12 months' time and will feature in the 2023/24 Business Plan.

4.8 Implement the best practice recommendations of the Scheme Advisory Board's good governance review

4.8.1 Activity: There has been no further progress on any of the recommendations either by the Department for Levelling Up, Housing and Communities (DLUHC) or the Scheme Advisory Board (SAB).

4.8.2 Key milestones:

Key Milestones	Dates	On target for completion?
Develop an action plan to implement the best practice activities	Rescheduled to 2023. Date to be confirmed upon receipt of further information	Dependent upon when the Scheme Advisory Board resume focus on the workplan
Present action plan and Conflicts of Interest Policy	Pension Committee December 2022/ Local Pension Board January 2023	Completed.
Present update on progress on action plan	Rescheduled to 2023. Date to be confirmed upon receipt of further information	Dependent upon SAB as above

Key Milestones	Dates	On target for completion?
Implementation of activities requiring SAB and DLUHC guidance	Rescheduled to 2023. Date to be confirmed upon receipt of further information	Dependent upon SAB as above

4.8.3 Update: There has been no activity from the SAB or DLUHC in this area since February 2021. Once the Scheme Advisory Board provides further details on the recommendations the Fund will develop an action plan. The Conflicts of Interest Policy was approved in December 2022 and is an agenda item at this meeting. Activity has been rescheduled and changed to a RAG status of Green.

Scheme member and data projects

4.9 Complete the Guaranteed Minimum Pension Rectification

4.9.1 Activity: To complete the rectification stage for scheme members, making adjustments to pensions in payment where necessary.

4.9.2 Key milestones:

Key Milestones	Dates	On target for completion?
Manual rectification of outstanding records	April 2022 – March 2023	Extension to 31 December 2023 to be confirmed (see update)

4.9.3 Update: In September 2022 there were approximately 550 cases requiring rectification of a scheme member's pension in payment. At the time of writing approximately 515 cases remain outstanding as a result of an increased focus of resources on unprocessed leavers. There will be an increased focus on this project commencing February 2023. An extension to 31 December 2023 will be required to complete this project and this will be recommended in the Business Plan Update report that will be presented to the Pension Fund Committee in March 2023.

4.10 Application of the McCloud age discrimination remedy

4.10.1 Activity: To rectify the pension records of scheme members within scope of the McCloud ruling following the implementation of the age discrimination remedy once legislation is in place.

4.10.2 Key milestones:

Key Milestones	Dates	On target for completion?
Data sheets returned from scheme employers	February 2022 – April 2022	Completed
Data sheets checked by Fund	May 2022 – July 2022	Completed
Uploading of revised scheme member data	August 2022 – March 2023	In progress
Respond to DLUHC consultation on draft regulations (expected December 2022)	January 2023 – February 2023	Anticipated

Key Milestones	Dates	On target for completion?
Devise communication plan for scheme members and scheme employers	Rescheduled to January 2023 (November 2022)	On target
Undertake scheme member record preparations to identify in scope members in readiness for the application of the underpin	April 2023 – September 2023	On target
Application of the revised underpin following release of amended LGPS Regulations	October 2023 onwards	On target

4.10.3 Update: DLUHC have announced that they expect draft regulations to be issued in late 2022, followed by a consultation in early 2023. As a result, this activity has been realigned accordingly and a new milestone added. The uploading of revised scheme member data is underway and is expected to complete in the set timescale. This activity is being run on a full project basis with several separate workstreams and a detailed project plan.

On 24 November 2022, HMRC launched a consultation on how pension tax will apply to members protected by the McCloud remedy with a closing date of 6 January 2023. As the draft regulations were mainly looking at clarification in niche scenarios the Fund did not feel it necessary to submit a response.

4.11 Processing of undecided leaver records

4.11.1 Activity: To reduce the backlog by 2,500 cases per year for the next 3 years from a baseline of approximately 9,000 at the beginning of April 2022.

