



Pensions Fund Committee

A meeting of the Pensions Fund Committee will be held at the Jeffrey Room, The Guildhall, Northampton, NN1 1DE on Monday 25 July 2022 at 4.00 pm

Agenda

2.	<p>Declarations of Interest</p> <p>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.</p>
3.	<p>Minutes (Pages 5 - 10)</p> <p>To confirm the Minutes of the meeting of the Committee held on 29 June 2022.</p>
4.	<p>Chair's Announcements</p> <p>To receive communications from the Chair.</p>
5.	<p>Action Log (Pages 11 - 12)</p>
6.	<p>Audit Plan (Pages 13 - 38)</p>
7.	<p>Annual Report and Statement of Accounts (Pages 39 - 124)</p>
8.	<p>Northamptonshire Pension Fund Committee Forward Agenda Plan (Pages 125 - 128)</p>
9.	<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) 3 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>
10.	<p>Private Minutes (Pages 129 - 136)</p> <p>To approve the private minutes of the Pensions Fund Committee held on 29 June 2022.</p>
11.	<p>Climate Action Plan (Pages 137 - 146)</p>
13.	<p>Annual Investment Review (Pages 169 - 200)</p>

Catherine Whitehead
Proper Officer
15 July 2022

Pensions Fund Committee Members:

Councillor Malcolm Longley (Chair)	Councillor Charles Morton (Vice-Chair)
Councillor Phil Bignell	Councillor Paul Joyce
Councillor Jamie Lane	Councillor Peter Matten
Councillor Cathrine Russell	Councillor Lloyd Bunday
Councillor Graham Lawman	John Wignall
Robert Austin	Peter Borley-Cox

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.

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One Angel Square
Angel Street
Northampton
NN1 1ED

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Pensions Fund Committee

Minutes of a meeting of the Pensions Fund Committee held at The Jeffrey Room, The Guildhall, Northampton, NN1 1DE on Wednesday 29 June 2022 at 4.00 pm.

Present: Councillor Malcolm Longley (Chair)
 Councillor Charles Morton (Vice-Chair)
 Councillor Jamie Lane
 Councillor Graham Lawman
 Councillor Peter Matten
 John Wignall
 Robert Austin

Substitutes: Andy Langford as substitute for Peter Borley-Cox

Also Present: Julie Petrie
 Robert McInroy, Hymans Robertson
 Andreas Pafitis, Aon
 Karen McWilliam, Aon

Apologies for Absence: Councillor Paul Joyce
 Councillor Cathrine Russell
 Councillor Lloyd Bunday
 Peter Borley-Cox

Officers: Mark Whitby, Head of Pensions
 Cory Blose, Employer Services and Systems Manager
 Michelle Oakensen, Governance Officer
 Maisie McInnes, Democratic Services Officer

72. **Declarations of Interest**

Rob Austin declared a disclosable pecuniary interest as a member of LGPS. John Wignall declared a personal interest as a retired member of LGPS. Councillor Graham Lawman disclosed a personal interest as his wife is a deferred member of LGPS.

73. **Minutes**

The minutes of the previous meeting held on 30 March 2022 were agreed as a true and accurate record of the meeting subject to the admission of Councillor Graham Lawman on the list of those present.

74. **Chair's Announcements**

The Chair welcomed everyone to the meeting and announced he had two important items to note. He explained at the previous meeting of the Investment Sub-

Committee, poor attendance led to the meeting not being quorate meaning that no decisions could be taken at the meeting. The Chair reminded members that if they are unable to make a meeting of the Pensions Committee or Investment Sub-Committee, they are to send a substitute in their place or send apologies in advance so that the Democratic Services Officer could manage attendance and rearrange the meeting if necessary. The Chair made comment about the length of meetings and asked officers to ensure that the meetings were no longer than 2 hours to ensure members were focussed and engaged.

75. **Action Log**

The Governance Officer presented the action log as detailed in the report.

RESOLVED: That the Pensions Fund Committee noted the action log.

76. **Administration Report**

At the Chair's invitation, the Governance Officer presented the Administration Report and summarised that in terms of the Key Performance Indicators (KPIs) these were all positive with consistently good performance over the period except for 2 targets. This was detailed in section 5.1.3 of the report. In January, February and March 2022, the Governance Officer reported that 100% of payments were received on time from employers. The Governance Officer highlighted the breach in section 5.3.2 of the report, which detailed that prudential had failed to provide annual benefit statements by statutory deadline. As a result of this the deadline was extended to 30 April and this was met. The Pensions Regulator confirmed that no further action would be taken at this time.

The Governance Officer shared that a new section, material data breaches, had been added as a standing item in the report. The Governance Officer explained this was important for transparency. As detailed in section 5.4, there was a data breach involving 157 scheme members due to a printing error with double-sided printed letters with another scheme members details printed on the reverse. This was quickly identified, and West Northants Council's breach guidelines were followed and GDPR training provided to staff. In terms of Internal Dispute Resolution Procedure cases, there was one dispute in the period 1 February to 30 April 2022 that was responded to and the monitoring officer had decided not to uphold.

The Governance Officer concluded the report and invited members to ask any questions.

RESOLVED: That the Pensions Fund Committee noted the report.

77. **Governance and Compliance Report**

At the Chair's invitation, the Governance Officer presented the report and explained that there had been further work undertaken since publishing the report on pensions dashboards in section 5.1 of the report, as there had been further development from the dashboard programme. The progress report and log released covered key topics

such as how to prepare for further dashboards, timeliness, and data quality. The DWP will publish its response to the consultation and produce draft standards over the summer. Since the governance and compliance progress report had been published, the Pension Regulator has published guidance stating that all schemes should be taking action and preparing in advance for future activity. The Governance Officer shared that Northamptonshire Pension Fund were undertaking background reading, attending webinars and conducting research into system requirements in preparation. The fund already used iConnect for most employers which helped record monthly data collection and ensure data quality was up to date.

The Governance Officer explained that since the last meeting, the Fund managed to secure a North Northamptonshire Council representative for the Local Pension Board. There was still a vacancy on the Pension Fund Committee and recruitment would be rescheduled to the summer.

The Governance Officer highlighted the new section in the report at 5.3 Fund Policy/Strategy Updates. This would enable officers to provide updates on immaterial changes to policies and strategies, rather than requiring the entire policy to be reviewed for small changes. Since the last meeting The Anti-Fraud and Corruption policy had been updated to add a link to the whistleblowing policy in the report. The Data Improvement Strategy was a separate agenda item in the meeting.

The Governance Officer referred to the training program detailed in Appendix A of the report and encouraged members to make contact if they were interested in any further training opportunities.

RESOLVED: That the Pensions Fund Committee noted the report.

78. Employers Admissions and Cessations Report

The Employers Admissions and Cessations Manager presented the report and invited members to ask any questions.

RESOLVED: That the Pensions Fund Committee:

- a) Noted the admission of the following admitted body to the Northamptonshire Pension Fund and approved the sealing of the following admission agreement:**
 - **RM Education Limited**
- b) Noted the exit of the following bodies from the Northamptonshire Pension Fund:**
 - **Maid Marion Limited**
 - **Consortium Audit**

79. Administering Authority Discretions

At the Chair's invitation, the Head of Pensions presented the report and summarised that as detailed in section 4 of the report, the administering authority has discretion over the determination of the value of any exit credit that should be paid to any exiting employers. The Head of Pensions explained that the current process was that key decisions were determined by the Head of Pensions and Executive Director Finance (Section 151). The report proposed that the Employer Services Manager be named as the officer responsible for making determinations in relation to matters around exiting employers and exit credits in the first instance. The Head of Pensions explained this would enable him to be able to judicate in the case of any appeals and create a framework to be put in place.

The Chair asked if this proposal would speed up the process. The Head of Pensions explained that the framework would speed up the decision making and put logical steps in place. The Fund had been working on this for a few months and it was determined as the best way forward.

Members discussed the report and shared that they agreed with the framework but felt that the Fund's starting position should be to pay the credit back to the employer. Members felt there should be a threshold on the amount paid back and any significant amounts should be brought to the committee to decide as credits could be quite considerable. The Chair agreed that it would be good to report from a governance perspective. The Head of Pensions responded that the law was quite clear on this as the actuary identifies the surplus and the administering authority's role was to determine how much was to be paid. The law is clear on the multifactorial decision making which considers risks, contracts and who would pay deficit and that the monitoring officer would be responsible for handling any appeals. The Employer Services Manager explained that the fund had tested out the framework and sought legal advice which found that the framework was robust.

Members questioned if there would be a conflict of interest with the individual dealing with appeals and determining the exit credits. The Head of Pensions shared that he was comfortable with the post holder, as any individual who would take on the role would have a role within the Pensions Fund.

RESOLVED: That the Pensions Fund Committee approved the updated proposed Administering Authority Discretions Policy provided in Appendix A of the report.

