

West Northamptonshire Council

Local Pension Board

24 January 2023

Mark Whitby - Head of Pensions

Report Title	Northamptonshire Pension Fund Business Plan and Medium-
	Term Strategy Business Plan Update report
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Appendix A – Variances against the forecast of investments and administration expenses based on original setting of assumptions.

Appendix B – Progress against Climate Action Plan

Appendix C – Progress against Cyber Resilience Action Plan – exempt

1. Purpose of Report

1.1. Good governance requires that updates to the pre-agreed Annual Business Plan and Medium-Term Strategy are provided to the Committee and Board on a regular basis. This update highlights the progress made on the key activities for the period and seeks approval of the recommendations set out in section 3 below.

2. Executive Summary

- 2.1. The Northamptonshire Pension Fund have for many years considered it good governance to have in place a Business Plan and Medium-Term Strategy that is agreed annually and regularly monitored by the Committee and Board.
- 2.2. The report summarises the progress made on each activity for the period under review.
- 2.3. Section 4 of this report provides a progress update for each business plan activity. The table below provides an overview of the RAG status of each activity.

Paragraph	Activity	RAG status
4.1	Extend the existing contract and re-tender for actuarial	Green
	consultancy services	
4.2	Extend the existing contract and re-tender for benefits	Green
	and governance consultancy services	
4.3	Extend existing contract and re-tender for legal services	Green
	provider	

Paragraph	Activity	RAG status
4.4	Re-tender for pensions administration and pensioner	Green
	payroll platform	
4.5	Continue to develop the Fund's Cyber Strategy	Amber
4.6	Review and implement changes required from the Pension	Green
	Regulator's new Code of Practice	
4.7	Review the administrative performance of the Fund's	Completed
	additional voluntary contribution providers	
4.8	Implement the best practice recommendations of the	Green
	Scheme Advisory Board's good governance review	
4.9	Complete the Guaranteed Minimum Pension Rectification	Red
4.10	Application of the McCloud age discrimination remedy	Green
4.11	Processing of undecided leaver records	Amber
4.12	Complete the 2022 Valuation of the Pension Fund	Green
4.13	Prepare for the implementation of Pension Dashboards	Green
4.14	Continue development of the ACCESS asset pool	Green
4.15	Decarbonisation and improved stewardship reporting	Green
4.16	Review the Fund's Property Investment Strategy	Green
4.17	Review the Investment Strategy and Strategic Asset	Green
	Allocation	
4.18	Private Equity Review	Green
4.19	Review of website and digital communications	Green

- 2.4. The tables in appendix A provide an update of the Fund account, investment and administration income and expenditure against the cash flow projection outlined in the Annual Business Plan as agreed by the Pension Committee in March 2022. There are no material variances identified.
- 2.5 The link to the full Business Plan approved by the Committee in March 2022 is provided in section 7 for full context and reference.

3. Recommendations

- 3.1. The Local Pension Board is asked to:
- 3.1.1. note the Business Plan Update

4. Issues and Choices

Progress made against the Business Plan Procurement of Services

4.1 Extend the existing contract and re-tender for actuarial consultancy services

4.1.1 Activity: To extend the existing contract and re-tender for actuarial consultancy services currently with Hymans Robertson due to expire on 31 March 2024 (following extension).

4.1.2 Key milestones:

Key milestones:		
Key Milestones	Dates	On target for
		completion?
Extend contract	January 2023	Completed
Register to access national LGPS	August 2023	On target
Frameworks		

Key Milestones	Dates	On target for completion?
Draft specification of services required and associated documentation	August 2023 – September 2023	On target
Issue invitation to tender to suppliers on the Framework	October 2023	On target
Evaluate tender responses	November 2023 – December 2023	On target
Award contract	January 2024	On target

4.1.3 Update: Officers have spoken to Hymans ahead of the contract expiry date to confirm that the contract would automatically extend, if notice is not given.

4.2 Extend the existing contract and re-tender for benefits and governance consultancy services

4.2.1 Activity: To extend the existing contract and re-tender for the supplier of benefits and governance consultancy services currently with Aon due to expire 31 March 2024 (following extension).