4.11.2 Key milestones:

Key Milestones	Dates	On target for completion?
Re-baseline project	April 2022	Completed
Reduce cases by 2,500	April 2022 – March 2023	No – see update below
Reduce cases by a further 2,500	April 2023 – March 2024	On target
Reduce cases by a further 2,500 to a business as usual baseline	April 2024 to March 2025	On target

4.11.3 Update: At 31 December 2022 the number of unprocessed leavers ringfenced as backlog had decreased by approximately 6,500 from the baseline in April 2022. However, the service has not been able to keep on top of business as usual (BAU) cases following an influx of leavers which has offset the backlog reduction and led to the overall number of aged cases decreasing by only 324 as a result. Further resource has been added to the BAU team and bulk processing is now operating on both backlog and business as usual cases.

4.12 Complete the 2022 Valuation of the Pension Fund

4.12.1 Activity: The valuation date is 31 March 2022, and the work is carried out during 2022/23 with results to be published by 31 March 2023. New employer contribution rates will be effective from 1 April 2023.

4.12.2 Key milestones:

Key Milestones	Dates	On target for completion?
Provision, validation and sign-off of valuation data	July 2022 – August 2022	Completed
Provision of whole Fund results by Fund Actuary	September 2022	Completed
Discuss whole Fund results with Committee	October 2022	Completed
Committee to approve Funding Strategy Statement for consultation	October 2022	Completed
Funding Strategy Statement issued for consultation	November 2022	Completed
Issue draft employer results and contribution strategies to scheme employers	November 2022 to December 2022	Completed
Committee to approve final Funding Strategy Statement	Rescheduled to March 2023 (December 2022)	On target
Consultation and discussions with employers to agree contribution strategies	December 2022 – February 2023	On target
Publication of final valuation report and certified contribution rates	31 March 2023	On target

4.12.3 Update: The valuation project is progressing as planned with all target dates currently on track. The new cessations policy was approved by the Committee in December following consultation with employers. The approval of the Funding Strategy Statement has been deferred to March 2023 due to the proximity of the end of the consultation to the Committee and the size of the document. It was felt there may not be enough time to discuss and make the required changes. Draft individual employer results have been issued and discussions held with individual employers where required.

4.13 Prepare for the implementation of Pension Dashboards

4.13.1 Activity: To prepare for the implementation of Pension Dashboards by 30 September 2024.

4.13.2 Key milestones:

Key Milestones	Dates	On target for completion?
Work with the Pensions Administration Software supplier to connect to a Pensions Dashboard by the deadline of 30 September 2024.	April 2022 – September 2024	On target
Devise project plan and workstreams to prepare for connection to the Dashboard with clean value data.	October to November 2022	Completed
Connect to the Pension Dashboard	By 30 September 2024	On target
Provide value data to the Pension Dashboard	By 1 April 2025	On target

4.13.3 Update: The initial project plan and identification of the workstreams provided has been completed. The work plan will be continually reviewed as further information is released from the associated industry bodies.

Investment related activities

4.14 Continue development of the ACCESS asset pool

4.14.1 Activity: The ACCESS asset pool has recently appointed MJ Hudson as Implementation Adviser for Illiquid Assets. During 2022/23 MJ Hudson will be implementing pooled solutions for investing in Illiquid assets. Due to the illiquid nature of this asset class, migration of the Fund's assets may take several years.

4.14.2 Key milestones:

Key Milestones	Dates	On target for completion?
Transition into the new Multi Asset Credit sub fund	By 31 March 2023	On target
Produce plan for investing in illiquid assets in the pooled solution	By 31 March 2023	On target

4.14.3 Update: Following data collection and analysis on non-listed assets by MJ Hudson across ACCESS pool members, Real Estate (Property) has been approved by the ACCESS Joint Committee (AJC) as the first asset class to be progressed Hampshire County Council have been appointed as the procurement lead. The AJC approved that the next asset class to be progressed and indicative completion dates are: Private Debt (Q3 2023), followed by Private Equity (Q1 2024), and then Infrastructure (Q4 2024).