80. **Data Improvement Policy and Plan**

The Head of Pensions presented the report and explained that the Data Improvement Policy and Plan had been previously brought to committee. The policy had been completely rewritten to align with the Funds priorities going forward. In effect, the new plan demonstrates the in-year activities surrounding various projects and data scoring. The strategy itself gives indication on a monthly-basis on how the fund keeps high quality control of data. The Head of Pensions explained that the recommendations were seeking approval of the strategy that was regularly reviewed and concluded his report.

RESOLVED: The Pension Committee approved the revised Data Improvement Policy and Plan.

81. Northamptonshire Pension Committee Forward Agenda Plan

The Governance Officer presented the Northamptonshire Pension Committee Forward Agenda Plan and invited the Committee to note the report.

RESOLVED: That the Pensions Fund noted the forward plan.

82. Exclusion of Press and Public

The Chair moved that the remainder of the meeting be held in private:

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) 3 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.

RESOLVED: Members agreed that the public and press were excluded from the remainder of the meeting and the Pensions Committee moved into private session.

The meeting closed at 18:00

Chair: _____

Date: _____

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**NORTHAMPTONSHIRE PENSION
FUND**

**Pension Committee
Action log from Pension Committee meeting held on 29 June 2022**

This log captures the actions from the Pension Committee of the 29 June 2022 together with any carried forward items from previous meetings and updates members on the progress on compliance in delivering the necessary actions. This is the updated action log as at 13 July 2022.

Actions from 29 June 2022 meeting of the Pension Committee -

Item No.	Item	Action to be taken by	Issue	Action/Status
				None

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West Northamptonshire Council

Pensions Committee

25/07/2022

Mark Whitby – Head of Pensions

Report Title	Grant Thornton Audit Plan for Northamptonshire Pension Fund 2021-22
Report Author	Ben Barlow, Ben.Barlow@Westnorthants.gov.uk

Contributors/Checkers/Approvers

West MO	Gina Clarke on behalf of Catherine Whitehead	1/7/2022
West S151	James Smith on behalf of Martin Henry	6/7/2022
Head of Pensions	Mark Whitby	24/6/2022

List of Appendices

Appendix A – Northamptonshire Pension Fund Audit Plan Year ended 31 March 2022

Author: Grant Thornton (GT)

1. Purpose of Report

1.1 To present the Pension Committee with Audit Plan from Grant Thornton.

2. Executive Summary

2.1 Grant Thornton act as the Northamptonshire Pension Fund's external auditors. As the external auditors they have produced a plan of the upcoming audit 2021-22 of the Northamptonshire Pension Fund.

3. Recommendations

3.1 The Pension Committee is asked to:

a) Note the Audit Plan 2021-22 and the presentation by Grant Thornton.

4. Reason for Recommendations

4.1 To accord with the Audit and Accounts Regulations 2015.

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.

6. Content, Responsibilities and Timeline

- 6.1 Grant Thornton (GT) have been appointed as Independent External Auditors to provide an audit opinion on:
- 6.1.1 whether the financial statements of Northamptonshire Pension Fund give a true and fair view of the financial transactions of the Pension Fund during the year ended 31 March 2022 and the amount and disposition of the Fund's assets and liabilities as at 31 March 2022; and
 - 6.1.2 the consistency of the Pension Fund financial statements within the Pension Fund annual report with the published financial statements of Northamptonshire County Council.
- 6.2 GT have produced an audit plan, setting out identified audit risks, expected materiality levels, the audit logistics and the planned delivery of the audit process. A Key Audit Partner and Audit Manager from Grant Thornton, Ciaran McLaughlin and David Rowley, will attend this meeting to present the audit plan.
- 6.3 Page 7 of the accompanying report identifies the key risks and areas of auditor focus, details the Auditor's planned approach to these risk areas. These, along with the Fund's approach are summarised in the following table.

Risk/area of focus	Audit approach	Fund approach
Management over-ride of controls	<ul style="list-style-type: none"> • Evaluate the design effectiveness of management controls over journals; • Analyse the journals listing and determine the criteria for selective high risk unusual journals; • Test unusual journals recorded during the year and after the draft accounts state for appropriateness and corroboration • Gain an understanding of the accounting estimates and critical judgements applied by management and consider their reasonableness with 	<ul style="list-style-type: none"> • Ensure process notes include identified risks • Provide written process notes which detail controls • Make copy journals available • Provide working papers demonstrating the value used for the journals

Risk/area of focus	Audit approach	Fund approach
	<p>regard to corroborative evidence; and</p> <ul style="list-style-type: none"> Evaluate the rationale for any changes in accounting policies, estimates or significant unusual transactions. 	
Valuation of Level 3 investments (annual valuation)	<ul style="list-style-type: none"> Evaluate management's processes for valuing level 3 investments; Review the nature and basis of estimated values and consider what assurance management has over the year end valuations provided for these types of investment to ensure the requirements of the code are met; Independently request year end confirmations from Investment Managers; Sample testing of investment values; Sample testing of purchases and sales; Analyse the fund's holdings by sector, applying an additional layer of professional scepticism. 	<ul style="list-style-type: none"> Provide working papers demonstrating the value used at the year end and the valuation methodology Provide quarterly reconciliation reports Liaise with Investment Managers to provide information to auditors on a timely basis

6.4 Page 13 of the accompanying report sets out the planned materiality levels for the audit, based on 1% of net assets of £3.3bn, reduced by 10% to reflect the impact of the Russia-Ukraine conflict, which are planned to be:

Audit Area	Materiality
Planning Materiality	£29.8m
Audit Differences	£1.4m

6.5 Page 15 of the accompanying report sets out the proposed timeline for delivery of the audit. The key planned milestones are:

Milestone	Planned dates	Status
Interim Audit	March 2022	Completed
Report audit plan	July 2022	Completed
Year end Audit	July -September 2022	In progress
Audit Findings Report	October 2022	Deadline 30 September 2022

- 6.6 The statutory date for publication of the final set of the Council's Statement of Accounts is the end of September, or as soon as reasonably practicable after the receipt of the auditor's final findings (if later).
- 6.7 The statutory date for publication of the Pension Funds Annual Report is 1st December.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 There are no resource or financial implications arising from the proposals in this paper. This paper is for information only.

7.2 Legal

- 7.2.1 The legal implications are set out in the main body of the report.

7.3 Risk

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

Risk No.	Risk	Residual risk rating
4	Contributions to the Fund are not received on the correct date and/or for the correct amount	Amber
5	Fund assets are not sufficient to meet obligations and liabilities.	Amber
7	Information may not be provided to stakeholders as required	Green
9	Those charged with governance are unable to fulfil their responsibilities effectively	Green
15	Custody arrangements may not be sufficient to safeguard Pension Fund assets.	Green
17	Failure to administer the scheme in line with regulations and guidance.	Green
19	Pension Fund investments may not be accurately valued.	Green
25	Investment decisions and portfolio management may not achieve the return required or be performed in accordance with instructions provided.	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/>

7.4 Relevant Pension Fund Objectives

- 7.4.1 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.

7.5 **Consultation**

7.5.1 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.

7.6 **Consideration by Overview and Scrutiny**

7.6.1 The Pensions Committee is a committee of full council and therefore consideration by Overview and Scrutiny is not required.

7.7 **Climate Impact**

7.7.1 There are no climate impact considerations arising as a direct result of this paper.

7.8 **Community Impact**

7.8.1 There are no community impact implications.

7.9 **Communications**

7.9.1 This information only paper does not require any further communication activities.

8. Background Papers

8.1 Not applicable.

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Northamptonshire Pension Fund audit plan

Year ending 31 March 2022

Northamptonshire Pension Fund
June 2022



Contents



Your key Grant Thornton team members are:

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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.

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Significant improvements from the Financial Reporting Council's (FRC) quality inspection

On 29 October, the FRC published its annual report setting out the findings of its review of the work of local auditors. The report summarises the results of the FRC's inspections of twenty audit files for the last financial year. A link to the report is here: [FRC AQR Major Local Audits October 2021](#)

Grant Thornton are one of seven firms which currently delivers local audit work. Of our 330 local government and NHS audits, 87 are currently defined as 'major audits' which fall within the scope of the AQR. This year, the FRC looked at nine of our audits.

Our file review results

The FRC reviewed nine of our audits this year. It graded six files (67%) as 'Good' and requiring no more than limited improvements. No files were graded as requiring significant improvement, representing an impressive year-on-year improvement. The FRC described the improvement in our audit quality as an 'encouraging response by the firm to the quality findings reported in the prior year.' Our Value for Money work continues to be delivered to a high standard, with all of the files reviewed requiring no more than limited improvement. We welcome the FRC findings and conclusions which demonstrate the impressive improvement we have made in audit quality over the past year.

The FRC also identified a number of good practices including effective challenge of management's valuer, use of an auditor's expert to assist with the audit of a highly specialised property valuation, and the extent and timing of involvement by the audit partner on the VFM conclusion.

Our results over the past three years are shown in the table below:

Grade	Number 2018/19	Number 2019/20	Number 2020/21
Good with limited improvements (Grade 1 or 2)	1	1	6
Improvements required (Grade 3)	2	5	3
Significant improvements required (Grade 4)	1	0	0
Total	4	6	9

Our continued commitment to Audit quality and continuous improvement

Our work over the past year has been undertaken during the backdrop of COVID, when the public sector has faced the huge challenge of providing essential services and helping safeguard the public during the pandemic. Our NHS bodies in particular have been at the forefront of the public health crisis. As auditors we have had to show compassion to NHS staff deeply affected by the crisis, whilst staying focused on the principles of good governance and financial management, things which are more important than ever. We are very proud of the way we have worked effectively with audited bodies, demonstrating empathy in our work whilst still upholding the highest audit quality.

Significant improvements from the Financial Reporting Council's (FRC) quality inspection (cont.)

Over the coming year we will make further investments in audit quality including strengthening our quality and technical support functions, and increasing the level of training, support and guidance for our audit teams. We will address the specific improvement recommendations raised by the FRC, including:

- Enhanced training for local auditors on key assumptions within property valuations, and how to demonstrate an increased level of challenge
- Formalising our arrangements for the consideration of complex technical issues by Partner Panels.

As part of our enhanced Value for Money programme, we will focus on identifying the scope for better use of public money, as well as highlighting weaknesses in governance or financial stewardship where we see them.

Conclusion

Local audit plays a critical role in the way public sector audits an society interact, and it depends on the trust and confidence of all those who rely on it. As a firm we're proud to be doing our part to promote good governance, effective stewardship and appropriate use of public funds.

Key matters

Factors

Pension Fund developments

The latest financial data available as at the interim stage (September valuation) indicates the net assets of the Fund had increased from a position of 3.1bn as at 31 March 2021 to an unaudited position of £3.3bn as at 30 September 2021. This is reflective of increased market stability in the first six months of the 2021/22 financial year.

However, as we touch on below, there remain specific challenges and uncertainties in relation to the wider economic and political environment which will draw our attention as auditors and which management must work to mitigate.

The Ukraine – Russia conflict has resulted in increased market uncertainty during the final quarter of the 2021/22 financial year. The sanctions regime applied to Russia has led to spiralling oil and gas prices, with the energy price shock dampening investor sentiment. Most major indices have experienced a reduction of around 10% in February 2022. The audit team have opted to reduce the audit's materiality level by 10% to reflect this development.

2022 is also the year of the triennial valuation. This will not impact the 2021/22 year however will determine the level of funding and future contribution rates effective from the following year. This will also entail a significant time commitment from the pensions administration team during 2022.

The expectation on funds to invest sustainably and within environmental, social and governance initiatives is increasing with many funds setting net carbon zero targets.

DLUHC state their intention, subject to consultation, to introduce secondary legislation to extend the deadline for publishing audited local authority accounts to 30 November for the 2021/22 accounts. The consultation ran from 6 – 20 May with the intention of making these changes via secondary legislation by Summer Recess.

Recovery from Covid 19 pandemic

At a higher level, the pandemic situation broadly appears to be improving with optimism returning to markets.

From an operational perspective, the Fund continues to manage the pandemic well, ensuring a continuation of the day to day financial management of the organisation and production of key financial information in in line with agreed timetables. However, from our perspective as external auditors, remote working continues to present an operational challenge, in particular in relation to the time taken to obtain and process information in a remote setting.

McCloud

On 10 March 2022, the Public Service Pensions and Judicial Offices Act 2022 received Royal Assent. The main purpose of the Act is to support implementation of the McCloud remedy in the public service pension schemes. The McCloud remedy will be implemented in two phases that will impact the 2022/23 financial year.

Our response

- As a firm, we are absolutely committed to audit quality and financial reporting in the local government sector. Our proposed work and fee is outlined further in this report.
- We will continue to provide you with sector updates via our Audit and Governance Committee updates.
- We have identified an increased incentive and opportunity for organisations in the public sector to manipulate their financial statements due to increasing financial pressures. We have identified a significant risk in regards to level 3 investments, management override of controls and revenue recognition - refer to page 8.

Introduction and headlines

Purpose

This document provides an overview of the planned scope and timing of the statutory audit of Northamptonshire Pension Fund ('the Pension Fund') for those charged with governance.

Respective responsibilities

The National Audit Office ('the NAO') has issued a document entitled Code of Audit Practice ('the Code'). This summarises where the responsibilities of auditors begin and end and what is expected from the audited body. Our respective responsibilities are also set out in the agreed *in the Terms of Appointment and Statement of Responsibilities issued by Public Sector Audit Appointments (PSAA), the body responsible for appointing us as auditor of Northamptonshire Pension Fund. We draw your attention to both of these documents.*

Scope of our audit

The scope of our audit is set in accordance with the Code and International Standards on Auditing (ISAs) (UK). We are responsible for forming and expressing an opinion on the Pension Fund's financial statements that have been prepared by management with the oversight of those charged with governance (the Audit and Governance committee).

The audit of the financial statements does not relieve management or the Audit and Governance Committee of your responsibilities. It is the responsibility of the Pension Fund to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. We have considered how the Pension Fund is fulfilling these responsibilities.

Our audit approach is based on a thorough understanding of the Pension Fund's business and is risk based.

Significant risks

Those risks requiring special audit consideration and procedures to address the likelihood of a material financial statement error have been identified as:

- The valuation of Level 3 investments is incorrect.
- Management override of controls.
- The revenue recognition cycle (including those related to expenditure) contains fraudulent transactions (rebutted).

We will communicate significant findings on these areas as well as any other significant matters arising from the audit to you in our Audit Findings (ISA 260) Report.

Materiality

We have determined planning materiality to be £33.2m (PY N/A) for the Pension Fund, which equates to 1.00% of your net assets as at 30/09/2021 per the custodian report. We have subsequently reduced this figure by 10% to £29.8m to reflect the market impact of the Russia-Ukraine conflict. We are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. Clearly trivial has been set at £1.4m (PY £N/A).

Audit logistics

Our interim visit will take place in March and our final visit will take place in July, August and September. Our key deliverables are this Audit Plan and our Audit Findings Report. Our audit approach is detailed in Appendix A.

Our fee for the audit will be £51k (PY: £N/A) for the Pension Fund, subject to the Pension Fund delivering a good set of financial statements and working papers.

We have complied with the Financial Reporting Council's Ethical Standard (revised 2019) 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..

As this is our first year as auditors of the Fund, we will liaise with our counterparts on the predecessor engagement team at EY with a view to arranging an opportunity to gain assurance over opening balances via review of the predecessor audit file.

Significant risks identified

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.

Risk	Reason for risk identification	Key aspects of our proposed response to the risk
The revenue cycle includes fraudulent transactions (rebutted)	<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>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 for the Fund, West Northamptonshire County Council, mean that all forms of fraud are seen as unacceptable. <p>Therefore we do not consider this to be a significant risk for Northamptonshire Pension Fund.</p>
Management over-ride of controls	<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 misstatement.</p>	<p>We will:</p> <ul style="list-style-type: none"> - evaluate the design effectiveness of management controls over journals; - analyse the journals listing and determine the criteria for selecting high risk unusual journals; - test unusual journals recorded during the year and after the draft accounts stage for appropriateness and corroboration; - gain an understanding of the accounting estimates and critical judgements applied by management and consider their reasonableness with regard to corroborative evidence; and - evaluate the rationale for any changes in accounting policies, estimates or significant unusual transactions.

Significant risks identified

Risk	Reason for risk identification	Key aspects of our proposed response to the risk
Valuation of Level 3 investments (annual valuation)	<p>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..</p> <p>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.</p> <p>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.</p> <p>Management utilise the services of investment managers as valuation experts to estimate the fair value of these assets.</p> <p>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.</p>	<p>We will :</p> <ul style="list-style-type: none"> - Evaluate management's processes for valuing Level 3 investments. - Review the nature and basis of estimated values and consider what assurance management has over the year end valuations provided for these types of investment to ensure the requirements of the code are met. - Independently request year end confirmations from investment managers, with an additional focus on ensuring 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, test 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. - Complete sample testing of purchases and sales to prime documentation across the period to support our reconciliation of the opening and closing balances. - Analyse the funds 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.

Accounting estimates and related disclosures

The Financial Reporting Council issued an updated ISA (UK) 540 (revised): *Auditing Accounting Estimates and Related Disclosures* which includes significant enhancements in respect of the audit risk assessment process for accounting estimates.

Introduction

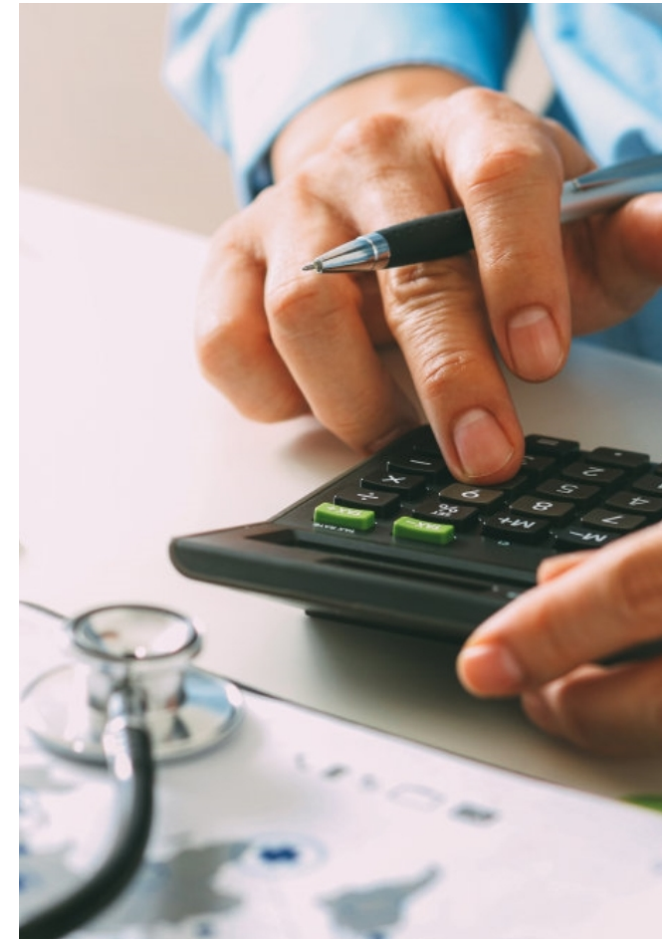
Under ISA (UK) 540 (Revised December 2018) auditors are required to understand and assess an entity's internal controls over accounting estimates, including:

- The nature and extent of oversight and governance over management's financial reporting process relevant to accounting estimates;
- How management identifies the need for and applies specialised skills or knowledge related to accounting estimates;
- How the entity's risk management process identifies and addresses risks relating to accounting estimates;
- The entity's information system as it relates to accounting estimates;
- The entity's control activities in relation to accounting estimates; and
- How management reviews the outcomes of previous accounting estimates.

As part of this process auditors also need to obtain an understanding of the role of those charged with governance, which is particularly important where the estimates have high estimation uncertainty, or require significant judgement.

Specifically do Audit and Governance Committee members:

- Understand the characteristics of the methods and models used to make the accounting estimates and the risks related to them;
- Oversee management's process for making accounting estimates, including the use of models, and the monitoring activities undertaken by management; and
- Evaluate how management made the accounting estimates?



Accounting estimates and related disclosures

Additional information that will be required

To ensure our compliance with this revised auditing standard, we will be requesting further information from management and those charged with governance during our audit for the year ended 31 March 2022.

Based on our knowledge of the Pension Fund we have identified the following material accounting estimates for which this is likely to apply:

- Valuation of level 2 and level 3 investments

The Pension Fund's Information systems

In respect of the Pension Fund's information systems we are required to consider how management identifies the methods, assumptions and source data used for each material accounting estimate and the need for any changes to these. This includes how management selects, or designs, the methods, assumptions and data to be used and applies the methods used in the valuations.

When the models used include increased complexity or subjectivity, as is the case for many valuation models, auditors need to understand and assess the controls in place over the models and the data included therein. Where adequate controls are not in place we may need to report this as a significant control deficiency and this could affect the amount of detailed substantive testing required during the audit.

If management has changed the method for making an accounting estimate we will need to fully understand management's rationale for this change. Any unexpected changes are likely to raise the audit risk profile of this accounting estimate and may result in the need for additional audit procedures.

We are aware that the Pension Fund uses management experts in deriving some of its more complex estimates, e.g. asset and investment. However, it is important to note that the use of management experts does not diminish the responsibilities of management and those charged with governance to ensure that:

- All accounting estimates and related disclosures included in the financial statements have been prepared in accordance with the requirements of the financial reporting framework, and are materially accurate;
- There are adequate controls in place at the Pension Fund (and where applicable its service provider or management expert) over the models, assumptions and source data used in the preparation of accounting estimates.



Estimation uncertainty

Under ISA (UK) 540 we are required to consider the following:

- How management understands the degree of estimation uncertainty related to each accounting estimate; and
- How management address this estimation uncertainty when selecting their point estimate.

For example, how management identified and considered alternative, methods, assumptions or source data that would be equally valid under the financial reporting framework, and why these alternatives were rejected in favour of the point estimate used.

The revised standard includes increased emphasis on the importance of the financial statement disclosures. Under ISA (UK) 540 (Revised December 2018), auditors are required to assess whether both the accounting estimates themselves and the related disclosures are reasonable.

Where there is a material uncertainty, that is where there is a significant risk of a material change to the estimated carrying value of an asset or liability within the next year, there needs to be additional disclosures. Note that not all material estimates will have a material uncertainty and it is also possible that an estimate that is not material could have a risk of material uncertainty.

Where there is material estimation uncertainty, we would expect the financial statement disclosures to detail:

- **What the assumptions and uncertainties are;**
- **How sensitive the assets and liabilities are to those assumptions, and why;**
- **The expected resolution of the uncertainty and the range of reasonably possible outcomes for the next financial year; and**
- **An explanation of any changes made to past assumptions if the uncertainty is unresolved.**

Planning enquiries

As part of our planning risk assessment procedures we have engaged with management and obtained an understanding of the control environments around estimates via the Informing the Audit Risk Assessment document, which will be presented separately to the Pension Committee. We would ask that Committee members familiarise themselves with the report, ensure that they understand the information provided around calculation of estimates and flag up any instances where the information supplied by management is inconsistent with their understanding.

Further information

Further details on the requirements of ISA (UK) 540 (Revised December 2018) can be found in the auditing standard on the Financial Reporting Council's website:

[https://www.frc.org.uk/getattachment/0fa69c03-49ec-49ae-a8c9-cc7a2b65382a/ISA-\(UK\)-540_Revised-December-2018_final.pdf](https://www.frc.org.uk/getattachment/0fa69c03-49ec-49ae-a8c9-cc7a2b65382a/ISA-(UK)-540_Revised-December-2018_final.pdf)

Other matters

Other work

The Pension Fund is administered by West Northamptonshire County Council (the 'Council'), and the Pension Fund's accounts form part of the Council's financial statements.

Therefore, as well as our general responsibilities under the Code of Practice a number of other audit responsibilities also follow in respect of the Pension Fund, such as:

- We read any other information published alongside the Council's financial statements to check that it is consistent with the Pension Fund financial statements on which we give an opinion and is consistent with our knowledge of the Authority.
- We consider our other duties under legislation and the Code, as and when required, including:
 - Giving electors the opportunity to raise questions about your 2021/22 financial statements, consider and decide upon any objections received in relation to the 2021/22 financial statements;
 - Issue of a report in the public interest or written recommendations to the Fund under section 24 of the Act, copied to the Secretary of State.
 - Application to the court for a declaration that an item of account is contrary to law under Section 28 or for a judicial review under Section 31 of the Act; or
 - Issuing an advisory notice under Section 29 of the Act.
- We carry out work to satisfy ourselves on the consistency of the pension fund financial statements included in the pension fund annual report with the audited Fund accounts.

Other material balances and transactions

Under International Standards on Auditing, "irrespective of the assessed risks of material misstatement, the auditor shall design and perform substantive procedures for each material class of transactions, account balance and disclosure". All other material balances and transaction streams will therefore be audited. However, the procedures will not be as extensive as the procedures adopted for the risks identified in this report.

Materiality

The concept of materiality

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. Misstatements, including omissions, are considered to be material if they, individually or in the aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

Materiality for planning purposes

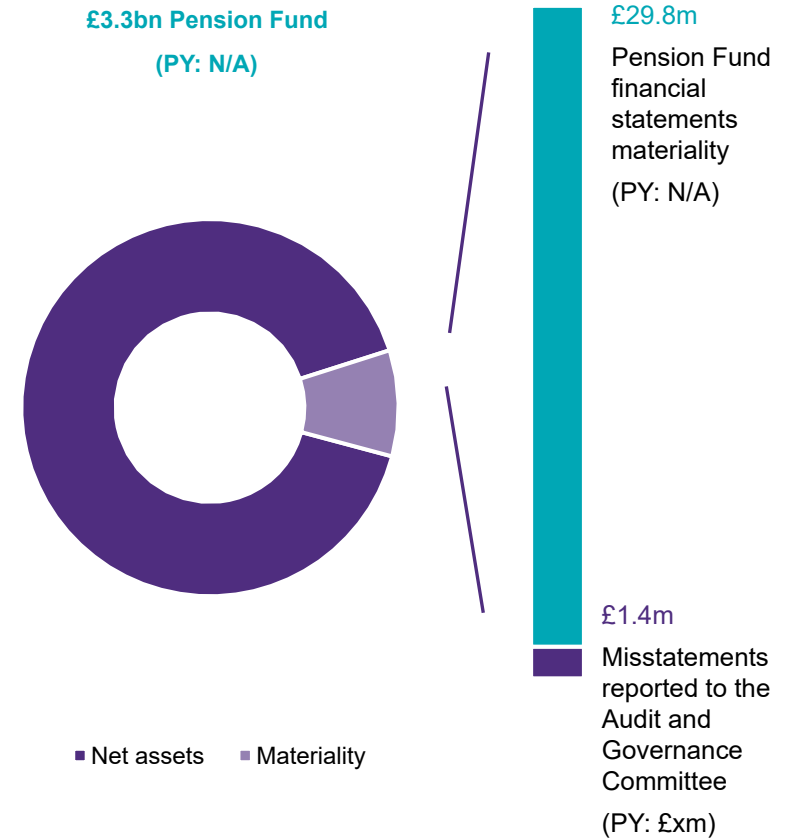
We have determined financial statement materiality based on a proportion of the net assets of the Pension Fund. Materiality at the planning stage of our audit is £29.8m (PY N/A), which equates to 1% of your net assets as at September 2021, reduced by 10% to reflect the impact of the Russia-Ukraine conflict. We reconsider planning materiality if, during the course of our audit engagement, we become aware of facts and circumstances that would have caused us to make a different determination of planning materiality.

Matters we will report to the Audit Committee

Whilst our audit procedures are designed to identify misstatements which are material to our opinion on the financial statements as a whole, we nevertheless report to the Audit Committee any unadjusted misstatements of lesser amounts to the extent that these are identified by our audit work. Under ISA 260 (UK) 'Communication with those charged with governance', we are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. ISA 260 (UK) defines 'clearly trivial' as matters that are clearly inconsequential, whether taken individually or in aggregate and whether judged by any quantitative or qualitative criteria. In the context of the Pension Fund, we propose that an individual difference could normally be considered to be clearly trivial if it is less than £1.4m (PY N/A).

If management have corrected material misstatements identified during the course of the audit, we will consider whether those corrections should be communicated to the Pension Committee to assist it in fulfilling its governance responsibilities.

net assets at 30/09/2021



IT audit strategy

In accordance with ISA (UK) 315, we are required to obtain an understanding of the information systems relevant to financial reporting to identify and assess the risks of material misstatement. As part of this we obtain an understanding of the controls operating over relevant Information Technology (IT) systems i.e., IT general controls (ITGCs). Our audit will include completing an assessment of the design of ITGCs related to security management; technology acquisition, development and maintenance; and technology infrastructure. Based on the level of assurance required for each IT system the assessment may focus on evaluating key risk areas ('streamlined assessment') or be more in depth ('detailed assessment').

[We plan to rely on the operation of application controls whether automated / IT dependent and will therefore carry out an extended ITGC assessment on the IT systems that support the operation of those controls. This is to gain assurance that the relevant controls have been operating effectively throughout the period.]

The following IT systems have been judged to be in scope for our audit and based on the planned financial statement audit approach we will perform the indicated level of assessment:

IT system	Audit area	Planned level IT audit assessment
Altair	Benefits payable	<ul style="list-style-type: none"> Assurance reports to be obtained from IT expert.
Agresso ERP	Financial reporting	<ul style="list-style-type: none"> Detailed ITGC assessment completed by internal expert.

Audit logistics and team

**Planning and
risk assessment**

**Interim audit
March 2022**

**Pension
committee**
June 2022

Audit Plan

**Year end audit
Summer 2022**

**Audit
committee**
TBC (est Sept 2022)

**Audit Findings
Report / Audit
Opinion**



Ciaran McLaughlin, Key Audit Partner

As your engagement lead, Ciaran will have the ultimate responsibility for the delivery of your audit service. He will lead our relationship with the Pension Fund and take overall responsibility for delivering high quality audits, which meet the highest professional standards while adding value



David Rowley, Audit Manager

As the engagement manager, David is responsible for overseeing the delivery of our service and managing the audit process in respect of Northamptonshire Pension Fund. He will be on hand to answer any queries, whilst ensuring an efficient audit process



Ben Stevenson, Audit Incharge

Ben will work with relevant officers and our on site team to ensure the smooth planning and delivery of the audit. He will oversee our operational team and discuss any issues with you during the audit process as well as any questions you may have throughout the year.

Audited body responsibilities

Where audited bodies do not deliver to the timetable agreed, we need to ensure that this does not impact on audit quality or absorb a disproportionate amount of time, thereby disadvantaging other audits. Where the elapsed time to complete an audit exceeds that agreed due to a client not meeting its obligations we will not be able to maintain a team on site. Similarly, where additional resources are needed to complete the audit due to a client not meeting their obligations we are not able to guarantee the delivery of the audit to the agreed timescales. In addition, delayed audits will incur additional audit fees.

Our requirements

To minimise the risk of a delayed audit, you need to ensure that you:

- produce draft financial statements of good quality by the agreed timetable you have agreed with us, including all notes, the Narrative Report and the Annual Governance Statement
- ensure that good quality working papers are available at the start of the audit, in accordance with the working paper requirements schedule that we have shared with you
- ensure that the agreed data reports are available to us at the start of the audit and are reconciled to the values in the accounts, in order to facilitate our selection of samples for testing
- ensure that all appropriate staff are available on site throughout (or as otherwise agreed) the planned period of the audit
- respond promptly and adequately to audit queries.

Audit fees

In 2021, PSAA awarded a contract of audit for Northamptonshire Pension Fund to begin with effect from 2021/22. The fee agreed in the contract was £45k. Since that time, there have been a number of developments, particularly in relation to the revised Code and ISA's which are relevant for the 2021/22 audit.

Additionally, across all sectors and firms, the FRC has set out its expectation of improved financial reporting from organisations and the need for auditors to demonstrate increased scepticism and challenge and to undertake additional and more robust testing, as detailed on page 9 in relation to the updated ISA (UK) 540 (revised): Auditing Accounting Estimates and Related Disclosures.

As a firm, we are absolutely committed to meeting the expectations of the FRC with regard to audit quality and public sector financial reporting. Our proposed work and fee for 2021/22, as set out below, is detailed overleaf.

	Actual Fee 2019/20	Actual Fee 2020/21	Proposed fee 2021/22
Northamptonshire Pension Fund Audit	N/A	N/A	£51k
Total audit fees (excluding VAT)	N/A	N/A	£51k

Assumptions

In setting the above fees, we have assumed that the Pension Fund will:

- prepare a good quality set of accounts, supported by comprehensive and well presented working papers which are ready at the start of the audit
- provide appropriate analysis, support and evidence to support all critical judgements and significant judgements made during the course of preparing the financial statements
- provide early notice of proposed complex or unusual transactions which could have a material impact on the financial statements.

Relevant professional standards

In preparing our fee estimate, we have had regard to all relevant professional standards, including paragraphs 4.1 and 4.2 of the FRC's [Ethical Standard \(revised 2019\)](#) which stipulate that the Engagement Lead (Key Audit Partner) must set a fee sufficient to enable the resourcing of the audit with partners and staff with appropriate time and skill to deliver an audit to the required professional and Ethical standards.

Independence and non-audit services

Auditor independence

Ethical Standards and ISA (UK) 260 require us to give you timely disclosure of all significant facts and matters that may bear upon the integrity, objectivity and independence of the firm or covered persons. relating to our independence. We encourage you to contact us to discuss these or any other independence issues with us. We will also discuss with you if we make additional significant judgements surrounding independence matters.

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 (Revised 2019) 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. We confirm that we have implemented policies and procedures to meet the requirements of the Ethical Standard. For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Council.

Other services

The following other services provided by Grant Thornton were identified/ No other services provided by Grant Thornton were identified.

[The amounts detailed are fees agreed to-date for audit related and non-audit services to be undertaken by Grant Thornton UK LLP in the current financial year. These services are consistent with the Pension Fund's policy on the allotment of non-audit work to your auditors. Any changes and full details of all fees charged for audit related and non-audit related services by Grant Thornton UK LLP and by Grant Thornton International Limited network member Firms will be included in our Audit Findings report at the conclusion of the audit.

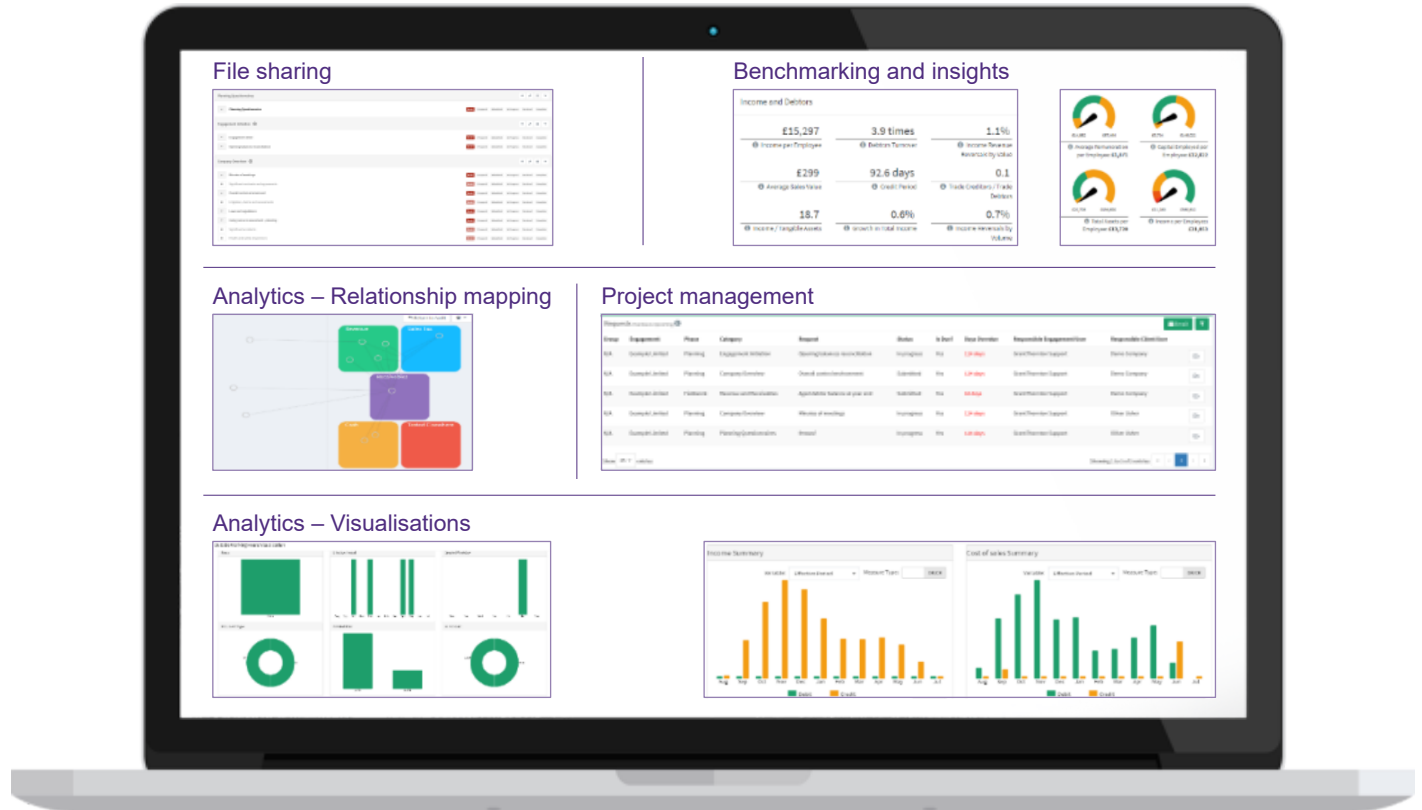
None of the services provided are subject to contingent fees.

Service	Fees £	Threats	Safeguards
Audit related			
IAS19 Assurance letters for Admitted Bodies	£9k	Self-Interest (because this is a 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.
Non-audit related		No non audit related services	
Total	£9k		

Our digital audit experience

A key component of our overall audit experience is our comprehensive data analytics tool, which is supported by Inflo Software technology. This tool has a number of key functions within our audit process:

Function	Benefits for you
Data extraction	Providing us with your financial information is made easier
File sharing	An easy-to-use, ISO 27001 certified, purpose-built file sharing tool
Project management	Effective management and oversight of requests and responsibilities
Data analytics	Enhanced assurance from access to complete data populations



Grant Thornton's Analytics solution is supported by Inflo Software technology

Our digital audit experience

A key component of our overall audit experience is our comprehensive data analytics tool, which is supported by Inflo Software technology. This tool has a number of key functions within our audit process:



Data extraction

- Real-time access to data
- Easy step-by-step guides to support you upload your data



File sharing

- Task-based ISO 27001 certified file sharing space, ensuring requests for each task are easy to follow
- Ability to communicate in the tool, ensuring all team members have visibility on discussions about your audit, reducing duplication of work



Project management

- Facilitates oversight of requests
- Access to a live request list at all times



Data analytics

- Relationship mapping, allowing understanding of whole cycles to be obtained quickly
- Visualisation of transactions, allowing easy identification of trends and anomalies

How will analytics add value to your audit?

Analytics will add value to your audit in a number of ways. We see the key benefits of extensive use of data analytics within the audit process to be the following:

Improved fraud procedures using powerful anomaly detection

Being able to analyse every accounting transaction across your business enhances our fraud procedures. We can immediately identify high risk transactions, focusing our work on these to provide greater assurance to you, and other stakeholders.

Examples of anomaly detection include analysis of user activity, which may highlight inappropriate access permissions, and reviewing seldom used accounts, which could identify efficiencies through reducing unnecessary codes and therefore unnecessary internal maintenance.

Another product of this is identification of issues that are not specific to individual postings, such as training requirements being identified for members of staff with high error rates, or who are relying on use of suspense accounts.

More time for you to perform the day job

Providing all this additional value does not require additional input from you or your team. In fact, less of your time is required to prepare information for the audit and to provide supporting information to us.

Complete extracts from your general ledger will be obtained from the data provided to us and requests will therefore be reduced.

We provide transparent project management, allowing us to seamlessly collaborate with each other to complete the audit on time and around other commitments.

We will both have access to a dashboard which provides a real-time overview of audit progress, down to individual information items we need from each other. Tasks can easily be allocated across your team to ensure roles and responsibilities are well defined.

Using filters, you and your team will quickly be able to identify actions required, meaning any delays can be flagged earlier in the process. Accessible through any browser, the audit status is always available on any device providing you with the information to work flexibly around your other commitments.



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West Northamptonshire Council

Pensions Committee

25/07/2022

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

West MO	Gina Clarke on behalf of Catherine Whitehead	1/7/2022
West S151	James Smith on behalf of Martin Henry	6/7/2022
Head of Pensions	Mark Whitby	24/6/2022

List of Appendices

Appendix A - Draft Annual Report and Statement of Accounts 2021-22

1. Purpose of Report

- 1.1 To provide the Pension Committee with the background information of the year end processes for the Northamptonshire Pension Fund's Annual Report and Statement of Accounts (ARSOA).
- 1.2 To present the Draft Annual Report and Statement of Accounts of the Pension Fund for the 2021-22 financial year.

2. Executive Summary

- 2.1 The report covers the contents of the draft 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 sets out the key milestones for the 2021-22 year end including audit testing (July) and issuing of the audit results report ISA260 (September 2022). The Pension Committee will see a final version of the Annual Report and Statement of Accounts at the Committee meeting to be held in October 2022.

3. Recommendations

- 3.1 The Pension Committee is asked to:
- a) Note the Draft Annual Report and Draft Statement of Accounts of the Pension Fund for the 2021-22 financial year.

4. Reason for Recommendations

- 4.1 The Pension Committee are responsible for approving the Annual Report for the Northamptonshire Pension Fund and providing assurance to Audit and Governance Committee for the Statement of Accounts. The Audit and Governance Committee are responsible for approving the Statement of Accounts as these form part of the overall Administering Authority's Statement of Accounts.

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. Content, Responsibilities and Timeline

- 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 and a final version for publication will be brought to the October Pension Committee.
- 6.3 The table below is a planned timeline for the Pension Fund 2021-22 year end audit:

Milestone	Planned dates	Status
Interim Audit	March 2022	Completed
Report audit plan	July 2022	Completed
Substantive testing	July – August 2022	In progress
Audit Results Report	October 2022	Deadline 30 September 2022

- 6.4 The statutory date for publication of the final set of the Council's Statement of Accounts is the end of September, or as soon as reasonably practicable after the receipt of the auditor's final findings (if later).
- 6.5 The statutory date for publication of the Pension Funds Annual Report is 1st December.

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 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 large income 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. Implications (including financial implications)

8.1 Resources and Financial

- 8.1.1 There are no resource or financial implications arising from the proposals in this paper. This paper is for information only.

8.2 Legal

- 8.2.1 In addition to legal implications mentioned in the report, the production of the Annual Report is a regulatory requirement and needs to be approved by the Pension Fund Committee by the 1 December. As it is proposed that the committee approves the Annual report its meeting in October, this will meet the timescale for compliance.

8.3 Risk

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

Risk No.	Risk	Residual risk rating
4	Contributions to the Fund are not received on the correct date and/or for the correct amount	Amber
5	Fund assets are not sufficient to meet obligations and	Amber

Risk No.	Risk	Residual risk rating
	liabilities.	
7	Information may not be provided to stakeholders as required	Green
9	Those charged with governance are unable to fulfil their responsibilities effectively	Green
15	Custody arrangements may not be sufficient to safeguard Pension Fund assets.	Green
17	Failure to administer the scheme in line with regulations and guidance.	Green
19	Pension Fund investments may not be accurately valued.	Green
25	Investment decisions and portfolio management may not achieve the return required or be performed in accordance with instructions provided.	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/>

8.4 Relevant Pension Fund Objectives

8.4.1 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.

8.5 Consultation

8.5.1 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.

8.6 Consideration by Overview and Scrutiny

8.6.1 The Pensions Committee is a committee of full council and therefore consideration by Overview and Scrutiny is not required.

8.7 Climate Impact

8.7.1 This an information update paper only. There are no climate impact considerations arising as a direct result of this paper.

8.8 Community Impact

8.8.1 There are no community impact implications.

8.9 Communications

8.9.1 This information only paper does not require any further communication activities.

9. Background Papers

9.1 Note applicable.



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

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Chairperson's Foreword

Awaiting comment

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	 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 28)</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).

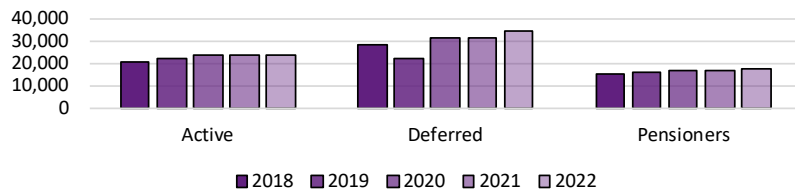
The Fund is a qualifying scheme under the automatic enrolment regulations and can be used by employers to automatically enroll eligible employees, and every three years re-enrol anyone who opts out of the scheme.

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	1/160 th accrual based on Tier 1 ill health pension enhancement
	Tier 1 – Immediate payment with service enhanced to Normal Pension Age (65)	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 2 – Immediate payment with 25% service enhancement to Normal Pension Age
	Tier 3 – Temporary payment of pension for up to 3 years	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 28), 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 35).

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)*	254
Admitted (Ad)	64
Total	319

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
Brington 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
Tharpston 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 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 2021, the ACCESS Pool has significant scale with assets of £56bn (of which 57% has been pooled) serving 3,400 employers with 1.1 million members including 300,000 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 £000	Indirect £000	Total £000	Direct £000	Indirect £000	Total £000	£000	
Investment Management Fee								
Performance Fee								
Transaction taxes								
Broker commissions								
Other explicit costs								
Implicit/indirect transaction costs								
Administration								
Governance and Compliance								
Other								
Total								

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

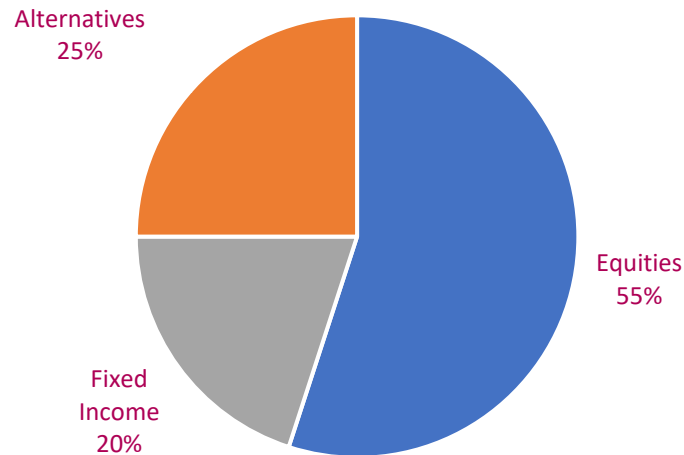
The Pension Fund Committee is responsible for approving the Strategic Asset Allocation proposed by the Investment Sub-Committee (ISC). The ISC performed a full review of the Strategic Asset Allocation during 2018-19 in conjunction with the Fund's Investment Consultants, Mercer Ltd and independent Investment 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

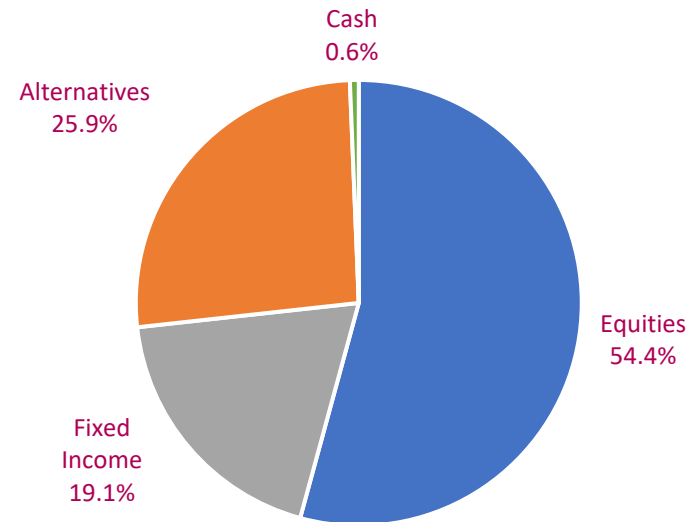
The strategy approved by the Pension Committee in December 2018 aimed to reduce the Fund's reliance upon, and the associated risks, of a large allocation to equities whilst retaining sufficient exposure to growth assets. The strategy focused on a reduction in equities and an increase in Alternative assets (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

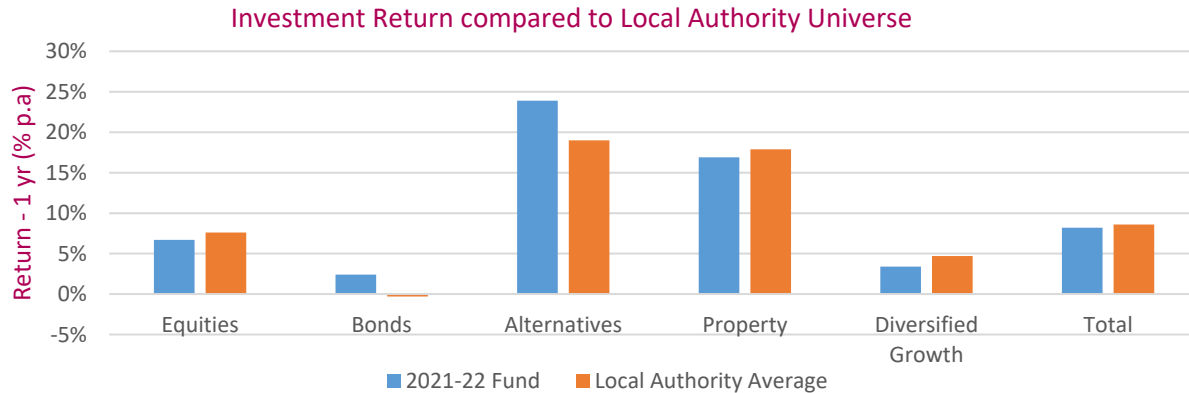
Investment Policy and Performance (continued)

Performance in Comparison with Local Authority Universe

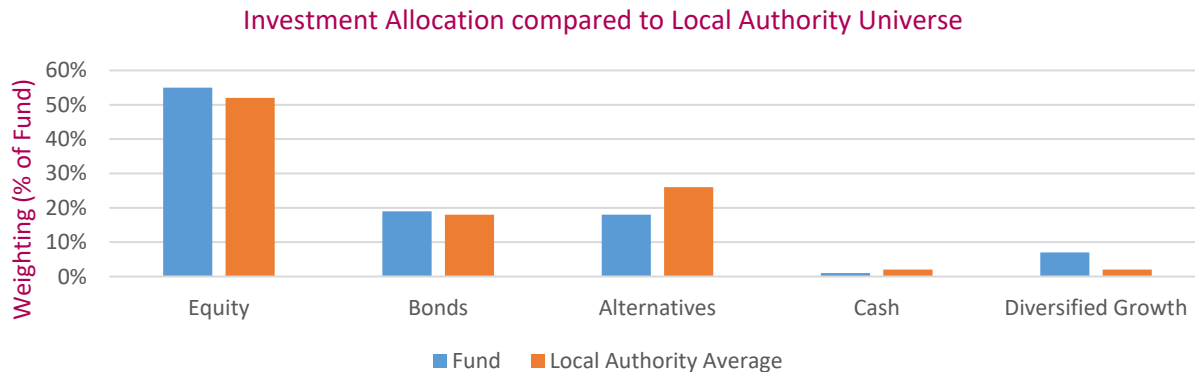
The Local Authority Universe is a national scheme consisting of 63 pension funds collated by PIRC Ltd that provides benchmarking of local authority pension funds investment performance.

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)

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Investment Policy and Performance (continued)

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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.

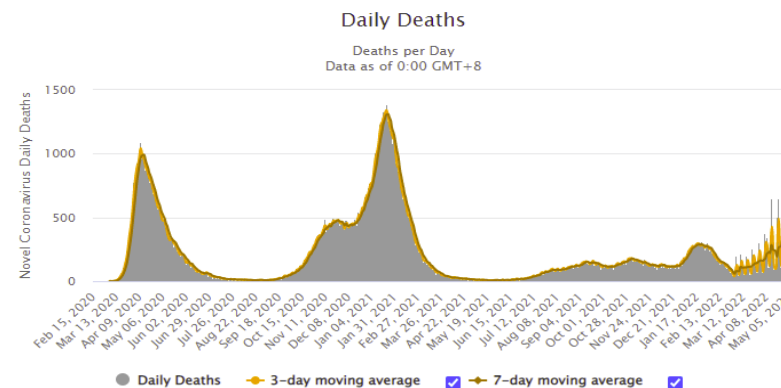
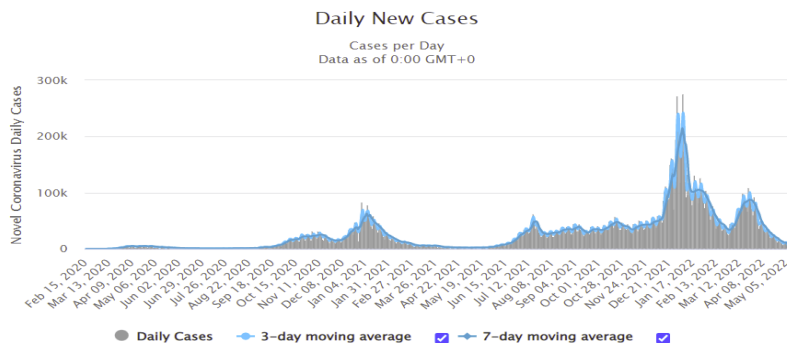
Investment Policy and Performance (continued)

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

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

Net Asset Statement

31-Mar-21 £000	Notes	31-Mar-22 £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 47 to 77 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 West Northamptonshire Council 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 42 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 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:

Number of employees in scheme:	31-Mar-21	31-Mar-22
Administering Authority	8,067	9,818
Other employers	15,801	14,237
Total	23,868	24,055
Number of pensioners:		
Administering Authority	8,918	9,229
Other employers	8,128	8,476
Total	17,046	17,705
Deferred pensioners:		
Administering Authority	14,228	14,287
Other employers	9,733	10,339
Total	23,961	24,626
Undecided leavers:		
Administering Authority	3,570	4,805
Other employers	4,633	5,328
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 75) 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.

Notes to the Pension Fund Accounts (continued)

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.

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 estimated based upon information received from fund managers.

Notes to the Pension Fund Accounts (continued)

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.

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).

Cash and Cash Equivalents

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

Cash equivalents are 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).

Notes to the Pension Fund Accounts (continued)

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.

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.

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

- **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.
- **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	55,703
80,402	Scheduled bodies	63,878
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	45,644
47,872	Scheduled bodies	50,579
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				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 Income from equities	19
8,448 Pooled investments – unit trusts and other managed funds	14,261
7,430 Pooled property investments	7,927
4,462 Private equity/infrastructure income	6,694
9 Interest on cash deposits	19
24 Other – securities lending income	0
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	0
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 £000	Purchases during the year and derivative payments £000	Sales during the year and derivative receipts £000	Change in market value during the year £000	Market value 31-Mar-22 £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 £000		Currency £000	£000	£000
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	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

Reclassification of Pooled property investments from Level 2 to Level 3 in agreement with the fair value techniques for property.

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	Transfers in/out of Level 3 £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	0	44,527	-22,635	42,985	9,196	187,426
Infrastructure	196,471	0	2,402	-9,655	12,861	-218	201,861
Property funds	127,150	58,366	36,836	-10,947	37,465	297	249,167
Total	436,974	58,366	83,765	-43,237	93,311	9,275	638,454

Reclassification of Pooled property investments from Level 2 to Level 3 in agreement with the fair value techniques for property.

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
0	60,645	0	36,327	8,706	0
0	1,014	0	0	509	0
0	8,815	0	0	9,905	0
3,039,388	70,474	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
3,039,388	70,474	-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
51,483 Cash and cash equivalents	36,374
9,162 Cash balances	8,659
311,751 Index linked bonds	327,080
285,714 Multi asset credit	311,757
658,110 Total	683,870

Exposure to interest rate risk	Asset values at	Impact of 1%	Impact of 1%
	31-Mar-22	decrease	increase
	£000	£000	£000
Cash and cash equivalents	36,374	36,374	36,374
Cash balances	8,659	8,659	8,659
Index linked bonds	327,080	330,351	323,809
Multi asset credit	311,757	314,875	308,639
Total change in assets available	683,870	690,259	677,481

Exposure to interest rate risk	Asset values at	Impact of 1%	Impact of 1%
	31-Mar-21	decrease	increase
	£000	£000	£000
Cash and cash equivalents	51,483	51,483	51,483
Cash balances	9,162	9,162	9,162
Index-linked securities	311,751	314,869	308,633
Fixed interest securities	285,714	288,571	282,857
Total change in assets available	658,110	664,085	652,135

Notes to the Pension Fund Accounts (continued)

Exposure to interest rate risk	Interest receivable 2021-22 £000	Value on 1% increase £000	Value on 1% decrease £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 2020-21 £000	Value on 1% increase £000	Value on 1% decrease £000
Cash deposits, cash and cash equivalents	9	209	205
Fixed interest securities	531	2,711	2,657
Total	540	2,920	2,862

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 9.8% 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

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	29.7

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:

a) **Retirements in ill-health** - Allowance has been made for ill-health retirements before normal pension age.

b) **Withdrawals** - Allowance has been made for withdrawals from service.

c) **Retirements in normal health** - We have adopted the retirement age pattern assumption as used for the purpose of the 2016 LGPS cost cap valuation.

d) **Death in Service** - Allowance has been made for death in service.

e) **Promotional salary increases** - Allowance has been made for promotional salary increases.

f) **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.

g) **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).

h) **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	
642	Standard Life	
6,367		0

Total contributions of £51k (2019-20: £17k) were paid directly to Standard Life during the year. The prudential figure for 2021 is an estimate due to delay in statements not being received from the provider.

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

Notes to the Pension Fund Accounts (continued)

25. RELATED PARTIES TRANSACTIONS

West Northamptonshire Council

The West Northamptonshire Council 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 £45.8m of employer's contributions to the Fund in 2021-22 (2020-21: £25.9m as Northamptonshire County Council). At 31 March 2022 there was £399.7k due to the Fund by the Council (31 March 2021: £263k was due to the Fund by the Council).

Governance

The following 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:

XXXXXX

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.

25 (a). KEY MANAGEMENT PERSONNEL

The administration of the Fund is provided by West Northamptonshire Council 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, who is Treasurer to the Fund, and the Head of HR.

31-Mar-21	31-Mar-22
£000	£000
54 Short-term benefits	56
535 Post-employment benefits	538
589	594

26. CONTINGENT LIABILITIES AND CONTRACTUAL COMMITMENTS

Outstanding capital commitments at 31 March 2022 totalled £205.6m (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.

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.

Northamptonshire Pension Committee Agenda Plan

Meeting date	Agenda item	Lead officer
25/7/2022	External Audit Plan [to note]	B Barlow
	Draft Annual Report and Statement of Accounts [to note]	B Barlow
	Climate Action Plan [to note] exempt	B Barlow
	ESG Monitoring [to note] exempt	B Barlow
	Annual Investment Review [to note] exempt	B Barlow
12/10/2022	Administration Report [standing item]	J Kent
	Business Plan Update [standing item]	M Whitby
	Governance and Compliance Report [standing item]	J Kent
	Employers Admission and Cessation Report [standing item]	C Blose
	Cyber Resilience [standing item] exempt	J Kent
	ACCESS Update [standing item] exempt	M Whitby
	Conflicts of Interest policy [approval]	M Oakensen
	Internal Audit Review [to note]	B Barlow
	Reporting Breaches of the Law to the Pensions Regulator [approval]	M Oakensen
	Additional Voluntary Contribution Review [to note]	J Kent
	Funding Strategy Statement and Valuation results [approval]	C Blose
	Final accounts & ISA 260 [to note]	B Barlow
12/12/2022	Administration Report [standing item]	J Kent

Meeting date	Agenda item	Lead officer
	Business Plan Update [standing item]	M Whitby
	Governance and Compliance Report [standing item]	J Kent
	Employers Admission and Cessation Report [standing item]	C Blose
	Cyber Resilience [standing item] exempt	J Kent
	ACCESS Update [standing item] exempt	M Whitby
	Funding Strategy Statement [approval]	C Blose
	Code of Practice Action Plan [to note]	J Kent
	Good Governance Review Action plan [to note]	J Kent
	Governance Policy and Compliance Statement [approval]	M Oakensen
	Risk Monitoring [standing item]	M Oakensen
	Risk Strategy [approval]	M Oakensen
	Administration Strategy [approval]	C Blose
	Cash Management Strategy [approval]	M Whitby
27/3/2023	Administration Report [standing item]	J Kent
	Business Plan Update [standing item]	M Whitby
	Governance and Compliance Report [standing item]	J Kent
	Employer Admission and Cessation Report [standing item]	C Blose
	Cyber Resilience [standing item] exempt	J Kent
	ACCESS Update [standing item] exempt	M Whitby

Meeting date	Agenda item	Lead officer
	The Code of Practice progress on action plan [to note]	J Kent
	Review of website and digital communications [to note]	C Blose
	Annual Business Plan and Medium-Term Strategy [approval]	M Whitby
	Communication Strategy and Plan [approval]	C Blose
	Overpayment of Pension Policy [approval]	M Oakensen

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