4.2.2 Key milestones:

Key Milestones	Dates	On target for completion?
Extend contract	January 2023	Completed
Register to access national LGPS	January 2023	Completed
Frameworks		
Draft specification of services required and	January 2023 – February	On target
associated documentation	2023	
Issue invitation to tender to suppliers on	March 2023	On target
the Framework		
Evaluate tender responses	May 2023 – June 2023	On target
Award contract	July 2023	On target

4.2.3 Update: The extension for the contract has been enacted with Aon and access to the framework has been obtained.

4.3 Extend existing contract and re-tender for legal services provider

4.3.1 Activity: To extend the existing contract with Squire Patton Boggs to February 2024 and retender for a legal services provider.

4.3.2 Key milestones:

101		
Key Milestones	Dates	On target for
		completion?
Extend existing contract	January 2023	On target
Register to access national LGPS	January 2023	On target
Frameworks		
Draft specification of services required	July 2023 – August 2023	On target
and associated documentation		
Issue invitation to tender to suppliers on	September 2023	On target
the Framework		

Key Milestones	Dates	On target for
		completion?
Evaluate tender responses	October 2023 - November 2023	On target
Award contract	December 2023	On target

4.3.3 Update: In discussion with Squire Patton Boggs and the National Frameworks to extend the existing contract, on track to be completed by January 2023. A new Legal Services Framework will launch on 16th January, once live, officers will register access to the framework.

4.4 Re-tender for pensions administration and pensioner payroll platform

4.4.1 Activity: To re-tender for pensions administration and pensioner payroll platform currently with Heywood that is due to cease in September 2024.

4.4.2 Key milestones:

Dates	On target for
	completion?
April 2022 – December	Completed
2022	
September 2022	Completed
January 2023 to March	On target
2023	
April 2023 – September	On target
2023	
October 2023	On target
October 2023 to	On target
September 2024	
October 2024	On target
	April 2022 – December 2022 September 2022 January 2023 to March 2023 April 2023 – September 2023 October 2023 October 2023 to September 2024

4.4.3 Update: Development of tender documents including invitation to further competition, specification and pricing schedule well advanced. Consultation is also under way with West Northants Council's Procurement, Legal, Data Protection and IT departments.

Core governance activities

4.5 Continue to develop the Fund's Cyber Strategy

- 4.5.1 Activity: Cyber-crime continues to evolve and become increasingly sophisticated and as such the cyber strategy and action plan developed in 2021/22 will need to be regularly reviewed and new activities added as time goes on.
- 4.5.2 Key milestones:

Please see Appendix C (exempt).

4.5.3 Update:

Please see Appendix C (exempt)

4.6 Review and implement changes required from the Pension Regulator's new Code of Practice

4.6.1 Activity: The new code of practice was expected to come into force summer 2022 following a delay from the Pensions Regulator and the Fund will have six months to achieve full compliance with its contents.

4.6.2 Key milestones

Key Milestones	Dates	On target for completion?
Develop an action plan of changes	Rescheduled to 2023.	Dependent
required on launch of code of practice	Date to be confirmed	upon release of
	following release of the	the Code
	Code	
Present action plan	As above	As above
Present update on progress on action plan	As above	As above

4.6.3 Update: The Pension Regulator's new code of practice was due to come into force in November 2021 and was postponed until Autumn 2022. To date, the new code has not been released with no further indication of when the new release date will be. Once the code comes into effect the Fund will have 6 months to achieve full compliance. Activity has been rescheduled and changed to a RAG status of Green.

4.7 Review the administrative performance of the Fund's additional voluntary contribution providers

4.7.1 Activity: The administrative performance of Prudential began to deteriorate in mid-2020 and in February 2022, Prudential's performance had still not improved. Aon have been commissioned to undertake a further review of both Standard Life and Prudential's administrative performance.