4.15 Decarbonisation and improved stewardship reporting

4.15.1 Activity: During 2022/23 the Fund is planning to commence the transition to a more sustainable portfolio by reviewing its passive equities mandates and commence Task Force on Carbon-Related Financial Disclosures (TCFD) reporting. The Fund will also prepare its first submission under the UK Stewardship Code.

4.15.2 Key milestones:

Key Milestones	Dates	On target for completion?
Draft TCFD report to be included in Fund annual report	December 2022	Completed
Commence implementation of decarbonisation changes to passive and active equity mandates	December 2022	Completed
Draft Stewardship Code submission presented to the Investment Sub Committee	March 2023	On target

4.15.3 Update: As agreed with the Pension Fund Committee, the Fund's TCFD position has been reported within the 21/22 Statement of Accounts.

The Fund has developed a Climate Action Plan which includes approved decarbonisation targets to reduce carbon emissions with the aim of achieving net zero by 2050 or earlier. Progress against the Plan is shown in Appendix B.

Implementation of decarbonisation changes to passive mandates is progressing well with new passively managed options presented, and the preferred manager products identified and agreed at the November 2022 ISC, subject to completion of Mercer research returning a positive view.

4.16 Review the Fund's Property Investment Strategy

4.16.1 Activity: A review of the mandate will be undertaken, including consideration of possible enhancements to the property strategy, especially considering the expected benefits arising from the pooling agenda.

4.16.2 Key milestones:

Key Milestones	Dates	On target for completion?
Report on strategy review presented to Investment Sub Committee	Rescheduled to February 2023 (November 2022)	On target
Implement required asset class changes from property review	December 2022 – March 2023	On target
Communicate Fund's new requirements to the ACCESS illiquid asset programme	Rescheduled to March 2023 onwards (December 2022)	On target - this work will move to the implementation of the SAA under next years business plan.

4.16.3 Update: A property portfolio review covering the target split across real estate styles, sectors, geographies, and implementation route/timeline was presented at the November 2022 ISC for consideration. This review will help shape the Fund's Property Investment Strategy and feed into the Fund's overall Investment Strategy Review which will agree target allocations across all asset classes, to be presented at the February 2023 ISC.

4.17 Review the Investment Strategy and Strategic Asset Allocation

4.17.1 Activity: The Fund must review and amend its strategic investment strategy in consultation with the s 151 officer as required pursuant to section 4.8 Section 1.3 (e) (k) of the Constitution and will undertake a strategic asset allocation (SAA) once the outcomes of the triennial valuation process is known. This will ensure the Fund's investment approach is appropriately aligned with its funding strategy and that the Fund can pay liabilities as they fall due over time.

It is proposed for this review to be undertaken with the Pensions Committee, supplemented by virtual training where required.

4.17.2 Key milestones:

Key Milestones	Dates	On target for completion?
Development of revised Investment Strategy/SAA by officers and advisors	Rescheduled to February 2023 (November to December 2022)	On target
Investment Strategy Training to Pensions Committee	January 2023	On target

Key Milestones	Dates	On target for completion?
Revised Investment Strategy/SAA approved by Pensions Committee	March 2023	On target
Implementation of revised Investment Strategy	2023 onwards	On target

4.17.3 Update: The Fund's Officers have engaged with its investment advisors, Mercer, and are on track to deliver training and a revised Investment Strategy as planned to be presented at the March 2023 Pension Fund Committee.

4.18 Private Equity Review

4.18.1 Activity: The Fund has a strategic asset allocation (SAA) for Private Equity of 5% within an overall allocation to Alternative assets of 25%. To maintain this the Fund must make regular private equity commitments.

To ensure the continued suitability of the portfolio, a deeper fundamental portfolio review covering exposures, risks and opportunities needs to be undertaken. This will also include modelling of expected commitment levels and deployment rates.

4.18.2 Key milestones:

Key Milestones	Dates	On target for completion?
Private Equity Portfolio Review	December 2022 to January 2023	On target
Investment Sub Committee approve future private equity commitments	February 2023	On target
Implementation of agreed private equity commitments	March 2023 onwards	On target

4.18.3 Update: The Fund's Officers have engaged with its investment advisors, Mercer, and are on track to bring forward proposals for private equity commitments for approval at the February 2023 ISC meeting.

Communications

4.19 Review of website and digital communications during 2022/23

4.19.1 Activity: The Fund's web offering will be reviewed to assess whether the website is still fit for purpose and alternative options available to meet the needs of the Fund's stakeholders.

4.19.2 Key milestones:

Key Milestones	Dates	On target for completion?
Initial engagement with key stakeholders and agreement of project objectives	April 2022 – June 2022	Completed
Review of initial engagement including mapping of user journeys and key insights	July 2022 – August 2022	Completed

Key Milestones	Dates	On target for completion?
Investigation into any identified “pain points” identified by user groups and identification of any further areas for improvement	Rescheduled to September – October 2022 (August 2022 - September 2022)	Completed
Stakeholder demonstration of new user journeys and prototype web pages/functions	Rescheduled to October – November 2022 (September 2022 – October 2022)	Completed
Presentation of key recommendations to officers	Rescheduled to November – December 2022 (October 2022 – November 2022).	Completed
Present outcomes and recommendations to Committee	March 2023	On target

4.19.3 Update: The review of the website has been progressing as planned. Initial findings and key recommendations have been presented to officers along with prototype webpages. These have also been tested with users and results are currently being collated for presenting to officers. A paper will be presented to the Committee in March providing recommendations and seeking approval to progress to the next stage of the project: implementing the recommended changes.

5 Implications (including financial implications)

5.1 Resources and Financial

5.1.1 The financial estimates and associated budgets included with the Business Plan and Medium-Term Strategy were approved by the Pension Committee on 30 March 2022.

5.2.1 Performance against the financial estimates in the Business Plan will be presented to the Pension Committee and Board each meeting. The Business Plan sets out the cost of each activity where known and where costs become known during the course of the year the Pension Committee and Board will be updated accordingly.

5.2 Legal

5.2.1 There are no legal implications arising from the proposals.

5.3 Risk

5.3.1 The mitigated risks associated with this report has been captured in the Fund’s risk register as detailed below –

Risk	Residual risk rating
Those charged with the governance of the Fund and scheme are unable to fulfil their responsibilities effectively	Green
Pension Fund objectives are not defined and agreed.	Green
Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	Green

5.3.2 Please see the [Northamptonshire Pension Fund Risk Register Executive Summary](#).

5.4 Relevant Pension Fund Objectives

5.4.1 The following objectives as per the Business Plan have been considered in this report -

1. To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
2. To continually monitor and measure clearly articulated objectives through business planning.
3. To continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate.

5.5 Consultation

6.5.1 Not applicable.

6. Background Papers

6.1 [Northamptonshire Pension Fund Business Plan and Medium-Term Strategy](#)

Appendix A – Variances against the forecast of investments and administration expenses based on original setting of assumptions