4.7.2 Key milestones:

Key Milestones	Dates	On target for completion?
Present to the Pension Committee the	Estimated July 2022	Completed
findings of the independent review		October 2022
alongside any recommendations for action		

4.7.3 Update: The Committee agreed to review again in 12 months' time and will feature in the 2023/24 Business Plan.

4.8 Implement the best practice recommendations of the Scheme Advisory Board's good governance review

4.8.1 Activity: There has been no further progress on any of the recommendations either by the Department for Levelling Up, Housing and Communities (DLUHC) or the Scheme Advisory Board (SAB).

4.8.2 Key milestones:

Key Milestones	Dates	On target for
		completion?
Develop an action plan to implement	Rescheduled to 2023. Date	Dependent
the best practice activities	to be confirmed upon	upon when the
	receipt of further	Scheme
	information	Advisory Board
		resume focus on
		the workplan
Present action plan and Conflicts of	Pension Committee	Completed.
Interest Policy	December 2022/ Local	
	Pension Board January 2023	
Present update on progress on action	Rescheduled to 2023. Date	Dependent
plan	to be confirmed upon	upon SAB as
	receipt of further	above
	information	

Key Milestones	Dates	On target for
		completion?
Implementation of activities requiring	Rescheduled to 2023. Date	Dependent upon
SAB and DLUHC guidance	to be confirmed upon	SAB as above
	receipt of further	
	information	

4.8.3 Update: There has been no activity from the SAB or DLUHC in this area since February 2021. Once the Scheme Advisory Board provides further details on the recommendations the Fund will develop an action plan. The Conflicts of Interest Policy was approved in December 2022 and is an agenda item at this meeting. Activity has been rescheduled and changed to a RAG status of Green.

Scheme member and data projects

4.9 Complete the Guaranteed Minimum Pension Rectification

4.9.1 Activity: To complete the rectification stage for scheme members, making adjustments to pensions in payment where necessary.

4.9.2 Key milestones:

Key Milestones	Dates	On target for
		completion?
Manual rectification of outstanding	April 2022 – March 2023	Extension to 31
records		December 2023
		to be confirmed
		(see update)

4.9.3 Update: In September 2022 there were approximately 550 cases requiring rectification of a scheme member's pension in payment. At the time of writing approximately 515 cases remain outstanding as a result of an increased focus of resources on unprocessed leavers. There will be an increased focus on this project commencing February 2023. An extension to 31 December 2023 will be required to complete this project and this will be recommended in the Business Plan Update report that will be presented to the Pension Fund Committee in March 2023.

4.10 Application of the McCloud age discrimination remedy

4.10.1 Activity: To rectify the pension records of scheme members within scope of the McCloud ruling following the implementation of the age discrimination remedy once legislation is in place.

4.10.2 Key milestones:

Key Milestones	Dates	On target for
		completion?
Data sheets returned from scheme	February 2022 – April 2022	Completed
employers		
Data sheets checked by Fund	May 2022 – July 2022	Completed
Uploading of revised scheme member	August 2022 – March 2023	In progress
data		
Respond to DLUHC consultation on draft	January 2023 – February	Anticipated
regulations (expected December 2022)	2023	

Key Milestones	Dates	On target for completion?
Devise communication plan for scheme members and scheme employers	Rescheduled to January 2023 (November 2022)	On target
Undertake scheme member record preparations to identify in scope members in readiness for the application of the underpin	April 2023 – September 2023	On target
Application of the revised underpin following release of amended LGPS Regulations	October 2023 onwards	On target

4.10.3 Update: DLUHC have announced that they expect draft regulations to be issued in late 2022, followed by a consultation in early 2023. As a result, this activity has been realigned accordingly and a new milestone added. The uploading of revised scheme member data is underway and is expected to complete in the set timescale. This activity is being run on a full project basis with several separate workstreams and a detailed project plan.

On 24 November 2022, HMRC launched a consultation on how pension tax will apply to members protected by the McCloud remedy with a closing date of 6 January 2023. As the draft regulations were mainly looking at clarification in niche scenarios the Fund did not feel it necessary to submit a response.

4.11 Processing of undecided leaver records

4.11.1 Activity: To reduce the backlog by 2,500 cases per year for the next 3 years from a baseline of approximately 9,000 at the beginning of April 2022.

4.11.2 Key milestones:

Key Milestones	Dates	On target
		for
		completion?
Re-baseline project	April 2022	Completed
Reduce cases by 2,500	April 2022 – March 2023	No – see
		update
		below
Reduce cases by a further 2,500	April 2023 – March 2024	On target
D. I	4 11 2024 1 44 1 2025	
Reduce cases by a further 2,500 to a	April 2024 to March 2025	On target
business as usual baseline		

4.11.3 Update: At 31 December 2022 the number of unprocessed leavers ringfenced as backlog had decreased by approximately 6,500 from the baseline in April 2022. However, the service has not been able to keep on top of business as usual (BAU) cases following an influx of leavers which has offset the backlog reduction and led to the overall number of aged cases decreasing by only 324 as a result. Further resource has been added to the BAU team and bulk processing is now operating on both backlog and business as usual cases.

4.12 Complete the 2022 Valuation of the Pension Fund

4.12.1 Activity: The valuation date is 31 March 2022, and the work is carried out during 2022/23 with results to be published by 31 March 2023. New employer contribution rates will be effective from 1 April 2023.

4.12.2 Key milestones:

Key milestones.		
Key Milestones	Dates	On target for completion?
Provision, validation and sign-off of	July 2022 – August 2022	Completed
valuation data		
Provision of whole Fund results by Fund	September 2022	Completed
Actuary		
Discuss whole Fund results with	October 2022	Completed
Committee		
Committee to approve Funding Strategy	October 2022	Completed
Statement for consultation		
Funding Strategy Statement issued for	November 2022	Completed
consultation		
Issue draft employer results and	November 2022 to	Completed
contribution strategies to scheme	December 2022	
employers		
Committee to approve final Funding	Rescheduled to March	On target
Strategy Statement	2023 (December 2022)	
Consultation and discussions with	December 2022 –	On target
employers to agree contribution strategies	February 2023	
Publication of final valuation report and	31 March 2023	On target
certified contribution rates		

4.12.3 Update: The valuation project is progressing as planned with all target dates currently on track. The new cessations policy was approved by the Committee in December following consultation with employers. The approval of the Funding Strategy Statement has been deferred to March 2023 due to the proximity of the end of the consultation to the Committee and the size of the document. It was felt there may not be enough time to discuss and make the required changes. Draft individual employer results have been issued and discussions held with individual employers where required.

4.13 Prepare for the implementation of Pension Dashboards

4.13.1 Activity: To prepare for the implementation of Pension Dashboards by 30 September 2024.

4.13.2 Key milestones:

Key Milestones	Dates	On target for completion?
Work with the Pensions Administration	April 2022 – September 2024	On target
Software supplier to connect to a Pensions Dashboard by the deadline of 30	2024	
September 2024.		
Devise project plan and workstreams to	October to November	Completed
prepare for connection to the Dashboard	2022	
with clean value data.		
Connect to the Pension Dashboard	By 30 September 2024	On target
Provide value data to the Pension	By 1 April 2025	On target
Dashboard		

4.13.3 Update: The initial project plan and identification of the workstreams provided has been completed. The work plan will be continually reviewed as further information is released from the associated industry bodies.

Investment related activities

4.14 Continue development of the ACCESS asset pool

4.14.1 Activity: The ACCESS asset pool has recently appointed MJ Hudson as Implementation Adviser for Illiquid Assets. During 2022/23 MJ Hudson will be implementing pooled solutions for investing in Illiquid assets. Due to the illiquid nature of this asset class, migration of the Fund's assets may take several years.

4.14.2 Key milestones:

Key Milestones	Dates	On target for
		completion?
Transition into the new Multi Asset	By 31 March 2023	On target
Credit sub fund		
Produce plan for investing in	By 31 March 2023	On target
illiquid assets in the pooled		
solution		

4.14.3 Update: Following data collection and analysis on non-listed assets by MJ Hudson across ACCESS pool members, Real Estate (Property) has been approved by the ACCESS Joint Committee (AJC) as the first asset class to be progressed Hampshire County Council have been appointed as the procurement lead. The AJC approved that the next asset class to be progressed and indicative completion dates are: Private Debt (Q3 2023), followed by Private Equity (Q1 2024), and then Infrastructure (Q4 2024).

4.15 Decarbonisation and improved stewardship reporting

4.15.1 Activity: During 2022/23 the Fund is planning to commence the transition to a more sustainable portfolio by reviewing its passive equities mandates and commence Task Force on Carbon-Related Financial Disclosures (TCFD) reporting. The Fund will also prepare its first submission under the UK Stewardship Code.

4.15.2 Key milestones:

Key Milestones	Dates	On target for completion?
Draft TCFD report to be included in Fund annual report	December 2022	Completed
Commence implementation of decarbonisation changes to passive and active equity mandates	December 2022	Completed
Draft Stewardship Code submission presented to the Investment Sub	March 2023	On target
Committee		

4.15.3 Update: As agreed with the Pension Fund Committee, the Fund's TCFD position has been reported within the 21/22 Statement of Accounts.

The Fund has developed a Climate Action Plan which includes approved decarbonisation targets to reduce carbon emissions with the aim of achieving net zero by 2050 or earlier. Progress against the Plan is shown in Appendix B.

Implementation of decarbonisation changes to passive mandates is progressing well with new passively managed options presented, and the preferred manager products identified and agreed at the November 2022 ISC, subject to completion of Mercer research returning a positive view.

4.16 Review the Fund's Property Investment Strategy

4.16.1 Activity: A review of the mandate will be undertaken, including consideration of possible enhancements to the property strategy, especially considering the expected benefits arising from the pooling agenda.

4.16.2 Key milestones:

Key Milestones	Dates	On target for completion?
Report on strategy review presented to Investment Sub Committee	Rescheduled to February 2023 (November 2022)	On target
Implement required asset class changes from property review	December 2022 – March 2023	On target
Communicate Fund's new requirements to the ACCESS illiquid asset programme	Rescheduled to March 2023 onwards (December 2022)	On target - this work will move to the implementation of the SAA under next years business plan.

4.16.3 Update: A property portfolio review covering the target split across real estate styles, sectors, geographies, and implementation route/timeline was presented at the November 2022 ISC for consideration. This review will help shape the Fund's Property Investment Strategy and feed into the Fund's overall Investment Strategy Review which will agree target allocations across all asset classes, to be presented at the February 2023 ISC.

4.17 Review the Investment Strategy and Strategic Asset Allocation

4.17.1 Activity: The Fund must review and amend its strategic investment strategy in consultation with the s 151 officer as required pursuant to section 4.8 Section 1.3 (e) (k) of the Constitution and will undertake a strategic asset allocation (SAA) once the outcomes of the triennial valuation process is known. This will ensure the Fund's investment approach is appropriately aligned with its funding strategy and that the Fund can pay liabilities as they fall due over time.

It is proposed for this review to be undertaken with the Pensions Committee, supplemented by virtual training where required.

4.17.2 Key milestones:

Key Milestones	Dates	On target for
		completion?
Development of revised Investment	Rescheduled to February	On target
Strategy/SAA by officers and advisors	2023 (November to	
	December 2022)	
Investment Strategy Training to Pensions	January 2023	On target
Committee		

Key Milestones	Dates	On target for completion?
Revised Investment Strategy/SAA approved by Pensions Committee	March 2023	On target
Implementation of revised Investment Strategy	2023 onwards	On target

4.17.3 Update: The Fund's Officers have engaged with its investment advisors, Mercer, and are on track to deliver training and a revised Investment Strategy as planned to be presented at the March 2023 Pension Fund Committee.

4.18 Private Equity Review

4.18.1 Activity: The Fund has a strategic asset allocation (SAA) for Private Equity of 5% within an overall allocation to Alternative assets of 25%. To maintain this the Fund must make regular private equity commitments.

To ensure the continued suitability of the portfolio, a deeper fundamental portfolio review covering exposures, risks and opportunities needs to be undertaken. This will also include modelling of expected commitment levels and deployment rates.

4.18.2 Key milestones:

Key Milestones	Dates	On target for
		completion?
Private Equity Portfolio Review	December 2022 to January	On target
	2023	
Investment Sub Committee approve	February 2023	On target
future private equity commitments		
Implementation of agreed private equity	March 2023 onwards	On target
commitments		

4.18.3 Update: The Fund's Officers have engaged with its investment advisors, Mercer, and are on track to bring forward proposals for private equity commitments for approval at the February 2023 ISC meeting.

Communications

4.19 Review of website and digital communications during 2022/23

4.19.1 Activity: The Fund's web offering will be reviewed to assess whether the website is still fit for purpose and alternative options available to meet the needs of the Fund's stakeholders.

4.19.2 Key milestones:

Key Milestones	Dates	On target for completion?
Initial engagement with key stakeholders and agreement of project objectives	April 2022 – June 2022	Completed
Review of initial engagement including mapping of user journeys and key insights	July 2022 – August 2022	Completed

Key Milestones	Dates	On target for completion?
Investigation into any identified "pain points" identified by user groups and identification of any further areas for improvement	Rescheduled to September – October 2022 (August 2022 - September 2022)	Completed
Stakeholder demonstration of new user journeys and prototype web pages/functions	Rescheduled to October – November 2022 (September 2022 – October 2022)	Completed
Presentation of key recommendations to officers	Rescheduled to November – December 2022 (October 2022 – November 2022).	Completed
Present outcomes and recommendations to Committee	March 2023	On target

4.19.3 Update: The review of the website has been progressing as planned. Initial findings and key recommendations have been presented to officers along with protype webpages. These have also been tested with users and results are currently being collated for presenting to officers. A paper will be presented to the Committee in March providing recommendations and seeking approval to progress to the next stage of the project: implementing the recommended changes.

5 Implications (including financial implications)

5.1 Resources and Financial

- 5.1.1 The financial estimates and associated budgets included with the Business Plan and Medium-Term Strategy were approved by the Pension Committee on 30 March 2022.
- 5.2.1 Performance against the financial estimates in the Business Plan will be presented to the Pension Committee and Board each meeting. The Business Plan sets out the cost of each activity where known and where costs become known during the course of the year the Pension Committee and Board will be updated accordingly.

5.2 Legal

5.2.1 There are no legal implications arising from the proposals.

5.3 Risk

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

Risk	Residual risk rating
Those charged with the governance of the Fund and	Green
scheme are unable to fulfil their responsibilities effectively	
Pension Fund objectives are not defined and agreed.	Green
Failure to provide relevant information to the Pension	Green
Committee/Pension Board to enable informed decision	
making.	

5.3.2 Please see the Northamptonshire Pension Fund Risk Register Executive Summary.

5.4 Relevant Pension Fund Objectives

- 5.4.1 The following objectives as per the Business Plan have been considered in this report -
 - 1. To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
 - 2. To continually monitor and measure clearly articulated objectives through business planning.
 - 3. To continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate.

5.5 Consultation

6.5.1 Not applicable.

6. Background Papers

6.1 Northamptonshire Pension Fund Business Plan and Medium-Term Strategy

Appendix A – Variances against the forecast of investments and administration expenses based on original setting of assumptions

Fund Account	2022/23 Estimate	2022/23 Forecast	Variance	Comments
	£000	£000	£000	-
Contributions	(120,000)	(123,000)	(3,000)	Contributions in line with current membership numbers
Transfers in from other pension funds	(8,500)	(11,000)	(2,500)	Demand led
Total income	(128,500)	(134,000)	(5,500)	
Benefits payable	108,000	108,000	-	
Payments to and on account of leavers	8,500	12,500	4,000	Demand led
Total Payments	116,500	120,500	4,000	
Net (additions)/withdrawals from dealings with members	(12,000)	(13,500)	(1,500)	
Management Expenses	3,645	3,815	170	See below
Total income less expenditure	(8,355)	(9,685)	(1,330)	
Investment income Taxes on income	(26,000)	(26,000)	-	Actual income received to December 2022 plus one estimated quarter
(profit) and losses on disposal of investments and changes in the market value of investments	(127,000)	232,400	359,400	Actual Q3 return followed by actuarial long term growth assumption
Net return on investments	(153,000)	206,400	359,400	
Net (increase)/decrease in the net assets available for benefits during the year	(161,355)	196,715	358,070	

Management Expenses	2022-23 Estimate	2022-23 Forecast	Variance	Comments
	£000	£000	£000	
Total Administration Expenses	2,331	2,521	190	See below
Total Governance Expenses	834	825	(9)	
Total Investment Invoiced Expenses	480	469	(11)	
Total Management Expenses	3,645	3,815	170	

Administration Expenses Analysis	2022-23 Estimate	2022-23 Forecast	Variance	Comments
Expenses Analysis	£000	£000	£000	
Staff Related	1,458	1,613	155	Budget based on estimated 22/23 pay rates, higher than expected pay awards received. Expected vacancies to be filled during the quarter
Altair administration and payroll system	329	361	32	Inflation increases higher than expected
Data assurance	45	42	(3)	
Communications	39	38	(1)	
Other Non-Pay and Income	15	22	7	Bank charges and IT hardware costs are higher than expected
County Council Overhead Recovery	445	445	-	
Total Administration Expenses	2,331	2,521	190	

Appendix B – Progress of Climate Action Plan

Climate action plan

Calendar year

Quarter 1 2022

Agree decarbonisation pathway and targets that align the beliefs and ambitions of the Investment Sub Committee (ISC). The ISC agreed target reductions in absolute carbon emissions of the Fund's listed equity holdings of at least: • 25% from June 2021 baseline by 2024 • 59% from June 2021 baseline by 2030	~
Communicate agreed targets and aspirations to investment managers	✓
Instruct advisers to investigate high level approaches to climate aware	✓
passive equity investing	
Publish Climate Action Plan	✓

Quarter 2/3 2022

ISC receive training on strategic options to decarbonise the Pension Fund's	✓
active equity portfolio, including setting targets for existing managers and	
considering sustainable and impact equity and/or UN Sustainable	
Development Goals (SDG) alignment	
ISC receive report on high level climate aware passive equity options	✓

Quarter 3/4 2022

Descive implementable proposal on carbon aware passive equity portfolio	_/
Receive implementable proposal on carbon aware passive equity portfolio	•
Prepare and publish reporting in line with the Task-Force on Climate-	✓
Related Financial Disclosures (TCFD) disclosure requirements for the 2021-	
22 Fund annual report	
Engage with existing active equity managers around decarbonisation	
approaches	
Engage with private asset managers to improve carbon data provision for	
portfolios and increased ESG integration	
Engage with ACCESS on sustainable/impact equity managers (based on	
Committee preferences following Q2 discussion)	
Consider draft UK Stewardship Report ahead of submission to FRC	
Implement carbon aware passive equity in Q4 2022	

2023

ISC consider proposals to include fixed income portfolio including Multi-	
Asset Credit (MAC) and credit portfolios in climate reporting and target	
setting	
ISC receive report on availability of data and approach on alternatives	
assets	
ISC consider proposals for impact investing	
Continuation of the work with active managers to implement carbon	
reduction measures and increase the sustainability of the portfolios they	
manage	

ISC consider feasibility of including Scope 3 within emissions reduction	
reporting and targets	
ISC consider proposals to extend climate reporting and target setting to	
private asset classes	
ISC review progress made to date against targets and reset short-term and	
long-term targets	
Pension Committee consider appropriateness of decarbonisation pathway	
and refine based upon experience to date	
Continuation of the work with active managers to implement carbon	
reduction measures and increase the sustainability of the portfolios they	
manage	