Fund Account	2022/23 Estimate	2022/23 Forecast	Variance	Comments
	£000	£000	£000	
Contributions	(120,000)	(123,000)	(3,000)	Contributions in line with current membership numbers
Transfers in from other pension funds	(8,500)	(11,000)	(2,500)	Demand led
Total income	(128,500)	(134,000)	(5,500)	
Benefits payable	108,000	108,000	-	
Payments to and on account of leavers	8,500	12,500	4,000	Demand led
Total Payments	116,500	120,500	4,000	
Net (additions)/withdrawals from dealings with members	(12,000)	(13,500)	(1,500)	
Management Expenses	3,645	3,815	170	See below
Total income less expenditure	(8,355)	(9,685)	(1,330)	
Investment income	(26,000)	(26,000)	-	Actual income received to December 2022 plus one estimated quarter
Taxes on income	-	-	-	
(profit) and losses on disposal of investments and changes in the market value of investments	(127,000)	232,400	359,400	Actual Q3 return followed by actuarial long term growth assumption
Net return on investments	(153,000)	206,400	359,400	
Net (increase)/decrease in the net assets available for benefits during the year	(161,355)	196,715	358,070	

Management Expenses	2022-23 Estimate	2022-23 Forecast	Variance	Comments
	£000	£000	£000	
Total Administration Expenses	2,331	2,521	190	See below
Total Governance Expenses	834	825	(9)	
Total Investment Invoiced Expenses	480	469	(11)	
Total Management Expenses	3,645	3,815	170	

Administration Expenses Analysis	2022-23 Estimate	2022-23 Forecast	Variance	Comments
	£000	£000	£000	
Staff Related	1,458	1,613	155	Budget based on estimated 22/23 pay rates, higher than expected pay awards received. Expected vacancies to be filled during the quarter
Altair administration and payroll system	329	361	32	Inflation increases higher than expected
Data assurance	45	42	(3)	
Communications	39	38	(1)	
Other Non-Pay and Income	15	22	7	Bank charges and IT hardware costs are higher than expected
County Council Overhead Recovery	445	445	-	
Total Administration Expenses	2,331	2,521	190	

Appendix B – Progress of Climate Action Plan

Climate action plan

Calendar year

Quarter 1 2022

Agree decarbonisation pathway and targets that align the beliefs and ambitions of the Investment Sub Committee (ISC). The ISC agreed target reductions in absolute carbon emissions of the Fund's listed equity holdings of at least: <ul style="list-style-type: none"> • 25% from June 2021 baseline by 2024 • 59% from June 2021 baseline by 2030 	✓
Communicate agreed targets and aspirations to investment managers	✓
Instruct advisers to investigate high level approaches to climate aware passive equity investing	✓
Publish Climate Action Plan	✓

Quarter 2/3 2022

ISC receive training on strategic options to decarbonise the Pension Fund's active equity portfolio, including setting targets for existing managers and considering sustainable and impact equity and/or UN Sustainable Development Goals (SDG) alignment	✓
ISC receive report on high level climate aware passive equity options	✓

Quarter 3/4 2022

Receive implementable proposal on carbon aware passive equity portfolio	✓
Prepare and publish reporting in line with the Task-Force on Climate-Related Financial Disclosures (TCFD) disclosure requirements for the 2021-22 Fund annual report	✓
Engage with existing active equity managers around decarbonisation approaches	
Engage with private asset managers to improve carbon data provision for portfolios and increased ESG integration	
Engage with ACCESS on sustainable/impact equity managers (based on Committee preferences following Q2 discussion)	
Consider draft UK Stewardship Report ahead of submission to FRC	
Implement carbon aware passive equity in Q4 2022	

2023

ISC consider proposals to include fixed income portfolio including Multi-Asset Credit (MAC) and credit portfolios in climate reporting and target setting	
ISC receive report on availability of data and approach on alternatives assets	
ISC consider proposals for impact investing	
Continuation of the work with active managers to implement carbon reduction measures and increase the sustainability of the portfolios they manage	

2024

ISC consider feasibility of including Scope 3 within emissions reduction reporting and targets	
ISC consider proposals to extend climate reporting and target setting to private asset classes	
ISC review progress made to date against targets and reset short-term and long-term targets	
Pension Committee consider appropriateness of decarbonisation pathway and refine based upon experience to date	
Continuation of the work with active managers to implement carbon reduction measures and increase the sustainability of the portfolios they manage	

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank