

Agenda for a meeting of the West Yorkshire Pension Fund Pension Board to be held on Tuesday, 14 September 2021 at 10.30 am in Aldermanbury House, 4 Godwin St, Bradford, BD1 2ST

Members of the Committee

| Employer Representatives | Member Representatives |
|-------------------------------------|------------------------------|
| Councillor S Lal (Chair) – Bradford | Mr G Nesbitt – GMB |
| Councillor L Martin– Leeds | Mr M Binks – Unison |
| Vacancy - Wakefield | Mr C Sykes – Unison |
| Ms R Manning - Employer | Mr A Jones – Unite the Union |

Notes:

- The taking of photographs, filming and sound recording of the meeting is allowed except if Councillors vote to exclude the public to discuss confidential matters covered by Schedule 12A of the Local Government Act 1972. Recording activity should be respectful to the conduct of the meeting and behaviour that disrupts the meeting (such as oral commentary) will not be permitted. Anyone attending the meeting who wishes to record or film the meeting's proceedings is advised to liaise with the Agenda Contact who will provide guidance and ensure that any necessary arrangements are in place. Those present who are invited to make spoken contributions to the meeting should be aware that they may be filmed or sound recorded.
- **Given the restrictions on room capacity, anyone who is not a member of the board wishing to speak to any of the business items on the agenda MUST REGISTER IN ORDER TO SPEAK BY EMAILING the Governance Officers jane.lythgow@bradford.gov.uk/ susan.booth2@bradford.gov.uk by midday on Friday 10 September 2021. You will then be advised on how you can participate in the meeting. Access to the meeting cannot be guaranteed if those wishing to attend don't register given the Council must comply with Covid regulations and guidance.**
- On the day of the meeting please ensure that you comply with the Covid restrictions in place at the current time by wearing a suitable face covering and adhering to social distancing. Staff will be at hand to advise accordingly. Participants may be asked to wait in a separate room if the capacity in the meeting room has been reached and they will be escorted back into the meeting when their item is considered by the Committee.
- This agenda can be made available in Braille, large print or tape format on request by contacting the Agenda contact shown below.
- If any further information is required about any item on this agenda, please contact the officer named at the foot of that agenda item.

From:

Parveen Akhtar, City Solicitor
Agenda Contact: Jane Lythgow/Su booth
Phone: 01274 4322700/1274 432280

To:

E-Mail: jane.lythgow@bradford.gov.uk/jane.lythgow@bradford.gov.uk

A. PROCEDURAL ITEMS

1. DISCLOSURES OF INTEREST

(Members Code of Conduct - Part 4A of the Constitution)

To receive disclosures of interests from members and co-opted members on matters to be considered at the meeting. The disclosure must include the nature of the interest.

An interest must also be disclosed in the meeting when it becomes apparent to the member during the meeting.

Notes:

- (1) Members may remain in the meeting and take part fully in discussion and voting unless the interest is a disclosable pecuniary interest or an interest which the Member feels would call into question their compliance with the wider principles set out in the Code of Conduct. Disclosable pecuniary interests relate to the Member concerned or their spouse/partner.*
- (2) Members in arrears of Council Tax by more than two months must not vote in decisions on, or which might affect, budget calculations, and must disclose at the meeting that this restriction applies to them. A failure to comply with these requirements is a criminal offence under section 106 of the Local Government Finance Act 1992.*
- (3) Members are also welcome to disclose interests which are not disclosable pecuniary interests but which they consider should be made in the interest of clarity.*
- (4) Officers must disclose interests in accordance with Council Standing Order 44.*

2. INSPECTION OF REPORTS AND BACKGROUND PAPERS

(Access to Information Procedure Rules – Part 3B of the Constitution)

Reports and background papers for agenda items may be inspected by contacting the person shown after each agenda item. Certain reports and background papers may be restricted.

Any request to remove the restriction on a report or background paper should be made to the relevant Strategic Director or Assistant Director whose name is shown on the front page of the report.

If that request is refused, there is a right of appeal to this meeting.

Please contact the officer shown below in advance of the meeting if you wish to appeal.

(Jane Lythgow - 01274 432270)

B. BUSINESS ITEMS

3. WEST YORKSHIRE PENSION FUND (WYPF) UNAUDITED REPORT AND ACCOUNTS FOR 31 MARCH 2021 1 - 220

The report of the Director, West Yorkshire Pension Fund, (**Document “F”**) presents the unaudited report on West Yorkshire Pension Fund financial activities and financial performance for the year 2020/21.

Members are requested to consider and note the unaudited report and accounts for 2020/21.

(Ola Ajala - 01274 434534)

4. WEST YORKSHIRE PENSION FUND FIVE-YEAR INTERNAL AUDIT PLAN 2021/22 TO 2025/26 221 - 226

The report of the Director, West Yorkshire Pension Fund, (**Document “G”**) presents the latest five-year internal audit plan for West Yorkshire Pension Fund (WYPF). Members will be aware that the plan is reviewed annually between WYPF finance team and CBMDC internal audit by carrying out a detailed assessment of WYPF business risks, pensions and investment regulatory compliance environments, and service developments.

Members are asked to review and note the report.

(Ola Ajala – 01274 434534)

5. WEST YORKSHIRE PENSION FUND (WYPF) PRODUCTION OF ANNUAL BENEFIT STATEMENTS FOR MEMBERS 2021. 227 - 238

The Director, West Yorkshire Pension Fund (WYPF) will present a report (**Document “H”**) which provides an update on WYPF annual benefit statement (ABS) production project 2021 for all members entitled to receive an ABS for the calendar year 2021.

Members are requested to consider and note the report.

(Ola Ajala - 01274 434534)

6. LOCAL GOVERNMENT PENSION SCHEME REGULATIONS UPDATE 239 - 244

The report of the Director, West Yorkshire Pension Scheme (**Document “I”**) updates the Pension Board on changes to the Local Government Pension Scheme (LGPS) 2014 and provides information on associated matters.

Recommended –

That the report be noted.

(Tracy Weaver – 01274 433571)

7. WEST YORKSHIRE PENSION FUND DATA IMPROVEMENT PLAN 245 - 258

The report of the Director, West Yorkshire Pension Fund (**Document “J”**) informs Members that The Pension Regulator’s (TPR) Code of Practice 14 and The Public Service Pensions (Record Keeping & Miscellaneous Amendments) Regulations 2014 set out the requirements for public sector pension funds to maintain comprehensive and accurate data on their members and their member’s pension contributions.

The West Yorkshire Pension Fund Data Improvement Plan 2020/21 is appended to the report.

Recommended –

That Document “J” and the WYPF Data Improvement Plan, appended to that Document, be noted.

(Caroline Blackburn – 01274 434523)

8. REGISTER OF BREACHES OF LAW 259 - 266

The Director, West Yorkshire Pension Fund, will present a report (**Document “K”**) which informs Members that, in accordance with the Public Service Pensions Act 2013, from April 2015, all Public Service Pension Schemes now come under the remit of the Pensions Regulator.

Section 70 of the Pensions Act 2004 (the Act) imposes a requirement to report a matter to The Pensions Regulator as soon as it is reasonably practicable where that person has reasonable cause to believe that:

- (a) A legal duty relating to the administration of the scheme has not been or is not being complied with, and
- (b) The failure to comply is likely to be of material significance to The Pensions Regulator in the exercise of any of its functions.

A register of any breaches of the Pensions Code of Practice is maintained in accordance with the WYPF Breaches Procedure. The

Register of Breaches 2021/22 is appended to Document “K”.

Recommended –

That the report and entries on the Register of Breaches of Law, contained in the appendix to Document “K”, be noted.

(Caroline Blackburn – 01274 434523)

9. WEST YORKSHIRE PENSION FUND PENSIONS ADMINISTRATION 267 -
292

The report of the Director, West Yorkshire Pension Fund, (**Document “L”**) provides an update on West Yorkshire Pension Fund’s (WYPF) pensions administration activities over the last six months.

Recommended –

That the report be noted.

(Yunus Gajra – 01274 432343)

10. McCLOUD- EFFECTS ON LOCAL GOVERNMENT PENSION SCHEME (LGPS) 293 -
296

The report of the Director, West Yorkshire Pension Fund (**Document “M”**) provides an update on the effects on the Local Government Pension Scheme (LGPS) of a long awaited consultation on applying the remedy to address the age discrimination inherent with the transitional protections that were adopted by the public service scheme in 2014.

Recommended –

That the report be noted.

(Caroline Blackburn - 01274 434523)

11. PENSIONS DASHBOARD 297 -
316

The report of the Director, West Yorkshire Pension Fund, (**Document “N”**) provides an update on the progress of the introduction of the Pensions Dashboard.

Recommended –

That the report be noted.

(Yunus Gajra – 01274 432343)

12. **TRAINING, CONFERENCES AND SEMINARS INCLUDING DETAILS OF WEST YORKSHIRE PENSION FUND ANNUAL MEETINGS.** 317 - 324

Members are reminded that training to understand their responsibilities and the issues they will be dealing with is a very high priority.

The report of the Director, West Yorkshire Pension Fund, (**Document “O”**) informs Members of training courses, conferences and seminars which may be of assistance. Details of the WYPF annual meetings are also included in the report.

Members are asked that consideration is given to attendance at the events in Section 1 of Document “O” and to note the requirement to complete the Pension Regulators toolkit training.

(Caroline Blackburn – 01274 434523)



Report of the Director, West Yorkshire Pension Fund, to the meeting of the WYPF Local Pension Board to be held on 14 September 2021.

F

Subject:

West Yorkshire Pension Fund (WYPF) Unaudited Report and Accounts for 31 March 2021.

Summary statement:

This is the unaudited report on West Yorkshire Pension Fund financial activities and financial performance for the year 2020/21 (attached as Appendix 1). The value of the Fund as at 31 March 2021 is £16,327.2m, a net increase of £3,112.9m, an increase of 23.6% from £13,214.3m as at 31 March 2020. The increase in value confirms that we have recovered the value wiped off our financial assets as a result of the financial impact of the Covid-19 pandemic. The pandemic remains and this makes the future more uncertain, however our performance in this uncertain time is reassuring.

The latest actuarial valuation update as at 31 March 2019 determined that WYPF funding level was 106%, an improvement of 12% from the 2016 valuation of 94%. The latest actuarial funding update for March 2021 shows funding level of 108.0% (2020 105.6%), this is good news for the fund, employers and members.

As a result of statutory changes to local authorities account deadlines for 2020/21 and 2021/22 financial year, Bradford Council's 2020/21 audited accounts have to be published by 30 September 2021. A version of the WYPF accounts are included within Bradford Council's accounts.

The deadline for publication of WYPF's accounts is 1 December 2021. Our work on the accounts is impacted by Covid-19 and home working arrangements, however we are confident that we will deliver WYPF final audited accounts by the deadline of 1 December 2021.

Rodney Barton
Director WYPF

Portfolio:

Report Contact: Ola Ajala
Financial Controller WYPF
Phone: (01274) 434 534
E-mail: ola.ajala@wypf.org.uk

Overview & Scrutiny Area:

1 SUMMARY

- 1.1 In order to comply with statutory accounting requirements for Local Government and Local Government Pension Schemes, WYPF must prepare an annual audited Report and Accounts. The 2020/21 Reports and Accounts was presented to the Joint Advisory Group to note, before being presented to Bradford Council Governance and Audit Committee later in the year for approval.
- 1.2 The Report and Accounts provide a summary of West Yorkshire Pension Fund's financial position at the end of the year, and key financial activities during the year ended 31 March 2021. The accounts have been prepared in accordance with:
- CIPFA Code of Practice on Local Authority Accounting in the United Kingdom 2020/21
 - CIPFA Guidance on Accounting for Local Government Pension Scheme Management Costs
 - Latest Pensions Statement of Recommended Practice
 - International Financial Reporting Standards (IFRS), as amended for the UK public sector

External Auditor work 2019/20

- 1.3 Bradford external auditor Mazars LLP are still carrying out their audit work and will be presenting their findings to Bradford Council Governance and Audit Committee meeting where the accounts will be approved.

2 BACKGROUND

Initial value of assets

- 2.1 The value of the Fund as at 31 March 2021 is £16,327.2m, a net increase of £3,112.9m (23.6%) from 31 March 2020. The table below gives assets values for the last ten years including 2020/21:

| <u>Year</u> <u>to 31 March</u> | <u>Net Asset</u> <u>£m</u> | <u>Increase</u> <u>(Decrease)</u> <u>£m</u> | <u>Increase</u> <u>(Decrease)</u> |
|-----------------------------------|-------------------------------|---|--------------------------------------|
| 2021 | 16,327.20 | 3,112.90 | 23.56% |
| 2020 | 13,214.30 | -1,148.74 | -8.00% |
| 2019 | 14,363.04 | 796.41 | 5.87% |
| 2018 | 13,566.63 | -65.7 | -0.48% |
| 2017 | 13,632.33 | 2,421.35 | 21.60% |
| 2016 | 11,210.98 | -108.22 | -0.96% |
| 2015 | 11,319.20 | 950.4 | 9.17% |
| 2014 | 10,368.80 | 428.5 | 4.31% |
| 2013 | 9,940.30 | 1,155.89 | 13.16% |
| 2012 | 8,784.41 | 134.11 | 1.55% |

Change in net assets during the year

- 2.2 The increase in net assets of £3,112.9m between 31 March 2020 and 31 March 2021 is mainly due to the positive turnaround of financial markets after the immediate financial impact of the Covid-19 pandemic.

Return on investment

- 2.3 The total return on investment in 2020/21 is £3,189.3m (2019/20 -£1,038.8m). This is made up of £2,833.7m (2019/20 - £1,497.1m) gains in market value and net investment income of £361.2m (2019/20 £464.3m) from dividends, interest, and stock lending commission, less taxes on income £7.9m (2019/20 £8.4m).

Net cashflow

- 2.4 WYPF continues to have a positive net cashflow, in 2020/21 net cash was £297.1m (2019/20 £369.3m).

Investment performance

- 2.5 In 2020/21 we recovered the losses in 2019/20 and investment performance in 2020/21 is 23.4%. This is 2.1% above our benchmark. The long term track record is also positive, as shown in the table below, and over five and ten years WYPF's performance has outperformed the benchmark by more than 0.5% per annum. Investment returns against benchmark are as follows:

| <u>31-Mar-21</u> | <u>Annualised Return</u> | <u>Fund Specific Benchmark</u> | <u>Over /(Under)</u> |
|-------------------------|-------------------------------------|---|---------------------------------|
| | <u>%</u> | <u>%</u> | <u>%</u> |
| One Year | 23.2 | 21.1 | 2.1 |
| Three Years | 6.8 | 6.2 | 0.6 |
| Five Years | 9.2 | 8.2 | 1.0 |
| Ten Years | 7.7 | 7.2 | 0.5 |

Membership numbers

- 2.6 Our membership increased from 294,447 in 31 March 2020 to 298,307 in 31 March 2021, an increase of 1.3%.

Number of employers

- 2.7 The number of employers as at 31 March 2021 was 423, at 31 March 2020 it was 451, a net reduction of 28, is the result of employers leaving due to contractual changes and academy mergers.

Key performance indicators

2.8 The table below shows our 2020/21 performance in 20 key work areas, this performance reflects the commitment of officers and managers in delivering services to all our clients.

| Work type | Total cases | Target days | Target cases met | KPI target | Actual KPI | Actual KPI |
|--|-------------|------------------|------------------|------------|------------|------------|
| | 2020/21 | 2020/21 | 2020/21 | 2020/21 | 2020/21 | 2019/20 |
| | | | | % | % | % |
| 1 Payment of pensioners (WYPF LG pensioners and beneficiaries) | 1,899,096 | Paid on due days | 1,899,096 | 100 | 100.00 | 100.00 |
| 2 Change of address | 3,844 | 10 | 3,682 | 85 | 95.79 | 94.70 |
| 3 Change to bank details | 1,313 | 10 | 1,241 | 85 | 94.52 | 87.30 |
| 4 Death grant nomination | 9,134 | 20 | 9,113 | 85 | 99.77 | 99.40 |
| 5 Death grant payments | 2,980 | 5 | 2,773 | 85 | 93.05 | 96.90 |
| 6 Death in retirement | 251 | 10 | 223 | 85 | 88.84 | 93.90 |
| 7 Deferred benefits | 3,742 | 35 | 3,617 | 85 | 96.66 | 97.20 |
| 8 Deferred Benefits Into Payment Actual | 3,209 | 5 | 2,832 | 90 | 88.25 | 80.80 |
| 9 Divorce quote | 463 | 20 | 423 | 85 | 91.36 | 96.20 |
| 10 Life certificate received | 148 | 10 | 119 | 85 | 80.41 | 96.70 |
| 11 Monthly posting | 5,091 | 10 | 4,866 | 95 | 95.58 | 96.80 |
| 12 Payroll changes | 1,990 | 10 | 1,965 | 85 | 98.74 | 87.30 |
| 13 Pension estimate | 4,653 | 10 | 4,481 | 75 | 96.30 | 83.40 |
| 14 Refund payment | 1,909 | 10 | 1,875 | 95 | 98.22 | 98.60 |
| 15 Refund quote | 2,464 | 35 | 2,449 | 85 | 99.39 | 97.00 |
| 16 Retirement actual | 3,157 | 3 | 2,927 | 90 | 92.71 | 92.90 |
| 17 Transfer out payment | 217 | 35 | 195 | 85 | 89.86 | 92.20 |
| 18 Transfer-in payment | 548 | 35 | 520 | 85 | 94.89 | 96.50 |
| 19 Transfer-in quote | 801 | 35 | 798 | 85 | 99.63 | 99.70 |
| 20 Transfer-out quote | 1,435 | 20 | 1,093 | 85 | 76.17 | 92.90 |

Cost performance

2020/21 WYPF Cost per member

2.9 The 2020/21 annual cost of administering the West Yorkshire Pension Fund per member is £13.42, investment management £17.19, oversight and governance £2.92 giving a total management cost per member of £33.53. These figures compare favourably with the average cost for authorities in the Ministry of Housing Communities & Local Government (MHCLG) – SF3 data collection results for the previous year shown in the table below.

| Cost per member | West Yorkshire Pension Fund 2020/21 Financial Statement | Position 2019/20 Gov't data SF3 | West Yorkshire Pension Fund 2019/20 Gov't data SF3 | LGPS lowest 2019/20 Gov't data SF3 | LGPS highest 2019/20 Gov't data SF3 | Average LGPS 2019/20 Gov't data SF3 |
|--|---|---------------------------------|--|------------------------------------|-------------------------------------|-------------------------------------|
| Admin cost per member | £13.42 | 7th | £16.23 | £0.74 | £118.78 | £23.50 |
| Investment cost per member | £17.19 | 1st | £22.83 | £20.68 | £774.27 | £278.76 |
| Oversight and governance | £2.92 | 5th | £2.88 | £0.00 | £52.64 | £12.21 |
| Total cost per member | £33.53 | 1st | £41.94 | | | |
| Lowest / Highest / Average (not a sum of figures in the rows above) | | | | £41.94 | £829.30 | £245.41 |

2019/20 Administration cost per member

- 2.10 From the latest data provided by government WYPF pension administration cost is the 7th lowest amongst LGPS fund in England & Wales for 2019/20, cost of £16.23 per member, the lowest cost is £ 0.74 and the highest is £118.78.

2019/20 Investment management cost per member

- 2.11 WYPF investment management cost is the second lowest cost per member in the latest result at £22.83, the lowest £20.68 and the highest cost is £553.02. The reason for this low cost is because WYPF use directly employed staff to manage investments and a centralised office support for both investment management and pension administration.

2019/20 Oversight and governance cost per member

- 2.12 On oversight and governance, WYPF cost is the 5th lowest cost at £2.92. The lowest is £0 and the highest is £52.64.

2019/20 Total cost per member

- 2.13 WYPF has the lowest total cost per member (administration, investment and oversight & governance) at £41.94, the national average for LGPS in 2019/20 is £245.41 and the highest is £829.30.

3 OTHER CONSIDERATIONS

The financial accounts for the Council and WYPF will be approved by the Governance and Audit Committee later in 2021.

4 FINANCIAL & RESOURCE APPRAISAL

The Council is required by law to produce an audited annual financial report for WYPF within the Council's financial statements. The audited accounts for the Council must be completed and approved by the statutory deadline of 30 September 2021 for 2020/21 accounts. In addition, WYPF must publish a separate audited report and accounts by 1

December 2021, this report must be prepared in accordance with accounting standards and comply with statutory requirements.

5 RISK MANAGEMENT AND GOVERNANCE ISSUES

The WYPF report and accounts is a statutory financial document. It is a key element of financial risk management and governance, and provides evidence of risk management and governance processes in operation during the financial year.

6 LEGAL APPRAISAL

In order to meet statutory deadlines, the report and accounts have to be approved and signed by the Chair of Governance and Audit Committee on or before 31 August 2021. There are no other legal issues.

7 OTHER IMPLICATIONS

None

8 RECOMMENDATION

That the unaudited report and accounts for 2020/21 be considered and noted.

9 APPENDICES

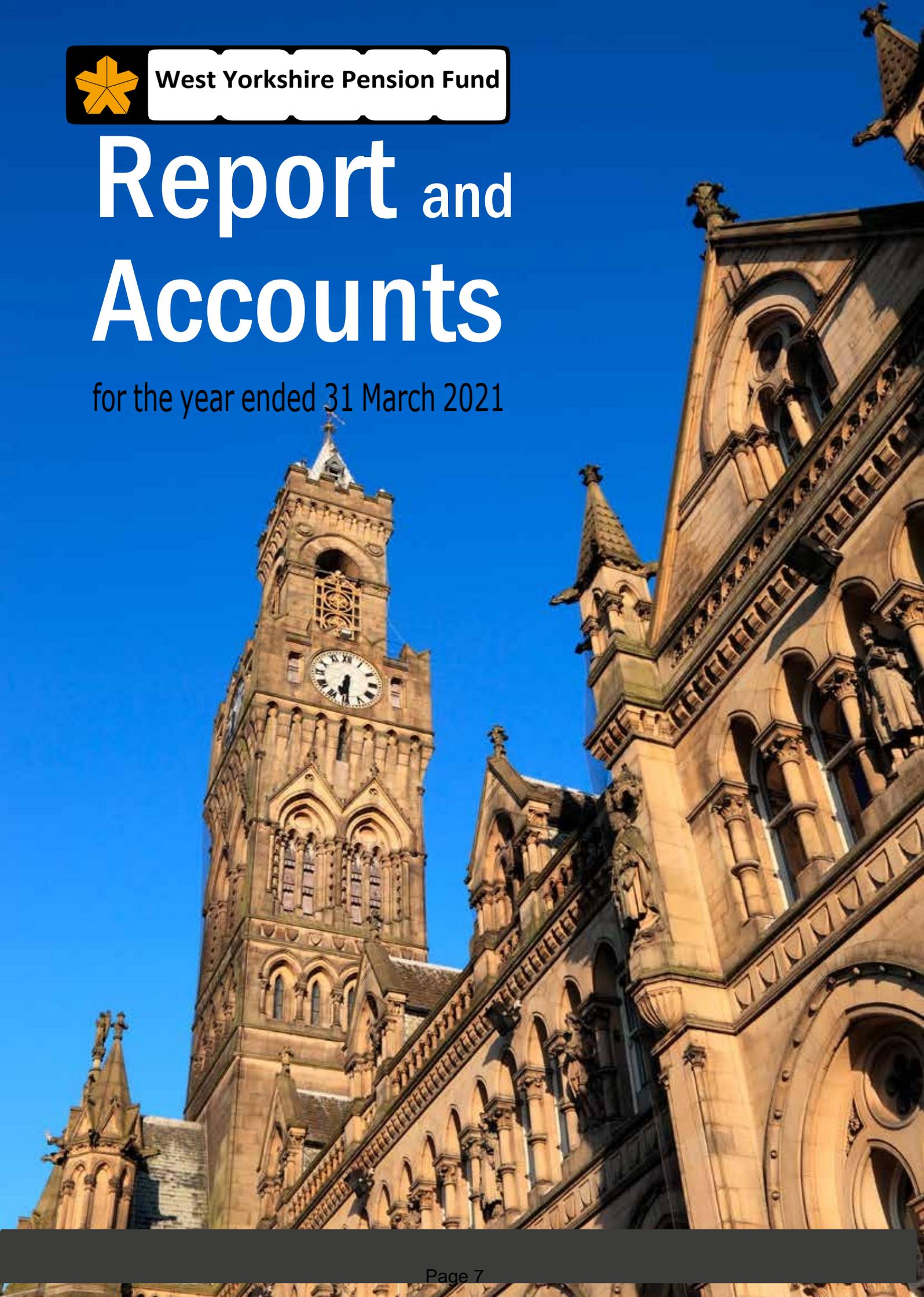
Appendix 1 – WYPF Unaudited Report and Accounts 2020/21



West Yorkshire Pension Fund

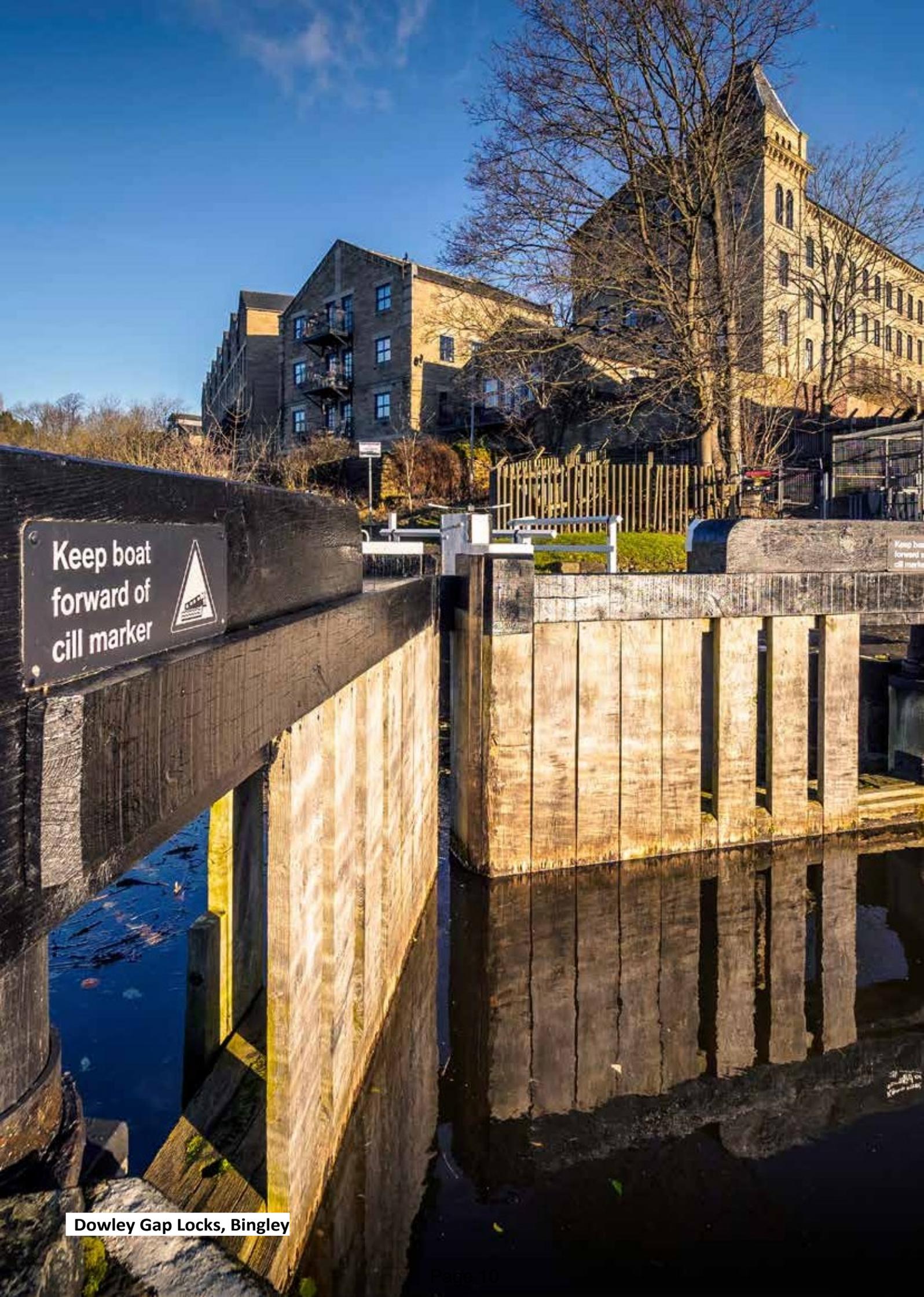
Report and Accounts

for the year ended 31 March 2021



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Dowley Gap Locks, Bingley

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Section 1

Foreword

Foreword

West Yorkshire Pension Fund (WYPF) is a local government pension scheme, founded in 1974. As at 31 March 2021 we had nearly 300,000 members and 411 employers across the UK. Our largest employers are the five West Yorkshire Councils - Bradford, Calderdale, Kirklees, Leeds and Wakefield. In total within our Shared Service administration arrangements we serve 470,000 members and 704 employers.

All aspects of our operations have felt the impact of the Covid-19 pandemic throughout the year, with staff having to work remotely and volatile investment markets.

The fall in investment values experienced in the last weeks of the previous financial year was followed by a strong bounce in the quarter to June, after which markets progressed, with some volatility, in line with the pandemic news flow. The net result was that the valuation rose by over 23% to £16.3 billion at the end of the March, leaving WYPF very well-funded.

The strategic asset allocation was reviewed during the period, which will result in changes to the portfolio over the next few years, with investment in infrastructure continuing, as well as increases in property and credit strategies, and reductions in equities and government bonds, all of which is designed to improve diversification within the portfolio. This will all be done in the context of our Environmental, Social and Governance policies, which have been considered in detail and further developed by the Investment Advisory Panel during the year.

Our collaborative engagements with companies on a range of issues through the Local Authority Pension Fund Forum (LAPFF) have met with increasing success this year, helped by the increasing number of asset managers taking a positive stance on a range of issues.

Our administration teams had to move to remote working due to the pandemic with little notice, but have continued to deliver the service to a very high standard throughout the year. Not only has the service been maintained, but they have also successfully taken on the administration of the London Borough of Barnet Pension Fund and a further three Fire and Rescue Authority pension funds in the year. An exceptional result, I am sure you will agree.

I would like to thank the administration and investment staff for their continued hard work and excellent performance in what has been a most challenging year, and the members of the Investment Advisory Panel, Joint Advisory Group and the Local Pension Board for their contribution. I hope you will find the Report and Accounts an interesting read.



Councillor Andrew Thornton
Chair
Joint Advisory Group and
Investment Advisory Panel

Section 2

Management Structure

Members of the WYPF Joint Advisory Group

Bradford Council

Councillor A Thornton
Chair

Councillor G Winnard
Deputy Chair

Councillor T Salam

Calderdale Council

Councillor B Metcalfe

Councillor S Baines MBE

Councillor J Lynn

Kirklees Council

Councillor G Asif

Councillor R Murgartroyd

Councillor M Ahmed (to Oct 2020)

Councillor E Firth (from Oct 2020)

Leeds Council

Councillor A Scopes

Councillor P Harrand

Councillor N Dawson

Wakefield Council

Councillor L Shaw

Councillor J Speight

Councillor M Graham

Trade union representatives

T Chard – GMB

L Bailey – UNISON

A Goring – UNISON

Scheme member representatives

Mark Morris

Representative from City of Bradford Metropolitan District Council

C Chapman

Director of Finance / s151 Officer -
BMDC

Members of the WYPF Investment Advisory Panel

Bradford Council

Councillor A Thornton
Chair

Councillor G Winnard

Calderdale Council

Councillor J Lynn

Councillor S Baines MBE

Kirklees Council

Councillor G Asif

Councillor M Ahmed (to Oct 2020) Councillor E Firth (from Oct 2020)

Leeds Council

Councillor A Scopes

Councillor P Harrand

Wakefield Council

Councillor J Speight

Councillor M Graham

Trade union representatives

T Chard – GMB

L Bailey – UNISON
Deputy Chair

A Goring – UNISON

West Yorkshire Pension Fund

R Barton – Director

External advisers

M Stevens

Marian George (from Oct 2020) Philip Hebson (from Oct 2020)

Representative from the Finance Directors of the councils of West Yorkshire

N Broadbent
Head of Finance – Calderdale Council

Scheme member representatives

C Greaves

P Cole

Members of the WYPF Local Pension Board

Employer representatives

Councillor S Lal - Bradford MDC
Chair

Councillor D Jenkins - Leeds CC

Councillor K Johnson - Wakefield MDC

Ruth Manning - Northern School of Contemporary Dance

Member representatives

G Nesbitt – GMB

C Sykes – UNISON

M Morris – Unite

M Binks – UNISON

Appointed service providers and advisers

Actuarial services

Aon
1 Redcliff Street
Bristol
BS1 6NP

AVC providers

Prudential
Lancing
BN15 8GB

Scottish Widows
PO Box 902
15 Dalkeith Road
Edinburgh
EH16 5BU

Utmost Life and Pensions
Walton Street
Aylesbury
Bucks
HP21 7QW

Section 151 officer

Chris Chapman
Director of Finance/S151 Officer
City of Bradford Metropolitan District
Council
Britannia House
Bradford
BD1 1HX

Auditors

Mazars LLP
Gelderd Road
Gildersome
Leeds
LS27 7JN

Banking Services

HSBC
8 Canada Square
Canary Wharf
London
E14 5HQ

Appointed service providers and advisers

| | |
|-----------------------------------|---|
| Custodial Services | Northern Trust One Canada Square Canary Wharf London E14 5AB |
| Legal Adviser | Parveen Akhtar City Solicitor City of Bradford Metropolitan District Council City Hall Bradford BD1 1HY |
| Pensions Computer Services | Civica Plc Vanguard House Dewsbury Road Leeds LS11 5DD |

Internal Dispute Resolution Adjudicators

| | |
|--|---|
| Appointed Persons for Stage 1 Internal Dispute Resolution Procedure (IDRP) | Rodney Barton – Director, WYPF City of Bradford Metropolitan District Council WYPF Ground Floor Aldermanbury House 4 Godwin Street Bradford BD1 2ST |
| Appointed Persons for Stage 2 Internal Dispute Resolution Procedure (IDRP) | Kersten England Chief Executive City of Bradford Metropolitan District Council City Hall Bradford BD1 1HY |
| IDRP Medical Adviser | Santia Occupational Health Santia House Parc Nantgarw Cardiff CF15 7QX |

Section 3

Local Pension Board Annual Report

Annual Report of the West Yorkshire Pension Fund Pension Board 2020/2021

Introduction

I am pleased to present the report of the local pension board West Yorkshire Pension Fund (WYPF) for the year 2020/2021. The WYPF Pension Board was established as a result of the Public Sector Pensions Act 2013, which required all public sector pension schemes to set up a representative local pension board by 1 April 2015. The board operates independently from both the Joint Advisory Group and Investment Advisory Panel. The role of the pension board is to assist the administering authority in securing compliance with all regulations and legislation and to help ensure the effective, efficient governance and administration of the scheme.

Local pension boards have no executive powers. The board can scrutinise compliance with regulations and call WYPF officers or the WYPF Joint Advisory Group and Investment Advisory Panel to account, but we are not a decision-making body. The aim of the board is to focus our discussions on providing scrutiny of WYPF's decision-making process and provide input from the perspective of scheme members and employers.

Governance arrangements

The governance arrangements of the fund and relationship with the Scheme Manager (City of Bradford MDC), Local Pension Board, Joint Advisory Group and Investment Advisory Panel are detailed in the funds Governance Compliance Statement which can be found on the Funds website at:

<https://www.wypf.org.uk/publications/policyhome/wypf-index/t:>

Constitution and membership

Local Pension Boards must contain an equal number of employer and scheme member representatives. WYPF's pension board has been established with four employer and four member representatives.

The membership of the Board has seen a two new members joining during 2020. During the year Councillor Mitchell - from nWakefield Council and Andy Jones from Unite have joined the board.

The membership of the board at the end of 2021 is listed below:

Employer representatives

- Councillor Shakeela Lal (Chair) – City of Bradford MDC
- Councillor D Jenkins – Leeds CC
- Councillor H Mitchell – Wakefield MDC
- Ruth Manning – Northern School of Contemporary Dance

Member representatives

- Andy Jones – Unite
- Mick Binks – Unison
- Colin Sykes – Unison
- Gary Nesbitt – GMB

Information about the Board members and their contact details, are available on the WYPF website via the following link:

www.wypf.org.uk/Member/PensionBoard/WYPF/PensionBoard_WYPF_Index.aspx

Meetings

During the year the board held four Pension Board meetings:

- 23 June 2020
- 22 September 2020 (this meeting was postponed and reconvened on 15 December 2020)
- 15 December 2020
- 23 March 2021

All meetings held in 2020/21 were held virtually due to the Covid-19 pandemic. Information about the board, including minutes of board meetings, is available on the WYPF website via the following link:

www.wypf.org.uk/Member/PensionBoard/WYPF/PensionBoard_WYPF_Index.aspx

WYPF Pension Board member training

Maintaining a good level of understanding amongst members of the pension board is important in maintaining strong levels of governance. Members are encouraged to make use of opportunities for training and attendance at industry events.

The agenda of every Board meeting contains information on upcoming industry events and training opportunities. In addition, there is a vast amount of experience available for members in the Fund. Members are encouraged to contact the Fund if they feel they would benefit from 1 to 1 training on specific areas. Officers also arrange specific in house training events for Investment Panel, Pensions Board and Joint Advisory Group members to attend during the year.

The training undertaken by pension board members during the past year includes the following events.

Virtual meetings training

- The Pensions Regulator's Single Modular Code and the LGPS webinar- 25 March 2021
- Barnet Waddingham LGPS Pension Committee & Local Pension Board Members training – 26 January 2021
- CIPFA McCloud Implementation Workshop for Committee and Board Members – August 2020

In addition, all pension board members are encouraged to undertake the Pensions Regulator Toolkit training which is an online learning programme aimed at trustees of occupational pension schemes. The training includes a series of online learning modules and downloadable resources developed to help Members meet the minimum level of knowledge and understanding introduced in the Pensions Act 2004.

The work programme

Services to members and employers continues to be high on the board's agenda.

The meetings during the year received the following reports:

- Minutes of the Joint Advisory Group meetings
- Updates to the Pensions Administration Strategy
- Proposed updates to the Funding Strategy Statement
- Register of Breaches of Law
- Local Government Pension Scheme updates
- 2020/21 Service Budget
- Training Conferences and Seminars
- Minutes of Investment Advisory Panel
- Report and Accounts
- Audit Plan
- 2020 Annual Benefit Statement Exercise
- Data Improvement Plan
- McCloud Planning
- Risk register
- Communication Strategy

Conclusion

This is the sixth report of the WYPF Pension Board I would like to thank all members of the board, our officers and advisers for their continued support and assistance.



Councillor Shakeela Lal
Chair of WYPF Pension
Board

Section 4

Pensions Administration Review

Overview and legal status of West Yorkshire Pension Fund

West Yorkshire Pension Fund (WYPF) is part of the Local Government Pension Scheme (LGPS). The LGPS is a statutory scheme and benefits are paid under the provisions of the Local Government Pension Scheme Regulations 2013, the Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014 and other applicable legislation. The government issues local government pension scheme guidance and regulations through the Ministry of Housing, Communities and Local Government, and as such these have the force of law.

Administering authority

City of Bradford Metropolitan District Council is the administering authority for WYPF. Bradford Council's administering authority responsibilities are met by WYPF's in-house pensions administration and investment teams. WYPF's Pension Schemes Registration number with HMRC is 10041078. Contributing members of the scheme were contracted out of the State Second Pension until 5 April 2016 when the State Second Pension was abolished and replaced by a single-tier state pension. The result is that employers and members now pay full Class 1 National Insurance Contributions (NICs) and members will benefit from the single-tier state pension.

HMRC registration

HM Revenue and Customs (HMRC) has granted the scheme 'exempt approval' for the purposes of the Income and Corporation Taxes Act 1988. The scheme became a Registered Pension Scheme under Part 4 of Chapter 2 of the Finance Act 2004 with effect from 6 April 2006.

Fund activities during the year

Covid-19

The impact of the covid-19 pandemic has resulted in a number of changes to the way we have delivered our services to both members and employers in the pension fund.

Annual meetings

WYPF held its eighteenth annual meeting for scheme members on 28th October 2020 but due to the pandemic this was held as an online meeting. Pension fund members logged onto a video feed of the meeting.

The meeting was chaired by Councillor Andrew Thornton, The Chairman of WYPF's Investment Panel and Joint Advisory Group. As usual, there were presentations from Rodney Barton, WYPF's director, and from the Fund's external investment adviser Mark Stevens. Our employers' annual meeting was also held virtually on 29th October 2020. Topics covered were pension fund valuation, and updates on the Fund including its investments, administration and the general economic and financial market climate. Employers were treated to a guest slot by the fund actuary AON Hewitt.

Employer Training

During the summer we launched our Employer Webcasts under the heading 'Training Tuesdays'. This replaced our popular half day workshops and allowed us to continue offering employers training throughout the year. The webcasts were also recorded and available on demand on our employer website. Many topics were covered and included understanding pensionable pay, employer discretions, using online forms and ill health retirement.

In the second half of the year we began working with our second London Borough, Barnet Pension Fund, and over the autumn we held extensive employer training sessions to help the employers with the on-boarding process.

Member engagement

We've continued to work with our pre-retirement partner Affinity Connect to offer 2 hour courses to members covering the financial and emotional aspects of retiring. Like our employer training, this has moved online this year with plans to move to a hybrid delivery model once the pandemic has passed. This year was also notable as we restructured our Employer Relations and Communications functions splitting the responsibilities into two dedicated teams in WYPF.

Pension Increase

Each year, WYPF pensioners receive an annual increase in accordance with pension increase legislation. The increase is linked to movements in the Consumer Price Index (CPI). Deferred member benefits are also increased by CPI. For the 2020/21 year an increase of 1.7% was applied on 6 April 2020.

Pension administration and cost

As in previous years, the workload of the pension administration section continued to increase, member numbers continue to rise, particularly with the addition of new clients. WYPF’s service delivery continues to be underpinned by our accreditation to the International Organisation for Standardisation - ISO 9001:2000. Our quality management systems ensure that we are committed to providing the best possible service to customers, and will continue to ensure that we deliver best value to all our stakeholders. The latest published data for all LGPS funds administration costs shows that WYPF pensions administration cost per member is £16.23, this is the 7th lowest cost amongst 86 LGPS funds and well below national average of £23.50.

WYPF achieved accreditation for ISO27001 Information Security Management System Certification (ISMS). This accreditation is particularly important to us and highlights our continued commitment to information security and provides assurance to our customers that we have the ability to protect their data and reputation at all times.

Shared Service

Our shared service partnership continues to flourish with the addition of four new Fire and Rescue Service clients. This brings the total number of Fire Authorities we provide administration for to nineteen. We also welcomed the London Borough of Barnet to our LGPS partnership adding to Lincolnshire Pension Fund and Hounslow Pension Fund.

Data Quality

The Fund is required to report on the data quality to the Pensions Regulator as part of the annual scheme returns. The Pensions Regulator has set a target of 100% accuracy for new common data received after June 2010.

| Data Type | % |
|-------------------|-------|
| Forename | 100 |
| Surname | 100 |
| Membership status | 99.99 |
| Date of birth | 99.99 |
| NI number | 100 |
| Postcode | 99.93 |
| Address | 96.45 |

Work continues to be undertaken to improve address data and this work will continue over the next twelve months and beyond as members continue to change address without informing the Fund.

Communications

Our Contact Centre has remained closed to visitors to our offices but we have continued to provide a full telephone service. Contact through emails and our secure member portal has increased as a result.

100% of annual pension benefit statements for active and deferred members were produced on time giving members information on their benefits accrued to date and what their potential benefits will be at retirement age, as well as other useful information.

Regular newsletters continue to be issued to our members to keep them informed of important pensions news.

MyPension

With the new WYPF members' web service "MyPension" members can view their pension record and statements, update personal details, tell us they have moved house and more. Members are being encouraged to sign up as we move to more online communications. Enhancements to be introduced shortly include the facility for members to run their own estimate of retirement benefits calculations.

Pension Age Awards

It has proved to be another successful year for WYPF having been shortlisted by Pensions Age under the following categories:

- DB Scheme of the Year
- Pension Scheme Communications Award
- Pensions Administration Award

Due to the pandemic the awards ceremony has been postponed to later in 2021.

Disaster recovery and risk management monitoring

WYPF uses Bradford Council's pair of geographically separated data centres, which are 3.2km apart. Both purpose-built data centres are protected by redundant power (UPS), a backup generator and cooling.

- The data centres are connected by point-to-point council-owned fibre runs. Data centres have secure access systems and are monitored 24/7 by Bradford's CCTV Unit.
- Both sites are permanently live and accessible by our internal end-users who are networked to the sites via diverse fibre cable routes.
- Where possible, servers are virtualised, using Microsoft Hyper-V. The servers and data are replicated between the Hyper-V hosts at both sites to ensure a short recovery time.
- Data is backed up to disk medium in a 24-hour cycle and written to tape archive on robotic tape libraries at both sites. An encrypted archive copy is sent to a dedicated offsite storage facility every week.
- WYPF's server, disk and core network infrastructure is monitored for errors and warnings, and these generate a ticket on the WYPF IT ITIL system for investigation and resolution.
- Critical data stores are also replicated at disk level between sites. In the event of serious system failures, WYPF would re-provision testing hardware and the infrastructure environment for live running.

In the event of WYPF office accommodation becoming unavailable, staff will be relocated to other council offices or our Lincoln office, or work remotely. WYPF is covered by the council's comprehensive disaster recovery plan for the email, web, phone, network and SAP services they deliver for us.

Social media

WYPF's Facebook and Twitter accounts were launched in November 2014 to encourage members of all ages to engage more with the fund.

www.twitter.com/wypf_lgps

www.facebook.com/westyorkshirepensionfund

See www.wypf.org.uk/privacy for more details.



Stoodley Pike, Calderdale

Section 5

Financial Management and Performance

Financial Performance – analytical review

The following table identifies movements in the Fund Account based on expenditure between 31 March 2020 and 31 March 2021 and provides reasons for variances. The full financial statements are within section 10 – Statement of accounts of this document.

Statutory accounts financial performance variance 2021 versus 2020

Table A – dealing with members and employers

| Dealings with members, employers and others directly involved in the fund | 31-Mar-21 £000 | 31-Mar-20 £000 | Variance £000 | Notes on significant variances |
|---|-------------------|-------------------|------------------|---|
| Contributions receivable | 480,170 | 441,973 | 38,197 | Increased number of active members and contributions due |
| Transfers In | 26,934 | 50,705 | -23,771 | Reduction in the number of members transferring their pension savings to WYPF. |
| Non-statutory pensions and pensions increases recharged | 21,019 | 21,671 | -652 | No significant change. |
| Benefits payable | -550,077 | -553,082 | 3,005 | A small reduction in the number of pensioners. |
| Non-statutory pensions and pensions increase | -21,019 | -21,671 | 652 | No significant change. |
| Payments to and on account of leavers | -23,373 | -37,250 | 13,877 | Reduction in number of members transferring their pension savings from WYPF |
| Management expenses | -10,002 | -12,306 | 2,304 | Impact of home working, direct result of Covid-19 pandemic. In addition there has been a reduction in the level of investments transactions and costs, to manage the prevailing impact of reduced dividends from companies, WYPF conserved its cash balances. |

Table B – fund assets performance

| Returns on investments | 31-Mar-21 £000 | 31-Mar-20 £000 | Variance £000 | Notes on significant variances |
|---|-------------------|-------------------|-------------------|---|
| Investment income | 361,159 | 464,284 | -103,125 | Reduced dividend income, direct result of Covid-19 pandemic, companies naturally conserved their cash reserves to deal with increased market and operational uncertainty. |
| Taxes on income | -7,919 | -8,719 | 800 | Reduced tax on income direct result of reduced dividends globally as companies conserve their cash reserves. |
| Profit and losses on disposal and changes in value of investments | 2,833,734 | -1,497,058 | 4,330,792 | Positive impact of financial markets rallying during 2020/21, after the 2019/20 loss of value. |
| Stock lending | 2,278 | 2,710 | -432 | Reduced stock lending activities, as a result of the Covid-19 pandemic and a small impact of increased voting activities by WYPF on all stock owned. |
| Net return on investments | 3,189,252 | -1,038,783 | 4,228,035 | Negative market impact of Covid-19 on asset values. |
| Net increase/(decrease) in the net assets | 3,112,904 | -1,148,743 | 4,261,647 | Positive market increases after the unprecedented loss of asset value due to Covid-19 in 2019/20. |
| Opening net assets of the fund | 13,214,298 | 14,363,041 | -1,148,743 | 8% reduction in market value mainly due to financial impact of Covid-19 on asset values between 2018/19 and 2019/20. |
| Closing net assets of the fund | 16,327,202 | 13,214,298 | 3,112,904 | Positive market increases after the unprecedented loss of asset value due to Covid-19 in 2019/20. |

Fund account three-year forecast and two-year outturn

The table below shows a three-year budget estimate 2020/21 to 2023/24 and outturn figures for 2019/20 and 2020/21

| Fund account – estimates and actuals | 2023/24 | 2022/23 | 2021/22 | 2020/21 | 2020/21 | 2019/20 | 2018/19 |
|--|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| | Estimate | Estimate | Estimate | Estimate | Outturn | Outturn | Outturn |
| | £000 | £000 | £000 | £000 | £000 | £000 | £000 |
| Dealings with members, employers and others directly involved in the fund | | | | | | | |
| Contributions receivable | 494,800 | 489,900 | 485,000 | 430,900 | 480,170 | 441,973 | 416,949 |
| Transfers in | 27,800 | 27,500 | 27,200 | 27,400 | 26,934 | 50,705 | 26,491 |
| Non-statutory pensions and pensions increases recharged | 21,600 | 21,400 | 21,200 | 20,500 | 21,019 | 21,671 | 21,938 |
| Total income from members and employers | 544,200 | 538,800 | 533,400 | 478,800 | 528,123 | 514,349 | 465,378 |
| Benefits payable | -636,800 | -606,500 | -577,600 | -523,300 | -550,077 | -553,082 | -506,461 |
| Non-statutory pensions and pensions increase | -24,400 | -23,200 | -22,100 | -20,500 | -21,019 | -21,671 | -21,938 |
| Payments to and on account of leavers | -27,000 | -25,700 | -24,500 | -41,700 | -23,373 | -37,250 | -40,445 |
| Total payments to members | -688,200 | -655,400 | -624,200 | -585,500 | -594,469 | -612,003 | -568,844 |
| Management expenses | -14,000 | -13,300 | -12,685 | -12,765 | -10,002 | -12,306 | -10,006 |
| Returns on investments | | | | | | | |
| Investment income | 418,100 | 398,200 | 379,200 | 405,400 | 361,159 | 464,284 | 438,585 |
| Taxes on income | -9,100 | -8,700 | -8,300 | -8,400 | -7,919 | -8,719 | -8,236 |
| Profit and losses on disposal of and changes in value of investments | 551,300 | 525,000 | 500,000 | 357,900 | 2,697,250 | -1,497,058 | 476,252 |
| Stock lending | 2,600 | 2,500 | 2,400 | 3,500 | 2,277 | 2,710 | 3,279 |
| Net return on investments | 962,900 | 917,000 | 873,300 | 758,400 | 3,052,767 | -1,038,783 | 909,880 |
| Net increase in the net assets available for benefits during the year | 804,900 | 787,100 | 769,815 | 638,935 | 2,976,419 | -1,148,743 | 796,408 |
| Opening net assets of the | 17,747,632 | 16,960,532 | 16,190,717 | 13,846,234 | 13,214,298 | 14,363,041 | 13,566,633 |
| Closing net assets of the fund | 18,552,532 | 17,747,632 | 16,960,532 | 14,485,169 | 16,190,717 | 13,214,298 | 14,363,041 |
| % Increase in net assets | 4.54% | 4.64% | 4.75% | 9.62% | 22.52% | -8.00% | 5.87% |

Estimates are based on straight line projection of outturn figures in previous years, adjusted for the fund's operational activities, with the exception of management expenses which are based on current costs of operational activities and our business plans.

Management expenses forecast and outturn report

The table below gives the management cost forecast for 2020/21 to 2023/24 and outturn figures for 2019/20 and 2020/21.

| | 2023/24 | 2022/23 | 2021/22 | 2020/21 | 2020/21 | 2020/21 | 2019/20 |
|--|---------------|---------------|---------------|---------------|---------------|--------------|---------------|
| | Estimate | Estimate | Estimate | Estimate | Full year | Variance | Full year |
| | | | | | outturn | outturn | outturn |
| | £000 | £000 | £000 | £000 | £000 | £000 | £000 |
| Expenditure | | | | | | | |
| Accommodation | 320 | 300 | 290 | 369 | 350 | 19 | 422 |
| Actuarial costs | 340 | 320 | 300 | 300 | 337 | -37 | 533 |
| Computer costs | 1,000 | 950 | 900 | 803 | 1,307 | -504 | 991 |
| Employee costs | 10,290 | 9,800 | 9,329 | 8,167 | 6,877 | 1,290 | 7,712 |
| Internal recharges from Bradford Council | 500 | 480 | 454 | 454 | 453 | 1 | 454 |
| Printing and postage | 560 | 530 | 500 | 662 | 496 | 166 | 518 |
| Other running costs | 1020 | 970 | 920 | 1,370 | 927 | 443 | 1,174 |
| Investment transaction costs | 3,000 | 2,860 | 2,725 | 2,725 | 1,496 | 1229 | 2,770 |
| Total expenditure | 17,030 | 16,210 | 15,418 | 14,850 | 12,243 | 2,607 | 14,574 |
| Expenditure | | | | | | | |
| Shared service income | -2,760 | -2,630 | -2,500 | -2,300 | -2,017 | -283 | -1,958 |
| Other income | -250 | -240 | -233 | -186 | -224 | 38 | -310 |
| Total income | -3,010 | -2,870 | -2,733 | -2,486 | -2,241 | -245 | -2,268 |
| Total | 14,020 | 13,340 | 12,685 | 12,364 | 10,002 | 2,362 | 12,306 |

Estimates shown above are based on current costs of operational activities and our current and future business plans.

Variances between the revised estimate and outturn for 2020/21 are mainly due to:

- **Accommodation costs:** £19k underspend, reduction in spend direct impact of staff working from home, due to Covid-19.
- **Actuarial costs:** £37k overspend on actuarial services is due to increased regulatory, covenant and general technical work to improve actuarial services for WYPF and fund employers.
- **Computer costs:** £504k increased investment in computers and systems to support home working and digital services for members and employers.
- **Employee costs:** £1,290k underspent against budget. Backdated estimated cost of new staffing structure was charged to 2019/20, however actual pay charged for this in 2020/21 was less than the provision. In addition, a number of vacant posts remained difficult to fill in 2020/21.
- **Internal recharges:** £1k underspend, payment to Bradford Council for services provided to West Yorkshire Pension Fund for ICT, payroll, legal services and other corporate services.
- **Printing and postage:** £166k underspend as a direct result of increased use of digital services.
- **Other running costs:** £443k underspend due to reduced traveling and restrictive impact of the Covid-19 pandemic, however we have maintained service using remote working, virtual services and increased investment in our digital services.

- **Investment transaction costs:** £1,229k underspend, this is another direct impact of Covid-19 resulting in reduced number of investment transactions in 2020/21.
- **Total income:** £245k overspend, reduced income net variance as a result of cost effectiveness and saving in 2020/21, we share our savings by charging our partners less. All charges to our shared service partners are based on actual total cost and number of members at the yearend for each service partner.



Civic Hall, Leeds

Participating employers

Analysis of employers summarised by type

There were 409 active employers at the end of the financial year. A total of 33 employers ceased their membership of the fund during the year, converted to academy status or joined multi academy trusts.

| Employers | 2020/21 | 2020/21 | 2020/21 | 2019/20 |
|----------------|------------|-----------|------------|------------|
| | Active | Ceased | Total | Total |
| Admitted body | 147 | 30 | 177 | 180 |
| Scheduled body | 262 | 3 | 265 | 307 |
| Total | 409 | 33 | 442 | 487 |

Analysis of contributions received on time and late

The table below shows the value of pension contributions received both on time and late. West Yorkshire Pension Fund receives contributions from over 420 employers every month with a total monthly value of almost £34M. Contribution payment from employer is due by the 19th of the month following the payroll month. Contributions received late were late by less than one month; therefore, no statutory late payment interest was charged.

| Contribution payment performance | 2020/21 | 2020/21 | 2020/21 | 2020/21 | 2020/21 | 2019/20 | 2019/20 |
|----------------------------------|----------------|------------------|------------------|---------------|---------------|---------------|---------------|
| | Total | Received on time | Received on time | Received late | Received late | Received late | Received late |
| | £000 | £000 | % | £000 | % | £000 | % |
| Employer contributions | 353,385 | 350,472 | 99.10 | 2,913 | 0.80 | 533 | 0.17 |
| Employee contributions | 126,785 | 125,633 | 99.10 | 1,152 | 0.90 | 207 | 0.17 |
| Total | 480,170 | 476,105 | 99.20 | 4,065 | 1.70 | 740 | 0.17 |

Data governance and monthly returns

Since April 2014 all employers who participate in the fund have been required to submit a detailed monthly return to WYPF for staff who are active members in the fund. The information collected each month includes members’ data and contribution payments made to the fund. The data is used to update members’ records on the pension administration system and as a means of reconciling contribution income received monthly.

The monthly data return process is the cornerstone of our award winning data governance process. The process has improved data governance and operational efficiency, and removed the need for a number of year-end reconciliation projects. Data posting and cash reconciliation from employers to members’ record and cash accounts are daily business as usual processes. This is enabling us to manage very strong pension regulatory compliance performance management.

| Monthly returns performance data | 2020/21 | % | 2019/20 | % | 2018/19 | % | 2017/18 |
|--|-----------|--------|-----------|--------|-----------|---------|-----------|
| Number of returns expected in the year from all employers | 9,822 | | 5,640 | | 6,015 | | 5,468 |
| Number of returns received by 19 April | 9,798 | 99.756 | 5,497 | 97.465 | 6,015 | 100.000 | 5,468 |
| Number of returns not received by 31 May | 24 | 0.244 | 8 | 0.142 | 0 | 0.000 | 0 |
| Returns processed within 10 working days | 9,193 | 93.596 | 5,375 | 95.301 | 5,465 | 90.860 | 4,490 |
| Number of records on return | 1,553,903 | | 1,211,489 | | 1,205,499 | | 1,275,273 |
| Number of new member records set up using monthly return | 21,005 | 0.014 | 20,493 | 0.017 | 20,493 | 1.700 | 23,172 |
| Number of leaver notifications processed using monthly returns | 9,865 | 0.006 | 11,492 | 0.009 | 11,492 | 0.950 | 12,091 |

Employers who made contributions to the fund during 2020/21

| PARTICIPATING EMPLOYERS | | |
|---|--|--|
| BRADFORD M.D.C | BOLTON BROW PRIMARY ACADEMY | CLAPGATE PRIMARY SCHOOL |
| LEEDS CITY COUNCIL | BOOTHROYD PRIMARY ACADEMY | CLAYTON PARISH COUNCIL |
| CALDERDALE M.B.C | BRADFORD ACADEMY | COALFIELDS REGENERATION TRUST |
| KIRKLEES M.C | BRADFORD COLLEGE | COCKBURN MULTI ACADEMY TRUST |
| WAKEFIELD M.D.C | BRADFORD DIOCESAN ACADEMIES TRUST | COLLABORATIVE LEARNING TRUST |
| ABBAY MULTI ACADEMY TRUST | BRADFORD DISTRICT CREDIT UNION | COLLINGHAM LADY ELIZABETH HASTINGS |
| ABSOLUTELY CATERING LIMITED (BATLEY MAT) | BRADSHAW PRIMARY SCHOOL | COMMUNITY ACCORD |
| ABSOLUTELY CATERING LTD (BGS) | BRAMLEY PARK ACADEMY (left 31/03/20) | COMPASS (LEEDS PFI SCHOOLS) |
| ACCORD MULTI ACADEMY TRUST | BRAMLEY ST PETERS C OF E SCHOOL | COMPASS CONTRACT SERVICES (GREEN LANE) |
| ACKWORTH PARISH COUNCIL | BRIGHOUSE ACADEMY | COMPASS CONTRACT SERVICES (LAISTERDYKE) |
| ACTIVE CLEANING LTD (CROFTON ACADEMY) | BRIGHTER FUTURES ACADEMY TRUST | COMPASS CONTRACT SERVICES (NORTHERN EDUCATION TRUST) |
| ADDINGHAM PARISH COUNCIL | BRIGSHAW LEARNING PARTNERSHIP | COMPASS CONTRACT SERVICES (PARK VIEW & EAST GARFORTH) |
| ADEL ST JOHN THE BAPTIST C E (V A) PRIMARY SCHOOL | BRITISH GAS SOCIAL HOUSING LTD | COMPASS CONTRACT SERVICES (ST JOHN FISHERS) |
| AFFINITY TRUST (left 31/03/20) | BRODETSKY JEWISH (V A) PRIMARY SCHOOL | COMPASS CONTRACT SERVICES (UK) (PONTEFRAC ACADEMIES TRUST) |
| AIREBOROUGH LEARNING PARTNERSHIP TRUST | BRONTE ACADEMY TRUST | COMPASS CONTRACT SERVICES (UK) LTD |
| ALL SAINTS C E J & I SCHOOL | BROOKSBANK SCHOOL SPORTS COLLEGE | COMPASS CONTRACT SERVICES (UK) LTD (CHARTWELL) |
| ALL SAINTS RICHMOND HILL CHURCH OF ENGLAND PRIMARY SCHOOL | BULLOUGH CONTRACT SERVICES (LEEDS CITY COLLEGE) | COMPASS CONTRACT SERVICES (UK) LTD (SHARE MAT) |
| AMEY COMMUNITY LTD BRADFORD BSF PHASE 2 FM SERVICES | BURLEY PARISH COUNCIL | COMPASS CONTRACT SERVICES (WESTBOROUGH HIGH SCHOOL) |
| AMEY COMMUNITY LTD FM SERVICES | BURNLEY ROAD ACADEMY | COMPASS CONTRACT SERVICES (WHETLEY ACADEMY) |
| AMEY INFRASTRUCTURE SERVICES LTD (WAKEFIELD) | C AND K CAREERS LTD | COMPASS CONTRACT SERVICES LTD (MANOR CROFT) |
| APCOA PARKING (UK) LIMITED | CAFCASS | CONSULTANT CLEANERS LIMITED (W Y FIRE) |
| ARAMARK LIMITED | CALDER HIGH SCHOOL | CONSULTANT CLEANERS LIMITED (WESTBOROUGH HIGH SCHOOL) |
| ARCADIS (UK) LTD | CALDERDALE COLLEGE | COOKRIDGE HOLY TRINITY C E PRIMARY SCHOOL |
| ARTS COUNCIL ENGLAND | CALVERLEY C OF E PRIMARY SCHOOL | CORPUS CHRISTI CATHOLIC COLLEGE |
| ASPENS SERVICES LTD | CARDINAL HEENAN CATHOLIC HIGH SCHOOL | CORPUS CHRISTI CATHOLIC PRIMARY SCHOOL |
| ASPENS SERVICES LTD (APPLETON ACADEMY) | CARE QUALITY COMMISSION | COTTINGLEY PRIMARY ACADEMY |
| ASPENS SERVICES LTD (OASIS ACADEMY) | CARR MANOR COMMUNITY SCHOOL | CRAFT CENTRE & DESIGN GAL. LTD |
| ASPIRE COMMUNITY BENEFIT SOCIETY LTD | CARROLL CLEANING CO LTD (LAPAGE PRIMARY SCHOOL) | CREATIVE SUPPORT LIMITED |
| ASPIRE-I | CARROLL CLEANING CO LTD (LEE MOUNT PRIMARY SCHOOL) | CRESCENT PURCHASING LTD |
| ASPIRE-IGEN LTD | CARROLL CLEANING COMPANY (NESSFIELD PRIMARY SCHOOL) | CRIGGLESTONE ST JAMES CE PRIMARY ACADEMY |
| B B G ACADEMY | CARROLL CLEANING COMPANY LIMITED (FRIZINGHALL) | CROFTON ACADEMY |
| BAILDON TOWN COUNCIL | CARROLL CLEANING COMPANY LIMITED (THORNBURY) | CROSSLEY HALL PRIMARY SCHOOL |
| BANKSIDE PRIMARY SCHOOL | CARROLL CLEANING COMPANY LTD (BIRKENSRAW PRIMARY SCHOOL) | CROW LANE PRIMARY AND FOUNDATION STAGE SCHOOL |
| BANKSIDE PRIMARY SCHOOL | CARROLL CLEANING COMPANY LTD (HOLY TRINITY PRIMARY) | DARRINGTON C OF E PRIMARY SCHOOL |
| BARDSEY PRIMARY FOUNDATION SCHOOL | CARROLL CLEANING COMPANY LTD (PEEL PARK PRIMARY SCHOOL) | DEIGHTON GATES PRIMARY FOUNDATION SCHOOL |
| BARNARDOS ASKHAM GRANGE PRISON | CARROLL CLEANING COMPANY LTD (SOUTHMERE PRIMARY ACADEMY) | DELTA ACADEMIES TRUST |
| BASKETBALL ENGLAND | CARROLL CLEANING COMPANY LTD (ST JOHNS WAKEFIELD) | DENBY DALE PARISH COUNCIL |

| PARTICIPATING EMPLOYERS | | |
|--|---|--|
| BATLEY GRAMMAR FREE SCHOOL | CARROLL CLEANING COMPANY LTD (WAKEFIELD) | DIXONS ACADEMIES CHARITABLE TRUST LTD |
| BATLEY GRAMMAR SCHOOL (BATLEY M.A.T.) | CARROLL CLEANING COMPANY LTD (WHETLEY) | Dolce (Bishop Konstant C.A.T) |
| BATLEY MULTI ACADEMY TRUST | CASTLE HALL ACADEMY | EAST NORTH EAST HOMES LEEDS |
| BECKFOOT TRUST | CASTLEFORD ACADEMY | EBOR GARDENS PRIMARY ACADEMY (left 31/03/20) |
| BEESTON HILL ST LUKES C E PRIMARY SCHOOL | CATERLINK LIMITED (BROADGATE PRIMARY SCHOOL) | ELEMENTS PRIMARY SCHOOL |
| BEESTON PRIMARY TRUST | CATERLINK LIMITED (IRELAND WOOD PRIMARY SCHOOL) | ELEVATE MULTI ACADEMY TRUST |
| BELLE ISLE TENANT MANAGEMENT ORG | CBRE MANAGED SERVICES LIMITED | ELITE CLEANING AND ENVIRONMENTAL SERVICES LTD |
| BID SERVICES | CHIEF CONSTABLE FOR WEST YORKSHIRE | ENGIE SERVICES LTD |
| BINGLEY GRAMMAR SCHOOL | CHURCHILL CONTRACT SERVICES (B B G ACADEMY) | ENHANCE ACADEMY TRUST |
| BIRSTALL PRIMARY ACADEMY | CHURCHILL CONTRACT SERVICES (BRADFORD COLLEGE SECURITY) | ENTERPRISE MANAGED SERVICES LTD |
| BLESSED CHRISTOPHER WHARTON ACADEMY TRUST | CHURCHILL CONTRACT SERVICES (BRADFORD COLLEGE) | ENVIROSERVE (CALDER HIGH SCHOOL) |
| BLESSED PETER SNOW CATHOLIC ACADEMY TRUST (CALDERDALE) | CHURCHILL CONTRACT SERVICES (OUTWOOD GRANGE ACADEMIES TRUST) | ENVIROSERVE (EBOR GARDENS PRIMARY ACADEMY) |
| BLESSED PETER SNOW CATHOLIC ACADEMY TRUST (KIRKLEES) | CHURCHILL CONTRACT SERVICES (SHARE MAT) | ENVIROSERVE (JOSEPH NORTON ACADEMY) |
| ENVIROSERVE (VICTORIA PRIMARY ACADEMY) | INTERSERVE (FACILITIES MANAGEMENT) LTD (P.C.C FOR WEST YORKSHIRE) (left 31/03/20) | LOCALA (CALDERDALE) |
| ETHOS ACADEMY TRUST | INTERSERVE (FACILITIES MANAGEMENT) LTD (W Y POLICE CLEANING CONTRACT) | LONGROYDE JUNIOR SCHOOL |
| EXCEED ACADEMIES TRUST | INTERSERVE CATERING SERVICES LIMITED | MAKING SPACE |
| FALCON EDUCATION ACADEMIES TRUST | INTERSERVE INTEGRATED SERVICES LTD | MAST ACADEMY TRUST |
| FEATHERSTONE ACADEMY (left 31/03/20) | IQRA ACADEMY | MEANWOOD C E (VA) PRIMARY SCHOOL |
| FEVERSHAM EDUCATION TRUST | IQRA ACADEMY (FEVERSHAM EDUCATION TRUST) | MEARS LTD (SOUTH) |
| FEVERSHAM PRIMARY ACADEMY | JERRY CLAY ACADEMY | MEARS LTD (WEST) |
| FIELDHEAD JUNIOR INFANT AND NURSERY ACADEMY | JOHN SMEATON ACADEMY | MELLORS CATERING SERVICES (SOUTHFIELD GRANGE) |
| FIRST WEST YORKSHIRE LTD | JOSEPH NORTON ACADEMY (left 31/03/20) | MELLORS CATERING SERVICES LTD (CAVENDISH PRIMARY) |
| FLEET FACTORS LTD | KEELHAM PRIMARY SCHOOL | MELTHAM TOWN COUNCIL |
| FOXHILL PRIMARY SCHOOL | KEEPMOAT PROPERTY SERVICES LIMITED | MENSTON PARISH COUNCIL |
| FUTURE CLEANING SERVICES LIMITED (CALDER HIGH) | KEIGHLEY TOWN COUNCIL | MICKLEFIELD PARISH COUNCIL |
| GOLCAR JUNIOR INFANTS AND NURSERY SCHOOL | KHALSA SCIENCE ACADEMY | MINSTHORPE ACADEMY TRUST |
| GREENHEAD SIXTH FORM COLLEGE | KILLINGHALL PRIMARY SCHOOL | MITIE LIMITED (LEEDS SCHOOLS PFI) |
| GROUNDWORK LEEDS | KING JAMES'S SCHOOL | MITIE PFI LIMITED |
| GROUNDWORK WAKEFIELD | KIRKBURTON PARISH COUNCIL | MOORLANDS LEARNING TRUST |
| HALIFAX OPPORTUNITIES TRUST (CALDERDALE) | KIRKLEES ACTIVE LEISURE | MORLEY TOWN COUNCIL |
| HANSON SCHOOL | KIRKLEES CITIZENS ADVICE AND LAW CENTRE | MOUNT ST MARYS CATHOLIC HIGH SCHOOL |
| HAWKSWORTH C E (VA) PRIMARY SCHOOL | KIRKLEES COLLEGE | MOUNTAIN HEALTHCARE LTD (W Y POLICE) |
| HEBDEN ROYD TOWN COUNCIL | KIRKLEES NEIGHBOURHOOD HSE LTD | MYRTLE PARK PRIMARY SCHOOL |
| HECKMONDWIKE GS ACADEMY TRUST | KIRKSTALL ST STEPHENS C E (VA) PRIMARY SCHOOL | N.I.C. SERVICES GROUP LIMITED (MIDDLETON ST MARYS LEEDS) |
| HEMSWORTH TOWN COUNCIL | LADY ELIZABETH HASTINGS SCHOOL | NATIONAL COAL MINING MUSEUM FOR ENGLAND |
| HEPWORTH GALLERY TRUST | LAISTERDYKE LEADERSHIP ACADEMY | NEW COLLABORATIVE LEARNING TRUST |
| HF TRUST LIMITED (left 31/03/20) | LANE END PRIMARY TRUST | NINELANDS PRIMARY SCHOOL |
| HILL TOP FIRST SCHOOL | LEARNING ACCORD MULTI ACADEMY TRUST | NORMANTON TOWN COUNCIL |
| HOLLY BANK TRUST | LEEDS AND BRADFORD INTERNATIONAL AIRPORT | NORTH HALIFAX GRAMMAR ACADEMY |
| HOLME VALLEY PARISH COUNCIL | LEEDS APPROPRIATE ADULT SERVICE | NORTH HALIFAX PARTNERSHIP LTD |
| HOLY FAMILY CATHOLIC (VA) PRIMARY SCHOOL | LEEDS ARTS UNIVERSITY | NORTHERN AMBITION ACADEMIES TRUST |
| HOLY ROSARY AND ST ANNES CATHOLIC PRIMARY SCHOOL | LEEDS BECKETT UNIVERSITY | NORTHERN EDUCATION TRUST |

| PARTICIPATING EMPLOYERS | | |
|---|--|--|
| HOLY TRINITY PRIMARY C OF E ACADEMY | LEEDS C.A.B. | NORTHERN SCH.OF CONTEMP DANCE |
| HORBURY BRIDGE CE J AND I SCHOOL | LEEDS CENTRE FOR INTEGRATED LIVING | NORTHERN STAR ACADEMIES TRUST |
| HORSFORTH SCHOOL ACADEMY | LEEDS CITY ACADEMY | NORTHORPE HALL CHILD AND FAMILY TRUST |
| HORSFORTH TOWN COUNCIL | LEEDS CITY COLLEGE | NOTRE DAME SIXTH FORM COLLEGE |
| HORTON HOUSING ASSOCIATION (BRADFORD) | LEEDS COLLEGE OF BUILDING | NPS LEEDS LIMITED |
| HUDDERSFIELD NEW COLLEGE | LEEDS COLLEGE OF MUSIC | NURTURE ACADEMIES TRUST |
| HUGH GAITSKELL PRIMARY SCHOOL TRUST | LEEDS EAST PRIMARY PARTNERSHIP TRUST | OASIS ACADEMY LISTER PARK |
| HUMANKIND CHARITY (LEEDS) | LEEDS GRAND THEATRE & OPERA HSE | OFSTED |
| HUNSLET ST JOSEPHS CATHOLIC (VA) PRIMARY SCHOOL | LEEDS JEWISH FREE SCHOOL | OLD EARTH ACADEMY |
| HUNSLET ST MARYS C E (VA) PRIMARY SCHOOL | LEEDS M.I.N.D | ONE IN A MILLION FREE SCHOOL |
| HUTCHISON CATERING LTD (GUISELEY SCHOOL) | LEEDS NORTH WEST EDUCATION PARTNERSHIP | OPEN COLLEGE NETWORK YORKS & HUMBER (TRADING AS CERTA) |
| I S S MEDICLEAN LTD | LEEDS SOCIETY FOR THE DEAF & BLIND | OSSETT TRUST |
| ILKLEY PARISH COUNCIL | LEEDS TRINITY UNIVERSITY | OTLEY TOWN COUNCIL |
| IMMACULATE HEART OF MARY CATHOLIC PRIMARY SCHOOL | LEODIS ACADEMIES TRUST | OUR LADY OF GOOD COUNSEL CATHOLIC PRIMARY SCHOOL |
| IMPACT EDUCATION MULTI ACADEMY TRUST | LIBERTY GAS OUTER WEST | OUTWOOD ACADEMY FREESTON |
| INCOMMUNITIES | LIBERTY GAS WEST | OUTWOOD ACADEMY HEMSWORTH |
| INNOVATE SERVICES LTD (CROSSFLATTS) | LIDGET GREEN COMMUNITY CO-OPERATIVE LEARNING TRUST | OUTWOOD ACADEMY WAKEFIELD CITY |
| INSPIRE PARTNERSHIP MULTI ACADEMY TRUST | LIGHTHOUSE SCHOOL | OUTWOOD GRANGE ACADEMY |
| INTERACTION AND COMMUNICATION ACADEMY TRUST | LINDLEY C E INFANT ACADEMY | OUTWOOD PRIMARY ACADEMY BELL LANE |
| INTERACTION AND COMMUNICATION ACADEMY TRUST (HIGH PARK) | LINDLEY JUNIOR SCHOOL ACADEMY TRUST | OUTWOOD PRIMARY ACADEMY KIRKHAMGATE |
| INTERSERVE (FACILITIES MANAGEMENT) LTD | LOCALA | OUTWOOD PRIMARY ACADEMY LEDGER LANE |
| OUTWOOD PRIMARY ACADEMY LOFTHOUSE GATE | SITLINGTON PARISH COUNCIL | THE BISHOP WHEELER CATHOLIC ACADEMY TRUST |
| OUTWOOD PRIMARY ACADEMY NEWSTEAD GREEN | SKILLS FOR CARE LIMITED | THE CO-OPERATIVE ACADEMIES TRUST |
| OUTWOOD PRIMARY ACADEMY PARK HILL | SODEXO LTD | THE CROSSLEY HEATH ACADEMY TRUST |
| OWLCOTES MULTI ACADEMY TRUST | SOUTH ELMSALL TOWN COUNCIL | THE FAMILY OF LEARNING TRUST |
| PADDOCK JUNIOR INFANT AND NURSERY SCHOOL | SOUTH HIENDLEY PARISH COUNCIL | THE GORSE ACADEMIES TRUST |
| PENNINE ACADEMIES YORKSHIRE | SOUTH KIRKBY AND MOORTHORPE TOWN COUNCIL | THE GREETLAND ACADEMY TRUST |
| PINNACLE (W Y POLICE) | SOUTH OSSETT INFANTS ACADEMY | THE JOHN CURWEN CO-OPERATIVE PRIMARY ACADEMY |
| PINNACLE FM LIMITED (KIRKLEES) | SOUTH PENNINE ACADEMIES | THE LANTERN LEARNING TRUST |
| PINNACLE FM LTD | SOUTHFIELD GRANGE TRUST | THE MFG ACADEMIES TRUST |
| PONTEFRACT ACADEMIES TRUST | SOUTHWAY AT THE RODILLIAN ACADEMY LTD | THE POLICE AND CRIME COMMISSIONER FOR WEST YORKSHIRE |
| POOL PARISH COUNCIL | SPEN VALLEY FOUNDATION TRUST | THORNHILL JUNIOR AND INFANT SCHOOL |
| POSSABILITIES CIC | SPIE LTD | THORNTON PRIMARY SCHOOL |
| PRIESTHORPE SCHOOL TRUST | SPRINGWELL ACADEMY LEEDS (left 31/03/20) | THORP ARCH LADY ELIZABETH HASTINGS C E (VA) PRIMARY SCHOOL |
| PRIESTLEY ACADEMY TRUST | SSE CONTRACTING LTD | TNS CATERING (SPTA) |
| PRIMROSE LANE PRIMARY FOUNDATION SCHOOL | ST ANNE'S (BRADFORD) COMMUNITY SERVICES | TNS CATERING MAN LTD (ST BOTOLPHS) |
| PROGRESS TO CHANGE (CARDIGAN HOUSE) | ST ANNE'S COMMUNITY SERVICES | TODMORDEN TOWN COUNCIL |
| PROGRESS TO CHANGE (RIPON HOUSE) | ST ANTHONYS CATHOLIC (VA) PRIMARY SCHOOL | TOGETHER HOUSING ASSOCIATION LTD (GREENVALE) |
| PROSPECTS SERVICES (BRADFORD 3) | ST AUGUSTINES CATHOLIC PRIMARY SCHOOL | TOGETHER HOUSING ASSOCIATION LTD (PENNINE) |
| PROV CARLTON BOLLING COLLEGE | ST EDWARDS CATHOLIC (VA) PRIMARY SCHOOL | TONG LEADERSHIP ACADEMY |
| PROV NORSE COMMERCIAL SERVICES LTD (WELLSPRING ACADEMY TRUST) | ST FRANCIS CATHOLIC PRIMARY SCHOOL | TRINITY ACADEMY HALIFAX |
| PROV WRAT CLEANING CONTRACT | ST FRANCIS OF ASSISI CATHOLIC (VA) PRIMARY SCHOOL | TURNING LIVES AROUND |
| PUDSEY GRANGFIELD SCHOOL | ST GREGORY THE GREAT CATHOLIC ACADEMY TRUST | TURNING POINT (left 31/03/20) |

| PARTICIPATING EMPLOYERS | | |
|--|---|--|
| PUDSEY SOUTHROYD PRIMARY SCHOOL TRUST | ST JOHN'S (CE) PRIMARY ACADEMY TRUST | TURNING POINT (WAKEFIELD) |
| RAINBOW PRIMARY FREE SCHOOL | ST JOHN'S APPROVED PREMISES LIMITED | UNITED RESPONSE |
| RASTRICK HIGH SCHOOL ACADEMY TRUST | ST JOHN'S PRIMARY ACADEMY RISHWORTH | UNIVERSITY ACADEMY KEIGHLEY |
| RAWDON PARISH COUNCIL | ST JOSEPHS CATHOLIC (VA) PRIMARY SCHOOL WETHERBY | UNIVERSITY OF BRADFORD |
| RED KITE LEARNING TRUST (HARROGATE HR HUB) | ST JOSEPHS RC PRIMARY SCHOOL (TODMORDEN) RCAT | UNIVERSITY OF HUDDERSFIELD |
| RED KITE LEARNING TRUST (LEEDS EAST HR HUB) | ST MATTHEWS C E PRIMARY SCHOOL | UNIVERSITY TECHNICAL COLLEGE LEEDS |
| REEVY HILL PRIMARY SCHOOL | ST MICHAEL & ALL ANGELS J & I | VICTORIA PRIMARY ACADEMY (left 31/03/20) |
| RENEWI UK SERVICES LIMITED | ST NICHOLAS CATHOLIC PRIMARY SCHOOL | W.Y. FIRE & RESCUE AUTHORITY |
| RODILLIAN ACADEMY | ST OSWALDS CHURCH OF ENGLAND PRIMARY SCHOOL | WAKEFIELD & DISTRICT HOUSING LTD |
| ROOK'S NEST ACADEMY | ST PATRICKS CATHOLIC (VA) PRIMARY SCHOOL | WAKEFIELD CITY ACADEMIES TRUST |
| ROTHWELL ST MARYS CATHOLIC (VA) PRIMARY SCHOOL | ST PAULS CATHOLIC (VA) PRIMARY SCHOOL (left 31/03/20) | WAKEFIELD COLLEGE |
| ROUNDHAY ST JOHNS C E (VA) PRIMARY SCHOOL | ST PETERS C E PRIMARY SCHOOL | WAKEFIELD M.D.C. COUNCILLORS |
| ROYDS COMMUNITY ASSOCIATION | ST PHILIPS CATHOLIC PRIMARY SCHOOL | WATERTON ACADEMY TRUST |
| ROYDS LEARNING TRUST | ST THERESAS CATHOLIC PRIMARY SCHOOL | WEST YORKSHIRE COMBINED AUTHORITY |
| RUSSELL HALL FIRST SCHOOL | ST URBANS CATHOLIC (VA) PRIMARY SCHOOL | WEST. YORKS. POLICE CIVILIAN |
| RYBURN VALLEY ACADEMY | ST VINCENT DE PAUL SOCIETY (ENGLAND & WALES) | WESTWOOD PRIMARY SCHOOL TRUST |
| RYHILL PARISH COUNCIL | STAR ACADEMIES TRUST | WETHERBY HIGH SCHOOL |
| SACRED HEART CATHOLIC (VA) PRIMARY SCHOOL | STRAWBERRY FIELDS PRIMARY SCHOOL | WETHERBY TOWN COUNCIL |
| SALENDINE NOOK ACADEMY TRUST | SUEZ RECYCLING AND RECOVERY UK LIMITED | WHINMOOR ST PAULS C E PRIMARY SCHOOL |
| SALTERLEE ACADEMY TRUST | TAYLOR SHAW LIMITED (GORSE ACADEMIES TRUST) | WHITEHILL COMMUNITY ACADEMY |
| SALTERLEE J & I SCHOOL | TAYLOR SHAW LIMITED (GORSE AT ELLIOTT HUDSON COLLEGE) | WILLIAM HENRY SMITH SCHOOL |
| SCOUT ROAD ACADEMY | TAYLORSHAW LTD (COOKRIDGE HOLY TRINITY SCHOOL) | WILSDEN PRIMARY SCHOOL |
| SEA FISH INDUSTRY AUTHORITY | TAYLORSHAW LTD (CROSSGATES BEECHWOOD WHITELAITH) | WOLSELEY UK LTD |
| SERVEST (B B G ACADEMY) | TAYLORSHAW LTD (FIELDHEAD GRIMES MANSTON) | WOODKIRK ACADEMY |
| SHARE MULTI ACADEMY TRUST | TAYLORSHAW LTD (PARKLANDS PRIMARY) | WOODSIDE ACADEMY |
| SHIBDEN HEAD PRIMARY ACADEMY | TAYLORSHAW LTD (SWARCLIFFE PRIMARY SCHOOL) | WORTH VALLEY PRIMARY SCHOOL |
| SHIPLEY COLLEGE | THE ANAH PROJECT | WRAT - LEEDS EAST ACADEMY |
| SHIRLEY MANOR PRIMARY ACADEMY | THE BISHOP KONSTANT CATHOLIC TRUST | WRAT - LEEDS WEST ACADEMY |
| YORKSHIRE PURCHASING ORGANISATION | | |

Benefits paid

West Yorkshire Pension fund pays almost 141,000 pensioner and beneficiaries with a gross pension payroll in excess of £56m each month for West Yorkshire members and pension members of pension funds participating in our shared services. Only West Yorkshire Pension Fund members are charged to the account in this financial statement.

Shared service provision

In addition to the local government pensions paid each month, West Yorkshire Pension Fund also provides a pensions administration and payroll service for the following organisations.

| | Service type | Shared service partners |
|----|--------------|--|
| 1 | LGPS | Lincolnshire LGPS |
| 2 | LGPS | LB Hounslow LGPS |
| 3 | LGPS | LB Barnet LGPS |
| 4 | FIRE | West Yorkshire Fire |
| 5 | FIRE | South Yorkshire Fire |
| 6 | FIRE | North Yorkshire Fire |
| 7 | FIRE | Humberside Fire |
| 8 | FIRE | Lincolnshire Fire |
| 9 | FIRE | Royal Berkshire Fire |
| 10 | FIRE | Buckinghamshire and Milton Keynes Fire |
| 11 | FIRE | Devon and Somerset Fire |
| 12 | FIRE | Dorset and Wiltshire Fire |
| 13 | FIRE | Tyne and Wear Fire |
| 14 | FIRE | Northumberland Fire |
| 15 | FIRE | Norfolk Fire |
| 16 | FIRE | Staffordshire Fire |
| 17 | FIRE | Hereford and Worcester Fire |
| 18 | FIRE | East Sussex Fire |
| 19 | FIRE | Durham and Darlington Fire |
| 20 | FIRE | Leicestershire Fire |
| 21 | FIRE | Nottinghamshire Fire |
| 22 | FIRE | Derbyshire Fire |

The combined shared service membership for the 2019/20 financial year is shown in the following table.

Section FINANCIAL AND MANAGEMENT PERFORMANCE

| | Service type | Shared service partners | 2020/21 Active | 2020/21 Pensioners | 2020/21 B'ficiaries | 2020/21 Deferred | 2020/21 Undecided | 2020/21 Frozen | 2020/21 Total | 2019/20 Total |
|----|--------------|--|-------------------|-----------------------|------------------------|---------------------|----------------------|-------------------|------------------|------------------|
| | LGPS | W Yorkshire PF | 101,080 | 89,346 | 11,523 | 85,696 | 1,678 | 8,985 | 298,308 | 294,447 |
| 1 | LGPS | Lincolnshire LGPS | 23,002 | 22,141 | 2,444 | 26,126 | 567 | 2,490 | 76,770 | 76,734 |
| 2 | LGPS | LB Hounslow LGPS | 6,550 | 6,722 | 889 | 7,728 | 195 | 1,382 | 23,466 | 23,875 |
| 3 | LGPS | LB Barnet LGPS | 8,184 | 7,605 | 982 | 10,032 | 1,503 | 974 | 29,280 | 0 |
| 4 | FIRE | West Yorkshire Fire | 989 | 2,095 | 335 | 278 | 3 | 2 | 3,702 | 3,703 |
| 5 | FIRE | South Yorkshire Fire | 593 | 1,132 | 193 | 134 | 4 | 10 | 2,066 | 2,020 |
| 6 | FIRE | North Yorkshire Fire | 608 | 531 | 89 | 403 | 1 | 1 | 1,633 | 1,589 |
| 7 | FIRE | Humberside Fire Authority | 694 | 921 | 152 | 269 | 10 | 2 | 2,048 | 2,036 |
| 8 | FIRE | Lincolnshire Fire | 580 | 314 | 60 | 626 | 26 | 25 | 1,631 | 1,613 |
| 9 | FIRE | Royal Berkshire Fire | 413 | 460 | 54 | 199 | 2 | 1 | 1,129 | 1,132 |
| 10 | FIRE | Buckinghamshire and Milton Keynes Fire | 349 | 399 | 82 | 349 | 5 | 5 | 1,189 | 1,144 |
| 11 | FIRE | Devon and Somerset Fire | 1,579 | 1,255 | 190 | 1027 | 14 | 14 | 4,079 | 3,982 |
| 12 | FIRE | Dorset and Wiltshire Fire | 1000 | 853 | 106 | 667 | 10 | 6 | 2,642 | 2,558 |
| 13 | FIRE | Tyne and Wear Fire | 531 | 1,245 | 189 | 99 | 5 | 0 | 2,069 | 2,053 |
| 14 | FIRE | Northumberland Fire | 238 | 318 | 55 | 212 | 5 | 2 | 830 | 836 |
| 15 | FIRE | Norfolk Fire | 653 | 481 | 86 | 294 | 18 | 1 | 1,533 | 1,478 |
| 16 | FIRE | Staffordshire Fire | 571 | 680 | 126 | 644 | 2 | 1 | 2,024 | 2,006 |
| 17 | FIRE | Hereford and Worcester Fire | 576 | 467 | 68 | 338 | 10 | 0 | 1,459 | 1,466 |
| 18 | FIRE | Durham and Darlington Fire | 467 | 532 | 96 | 228 | 0 | 0 | 1,323 | 1,257 |
| 19 | FIRE | East Sussex Fire | 558 | 549 | 105 | 353 | 3 | 4 | 1,572 | 0 |
| 20 | FIRE | Derbyshire Fire | 655 | 675 | 108 | 373 | 1 | 13 | 1,825 | 0 |
| 21 | FIRE | Leicestershire Fire | 530 | 603 | 82 | 307 | 2 | 13 | 1,537 | 0 |
| 22 | FIRE | Nottinghamshire Fire | 630 | 798 | 122 | 384 | 0 | 7 | 1,941 | 0 |
| | | Total | 151,030 | 140,122 | 18,136 | 136,766 | 4,064 | 13,938 | 464,056 | 423,929 |

Pension overpayment

Occasionally pensions are paid in error. When this happens, we have processes in place to recover the overpayments. The table below shows a summary of the value of the overpayments involved. Every effort is made to recover these, whilst managing the financial and social impact on overpaid pensioners.

| Overpayments | 2020/21 | 2019/20 | 2018/19 | 2017/18 | 2016/17 |
|--------------------------|---------|---------|---------|---------|---------|
| | £000 | £000 | £000 | £000 | £000 |
| Annual payroll | 550,077 | 553,082 | 394,445 | 380,862 | 370,147 |
| Overpayments | 440 | 331 | 626 | 76 | 315 |
| Overpayments written off | 8 | 27 | 7 | 7 | 17 |
| Overpayments recovered | 238 | 62 | 359 | 161 | 217 |

The table below shows a summary of transactions processed during the year.

| Analysis of overpayments | 2020/21 | 2019/20 | 2018/19 | 2017/18 | 2016/17 |
|-----------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| | No. of payments |
| Number of pensions paid | 2,606,794 | 1,160,604 | 1,096,524 | 1,042,404 | 1,036,008 |
| Number of cases overpaid | 1564 | 295 | 365 | 54 | 479 |
| Number of cases written off | 4 | 36 | 6 | 29 | 18 |
| Number of cases recovered | 543 | 225 | 270 | 262 | 332 |

Fraud prevention – National Fraud Initiative

West Yorkshire Pension Fund takes part twice a year in the National Fraud Initiative (NFI). The data that is submitted by the fund includes pensioners, beneficiaries and deferred member information for LGPS and fire services pension members managed by the fund.

A summary of five year results of these exercises is shown below.

| | Number of records sent | Number of mismatches | Number of mismatches % | Overpayments | Overpayments % | Possible Frauds | mismatches carried forward at 31 March |
|---------|------------------------|----------------------|------------------------|--------------|----------------|-----------------|--|
| 2020/21 | 286,429 | 963 | 0.34 | 4 | 0.00 | 0 | 1 |
| 2019/20 | 277,293 | 3,845 | 1.40 | 17 | 0.01 | 2 | 10 |
| 2018/19 | 260,387 | 3,339 | 1.28 | 3 | 0.00 | 2 | 2 |
| 2017/18 | 229,994 | 518 | 0.23 | 35 | 0.02 | 2 | 10 |
| 2016/17 | 224,122 | 1,425 | 0.64 | 5 | 0.00 | 4 | 5 |
| 2015/16 | 219,313 | 868 | 0.40 | 61 | 0.03 | 3 | 10 |

Internal Audits completed during 2020/21

The Internal Audit function for the West Yorkshire Pension Fund is carried out by Bradford Council; each year an agreed number of planned audits are performed on financial systems and procedures across the organisation. Listed below is a summary of reviews that were carried out during the financial year 2020/21.

Transfer of Custodial Arrangements

This piece of work looked at the high level controls in place to manage the transfer of assets to the new custodial provider, the Northern Trust Bank. No issues were identified as a result of this audit.

Pensioners Payroll

The pensioner's payroll process was reviewed, the majority of these payments are made, mainly on a monthly basis, to almost 141,000 pensioners. The process was found to be well controlled and did not result in any recommendations being made.

New Pensions and Lump Sums Flexible Retirements

This audit examined the calculation of the annual pension and the lump sum following a member's decision to retire on a flexible basis. The standard of control in this process was found to be good, with two recommendations for improvement being made.

Transfers Out

This was an audit of the risks to the process where individuals cease to be employed by an admitted body of the West Yorkshire Pension Fund and transfer their pension benefits into a new pension scheme. The control environment was found to be of an excellent standard with no recommendations arising from the work carried out.

Review of the West Yorkshire Pension Fund 2019/20 Accounts

This is an annual account review process, that ensures the final account is consistent with internal control reviews carried out by our Internal Audit Team during the year.

New Pensions and Lump Sums Fire and Rescue Authorities

West Yorkshire Pension Fund provides an administration service for the payment of nineteen fire and rescue authority pensions. This audit examined the calculation of the annual pension and the lump sum following a Fire Pension member's decision to retire. The control environment was largely as required resulting in one recommendation for improvement.

Equities

Since November 2019, all quoted investments are now held under the custody of the Northern Trust Bank (previously HSBC), and represent a significant proportion of the West Yorkshire Pension Fund investment portfolio, the annual audit review of this asset class found the process to be well controlled.

Treasury Management

This audit reviewed the arrangements in place for Treasury Management, to ensure that surplus cash is invested in the most appropriate ways. Controls in this area were found to be excellent.

GLIL

This is an infrastructure investment partnership, which in addition to WYPF also includes the Local Pension Partnership, Lancashire County, Greater Manchester and Merseyside Pension Funds, under a partnership agreement. The audit focused on the risks associated with investment through this partnership and resulted in one recommendation for improvement.

WYPF Quality Management

ISO 9001:2015

WYPF is an ISO 9001:2015 accredited service provider. All WYPF's services are quality assured using rigorous quality management systems and assessed by external assessors. WYPF first achieved accreditation in 1994, and has successfully maintained this accreditation since.

The purpose of the ISO 9001:2015 certification is to ensure that WYPF provides quality Local Government Pension Scheme administration to employers, members and beneficiaries within the scope of Local Government Pension Scheme regulations and the Firefighters' Pension Scheme order.

WYPF quality policy

- We will provide an efficient and effective service to all our scheme members by responding quickly to requests for information and advice.
- We will provide an efficient and effective service to all beneficiaries, i.e. current pensioners, dependants and deferred members and receivers of early leaver benefits by paying correct benefits on time.
- We will provide an efficient and effective service to all employers whose employees participate in a pension scheme administered by WYPF, respond quickly to requests for information, advice and training, and provide detailed guidance on implications of any new legislation affecting the scheme.

Quality management system

As part of the quality management system, several systems and procedures have been put in place to ensure our service continually improves. These include:

- having procedures in place for dealing with customer complaints and faults and ensuring appropriate corrective and preventative actions are taken
- conducting internal quality audits to ensure quality is maintained and to identify improvements
- monitoring our processes to obtain statistical data on our efficiency in calculating and paying pensions, so we can ensure benefits are paid on time
- surveying customers about their experience of our service, and
- holding regular service review meetings to review service performance and quality issues.

Information Security Management System ISO 27001

WYPF achieved accreditation to ISO27001 Information Security Management Certificate in April 2019.

This accreditation is particularly important to WYPF as it highlights our continued commitment to information security and provides assurance to our members and customers that we have the ability to protect their data and corporate reputation at all times. An ISMS (Information Security Management System) is a systematic approach to managing sensitive personal and company information so that it remains secure. It includes people, processes and IT systems by applying a risk management process.

Management and customer service key performance indicators

WYPF monitors its performance against several key performance indicators (KPIs). All aspects of our administrative structure, processes and systems are reviewed on a planned cycle.

Our key performance indicators during the year measured against our targets are shown in the table below. The table highlights critical business areas impacting on pensioners and their families takes priority.

| | Work type | Total cases | Target days | Target cases met | KPI target | Actual KPI | Actual KPI |
|----|--|-------------|------------------|------------------|------------|------------|------------|
| | | 2020/21 | 2020/21 | 2020/21 | 2020/21 | 2020/21 | 2019/20 |
| | | | | | | % | % |
| | | | | | | % | % |
| 1 | Payment of pensioners (WYPF LG pensioners and beneficiaries) | 1,899,096 | Paid on due days | 1,899,096 | 100 | 100.00 | 100 |
| 2 | Change of address | 3,844 | 10 | 3,682 | 85 | 95.79 | 94.7 |
| 3 | Change to bank details | 1,313 | 10 | 1,241 | 85 | 94.52 | 87.3 |
| 4 | Death grant nomination | 9,134 | 20 | 9,113 | 85 | 99.77 | 99.4 |
| 5 | Death grant payments | 2,980 | 5 | 2,773 | 85 | 93.05 | 96.9 |
| 6 | Death in retirement | 251 | 10 | 223 | 85 | 88.84 | 93.9 |
| 7 | Deferred benefits | 3,742 | 35 | 3,617 | 85 | 96.66 | 97.2 |
| 8 | Deferred Benefits Into Payment Actual | 3,209 | 5 | 2,832 | 90 | 88.25 | 80.8 |
| 9 | Divorce quote | 463 | 20 | 423 | 85 | 91.36 | 96.2 |
| 10 | Life certificate received | 148 | 10 | 119 | 85 | 80.41 | 96.7 |
| 11 | Monthly posting | 5,091 | 10 | 4,866 | 95 | 95.58 | 96.8 |
| 12 | Payroll changes | 1,990 | 10 | 1,965 | 85 | 98.74 | 87.3 |
| 13 | Pension estimate | 4,653 | 10 | 4,481 | 75 | 96.30 | 83.4 |
| 14 | Refund payment | 1,909 | 10 | 1,875 | 95 | 98.22 | 98.6 |
| 15 | Refund quote | 2,464 | 35 | 2,449 | 85 | 99.39 | 97 |
| 16 | Retirement actual | 3,157 | 3 | 2,927 | 90 | 92.71 | 92.9 |
| 17 | Transfer out payment | 217 | 35 | 195 | 85 | 89.86 | 92.2 |
| 18 | Transfer-in payment | 548 | 35 | 520 | 85 | 94.89 | 96.5 |
| 19 | Transfer-in quote | 801 | 35 | 798 | 85 | 99.63 | 99.7 |
| 20 | Transfer-out quote | 1,435 | 20 | 1,093 | 85 | 76.17 | 92.9 |



Jowett vehicles at Bradford Industrial Museum

Cost per member

| Cost per member | West Yorkshire Pension Fund | Position | West Yorkshire Pension Fund | LGPS lowest | LGPS highest | Average LGPS |
|---|-----------------------------|------------------------|-----------------------------|------------------------|------------------------|------------------------|
| | 2020/21 Financial Statement | 2019/20 Gov't data SF3 | 2019/20 Gov't data SF3 | 2019/20 Gov't data SF3 | 2019/20 Gov't data SF3 | 2019/20 Gov't data SF3 |
| Admin cost per member | £13.42 | 7th | £16.23 | £0.74 | £118.78 | £23.50 |
| Investment cost per member | £17.19 | 1st | £22.83 | £20.68 | £774.27 | £278.76 |
| Oversight and governance | £2.92 | 5th | £2.88 | £0.00 | £52.64 | £12.21 |
| Total cost per member | £33.53 | 1st | £41.94 | | | |
| Lowest / Highest / Average (not a sum of figures in the table above) | | | | £41.94 | £829.30 | £245.41 |

2020/21 WYPF Cost per member

The 2020/21 annual cost of administering the West Yorkshire Pension Fund per member is £13.42, investment management £17.19, oversight and governance £2.92 giving a total management cost per member of £33.53. These figures compare favourably with the average cost for authorities in the Ministry of Housing Communities & Local Government (MHCLG) – SF3 data collection results for the previous year shown in the table above.

2019/20 Administration cost per member

From the latest data provided by government WYPF pension administration cost is the 7th lowest amongst LGPS fund in England & Wales for 2019/20, cost of £16.23 per member, the lowest cost is £ 0.74 and the highest is £118.78.

2019/20 Investment management cost per member

WYPF investment management cost is the second lowest cost per member in the latest result at £22.83, the lowest £20.68 and the highest cost is £553.02. The reason for this low cost is because WYPF use directly employed staff to manage investments and a centralised office support for both investment management and pension administration.

2019/20 Oversight and governance cost per member

On oversight and governance, WYPF cost is the 5th lowest cost at £2.92. The lowest is £0 and the highest is £52.64.

2019/20 Total cost per member

WYPF has the lowest total cost per member (administration, investment and oversight & governance) at £41.94, the national average for LGPS in 2019/20 is £245.41 and the highest is £829.30.

Staff numbers

| | 2020/21 | 2019/20 | 2018/19 | 2017/18 | 2016/17 | 2015/16 |
|------------------------|---------------|--------------|--------------|--------------|------------|--------------|
| | FTE | FTE | FTE | FTE | FTE | FTE |
| Investments | 23.91 | 22.7 | 22.1 | 21.6 | 19.6 | 19.6 |
| Service centre staff | 52.44 | 54.8 | 59.5 | 58.1 | 54.7 | 53.2 |
| Payroll | 17.3 | 16.1 | 17.6 | 19 | 16.6 | 17.6 |
| ICT/UPM staff | 14.43 | 15.4 | 14.4 | 13.7 | 12.6 | 12.6 |
| Finance staff | 11.81 | 12 | 14.5 | 16 | 14 | 14 |
| Business support staff | 27.39 | 28.4 | 28.8 | 27.4 | 26 | 24.1 |
| Technical | 4.95 | 4.9 | 4.9 | 3.9 | 4.5 | 4.6 |
| Total | 152.23 | 154.3 | 161.8 | 159.7 | 148 | 145.7 |

Membership trends over a five-year period

Fund membership continues to grow, with a total membership, including undecided leavers and frozen refunds, of 298,307 as at 31 March 2021. Active members are employed by 451 separate organisations.

| | 2020/21 | % change | 2019/20 | % change | 2018/19 | % change | 2017/18 | % change | 2016/17 |
|-------------------|----------------|--------------|----------------|--------------|----------------|--------------|----------------|--------------|----------------|
| Active members | 101,079 | 0.80% | 100,281 | 0.20% | 100,060 | -1.90% | 102,017 | 0.10% | 101,881 |
| Pensioners | 89,346 | 4.72% | 85,323 | 7.20% | 79,583 | 5.60% | 75,363 | 1.00% | 74,630 |
| Beneficiaries | 11,523 | 1.13% | 11,394 | -3.40% | 11,794 | 2.50% | 11,504 | -1.70% | 11,704 |
| Deferred members | 85,696 | -1.30% | 86,821 | -2.70% | 89,241 | 2.10% | 87,414 | 4.40% | 83,763 |
| Undecided leavers | 1,678 | 33.60% | 1,256 | -29.00% | 1,770 | -32.50% | 2,623 | -54.50% | 5,768 |
| Frozen refunds | 8,985 | -4.13% | 9,372 | 3.40% | 9,066 | 20.10% | 7,550 | 6.70% | 7,074 |
| Total | 298,307 | 1.31% | 294,447 | 1.01% | 291,514 | 1.76% | 286,471 | 0.58% | 284,820 |

Admissions to the fund

Employees joining the fund were as follows.

| | 2020/21 | 2019/20 | 2018/19 | 2017/18 |
|--|---------------|---------------|---------------|---------------|
| Employees joining with no previous service | 20,306 | 21,153 | 21,283 | 21,692 |
| Employees with transfers from other local government funds | 23 | 42 | 31 | 25 |
| other pension schemes | 249 | 415 | 245 | 329 |
| Total | 20,578 | 21,610 | 21,559 | 22,046 |

Withdrawals from the fund

Benefits awarded to members leaving employment were as follows.

| | 2020/21 | 2019/20 | 2018/19 | 2017/18 |
|---|--------------|---------------|---------------|---------------|
| Members awarded immediate retirement benefits | 3,151 | 2,801 | 2,754 | 2,865 |
| Benefits awarded on death in service | 117 | 94 | 106 | 88 |
| Members leaving with entitlement to deferred benefits, transfer of pension rights or a refund | 5,602 | 7,560 | 9,875 | 9,192 |
| Total | 8,870 | 10,455 | 12,735 | 12,145 |



Leeds waterfront

Section 6

Investment Report

Investment Advisory Panel – operational review

The 2020-21 year was certainly very different for all of us, with the impact of COVID-19 restrictions bringing changed methods of working for the functional aspects of West Yorkshire Pension Fund. Zoom/ Teams/ Webex meetings rapidly became the norm, which allowed the investment managers to keep on top of some very volatile markets, particularly in the early stages of the pandemic. This technology also enabled the Investment Advisory Panel (IAP), the Joint Advisory Group (JAG) and the Local Pension Board (LPB) to continue to function effectively. We all look forward to being able to meet again face to face, but now that video meeting technology has been proven to work well it is to be hoped that this will remain part of being able to communicate more effectively in the future.

Appointment of external advisers

The year also saw the appointment of two new External members to the Investment Advisory Panel, Marian George and Philip Hebson. Along with Mark Stevens, they bring a complementary range of skills from their backgrounds within investment management and the LGPS. During the course of their induction into the working of the Fund Marian and Philip had a number of detailed meetings with the internal team. These provided an opportunity for them to provide some thoughts about the ways and means in which the Fund functions to ensure that current best practice is being followed in an appropriate way. In some respects, these aren't new messages as such, with much work already in progress to strengthen and enhance the Fund's governance and operational capabilities.

Governance

The Scheme Advisory Board has been building its Good Governance Project since 2018 with the objective of strengthening LGPS governance going forwards. The Phase III Report was published in February, including an Action Plan. Part of this states that the administering authority must publish an annual governance compliance statement (GCS) that sets out how they comply with the governance requirements for LGPS funds, as per statutory Guidance. In preparation for this a review of the effectiveness, roles and responsibilities of the IAP, the JAG and the LPB should be undertaken, with the objective to ensure that the work that they do properly complement each other, while retaining their requisite independence. In simple terms this will check the remit of each, so that the IAP remains focused on investments issues, the JAG on administrative issues and the LPB on their Fund oversight role (as defined by Regulations). A revised agenda structure, minutes and developing the scope of the business/action plans would improve the effectiveness of the advisory groups.

As is often the case the focus tends to drift from being strategic towards looking at the minutiae, such as individual stock selection. While interesting, this is not the role of an oversight group. Looking at the IAP in particular, the content of reports will be reviewed to focus on the key issues and deliverables, with a greater emphasis on future strategy and development of the investment portfolios.

Investment risk register

As identified at the July JAG meeting, the Fund does not currently have an investment risk register. Preliminary work has commenced on creating such a register and a draft format was shared at the training session held on 18 March 2021. This is subject to further refinement and will then be reviewed and updated at each future meeting of the IAP.

Identification and appropriate management of risk is a key responsibility for all aspects of the Fund and as such attracts attention from the external organisations that regulate and monitor the Fund within the wider LGPS. On a wider basis, keeping up to date with ever changing Rules and Regulations becomes an ever increasing burden for the Fund on both the administration and investment operations. To give you an idea of which bodies are involved with this external oversight, here is a list taken from the recent training session on Risk:

- Ministry of Housing, Communities and Local Government (MHCLG)
- The Pensions Regulator (TPR)
- The Scheme Advisory Board (SAB)
- Markets and Competition Authority (MCA)
- Financial Conduct Authority (FCA)
- The administering authority (City of Bradford)
- Employers, the Press, Pressure Groups, HM Treasury, etc.

Training

Across the LGPS there is an increased focus on ensuring that those involved with the management and monitoring of individual Funds have the necessary training to effectively fulfil their duties. This is often referred to as "Skills and Knowledge" training, and a logged programme of training is already required for members of the Local Pension Board. The Phase 3 Good Governance report, published in February 2021 recommends that this defined level of training should be also made mandatory for others involved in the key functions, in WYPF's case the IAP and JAG.

Many Funds have historically made do with “just in time” training at meetings and voluntary attendance at relevant conferences, such as those organised by the LAPFF, LGC and the PLSA. The Local Government Association (LGA) and The Chartered Institute of Public Finance and Accountancy (CIPFA) provide a regular programme of training, which alongside structured training to take account of an individual Fund’s characteristics can form a good knowledge base for new and existing members. With an ever-changing scene, both with rules and regulations and within investments, Continuing Professional Development (CPD) has become increasingly important, even for longstanding and knowledgeable members. In addition to “external” training, there needs to be a programme of structured internal training focused on WYPF, potentially provided by the advisors supplemented by other specialists. While being one of the few LGPS Funds with an internal investment management function is a desirable attribute, members need to understand how this works in practice and to be able to effectively challenge the team on performance and strategic issues. Good training adds value to the function of meetings, as members will understand the key issues that they need to focus on that are relevant to the Fund, enabling well informed decisions to be taken. External review bodies will wish to see evidence of best practice in this area.

Review of strategic asset allocation

The Strategic Asset Allocation review was completed during the year and this has initiated a number of projects, as follows:

1. The reduction in allocation in equities to fund an increase in the allocation to alternatives has provided the opportunity to review the allocation to geographic regions. Relative to global weightings and what is seen as good practice elsewhere the Fund has retained a relatively high weighting in UK equities. Work is now in progress to establish appropriate strategic weights for each region which will then need to be reflected within the Fund’s benchmark monitoring. It should be stressed that establishing strategic targets does not mean that they should be slavishly adhered to but forms a means for the tactical position of the regional weightings to be considered and measured against.
2. There will be a continuing requirement for some investment income to be available to form part of the cash flow required to pay pensions. Work is being undertaken to identify the most appropriate assets to meet this requirement, which will form a defined income “sleeve” within the portfolios.
3. Fixed income investments will form a major part of the income sleeve and as such the way in which these investments are managed will be reviewed. The aim will be to ensure an appropriate structure maximises the effectiveness of the total fixed income portfolio – as a source of income as well as introducing a diversified global element focussed on total return.

4. Positive ESG and Climate Change considerations have formed part of the ethos of West Yorkshire Pension Fund for longer than most other Funds within the LGPS. However, thinking in these areas is evolving ever more rapidly and the Fund will be taking steps to gain a greater understanding of the risks that face our investments against various scenarios. The appointment of a dedicated ESG Manager will assist greatly in establishing the facts surrounding our investments, such as carbon exposure, thus enabling informed decisions to be made about future investment strategy incorporating appropriate ESG and Climate Change considerations. This would include a review of benchmarks that will accurately reflect a thematic investment strategy. This work may well require specialist external input, certainly at the initial stages.

Review of staffing resources

There has been a long running review of staff resources required for the effective management of the Fund investments. In the advisors’ view, this should be a key focus for the Fund and the oversight groups. It is good to be able to report that progress is now being made with the recruitment process.

It is apparent that with the increased workload seen in certain areas of the investment function further recruitment of experienced personnel will be required. This would include the fixed income area as referred to above, where a range of specialist skills will be required, some of which are currently not covered by the internal team. Further resource will also be required within the alternatives team, as the scale and range of investments there increases over time, reflecting the increased commitment within the strategic asset allocation review. This would include enhanced due diligence skills, both operational and legal. It should be noted that the shared resource available with Northern Pool does help to some degree, but the Fund needs its own capabilities to ensure that any proposed investments are properly risk assessed. The advisors have some concerns that sub-optimal reporting lines within the administrating authority may lead to a lack of focus on this key Fund resource.

Northern Pool

While on the subject of the Northern Pool, there is a continuing requirement to monitor the effectiveness and benefit that the Pool brings to the West Yorkshire Pension Fund, particularly with regards to GLIL (Infrastructure) and Northern Private Equity Partnership (NPEP). While the relationship that the Fund has with its Pool is very different to that of most other Funds with their respective Pools, a focus on what benefit the Fund derives from the Pool is important, from a financial and resource orientated perspective.

Having a good communications strategy helps to ensure a good flow of appropriate information to all stakeholders, both internal and external. While there is already a healthy amount of information available on the Fund’s website, more could be done, particularly as we further develop our ESG and Climate Change investment strategy. This will enable members and officers to publicly display what our strategies are and over time to be able to demonstrate the outcomes from those strategies.

Conclusion financial year 2020/21

In summary; the Fund is in good shape, but we are in a period of quite rapid development with internal and external influences needing to be managed effectively. There is a lot of work in progress, with the objective to ensure that the Fund continues to be not only one of the largest LGPS Funds, but also one of the best.

April 2021



Piece Hall, Halifax

Section 7

Investment Management and Strategy

Investment management and strategy

The fund's investment portfolio continues to be managed in-house on a day-to-day basis, supported by the fund's external advisers. Investment strategy and asset allocation are agreed at quarterly meetings of the Investment Advisory Panel. There are fifteen professional investment managers and eight administration settlement staff in the in-house investment team.

The latest government LGPS data released in late 2020 for 2019/20 financial year, shows the fund's investment management costs were £22.83 (£16.53 in 2018/19) per scheme member. Our cost per member is the second lowest for all local authority pension funds, and compares exceptionally well with the average LGPS cost for 2018/19 of £278.76 (£189.59 in 2018/19).

The panel adopted a fund-specific benchmark in April 2005 which is reviewed and revised annually. Details of the benchmark currently being used are shown in the Investment Strategy Statement. The benchmark represents the optimal investment portfolio distribution between asset classes to bring WYPF to 100% funding in accordance with the principles outlined in the Investment Strategy Statement. The panel makes tactical adjustments around the benchmark for each asset class within a set control range.

Volatility in markets took a deep negative turn due to Covid-19 at the end of the 2019/20 financial year January to March 2020. Most of the losses were regained by the end of the 2020/21 financial year. Experience of the last 12 months confirms increased volatility in markets and in the immediate future. More detail is provided in the following sections, the fund holds 2.9% in cash, which gives us increased manoeuvrability to support the fund's strategy in a very dynamic market.

Investment performance

In 2020/21 our investments made a positive return of 23.2%. This shows that we have recovered all the financial losses of the 2019/20 financial year brought about by Covid-19.

Our medium to long term performance is as follows - three years 6.8% (77th percentile), five years 9.2% (rank 61st percentile), ten years 7.7% (80th percentile), twenty years 7.0% (32nd percentile) and thirty years 8.5% (25th percentile).

The fund is focused on long term investment performance and strategy. The fund has a very different asset strategy to that of the average LGPS fund. The key difference is our relatively high commitment to equities and the commensurate underweighting of other assets. During recent years this would have had a positive impact on the fund's performance relative to its peers because equities returns were considerably ahead of bonds.

Voting policy

Wherever practical the fund votes on resolutions put to the annual and extraordinary general meetings of all companies in which it has a shareholding. The basis of the voting policy is set out in the Investment Strategy Statement. Full details of the voting policy is also available on the fund website, as are details of the fund's voting activities at companies' annual general and extraordinary general meetings. The fund has appointed Pensions & Investment Research Consultants Ltd (PIRC) to manage voting rights, ensuring full engagement on governance and voting on all resolutions.

Custody of financial assets and stock lending

The Northern LGPS Pool appointed custodian - Northern Trust. Northern Trust provides custodial services to the fund and are responsible for safe keeping, settlement of transactions, income collection, overseas tax reclaims, stock lending, general custodial services and other administrative actions in relation to all the fund's listed fixed-interest and equity shareholdings, with the exception of private equity and properties. All the three funds in the Northern LGPS Pool - Greater Manchester Pension Fund, Merseyside Pension Fund and West Yorkshire Pension Fund are now serviced by Northern Trust.

Investment strategy March 2021

| Asset class 31 March 2021 | Book cost | Market value | Weighting | Fund specific benchmark | Control range |
|---------------------------|---------------|---------------|--------------|-------------------------|------------------|
| | £m | £m | % | % | % |
| Total equities | 81,045 | 10,875 | 67.0 | 65.0 | 57.5–72.5 |
| UK equities | 2,747 | 4,696 | 28.9 | 35.0 | 30–40 |
| Overseas equities | 78,298 | 6,179 | 38.1 | 30.0 | 25–40 |
| N America | 1,054 | 2,034 | 12.5 | 8.0 | 3–13 |
| Europe (Ex UK) | 2,212 | 1,800 | 11.1 | 10.0 | 5–15 |
| Japan | 55,793 | 799 | 4.9 | 4.0 | 1–7 |
| Asia Pacific (Ex Japan) | 7,928 | 566 | 3.5 | 3.0 | 0–6 |
| Emerging markets | 11,311 | 980 | 6.0 | 5.0 | 2–8 |
| Total bonds | 9,754 | 2,105 | 13.0 | 17.0 | 14–20 |
| UK govt. bonds | 548 | 550 | 3.4 | 5.0 | 2–8 |
| UK govt. index linked | 480 | 632 | 3.9 | 5.0 | 2–8 |
| UK corporate bonds | 506 | 509 | 3.1 | 4.0 | 1–7 |
| Global bonds | 8,220 | 414 | 2.6 | 3.0 | 1–5 |
| Total alternatives | 1,554 | 2,157 | 13.3 | 11.0 | 09–13 |
| Hedge funds | 52 | 106 | 0.7 | 0.0 | 0–4 |
| Private equity funds | 400 | 908 | 5.6 | 5.0 | 3–7 |
| Northern P equity pool | 112 | 130 | 0.8 | | |
| Private infrastructure | 364 | 408 | 2.5 | 4.0 | 2–6 |
| GLIL infrastructure | 285 | 315 | 1.9 | | |
| Listed alternatives | 341 | 290 | 1.8 | 2.0 | 0–4 |
| Property | 494 | 624 | 3.8 | 5.0 | 3–7 |
| Cash | 1,515 | 464 | 2.9 | 2.0 | 0–5 |
| Total | 94,362 | 16,225 | 100.0 | 100.0 | |

Section 8

Investment Markets

UK economy and equity market

The extraordinary events of the last 12 months marks 2020 as the year the fall in UK economic growth rivalled the 1920's depression. The UK economy suffered a shock of the magnitude perhaps only seen once in a century at the start of 2020 due to the coronavirus pandemic.

The first lockdown spanning the summer of 2020 caused a catastrophic fall in economic activity as schools, shops and businesses closed and people were told to stay at home.

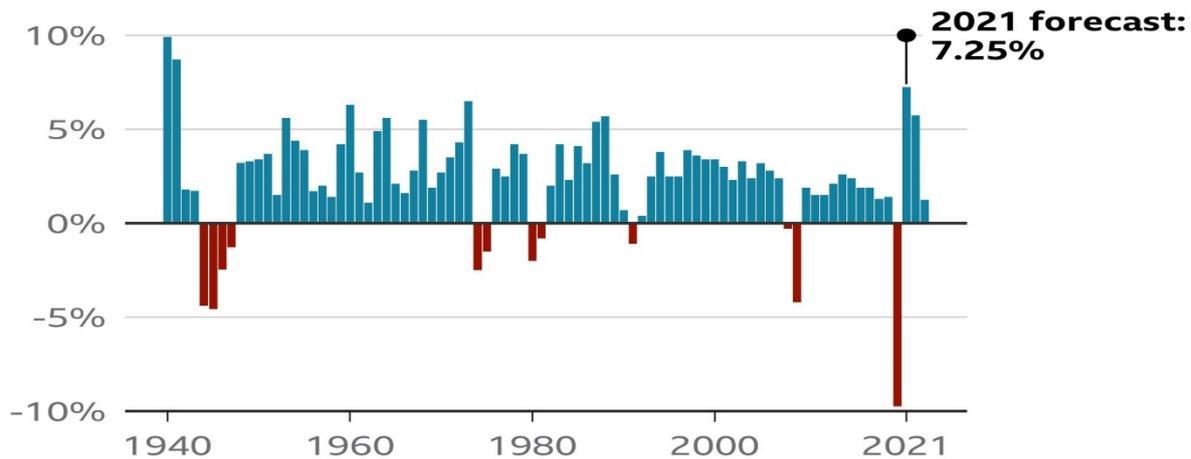
The UK government introduced an unprecedented package of financial support for businesses and individuals, including business grants and loans, a job retention scheme paying 80% of wages, and several tax relief or payment extensions. More than a million new claims for universal credit were made in the first lockdown.

The UK endured a further 2 lockdowns before the high take up of coronavirus vaccination brought infection rates and hospital admissions under control. With the UK on course to offer all adults the vaccine by the end of July 2021 and almost 70% already vaccinated the recovery looks to be lasting.

The Office for Budget Responsibility made the following forecasts based on an assumption that the current lockdown would last for three months.

UK economy set to grow at fastest rate since WW2

Historical UK GDP



Note: Pre-1949 data based on Bank of England estimates

Source: Bank of England

The high vaccination rate and the government support has avoided what could have been a worse and longer lasting contraction in the economy. The UK economy now looks likely to grow at the fastest rate since World War Two.

As new variants of the virus emerge worldwide it is imperative that all countries are able to vaccinate their populations. The UK pharmaceutical company AstraZeneca is at the forefront of this by offering their vaccine at cost.

A shift in shopping habits

As the UK entered lockdown food and general retailers had to adapt quickly to meet the change in shopping needs. Supermarkets reported strong demand for basic household items. Stores introduced dedicated shopping hours for key workers and the vulnerable members of society. Limits were imposed on certain items such as cleaning products and hand sanitisers to curb stockpiling.

Supermarkets have employed thousands of extra staff (many of them furloughed from their regular jobs) to assist in home delivery and online order fulfilment, and have worked hard to keep prices as low as possible as demand increased. Government grants issued to businesses at the start of the pandemic have since been returned by a number of large retailers, amounting to millions of pounds.

Clothing and general retail suffered more than food as non-essential stores were forced to close completely. A number of companies collapsed into administration, including Debenhams, Paperchase and Arcadia Group. Some popular brand names (such as TopShop) were bought by online specialist retailers, but hundreds of high street stores will not reopen. Thousands of job losses were seen across the general retail sector in 2020, the majority of which were younger people on low incomes.

UK leaves the European Union

The UK left the European Union on 31 December 2020 after reaching a deal just one week earlier. The deal is designed to allow frictionless trade between the UK and EU whilst regaining sovereign independence.

In summary this means leaving the customs union, EU regulation and legislation, freedom of EU citizens to live and work in the UK and vice versa and regaining control of UK fishing waters. However, Northern Ireland finds itself on the EU side of customs border, the deal seems to be focused on goods rather than services which are the driving force behind the UK economy and the EU retain the option to impose tariffs should it decide that the UK is not operating a level playing field on trade.

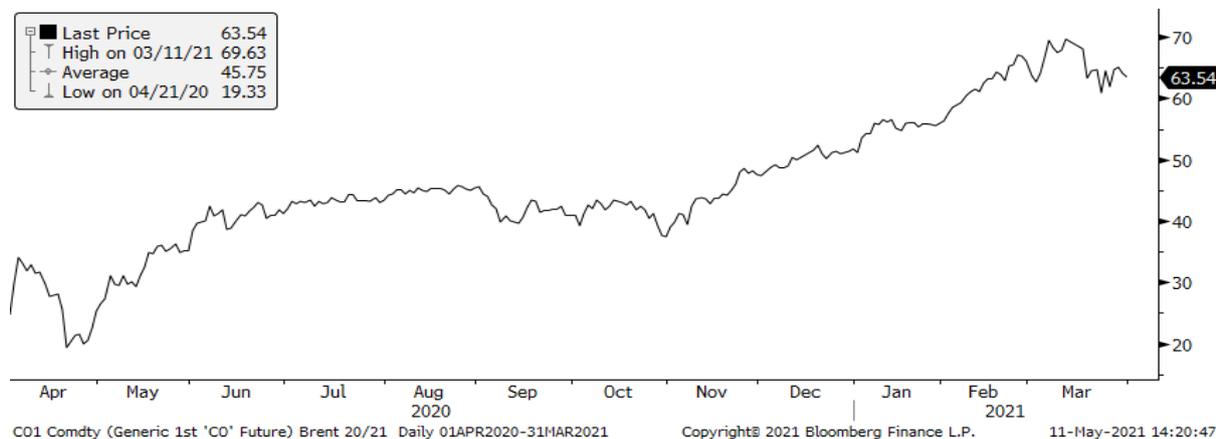
There are significant challenges ahead in making the deal work for the UK and a lasting impact on the UK economy but at present the coronavirus pandemic eclipses all other factors.

Oil price collapse and recovery

As the danger of Covid19 became increasingly evident and stock markets around the world began to fall, there were corresponding drops in value in the commodities and metals markets. This coincided with a disagreement between Saudi Arabia and Russia over oil production, which, added to the existing concern over the pandemic, caused the oil price to fall dramatically. The price of Brent oil fell to a low of \$19 in April, while the oil price in the USA was negative for a short time.

Oil prices started to slowly recover as demand from China stabilised, and remained around \$45 for the next six months. In November the price of Brent oil began to rise again as some countries started to lift restrictions, by the end of March the oil price was £63.

Brent Oil price USD per barrel 12 months to 31 March 2021



In the UK, the largest traditional Oil companies, BP and Royal Dutch Shell, have set out plans for reducing carbon emissions and increasing production of renewable energy, in line with the Paris Agreement. As an example, Royal Dutch Shell is one of the largest providers of renewable electricity to domestic users in the UK through Shell Energy. BP is expanding the existing network of electric vehicle charging stations across China and other regions, including Britain. There is still a great deal of work to be done to lower emissions, but work is well underway now and will accelerate in the coming years.

West Yorkshire Pension Fund continues to engage with the large oil producing companies, both domestic and overseas, to encourage a faster transition to renewable energy and net zero carbon emissions. The companies welcome this engagement, and hold regular calls and webcasts with shareholders to provide updates on their plans.

Dramatic fall in UK equity market followed by impressive recovery

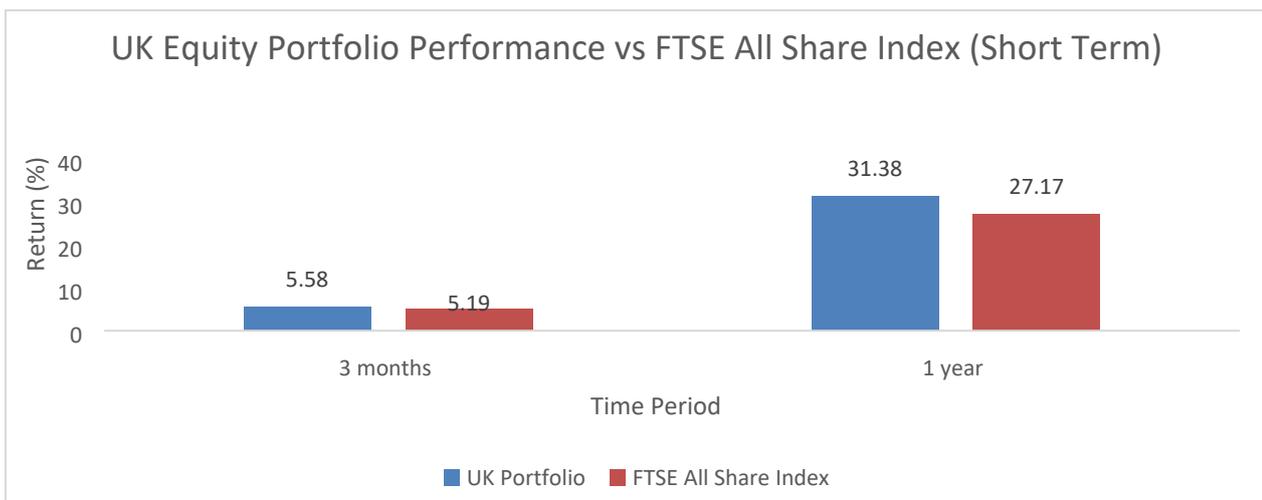
The UK equity market plunged 35% during March 2020, wiping out the gains made over the previous decade. As each lockdown reversed the market surged, a year later almost all of the fall has been recovered.

FTSE All Share Index over last 10 years

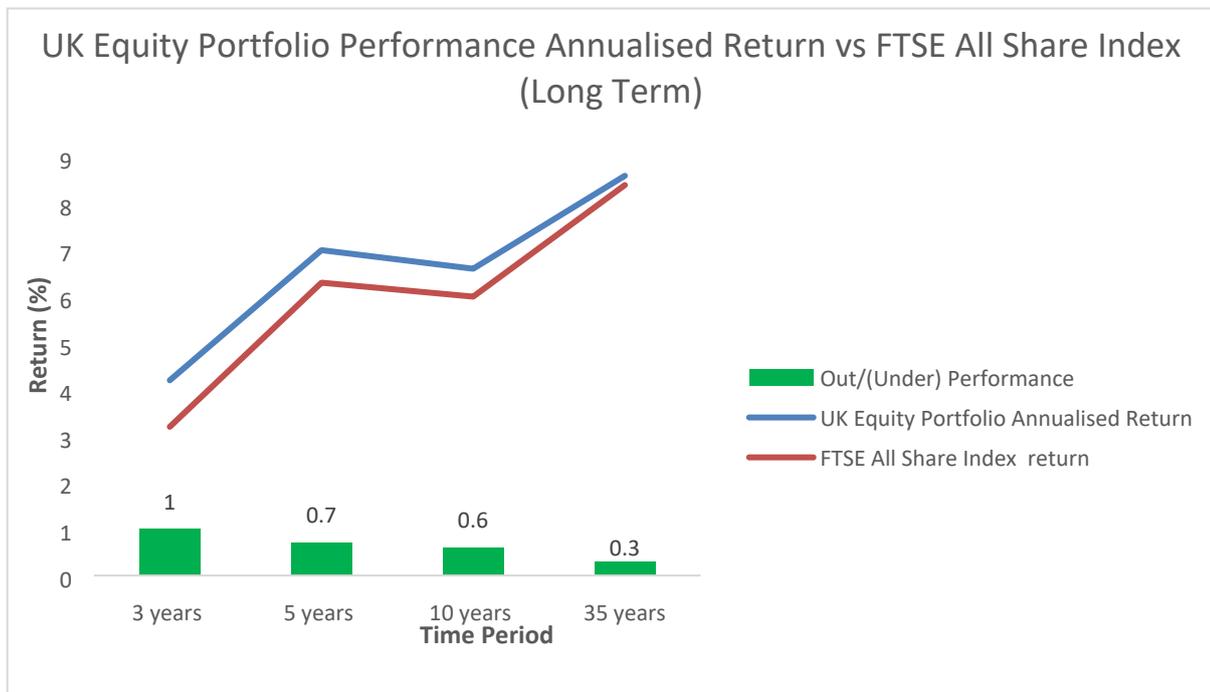


WYPF UK equity portfolio outperformance

The in house team of investment managers has again outperformed the UK equity market. Over one year the portfolio had a stellar performance returning 31.38% compared to the market return of 27.17%



This impressive return builds on a consistent long term record of out-performing the market. The in house team use a range of investment styles to benefit from growth, value and income, thereby avoiding the pitfalls of investment fashions. Long term objectives are embedded as the team buy to hold stock over a long horizon. This also avoids performance erosion due to excessive transaction costs.



Fund cash flow and returns effected by the pandemic

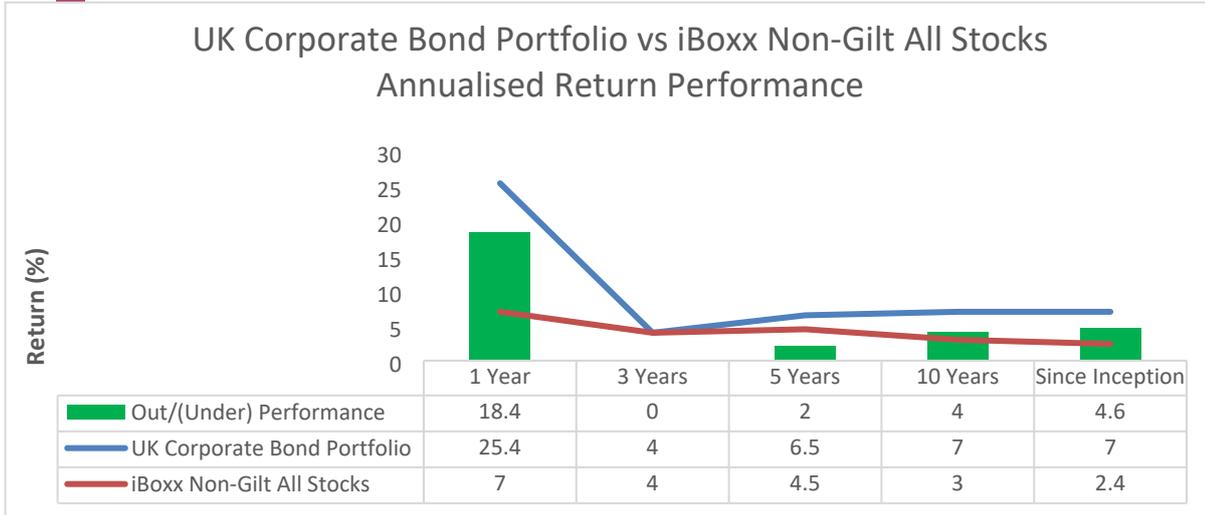
As company revenues reduced to almost zero in some cases while costs continue to be borne, cash conservation became a priority. Cost cutting where ever possible resulted in cancelling, reducing, or deferring dividend payments. Furthermore, some companies raised cash by issuing more shares and or debt.

This had an impact on the WYPF cash flow. The fund receives a significant level of income from dividends, over £200m each year from the UK equity portfolio alone. Initially income fell by almost 50 per cent however this is now near to normal levels

UK Corporate Bonds

The UK corporate bond portfolio was valued at £516m at the end of March 2021, representing 3.2% of the total fund. The portfolio is well diversified across counterparties, seniority ranking and investment grades. 1.7% of the fund is invested in investment grade bonds and 1.5% of the fund is invested in non-investment grade bonds.

The UK corporate bond fund has consistently shown strong outperformance compared to the benchmark over all periods since inception. The performance over the last year has been outstanding, reflecting the very strong recovery of high yielding corporate bonds in the portfolio.



In the initial stages of the pandemic many corporate bonds were priced at deep discount to par, mainly due to market shock and uncertainty. Almost all have now recovered to pre pandemic market prices.

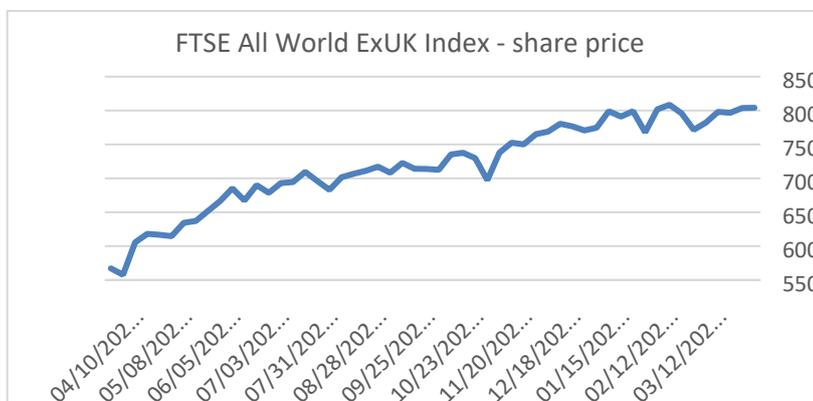
In contrast to equities, income from bonds remained unchanged during the market shock in 2020. None of the UK corporate bonds defaulted on coupon payment or maturity as a result of the pandemic.

International investment markets

This financial year will go down in history as the year of COVID19. A dreadful disease that has claimed an estimated 3 million lives and, according to the IMF, is the “worst crisis since the Great Depression”, costing the global economy 4.4% of GDP and an estimated \$28 trillion of lost economic activity.

To prevent the spread of the disease through social contact, countries throughout the world forced their populations to stay at home, close businesses and halt international travel. Governments have borrowed heavily to provide trillions of dollars’ worth of stimulus to support those thrown out of work and to aid the economic recovery. The story of the pandemic is ongoing with important developing economies, such as India, continuing to suffer from effects of the disease. Meanwhile other developed economies, notably the UK and USA, are vaccinating their populations and progressively reopening their economies.

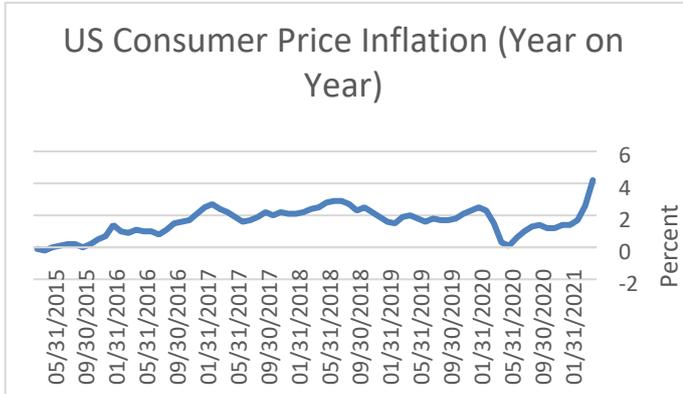
The impact on different industries has been varied. With people forced to stay at home, high street retailers had to close their doors whilst internet based businesses, such as Amazon, boomed. Understandably, world stock markets fell heavily at the start of the crisis in March 2020, but by April began to recover, rising strongly and steadily by 40% over the year to March 2021. There was a remarkably strong bounce back, driven first by the success of on-line technology companies, and later by optimism of a return to normality following the roll out of effective vaccines. The latter period saw some of those industries most effected by the early lockdowns recover and overtake the technology companies that had remained open throughout the pandemic.



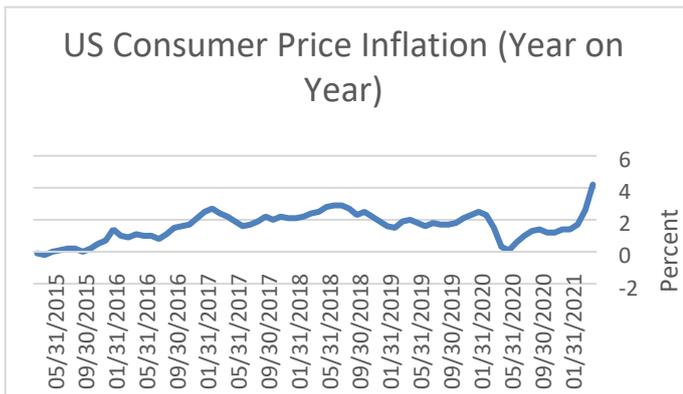
Source: Bloomberg

Inflation

The global lock down has led to disruption in the production of many items, such as micro-chips, leading to a global shortage. As businesses reopen, demand for such products has overtaken supply and led to price rises. Similarly demand for commodities has risen strongly, with copper rising in price by 83% over the year. This has led to a short term spike in inflation, as illustrated below.



Source: Bloomberg

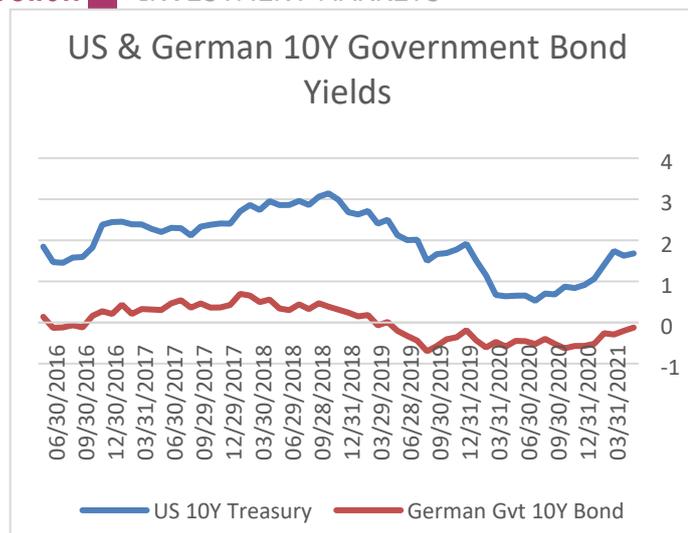


Source: Bloomberg

Most central banks, such as the US Federal Reserve, believe this spike in inflation will be temporary and expect it to stabilize at their target rate of 2% per annum, influenced by their policy efforts. However, pent up demand from consumers and corporations will continue to drive demand and some commentators are concerned that inflation will be difficult to control once it takes hold.

Bond Yields

This fear of inflation impacted the bond markets causing a significant sell off to occur during March 2021 resulting in a sharp uptick in bond yields toward the year end as shown below.



Source: Bloomberg

Since the market crash of 2000 and the Great Financial Crisis of 2008, central banks and governments have pursued accommodative monetary policies intended to keep interest rates low in order to stimulate the economy. This policy has succeeded in driving bond yields down to all-time lows and, as intended, borrowing costs remain low too. This has helped stimulate the economy but has raised asset prices which now sit at relatively high levels, with the FTSE All World ex UK index currently on a price to earnings ratio of 26 against a ten-year average of 19.

Equity markets

Over the year, equity markets performed very strongly, reaching an all-time high by 31 March 2021. This strength was supported by low bond yields and predicated on the belief corporate earnings would recover from the impact of COVID-19 and move higher than pre-pandemic levels. However, actual earnings are yet to reach that milestone and consequently equities appear to be expensive relative to current earnings. Valuations will appear to be more reasonable if expectations are realized, but if the IMF is to be believed, earnings are not likely to recover fully this year suggesting equity market valuations may be overly optimistic.

Alternative investments

Private markets

As at 31 March 2021, the private market equity and infrastructure portfolio accounted for 10.0% (£1,606m) of the West Yorkshire Pension Fund. In addition, at year end, undrawn commitments amounted to a further £1,237m. This included £145m committed to NPEP (see below for explanation) which had not yet been deployed to underlying private equity investments. During the year, the overall private market portfolio experienced capital calls of £308.6m and distributions of £259.6m, resulting in a net investment of £48.9m.

Private Equity

In Q2 2020, with the onset of Covid restrictions, the value of private equity deals halved, before rebounding strongly from Q3. For the financial year to 31 March 2021, the number of private equity deals globally increased by approximately 2% on the prior year. The total deal value increased by approximately 4% (Preqin). Average deal sizes remained approximately the same as the prior year. The WYPF private equity portfolio experienced a much bigger increase in buyout activity with an increase in drawdowns of 21%, compared with 4% for the market overall. This increase in activity was driven by WYPF’s commitment to NPEP, which saw activity increase nearly three-fold on the prior year. Excluding commitments made via NPEP, drawdowns declined 16%.

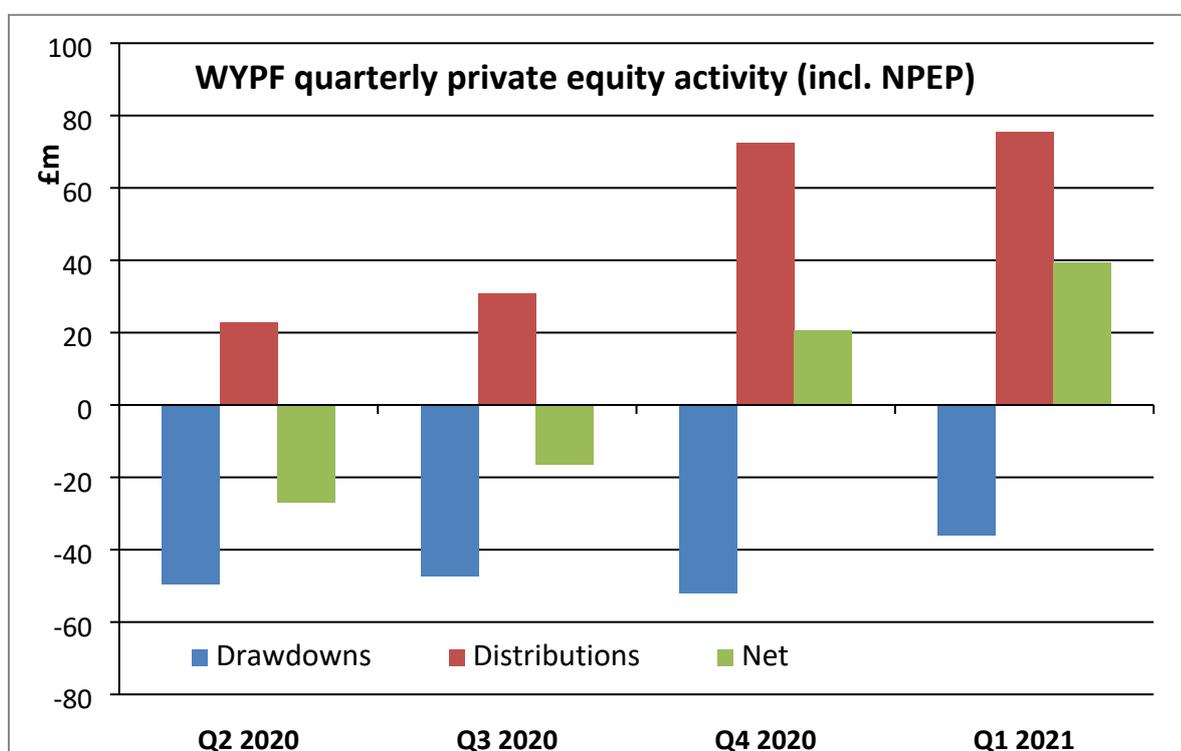
Managers were predominantly focussed on acquiring B2B and IT companies. In the US, managers opportunistically invested in sectors such as tech and healthcare, leading to increased valuations. In Europe, managers favoured lower-returning but well-positioned companies with capacity for bolt-on acquisitions.

Section INVESTMENT MARKETS

The value of global private equity backed exits for 2020/21 was 35% higher than the previous year. It was, however, a year of two halves: 1H exits declined 11%; 2H exits increased 104%. WYPF's experience was directionally similar, but different in magnitude: 1H -35%, 2H +81%. Overall, the WYPF portfolio saw distributions that were 23% higher than the previous year. Increased exit activity and a higher level of distributions normally lead to a robust fundraising market. However, for the year to 31 March 2021, the number of funds closed declined by 14% globally, and capital raised declined by 9%. This aberration was perhaps a function of a public markets sell-off at the start of the year, causing an automatic increase in private market allocations; thereby moderating investor need to increase commitments.

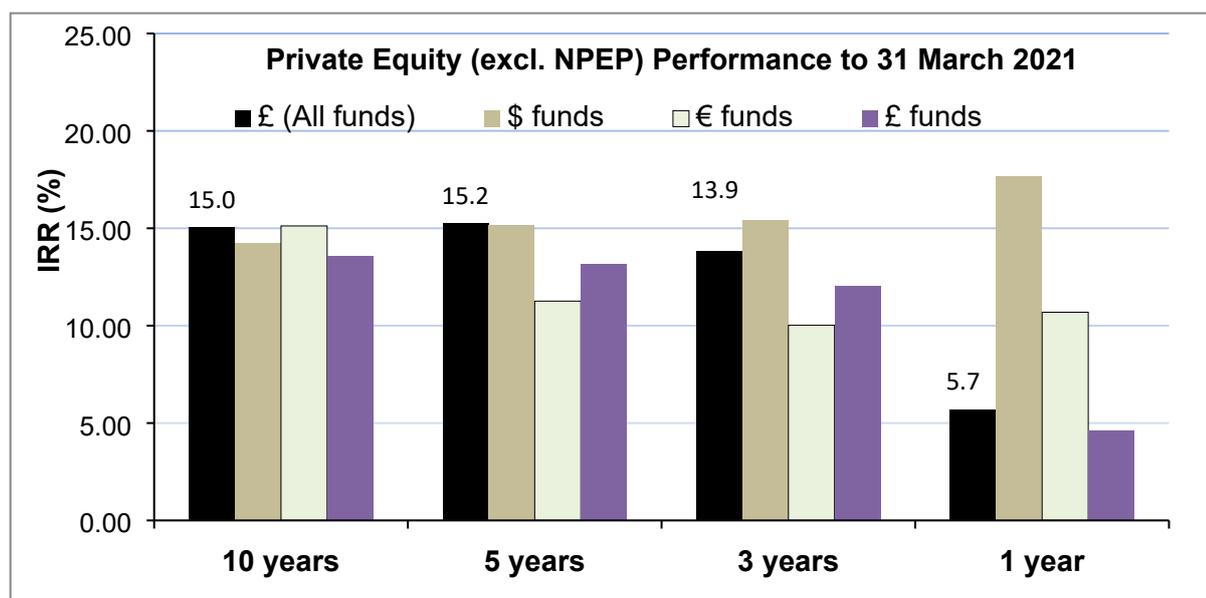
During the year, there was a significant increase in the number of Special Purpose Acquisition Companies (SPACs) coming to market. They offer an alternative route to public listing for privately held companies. Regulatory changes have eased the issuance of SPACs in the US, and there is an expectation that private equity could see more liquidity events via this route in 2021.

As reported previously, the Northern Private Equity Pool (NPEP) makes commitments to underlying private equity funds on behalf of its founding partners: West Yorkshire Pension Fund, Merseyside Pension Fund and Greater Manchester Pension Fund. NPEP is a joint-venture limited partnership akin to a typical private equity structure. During the year, NPEP received a further £325m in commitments from its founding members, including £90m from WYPF. In total, WYPF has now committed £595m to NPEP. Further annual commitments are expected from all founding members. WYPF's undrawn NPEP commitment amounted to £479.5m at year end.



For the year to 31 March 2021, net proceeds received from WYPF's private equity portfolio (including NPEP) amounted to £16.4m overall, compared to £11.6m in the prior year. Meanwhile, the portfolio increased by £35m from £868m to £903m. As a proportion of the WYPF, the weighting of the private equity portfolio decreased from 6.6% at the start of the financial year to 5.6%. This was due to a strong recovery in public equity markets relative to private equity, where valuations tend to lag public markets by around three months.

Local currency performance for funds denominated in each currency, and also performance on translation into Sterling, is shown below. The majority of the portfolio is USD denominated (61%), whilst Euro and Sterling denominated funds represent 19% and 20% respectively.



WYPF’s private equity portfolio remains well diversified across industry sectors, geographies, vintage years, financing stages and managers. For the 12 months to 31 March 2021, the portfolio returned 5.7%. Sterling returns were impacted by a weaker USD (-12.0%) and a weaker Euro (-3.9%). Overall, this gave an overall currency effect of -8.0%. For the 10-year period to 31 March 2021, the Private Equity portfolio in Sterling has delivered annualised returns of 15.0%.

Commitments during the year were made to the following private equity funds:

| Private equity fund | WYPF Commitment (£m) |
|-------------------------------------|----------------------|
| Elysian Capital Fund III | 10 |
| Tenzing Private Equity II | 15 |
| Growth Capital Partners Fund V | 15 |
| Key Capital Partners IX | 10 |
| Northern Private Equity Pool (NPEP) | 90 |
| Total | 140 |

During the year, the NPEP investment vehicle made four primary fund commitments with four different managers, three of which are new manager relationships for WYPF. As at 31 March 2021, un-drawn commitments, including WYPF’s share of underlying NPEP commitments, amounted to £661.2m.

The strategy and approach for this asset class remains unchanged. Net investment will continue to be monitored, and a commitment strategy followed to achieve a 5% exposure to private equity over the medium term.

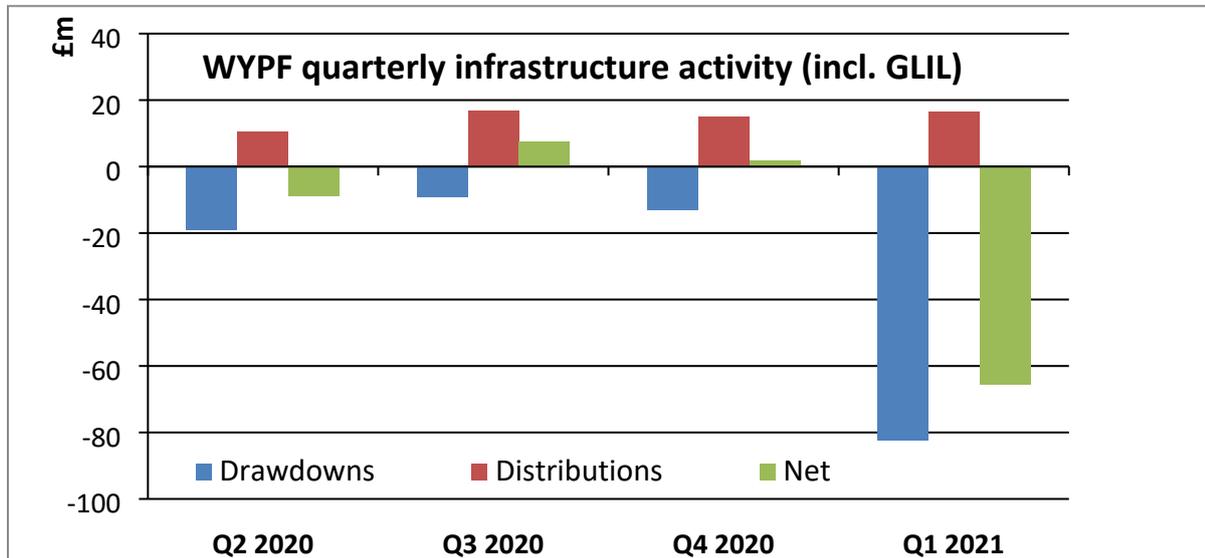
Infrastructure

During the financial year to 31 March 2021, the number of reported infrastructure deals globally decreased by 23% on the prior year. The total deal value decreased by 40% (Preqin). This resulted in the average deal size decreasing by 22%; albeit still 14% more than two years ago. The WYPF infrastructure portfolio (excluding GLIL) mirrored this experience with a 46% decrease in drawdown levels. Distributions, however, were just 5% less, resulting in a net divestment of £2.3m, compared to £33.5m net investment in 2019/20.

Section INVESTMENT MARKETS

In addition to the above, investment was bolstered by a further £67.6m due to WYPF's commitment to GLIL. GLIL is a cost-effective, limited liability partnership focused on investing in direct UK infrastructure. During the year, WYPF made a further £150m subscription to GLIL. This additional commitment increased WYPF's commitment to £525m, and WYPF's unfunded amount to £222.7m.

Including monies drawn down for GLIL, net investment was £65.3m, 35.8% higher than the prior year (£48.1m). Capital called from GLIL was predominantly for an equity stake in a rolling stock fleet of 65 new intercity trains; all of which are operational and connect London Kings Cross with cities across Scotland and the North of England.

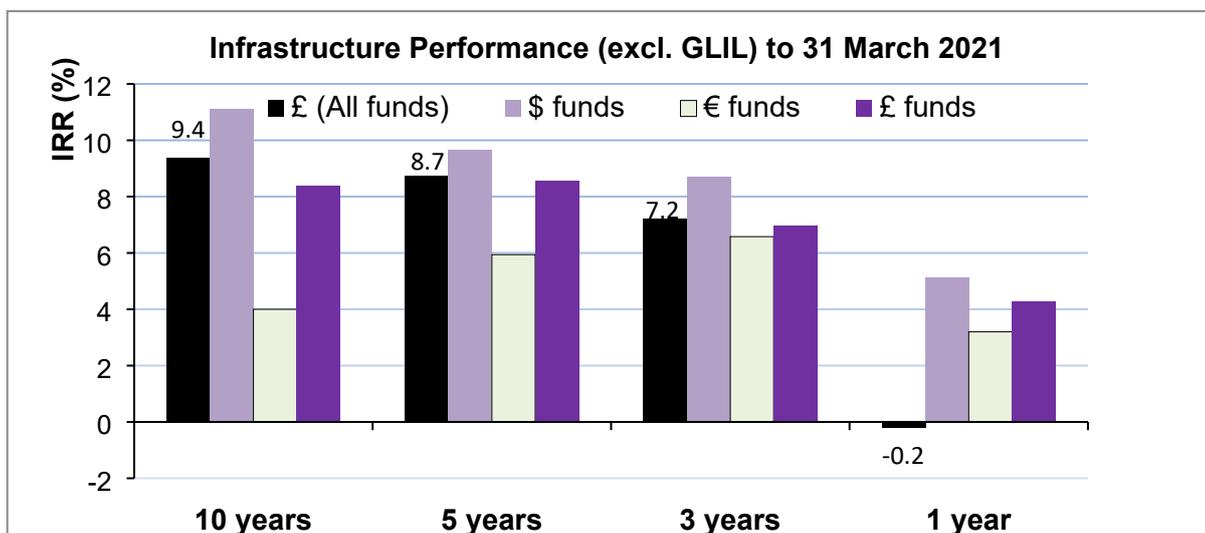


As a proportion of WYPF, the weighting of the infrastructure portfolio decreased to 4.4% (£703m), from 4.8% (£631m) the previous year. As with private equity, this was due to the strong recovery in public markets.

Local currency performance for funds denominated in each currency, and also performance on translation into Sterling, is shown below. Approximately half (49%) of the infrastructure portfolio is invested in Sterling denominated funds. USD and Euro denominated funds constitute 35% and 16% respectively.

For the 12 months to 31 March 2021, the portfolio returned -0.2%. Sterling returns were negatively impacted by USD (-10.9%) and Euro (-3.9%) weakness. Overall, this gave a currency effect of -4.5%.

For the 10-year period to 31 March 2021, the Infrastructure portfolio in Sterling has delivered annualised returns of 9.4%.



Section INVESTMENT MARKETS

WYPF's infrastructure portfolio remains well-diversified across industry sectors, geographies, vintage years, financing stages and managers.

Commitments during the year were made to the following infrastructure funds:

| Infrastructure fund | WYPF Commitment (£m) |
|---|----------------------|
| Stonepeak Infrastructure Fund IV | 28 |
| I-Squared Infrastructure Fund III | 28 |
| Partners Group Direct Infrastructure 2020 | 28 |
| GLIL | 150 |
| Total | 234 |

At 31 March 2021, un-drawn commitments amounted to £431.2m.

The strategy and approach for this asset class is to build and maintain a global portfolio of infrastructure assets diversifying between social, renewable, economic and opportunistic asset types. Developed markets with stable regulatory regimes and transparent policy frameworks are favoured. The focus is on assets with inflation linked, long duration income streams that are less sensitive to the economic cycle. Net investment will continue to be monitored, and a commitment strategy followed to achieve a 10% allocation to infrastructure.

Hedge funds

WYPF's hedge fund exposure is mainly via a bespoke fund similar to a managed account-type structure. This USD-denominated fund comprises seven underlying multi-strategy funds and two macro funds. This fund returned 23.7% (USD), versus 16.6% for the HFRX Global Hedge Fund Index (USD) for the year to 31 March 2021. Since inception (1 May 2012), this fund has delivered annualised local returns of 7.3%, 9.1% when translated into Sterling.

WYPF continues to focus on efficient diversification whilst achieving mid-high single digit returns and limiting downside risk.

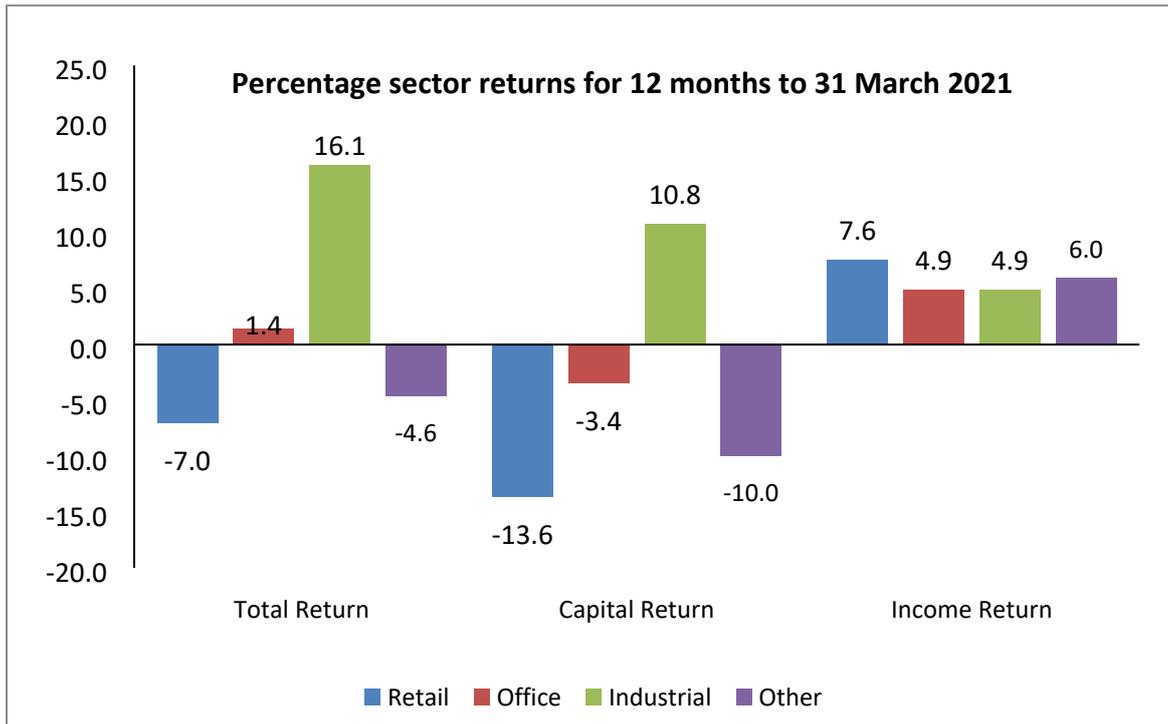
Property

For the year to 31 March 2021, total returns for the UK direct MSCI All Property benchmark amounted to 2.6%. This compares to the WYPF agreed benchmark of the All Property Funds Index, which returned 0.7%.

Section INVESTMENT MARKETS

Relative to other asset classes, the total return for UK Property versus UK Gilts and UK Equity is detailed in the bar chart below:

Source: Bloomberg and MSCI UK Quarterly Property Index

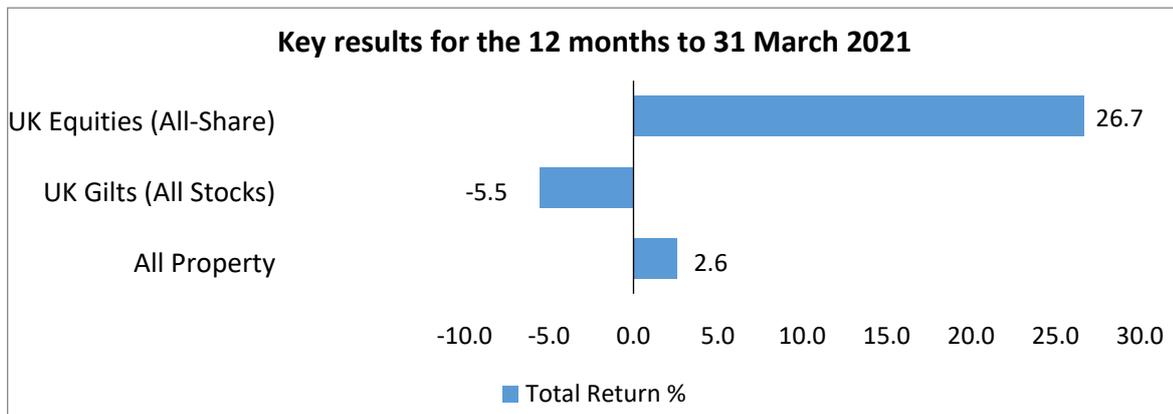


Source: CBRE Monthly (12m total return for CBRE All Property was 1.8%)

Retail returned -7.0% and was the lowest performing sector. Poor returns in the retail sector were driven by significant capital value falls (CBRE). Covid-related lockdown measures and non-essential retail shop closures resulted in shopping centre values declining by 28.9%. This came on top of a 21.5% valuation fall in 2019/20 and 13.5% in 2018/19. In comparison, retail warehouses and standard high street shop values were a little more defensive, with values falling 8.4% and 9.1%, respectively. Retail suffered negative sentiment due to increasing company voluntary arrangements and administrations, and also rising levels of online retail.

The Office sector delivered a total return of 1.4% for the twelve months to 31 March 2021, with income offset by capital valuation declines. Offices in the Outer London/M25 area (0.1%) were the laggards, whereas the City (1.9%) and Rest of UK offices (1.8%) were the strongest performers.

For the financial year to March 2021, the City of London investment market saw transaction volumes that were less than half of what they were the year before. The impact of the Covid-19 pandemic resulted in Q2 and Q3 2020 volumes falling 65–70% compared to the same period the prior year. Leasing activity across the Central London office market also saw a material decline.



Industrial was again the highest performing sector, with a total return of 16.1%. Within this, South East Industrials returned 16.4% and outperformed Rest of UK Industrials at 15.2%. With the level of online retail rising during the pandemic, the amount of warehouse space needed also increased. This led to increased rents and strong investor demand. UK industrial investment volume in Q4 2020 and Q1 2021 represented the first and third highest quarterly total in the last 20 years (Savills).

'Other' property includes the Private Rented Sector (PRS), Student Accommodation and Senior Living. Overall, this sector suffered valuation falls of 10%, and a total return after income of -4.6%. During the year, and as part of a Northern LGPS commitment, WYPF increased its exposure to 'Other' property with a £25m subscription to a UK affordable housing fund. This opportunity has a high probability of delivering competitive returns, diversification benefits and having a positive social impact.

UK commercial property transactional volume fell as lockdown restrictions were enforced. However, it recovered from September to December. Q4 2020 investment volume was nearly 20% higher than the combined total for the preceding two quarters. However, with the third lockdown, lower volumes were recorded in Q1 2021. Completed transactions during the year were biased towards prime assets. Transactions on lower quality assets struggled to complete due to divergent pricing expectations between buyers and sellers.

From March to September 2020, and in light of coronavirus, UK real estate valuers applied a 'material uncertainty' clause (MUC) to nearly all real estate valuations. As a result, a number of UK open-ended funds suspended subscriptions and redemptions. The decision for managers to reopen their property funds was based largely on redemption requests and fund liquidity.

The Government's various Covid-19 related emergency measures included legislation to protect commercial tenants from eviction if they are unable to pay rent due to the pandemic. Unsurprisingly, retail, leisure, and food and beverage markets have been hit hardest from the impact of coronavirus. Following this legislation, property managers experienced a significant increase in tenants seeking rental concessions.

WYPF is overweight in Industrials, Retail Warehouses and Rest of UK Offices compared to its benchmark, and underweight in City and West End Offices, and Other property.

Direct property

During the year, the procurement exercise for a Northern LGPS property management framework completed. With framework agreements in place, WYPF can now appoint an external direct property manager to help grow its direct portfolio in a cost effective manner. The aim of making direct investments is to lessen ongoing fees and enhance control, enabling long-term investment throughout market cycles.

Overall activity

WYPF made property purchases of £14.8m and sales of £6.3m, giving a net investment of £8.5m over the 12 months to 31 March 2021. The majority of capital was invested in continental European properties. Sale proceeds were mainly from a UK fixed-life funds nearing the end of their investment terms. The property portfolio returned -1.9% for the twelve months to March, underperforming its benchmark of 0.7%. The majority of underperformance is attributable to an overweight position in retail.

At 31 March 2021, un-drawn commitments amounted to £75.8m.

Net Asset as at 31 March 2021

| | Note | 31 March 2021 £000 | 31 March 2020 £000 |
|--|------|-----------------------|-----------------------|
| Investment assets | | | |
| Northern LGPS assets | 17 | 129,595 | 32,579 |
| Bonds | 17 | 1,315,811 | 1,387,188 |
| Equities (including convertible shares) | 17 | 12,112,419 | 9,499,515 |
| Index-linked securities | 17 | 735,119 | 736,119 |
| Pooled investment vehicles | 17 | 1,459,532 | 1,214,360 |
| Direct Property | 17 | 7,300 | 6,675 |
| Cash deposits | 17 | 422,003 | 254,625 |
| Cash in bank | 17 | 41,592 | 46,842 |
| Other investment balances | 17 | 58,153 | 53,918 |
| Investment liabilities | | | |
| Other investment balances | 17 | -13,990 | -51,239 |
| Total net investments | | 16,267,534 | 13,180,582 |
| Current assets | | | |
| Debtors | 20 | 81,033 | 54,197 |
| Current liabilities | | | |
| Creditors | 21 | -21,365 | -20,481 |
| Net current assets and liabilities | | 59,668 | 33,716 |
| Net assets of the scheme available to fund benefits | | 16,327,202 | 13,214,298 |

Section 9 Auditor's Report

Independent auditor's statement to the members of City of Bradford Metropolitan District Council on the pension fund financial statements included within the West Yorkshire Pension Fund annual report

Report on the financial statements

Opinion

We have examined the Pension Fund financial statements for the year ended 31 March 2020 included within the West Yorkshire Pension Fund annual report, which comprise the Fund Account, the Net Assets Statement and the notes to the financial statements, including the summary of significant accounting policies.

In our opinion, the Pension Fund financial statements are consistent with the audited financial statements of City of Bradford Metropolitan District Council for the year ended 31 March 2020 and comply with applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.

Respective responsibilities of the Director of Finance and the auditor

As explained more fully in the Statement of the Director of Finance's Responsibilities, the Director of Finance is responsible for the preparation of the Pension Fund's financial statements in accordance with applicable United Kingdom law.

Our responsibility is to report to the Members of City of Bradford Metropolitan District Council as a body, whether the Pension Fund financial statements within the Pension Fund annual report are consistent with the financial statements of City of Bradford Metropolitan District Council

We conducted our work in accordance with Auditor Guidance Note 07 – Auditor Reporting, issued by the National Audit Office. Our report on the Pension Fund financial statements contained within the audited financial statements of City of Bradford Metropolitan District Council describes the basis of our opinions on the financial statements.

Use of this auditor's statement

This report is made solely to the members of City of Bradford Metropolitan District Council, as a body and as administering authority for the West Yorkshire Pension Fund, in accordance with Part 5 paragraph 20(5) of the Local Audit and Accountability Act 2014. Our work has been undertaken so that we might state to the members City of Bradford Metropolitan District Council those matters we are required to state to them and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than City of Bradford Metropolitan District Council and City of Bradford Metropolitan District Council's members as a body, for our audit work, for this statement, or for the opinions we have formed.

Cameron Waddell
For and on behalf of Mazars LLP

5th Floor
3 Wellington Place
Leeds
LS1 4AP

DD MMM 2021

Section 10

Statement of Accounts

Statement of accounts

The City of Bradford Metropolitan District Council (Bradford Council), as administering authority for West Yorkshire Pension Fund, 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 authority, that officer is the Director of Finance.

The Director of Finance is responsible for the preparation of the Statement of Accounts, which is required to present fairly the financial position of the fund at 31 March 2021 and its income and expenditure for the year ended 31 March 2021.

In preparing this Statement of Accounts Director of Finance has issued a manual on the practices to be adopted in the preparation of the year-end accounts. This document sets out arrangements for ensuring the accounts are prepared in a consistent and prudent manner in line with suitable accounting principles.

Fund account for the year ended 31 March 2021

| | Note | 2021 £000 | 2020 £000 |
|---|------|-------------------|-------------------|
| Dealings with members, employers and others directly involved in the fund | | | |
| Contributions receivable | 6 | 480,170 | 441,973 |
| Transfers in | 7 | 26,934 | 50,705 |
| Non-statutory pensions and pensions increases recharged | 8 | 21,019 | 21,671 |
| | | 528,123 | 514,349 |
| Benefits payable | 9 | -550,077 | -553,082 |
| Non-statutory pensions and pensions increase | 8 | -21,019 | -21,671 |
| Payments to and on account of leavers | 10 | -23,373 | -37,250 |
| | | -594,469 | -612,003 |
| Net additions/(withdrawals) from dealing with members | | -66,346 | -97,654 |
| Management expenses | 13 | -10,002 | -12,306 |
| Net additions / (withdrawals) including management expenses | | -76,348 | -109,960 |
| Returns on investments | | | |
| Investment Income | 15 | 361,159 | 464,284 |
| Taxes on income | 15a | -7,919 | -8,719 |
| Profit and losses on disposal and changes in value of investments | 17a | 2,833,734 | -1,497,058 |
| Stock lending | 17c | 2,278 | 2,710 |
| Net return on investments | | 3,189,252 | -1,038,783 |
| Net Increase/(decrease) in the net assets available for benefits during the year | | 3,112,904 | -1,148,743 |
| Fund opening net assets | | 13,214,298 | 14,363,041 |
| Fund closing net assets | | 16,327,202 | 13,214,298 |

Net Assets Statement at 31 March 2021

| | Note | 2021 £000 | 2020 £000 |
|--|------|-------------------|-------------------|
| Investment assets | | | |
| Northern LGPS assets | 17 | 129,595 | 32,579 |
| Bonds | 17 | 1,315,811 | 1,387,188 |
| Equities (including convertible shares) | 17 | 12,112,419 | 9,499,515 |
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| Cash deposits | 17 | 422,003 | 254,625 |
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| Total net investments | | 16,267,534 | 13,180,582 |
| Current assets | | | |
| Debtors | 20 | 81,033 | 54,197 |
| Current liabilities | | | |
| Creditors | 21 | -21,365 | -20,481 |
| Net current assets and liabilities | | 59,668 | 33,716 |
| Net assets of the scheme available to fund benefits | | 16,327,202 | 13,214,298 |

The financial statements for West Yorkshire Pension Fund do not take account of liabilities to pay pensions and other benefits after 31 March 2021. This financial statement shows the net value of assets owned by the fund, the actuarial calculation of the present value of promised retirement benefits is provided in note 9.

Signed

Chris Chapman

Director of Finance & IT
City of Bradford Metropolitan District Council
DD MMMM 2021

Notes to the accounts

Note 1. Operations and Membership

The West Yorkshire Pension Fund (WYPF) provides for the payment of defined pension benefits to members or their dependants, from participating employers. It publishes its own detailed report and accounts document, which is available on the WYPF website address www.wypf.org.uk.

Administering Authority

City of Bradford Metropolitan District Council is the administering authority for the Fund, and as such has statutory responsibility for the management and administration of the Fund. The Fund's entire investment portfolio is managed on a day to day basis in-house supported by the Fund's external advisers.

Legal Status

WYPF is a statutory scheme and the benefits are paid out under the provisions of the Local Government Pension Scheme Regulations (2013). It has been classified as a registered public service pension scheme under Chapter 2 of Part 4 of the Finance Act 2004.

The scheme is governed by the Public Service Pensions Act 2013.

The Fund is administered in accordance with the following secondary legislation:

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

Management

The West Yorkshire Pension Fund Joint Advisory Group is responsible for advising on the administration of the Fund. The group is made up of three elected members from each of the five West Yorkshire Metropolitan District Councils (MDCs), three Trade Union representatives and two Scheme members. The Investment Advisory Panel is responsible for advising on the investment of the Fund and comprises two elected members from each of the five West Yorkshire Metropolitan District Councils, three trade union representatives, two external investment advisors, two scheme members, the Director – West Yorkshire Pension Fund and a Chief Financial Officer from the West Yorkshire District Councils on a two-year rotational basis.

Participating employers

There were 409 participating employers at 31st March 2021 (451 employers as at 31st March 2020) whose employees were entitled to be contributors to the Fund.

Membership

Total membership as at 31st March 2021 is 298,307 (31st March 2020 is 294,447).

| At 31 March 2020 | Profile of membership | At 31 March 2021 |
|------------------|---------------------------------|------------------|
| 100,281 | Active members | 101,079 |
| 96,717 | Pensioner members | 100,869 |
| 97,449 | Members with preserved pensions | 96,359 |
| 294,447 | Total members | 298,307 |

Benefits payable

On 1st April 2014, LGPS pensions became a career average scheme, whereby members accrue benefits based on their pensionable pay in that year at an accrual rate of 1/49th. Accrued pension is increased annually in line with Consumer Prices Index. Prior to April 2014 pension benefits under the LGPS were based on final pensionable pay and length of pensionable service as summarised below:

| | Service pre 1 April 2008 | Service post 31 March 2008 |
|----------|---|--|
| 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. |

Note 2. Actuary's Report

West Yorkshire Pension Fund

Statement of the Actuary for the year ended 31 March 2021

Introduction

The Scheme Regulations require that a full actuarial valuation is carried out every third year. The purpose of this is to establish that the West Yorkshire Pension Fund (the Fund) is able to meet its liabilities to past and present contributors and to review employer contribution rates. The last full actuarial investigation into the financial position of the Fund was completed as at 31 March 2019 by Aon, in accordance with Regulation 62 of the Local Government Pension Scheme Regulations 2013.

Actuarial Position

1. The valuation as at 31 March 2019 showed that the funding level of the Fund had increased since the previous valuation with the market value of the Fund's assets as at 31 March 2019 (of £14,363.0M) covering 106% of the liabilities allowing, in the case of pre- 1 April 2014 membership for current contributors to the Fund, for future increases in pensionable pay.
2. The valuation also showed that the aggregate level of contributions required to be paid by participating employers with effect from 1 April 2020 was:
 - 18.0% of pensionable pay. This is the rate calculated as being sufficient, together with contributions paid by members, to meet the liabilities arising in respect of service after the valuation date (the primary rate),

Plus

 - an allowance of 0.9% of pay for McCloud and cost management – see paragraph 9 below,

Less

 - 2.3% of pensionable pay to restore the assets to 100% of the liabilities in respect of service prior to the valuation date over a recovery period of 22 years from 1 April 2020 (which together with the allowance above comprises the secondary rate).
3. In practice, each individual employer's or group of employers' position is assessed separately and contributions are set out in Aon's report dated 31 March 2020 (the "actuarial valuation report"). In addition to the contributions certified, payments to cover additional liabilities arising from early retirements (other than ill-health retirements) will be made to the Fund by the employers.

Total contributions payable by all employers over the three years to 31 March 2023 are estimated to be:

| Year from 1 April | % of pensionable pay | Plus total contribution amount (£M) |
|-------------------|----------------------|-------------------------------------|
| 2020 | 16.3 | 3.4 |
| 2021 | 16.5 | 2.4 |
| 2022 | 16.6 | 1.9 |

4. The funding plan adopted in assessing the contributions for each employer is in accordance with the Funding Strategy Statement. Different approaches were adopted in relation to the calculation of the primary contribution rate, stepping of contribution increases and individual employers' recovery periods as agreed with the Administering Authority and reflected in the Funding Strategy Statement, reflecting the employers' circumstances.

5. The valuation was carried out using the projected unit actuarial method for most employers and the main financial actuarial assumptions used for assessing the funding target and the contribution rates were as follows.

| | |
|---|------------|
| Discount rate for periods in service | |
| Scheduled and Subsumption body funding target * | 4.35% p.a. |
| Intermediate funding targets* | |
| ▪ Low risk scheduled bodies | 4.10% p.a. |
| ▪ Low risk admission bodies and medium risk scheduled bodies | 3.95% p.a. |
| ▪ Medium risk admission bodies and higher risk scheduled bodies | 3.80% p.a. |
| Ongoing Orphan funding target | 3.30% p.a. |
| Discount rate for periods after leaving service | |
| Scheduled and Subsumption body funding target * | 4.35% p.a. |
| Intermediate funding targets* | |
| ▪ Low risk scheduled bodies | 4.10% p.a. |
| ▪ Low risk admission bodies and medium risk scheduled bodies | 3.95% p.a. |
| ▪ Medium risk admission bodies and higher risk scheduled bodies | 3.80% p.a. |
| Ongoing Orphan funding target | 1.60% p.a. |
| Rate of pay increases | 3.35% p.a. |
| Rate of increase to pension accounts | 2.10% p.a. |
| Rate of increases in pensions in payment (in excess of Guaranteed Minimum Pension) | 2.10% p.a. |

- * The Scheduled and Subsumption body and intermediate funding targets discount rates, as appropriate, were also used for employers whose liabilities will be subsumed after exit by an employer subject to that funding target.

In addition, the discount rate for already orphaned liabilities (i.e. where there is no scheme employer responsible for funding those liabilities and employer has exited the Fund) was 1.3% p.a.

The assets were valued at market value.

Further details of the assumptions adopted for the valuation, including the demographic assumptions, are set out in the actuarial valuation report.

6. The key demographic assumption was the allowance made for longevity. The post retirement mortality assumption adopted for the actuarial valuation was in line with standard self-administered pension scheme (SAPS) S2N mortality tables with appropriate scaling factors applied based on an analysis of the Fund's pensioner mortality experience and a Fund membership postcode analysis using Aon's Demographic Horizons™ longevity model, and included an allowance for improvements based on the 2018 Continuous Mortality Investigation (CMI) Core Projections Model (CMI2018), with a Sk of 7.5, Adjustment Parameter of 0.00 and a long term annual rate of improvement in mortality rates of 1.5% p.a. The resulting average future life expectancies at age 65 (for normal health retirements) were:

| | Men | Women |
|--|------|-------|
| Current pensioners aged 65 at the valuation date | 21.8 | 24.5 |
| Current active members aged 45 at the valuation date | 22.4 | 25.6 |

7. The valuation results summarised in paragraphs 1 and 2 above are based on the financial position and market levels at the valuation date, 31 March 2019. As such the results do not make allowance for changes which have occurred subsequent to the valuation date. The Administering Authority, in conjunction with the Actuary, monitors the funding position on a regular basis.
8. The formal actuarial valuation report and the Rates and Adjustments Certificate setting out the employer contribution rates for the period from 1 April 2020 to 31 March 2023 were signed on 31 March 2020. Other than as agreed or otherwise permitted or required by the Regulations, employer contribution rates will be reviewed at the next actuarial valuation of the Fund as at 31 March 2022 in accordance with Regulation 62 of the Local Government Pension Scheme Regulations 2013.
9. There are a number of uncertainties regarding the Scheme benefits and hence liabilities:

- **Increases to Guaranteed Minimum Pensions (GMPs):**

The 2019 valuation allows for the extension of the 'interim solution' for public service schemes to pay full inflationary increases on GMPs for those reaching State Pension Age (SPA) between 6 April 2016 and 5 April 2021. On 23 March 2021, the Government published a response to its consultation on the longer term solution to indexation and equalisation for GMPs and set out its proposal to extend the interim solution further to those reaching SPA after 5 April 2021.

The results of the 2019 valuation do not allow for the impact of this proposed longer term solution. Based on approximate calculations, at a whole of fund level, the impact of providing full pension increases on GMPs for those members reaching State Pension Age after 5 April 2021 is an increase in past service liabilities of between 0.1% to 0.2% across the Fund as a whole.

- **Cost Management Process and McCloud judgement:**

Initial results from the Scheme Advisory Board 2016 cost management process indicated that benefit improvements / member contribution reductions equivalent to 0.9% of pay would be required. However, the cost management process was paused following the Court of Appeal ruling that the transitional arrangements in both the Judges' Pension Scheme (McCloud) and Firefighters' Pension Scheme (Sargeant) constituted illegal age discrimination. Government confirmed that the judgement would be treated as applying to all public service schemes including the LGPS (where the transitional arrangements were in the form of a final salary underpin) and a consultation on changes to the LGPS was issued in July 2020.

The employer contributions certified from 1 April 2020 as part of the 2019 valuation include an allowance of 0.9% of pay in relation to the potential additional costs of the McCloud judgement / cost management process. This was a simplified approach which didn't take account of different employer membership profiles or funding targets and may be more or less than the assessed cost once the final details of the LGPS changes arising from the 2016 cost management process have been agreed.

Work on the 2020 cost management process has now been started, and it is possible that further changes to benefits and/or contributions may ultimately be required under that process, although the outcome is not expected to be known for some time.

- **Goodwin**

An Employment Tribunal ruling relating to the Teachers' Pension Scheme concluded that provisions for survivor's benefits of a female member in an opposite sex marriage are less favourable than for a female in a same sex marriage or civil partnership, and that treatment amounts to direct discrimination on grounds of sexual orientation. The chief secretary to the Treasury announced in a written ministerial statement on 20 July 2020 that he believed that changes would be required to other public service pension schemes with similar arrangements, although these changes are yet to be reflected in LGPS regulations. We expect the average additional liability to be less than 0.1%, however the impact will vary by employer depending on their membership profile.

10. This Statement has been prepared by the Actuary to the Fund, Aon, for inclusion in the accounts of the Fund. It provides a summary of the results of the actuarial valuation which was carried out as at 31 March 2019. The valuation provides a snapshot of the funding position at the valuation date and is used to assess the future level of contributions required.

This Statement must not be considered without reference to the formal actuarial valuation report which details fully the context and limitations of the actuarial valuation.

Aon does not accept any responsibility or liability to any party other than our client, City of Bradford Metropolitan District Council, the Administering Authority of the Fund, in respect of this Statement.

11. The report on the actuarial valuation as at 31 March 2019 is available on the Fund's website at the following address:

<https://www.wyph.org.uk/media/2850/wyph-2019-valuation-report.pdf>

Aon Solutions UK Limited

April 2021

Note 3. Accounting policies

Basis of preparation

This statement of accounts summarises the fund's transactions for the 2019/20 financial year and its financial position at year-end as at 31 March 2021. The accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 which is based upon International Financial Reporting Standards (IFRS), as amended for the UK public sector.

The financial statements summarise the transactions of the fund and report on the net assets available to pay pension benefits. They do not take account of obligations to pay pensions and benefits which fall due after the end of the financial year. The valuation of the present value of future benefits payable is provided by our actuary in note 12.

Contributions

Normal contributions from employers are accounted for on an accruals basis at the percentage rate recommended by the fund actuary in the payroll period to which they relate. Normal contributions from members are accounted for on an accruals basis at a percentage rate outlined in the Local Government Pension Scheme Regulations

Employer deficit funding contributions are accounted for on the due dates on which they are payable.

Where employers have to pay the indirect costs of early retirement, these costs are accounted for in the period in which the liability arises. Any amount due but unpaid are classed as current asset debtors.

Transfers in and out of the fund

Transfer values represent amounts received and paid during the period for individual. Bulk (group) transfers are accounted for on an accruals basis, these are calculated in accordance with the Local Government Pension Scheme Regulations 2013.

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 assets statement as current liabilities.

Management expenses

All management expenses are accounted for on an accruals basis. The Code does not require any breakdown of pension fund management expenses. However, in the interests of greater transparency, the Fund discloses its pension fund management expenses in accordance with CIPFA's preparing the annual report - Guidance for Local Government Pension Scheme (2019).

Administrative expenses

All WYPF staff are charged directly to the Fund. Associated indirect management costs and other overheads are apportioned to administrative expenses using relevant factors and charged as expenses to the Fund.

Oversight and Governance costs

All oversight and governance expenses are accounted for on an accruals basis. Associated indirect management costs and other overheads are apportioned to oversight and governance activities using relevant factors and charged as expenses to the fund.

Investment management expenses

All investment management expenses are accounted for on an accruals basis. Fees charged by external advisors and custodian are agreed in the respective mandates governing their appointment. The custodian fees are based on the market value of the investments under their management and unit price per transaction, therefore increase or reduce as the value of the investments and volume of transactions change. The fees of the external advisors increase by RPI on an annual basis.

The cost of the fund's in-house investment fund management team is charged direct to investment management expense and a proportion of the fund's management costs which represents management time spent by officers on investment management is also charged to investment management expenses.

Actuarial present value of promised retirement benefits

The actuarial present value of promised retirement benefits is assessed every three years per LGPS regulations and updated annually in the intervening years by the appointed actuary in accordance with the requirements of IAS19 and relevant actuarial standards. As permitted under IAS26, WYPF has opted to disclose the actuarial present value of promised retirement benefits as a note to the net assets statement (note 12).

Cash and cash equivalents

Cash comprises of cash in bank and on demand deposits. Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash and that are subject to minimal risk of changes in values.

Financial liabilities

The fund recognises financial liabilities at amortised cost. A financial liability is recognised in the net assets statement on the date the fund becomes party to the liability.

Investment income

Interest income

Interest due on fixed-interest securities, index-linked securities and short-term investments is accounted for on an accruals basis.

Property related income

Property related income is primarily rental income which is recognised on a straight-line basis over the term of the lease. Lease incentives have been recognised as part of the total rental income over the term of the lease.

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 assets statement as a current financial asset.

Distribution 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 assets statement as a current financial asset.

Movement in the net market value of investments

Changes in the net market value of investments (including investment properties) are recognised as income when positive (profits) and as expenditure when negative (losses). This comprises of all realised and unrealised profits/losses during the accounting period.

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 an expense as it arises.

Financial assets

Financial assets are included in the net assets statement based on fair value or 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. From the date of recognition any gains or losses arising from changes in the fair value of assets held at fair value are recognised in the fund account. The values of investments as shown in the net assets statement have been determined at fair value in accordance with the requirements of the Code and IFRS13 (see note 16). For the purpose 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).

Additional voluntary contributions (AVCs)

West Yorkshire Pension Fund provides an additional voluntary contribution (AVC) scheme for its members, the assets of which are invested separately from those of the pension fund. The fund has appointed Scottish Widows, Prudential and Utmost (Equitable Life) as its AVC providers. AVCs are 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 (note 11).

Currency translation

At the year-end all foreign currency balances are translated into sterling at exchange rates ruling at the financial year-end, and any gains or losses arising are treated as part of the change in market value of investments. During the year foreign currencies are transacted as follows.

- a. Proceeds of sales of foreign assets are translated into sterling at the exchange rate on the day of sale and recorded in our investment book of records in sterling and in local currency.
- b. Purchase of foreign investments are translated into sterling using the exchange rate at the time of purchase and recorded in our investment book of record at book cost in sterling and local currency.
- c. Balance of foreign currency income accounts are moved daily to capital account using the mid-market rate on the date of movement.
- d. Dividends from foreign investments are translated into sterling using the mid-market rate on the date of receipt.
- e. When currency is sold or purchased the actual trade rate is used and commissions are charged to management expense.

Acquisition costs of investments

Brokerage commissions, fees, stamp duties and foreign exchange fees paid as part of acquisition costs of investments are charged as revenue cost and included in investment management costs.

Netting

A financial asset and a financial liability shall be offset and the net amount presented in the Net Assets Statement when, and only when, the fund:

- a. currently has a legally enforceable right to set off the recognised amounts, and
- b. intends either to settle on a net basis, or to realise the asset and settle the liability simultaneously.

Contingent liabilities and contractual commitments

A contingent liability arises when an event has taken place that gives the fund a possible obligation whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the fund. Contingent liabilities also arise in circumstances where a provision would otherwise be made but either it is not probable that an outflow of resources would be required, or the amount of the obligation cannot be measured reliably. Contingent liabilities are not recognised in the Net Assets Statement but disclosed in note 22 of the accounts.

Undrawn commitments relate to outstanding call payments due on unquoted limited partnership funds held in private equity, property and infrastructure parts of the portfolio. The amounts “called” by these funds are irregular in both size and timing over a period of between four and six years from the date of each original commitment.

Investment transactions

Investment transactions occurring up to 31 March 2021 but not settled until later are accrued in the accounts.

Note 4. Critical judgements in applying accounting policies

In applying the accounting policies set out in Note 3 above, WYPF has had to make certain critical judgements about complex transactions or those involving uncertainty about future events.

Assumptions made about the future and other major sources of estimation uncertainty

The preparation of the Fund’s financial statements in accordance with IFRS requires management to make judgements, estimates and assumptions that affect the reported amounts of assets, liabilities, income and expenses. Due to the inherent uncertainty in making estimates, actual results reported in future periods may be based upon amounts which differ from those estimates. Estimates, judgements and assumptions are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. Key sources of estimation uncertainty in these financial statements, which together are deemed critical to the Fund’s results and financial position, are explained below.

Fair value of financial instruments

In accordance with the Code and IFRS13, the Fund categorises financial instruments carried on the net asset statement at fair value using a three-level hierarchy as disclosed in note 16. Financial instruments categorised as level 1 are valued using quoted market prices and therefore there is minimal judgement applied in determining fair value. However, the fair value of financial instruments categorised as level 2 and, in particular, level 3 is determined using valuation techniques including discounted cashflow analysis and valuation models. These require management judgement and contain significant estimation uncertainty. Reliance is placed on our third parties to perform these valuations and further due diligence is performed by the Fund to maintain confidence in the data provided.

Impact of Covid-19

The outbreak of the Novel Coronavirus (COVID-19), declared by the World Health Organisation as a “Global Pandemic” on the 11th March 2020, continued to impact global financial markets. Travel restrictions have been implemented by many countries and market activity is being impacted in many sectors. Valuation of quoted and unquoted assets were materially impacted. The impact of Covid-19 has added additional uncertainty to the valuation of unquoted stock, which is challenging in normal times. Asset values are less certain as a result of increased volatility, changing domestic and industrial consumption, markets trending more favourably in the direction of digital, virtual and contactless business activities with green environmental focus.

In simple terms the impact of Covid-19 has continued to significantly impact on the number of transactions in the market up to 31 March 2021 and consequently the relevant observable data available upon which to base a valuation judgement. Specifically, with regard to pooled property funds, a material valuation uncertainty clause has been included in a number of valuation reports from fund managers due to the possible impact of Covid-19. Therefore, there is less certainty, and a higher degree of caution should be attached to our valuations of Level 3 assets than would normally be the case. There is a risk that current valuations may be under or over stated in the accounts.

Retirement benefit obligations

Under IFRS the fund is required to disclose the actuarial present value of promised retirement benefits. This is disclosed as a note in note 12 and does not comprise part of the financial statements. Significant judgement and estimates are used in formulating this information, all of which are disclosed in note 12.

Note 5. Events after the balance sheet date

These are events, both favourable and unfavourable, that occur between the end of the reporting period and the date when the financial statements are authorised for issue. Two types of events can be identified:

- a. those that provide evidence of conditions that existed at the end of the reporting period (adjusting events after the reporting period).
- b. those that are indicative of conditions that arose after the reporting period (non-adjusting events after the reporting period).

There have been no adjusting events since 31 March 2021 and up to the date when these accounts were authorised, that require any adjustments to these accounts. The market value movement of financial assets as a result the prevailing Covid-19 pandemic is a non-adjusting event, it is impossible to estimate the impact of Covid-19 on this financial statement.

| | 2020/21 £000 | 2019/20 £000 |
|------------------------------------|-----------------|-----------------|
| By category | | |
| Employers | 353,385 | 319,830 |
| Members | 126,785 | 122,143 |
| Total | 480,170 | 441,973 |
| By type of employer | | |
| Administering authority | 52,806 | 53,103 |
| Scheme | 389,501 | 350,280 |
| Admitted bodies | 37,863 | 38,590 |
| Total | 480,170 | 441,973 |
| By type of contribution | | |
| Employees normal contributions | 122,673 | 116,727 |
| Employees additional contributions | 4,112 | 5,416 |
| Employers normal contributions | 313,057 | 294,435 |
| Employers deficit contributions | 40,328 | 25,395 |
| Total | 480,170 | 441,973 |

Employer contribution rates and deficit contributions

Employer contributions receivable in 2020-21 were based on 31 March 2019 triennial valuation. At each triennial valuation (latest 31 March 2019) the Actuary calculates an employer rate for each employer. In addition to this some employers are also required to pay an additional monetary amount to cover any past service deficit, which is recoverable over an appropriate period.

Employee contribution rates

Employees' contributions are as set out in the LGPS regulations from 1st April 2014, and there are several tiered employee contribution rates. The rates for 2020/21 based on pay in the financial year are provided below.

| 2020/21 Pay | Contribution rate |
|----------------------|-------------------|
| Up to £14,600 | 5.50% |
| £14,601 to £22,800 | 5.80% |
| £22,801 to £37,100 | 6.50% |
| £37,101 to £46,900 | 6.80% |
| £46,901 to £65,600 | 8.50% |
| £65,601 to £93,000 | 9.90% |
| £93,001 to £109,500 | 10.50% |
| £109,501 to £164,200 | 11.40% |
| £164,201 or more | 12.50% |

Note 7. Transfers in from other pension funds

| | 2020/21 | 2019/20 |
|--|---------------|---------------|
| | £000 | £000 |
| Individual transfers in from other schemes | 25,288 | 38,664 |
| Bulk transfers in from other schemes | 1,646 | 12,041 |
| Total Transfers In | 26,934 | 50,705 |

Note 8. Non-statutory pensions increase and recharges

| | 2020/21 | 2019/20 |
|--------------|---------------|---------------|
| | £000 | £000 |
| Pensions | 21,019 | 21,671 |
| Total | 21,019 | 21,671 |

The costs of added years granted by participating employers for early retirement together with associated inflation proofing costs are reimbursed to the fund, by the employer out of current revenues. Costs of annual inflation proofing for non-participating employers are also recharged.

Note 9. Benefits payable

| | 2020/21 | 2019/20 |
|---|-----------------|-----------------|
| | £000 | £000 |
| Pensions | | |
| Funded pensions – retired employees | -406,808 | -388,929 |
| Funded pensions – dependants | -33,611 | -34,926 |
| Total pensions | -440,419 | -423,855 |
| Lump sums | | |
| Funded lump sums on retirement | -95,919 | -115,655 |
| Funded lump sums on death | -13,739 | -13,572 |
| Total lump sums | -109,658 | -129,227 |
| Total benefits paid in year | -550,077 | -553,082 |
| Benefits payable by type of employer member body | | |
| | £000 | £000 |
| Pensions | | |
| Administering authority | -81,348 | -83,865 |
| Scheduled bodies | -415,221 | -412,990 |
| Admitted bodies | -53,508 | -56,227 |
| Total pensions | -550,077 | -553,082 |

For participating employers, all basic pensions plus the costs of annual inflation are met from the assets of the fund.

Note 10. Payments to and on account of leavers

| | 2020/21 | 2019/20 |
|-------------------------|----------------|----------------|
| | £000 | £000 |
| Refund of contributions | -1,266 | -1,644 |
| Individual transfers | -22,107 | -35,606 |
| Total | -23,373 | -37,250 |

Note 11. AVC Scheme – Equitable Life, Scottish Widows and Prudential

The fund provides an AVC Scheme for its contributors, the assets of which are invested separately from the main Fund. The scheme providers are Utmost (Equitable Life Assurance), Scottish Widows and Prudential, whereby additional benefits are secured on a money purchase basis for those contributors electing to pay additional voluntary contributions.

As advised by the three companies the amounts administered under AVC arrangements are as follows.

| | 2020/21 | 2019/20 |
|---|---------------|---------------|
| | £000 | £000 |
| Value of funds at 1 April | 12,800 | 33,970 |
| Contributions received | 425 | 6,112 |
| Transfers and withdrawals values | 20 | 144 |
| Interest and bonuses/change in market value of assets | 2,001 | -1,206 |
| Sale of investments to settle benefits due to members | -1,395 | -6,155 |
| Value of funds at 31 March | 13,851 | 32,865 |

| | Members still paying contribution 2020/21 Count | Members 2019/20 Count | 2020/21 £000 | 2019/20 £000 |
|-------------------------|---|-----------------------------|-----------------|-----------------|
| Utmost (Equitable Life) | 214 | 241 | 2,090 | 2,193 |
| Prudential | 2,174 | 1,871 | 0 | 20,065 |
| Scottish Widows | 503 | 558 | 11,761 | 10,606 |
| Total | 2,891 | 2,670 | 13,851 | 32,864 |

Still waiting for prudential figures.

Note 12. Actuarial present value of promised retirement benefits

The fund is part of the Local Government Pension Scheme and under IAS 26 it is required to disclose the actuarial present value of promised retirement benefits across the fund as a whole. The fund provides defined benefits, which for membership to 31 March 2014, are based on member's Final Pensionable Pay. On the 1 April 2014 the scheme changed from a final salary scheme to a CARE (Career Average Revalued Earnings) scheme and pension benefits are based on a member's pay each in scheme year. The required valuation is carried out by the fund Actuary, Aon Hewitt, using assumptions derived in the same way as those recommended for individual participating employers reporting pension liabilities under IAS 19. This approach results in a different valuation of liabilities than at the triennial funding valuation (Actuarial statement on p69).

Introduction

IAS 26 requires the 'actuarial present value of the promised retirement benefits' to be disclosed, which is the IAS 26 terminology for what IAS 19 refers to as the 'defined benefit obligation'. The information set out below relates to the actuarial present value of the promised retirement benefits in WYPF which is part of the Local Government Pension Scheme. The LGPS is a funded defined benefit plan with benefits earned up to 31 March 2014 being linked to final salary. Benefits after 31 March 2014 are based on a Career Average Revalued Earnings scheme. Details of the benefits covered by these figures are set out in 'The Local Government Pension Scheme Regulations 2013' (as amended) and 'The Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014' (as amended).

Actuarial present value of promised retirement benefits (defined benefit obligation)

Paragraph 6.5.2.8 of CIPFA's Code of Practice on local authority accounting for 2019/20 sets out that for consistency with employers' IAS 19 actuarial report, that the actuarial present value of promised retirement benefits based on projected salaries should be disclosed in the Pension Fund Account.

The results as at 31 March 2019, together with the results as at 31 March 2016 are shown in the table below. The corresponding fair value of Fund assets is also shown in order to show the level of surplus or deficit within the Fund when the liabilities are valued using IAS 19 assumptions.

| | Value as at 31 March 2019 £M | Value as at 31 March 2016 £M |
|---|------------------------------------|------------------------------------|
| Fair value of net assets | 14,363.0 | 11,211.0 |
| Actuarial present value of the defined benefit obligation (see Notes) | (19,365.8) | (14,085.4) |
| Surplus / (deficit) in the Fund as measured for IAS 26 purposes | (5,002.8) | (2,874.4) |

McCloud / Sargeant judgement

The actuarial present value of the defined benefit obligation at 31 March 2019 includes an estimated liability in relation to the McCloud/Sargeant judgement of £33.15M. The McCloud / Sargeant judgement (December 2018) found that the transitional arrangements put in place when the firefighters' and judges' pension schemes were reformed constituted illegal discrimination. The Government has since committed to compensate members of all public service schemes who were illegally discriminated against. In relation to the LGPS in England and Wales all members joined the new 2014 Scheme for membership after 1 April 2014, but members within 10 years of normal retirement were given an underpin (or 'better of both') promise, so their benefits earned after 1 April 2014 would be at least as valuable in terms of amount and when they could be drawn, as if they had remained in the 2008 Scheme.

The remedy for the LGPS is expected to be consulted upon in the summer. The additional liability included within this note assumes the underpin will be extended to cover all members who were actively participating in the Scheme on 1 April 2012 (and not just those within 10 years of retirement) and will apply on retirement or the date of leaving service if earlier.

Equalisation and Indexation of Guaranteed Minimum Pensions

The actuarial present value of the defined benefit obligation includes an estimated liability in relation to the equalisation and indexation of Guaranteed Minimum Pensions (GMPs) beyond the arrangements already formally in place, which apply to

members whose State Pension Age (SPA) is between 6 April 2016 and 5 April 2021 inclusive. Those arrangements require the LGPS to pay pension increases on GMPs at the full rate of CPI for those members, whereas GMP legislation only requires limited price increases to be applied. The additional liability included within this note assumes those arrangements for fully indexing GMPs will be extended to members whose SPA is after 5 April 2021. This has increased the defined benefit obligation by in the region of 0.1% to 0.2%.

Cost Management Process

The actuarial present value of the defined benefit obligation does not allow for any potential additional liability which may arise from the cost management valuations. Legislation requires HM Treasury and the Scheme Advisory Board (SAB) to undertake periodic valuations to monitor the cost of the LGPS to ensure it remains sustainable and affordable.

HM Treasury and the SAB have paused their reviews following the 'McCloud' judgement in the Court of Appeal. The cost cap process will not recommence until the remedy as applies to the LGPS has been decided.

On 24 April 2020 a number of Trades Unions filed court proceedings to challenge the Government's decision to pause the cost management process. If successful this could lead to higher liabilities and employer costs although it is not yet known how such changes, and those required due to the McCloud case, will affect the cost management valuation due as at 31 March 2020 which it is expected would lead to changes in benefits and/or member contributions in future.

Assumptions

The latest full triennial actuarial valuation of the Fund's liabilities was carried out as at 31 March 2019. The principal assumptions used for the purpose of IAS 26 by the Fund's independent qualified actuaries were:

| | 31 March 2019 (% p.a.) | 31 March 2016 (% p.a.) |
|---|---------------------------|---------------------------|
| Discount rate | 2.40 | 3.40 |
| CPI Inflation (pension increases) * | 2.20 | 1.80 |
| Rate of general increase in salaries ** | 3.45 | 3.05 |

* In excess of Guaranteed Minimum Pension increases in payment for members whose State Pension Age is on or before 5 April 2016 where appropriate

** In addition, allowance has been made for the same age related promotional salary scales as used at the actuarial valuation of the Fund as at the appropriate date

Principal demographic assumptions

The mortality assumptions are based on actual mortality experience of members within the Fund based on analysis carried out as part of the 2019 Actuarial Valuation and allow for expected future mortality improvements. Sample life expectancies at age 65 in normal health resulting from these mortality assumptions are shown below:

| | 31/03/2019 | 31/03/2016 |
|---|------------|------------|
| Males | | |
| Future lifetime from age 65 (pensioners aged 65 at 31 March 2019) | 21.8 | 22.0 |
| Future lifetime from age 65 (actives aged 45 at 31 March 2019) | 22.4 | 22.9 |
| Females | | |
| Future lifetime from age 65 (pensioners aged 65 at 31 March 2019) | 24.5 | 25.1 |
| Future lifetime from age 65 (actives aged 45 at 31 March 2019) | 25.6 | 26.9 |

Different mortality assumptions have been used for other categories of member as set out in the actuary's report on the 2019 valuation. Assumptions for the rates of the rates of withdrawal and ill health retirements (for active members), the allowance made for cash commutation on retirement, and the proportion of members whose death gives rise to a dependant's pension are the same as those adopted in the 2019 valuation of the Fund, which are detailed in the actuary's valuation report.

Key risks associated with reporting under IAS 26 and sensitivity

Volatility of results

Results under IAS 26 can change dramatically depending on market conditions. The defined benefit obligation is linked to yields on AA-rated corporate bonds, while a significant proportion of the assets of the Fund are invested in equities and other

growth assets. Changing markets in conjunction with discount rate volatility will lead to volatility in the funded status of the pension fund. For example:

A decrease in corporate bond yields will increase the value placed on the liabilities for accounting purposes, although this will be marginally offset by the increase in the assets as a result (to the extent the Fund invests in corporate bonds).

- The majority of the pension liabilities are linked to either pay or price inflation. Higher inflation expectations will lead to a higher liability value. The assets are not perfectly correlated with inflation meaning that an increase in inflation will increase the deficit.
- The majority of the Fund's obligations are to provide benefits for the life of the member following retirement, so increases in life expectancy will result in an increase in the liabilities.

Post 31 March 2019 experience

Since 31 March 2019 the Fund's assets are likely to have fallen in value due to the emerging Covid-19 crisis. This crisis has also caused a reduction in corporate bond yields, which will have led to an increase in the value of the defined benefit obligation (liabilities) on an accounting basis. The impact on the net pensions asset will depend on the Fund's asset performance, but we would expect most LGPS Funds' IAS 26 balance sheet positions to have deteriorated over the year, with a higher IAS 26 deficit at 31 March 2020. It is too early to say what impact the higher rates of mortality will have on the funding position of the Fund. At time of writing, ONS data is showing that the cumulative deaths in 2020 to date are well outside the range of the outcomes seen in recent years. The impact on longevity for the Fund's members will additionally be affected by the indirect impact of Covid-19, including the health of the surviving population, and the economic, social and political consequences of tackling Covid-19. In both of the above cases, the impact on longevity could be positive or negative.

Choice of accounting assumptions

The calculation of the actuarial present value of the promised retirement benefits involves projecting future cash-flows from the Fund many years into the future. This means that the assumptions used can have a material impact on the surplus / deficit.

Furthermore, as required by the accounting standard, the assumptions (with the exception of the discount rate) have been set so that they represent a best estimate of future experience for the Fund. In practice future experience within the Fund may not be in line with the assumptions adopted. This means that the liabilities shown in this report only represent one view of the future and the true position could be different from those shown. For example, members could live longer than foreseen or inflation could be higher or lower than allowed for in the calculations.

Sensitivity of results to key assumptions

In order to understand the magnitude of the possible volatility in the balance sheet position and to understand which assumptions are most important in determining the size of the liabilities, it is helpful to understand how sensitive the results are to the key assumptions.

We have set out below how the results would alter by changing the discount rate, the pay increase assumption and pension increase assumption by plus or minus 0.1% and if life expectancy was to reduce or increase by 1 year. In each case, only the assumption mentioned is altered; all other assumptions remain the same.

Sensitivity Analysis

| Discount rate assumption | | |
|--|---------------|---------------|
| Adjustment to discount rate assumption | +0.1% £M | -0.1% £M |
| £ change to present value of the defined benefit obligation | -396.0 | 404.2 |
| % change in present value of defined benefit obligation | -2.0% | 2.1% |
| Rate of general increase in salaries | | |
| Adjustment to salary increase rate assumption | +0.1% £M | -0.1% £M |
| £ change to present value of the defined benefit obligation | 50.1 | -49.5 |
| % change in present value of defined benefit obligation | 0.3% | -0.3% |
| Rate of increase to pensions in payment, deferred pensions increase assumption and rate of revaluation of pension accounts | | |
| Adjustment to pension increase rate assumption | +0.1% £M | -0.1% £M |
| £ change to present value of the defined benefit obligation | 354.2 | -346.5 |
| % change in present value of defined benefit obligation | 1.8% | -1.8% |
| Post retirement mortality assumption | | |
| Adjustment to members' life expectancy | +1 year £M | -1 year £M |
| £ change to present value of the defined benefit obligation | -745.4 | 757.9 |
| % change in present value of defined benefit obligation | -3.9% | 3.9% |

Note 13. Management expenses

| | 2020/21 £000 | 2019/20 £000 |
|--------------------------------|-----------------|-----------------|
| Administrative costs | -4,002 | -4,763 |
| Investment management expenses | -5,129 | -6,698 |
| Oversight and governance | -871 | -845 |
| Total | -10,002 | -12,306 |

This analysis of the costs of managing West Yorkshire Pension Fund during the accounting period has been prepared in accordance with CIPFA guidance. The Investment management expenses above includes Statutory audit fee of -£37.4k (2019/20 -£37.4k) is included on oversight and governance. The statutory audit fee does not include fees chargeable to the Fund for pension assurance work undertaken at the request of employer auditors, fees payable for this work total -£24.3k (2019/20 -£22k) and are recharged to the relevant employers. No other fees have been paid to the external auditor.

The costs associated with the setting up and running Northern LGPS that relate specifically to WYPF are included within the administration costs above; the costs for the 2020/21 reporting period are £75.6k (2019/20 £106k).

Note 14. Investment expenses

| | 2020-21 | Management | Performance | Transaction |
|----------------------------|----------------|-------------|--------------|-------------|
| | Total | Fees | related Fees | Costs |
| | £000 | £000 | £000 | £000 |
| NPEP | 28 | 28 | 0 | 0 |
| Bonds | 336 | 336 | 0 | 0 |
| Equities | 3,848 | 3,062 | 0 | 786 |
| Index-linked securities | 187 | 187 | 0 | 0 |
| Pooled investment vehicles | 397 | 370 | 0 | 27 |
| Property | 2 | 2 | 0 | 0 |
| Cash deposits | 129 | 129 | 0 | 0 |
| | 4,927 | 4,114 | 0 | 813 |
| Custody Fees | 202 | | | |
| Total | 5,129 | | | |

| | 2019-20 | Management | Performance | Transaction |
|----------------------------|----------------|-------------|--------------|-------------|
| | Total | Fees | related Fees | Costs |
| | £000 | £000 | £000 | £000 |
| NPEP | 5 | 5 | 0 | 0 |
| Bonds | 211 | 211 | 0 | 0 |
| Equities | 3,736 | 1,442 | 0 | 2,294 |
| Index-linked securities | 112 | 112 | 0 | 0 |
| Pooled investment vehicles | 184 | 184 | 0 | 0 |
| Property | 1 | 1 | 0 | 0 |
| Cash deposits | 46 | 46 | 0 | 0 |
| | 4,295 | 2,001 | 0 | 2,294 |
| Custody Fees | 505 | | | |
| Total | 4,800 | | | |

Investment expenses are included in within management expenses (note 13). Investment expenses are of particular interest to LGPS funds' stakeholders and as such further breakdown of this cost is provided here. Transaction costs are included to comply with CIPFA guidance. All of the assets that WYPF hold are managed by a team of internal investment managers and as such we do not incur any performance fees.

Note 15. Investment income

| | 2020/21 | 2019/20 |
|-------------------------------------|----------------|----------------|
| | £000 | £000 |
| NPEP | 154 | 0 |
| Income from bonds | 39,418 | 48,549 |
| Dividends from equities | 295,369 | 382,045 |
| Income from index-linked securities | 3,532 | 3,683 |
| Income from pooled funds | 21,053 | 26,435 |
| Income from direct property | 449 | 438 |
| Interest on cash deposits | 1,184 | 3,134 |
| Total | 361,159 | 464,284 |

Note 15a. Tax on income

| | 2020/21 | 2019/20 |
|-----------------------------------|---------------|---------------|
| | £000 | £000 |
| Dividends from equities | -7,919 | -9,604 |
| HMRC receipt re GMP equalisation* | 0 | 885 |
| Total | -7,919 | -8,719 |

* GMP – Guaranteed minimum pension

Note 16. Direct property holdings

| | 2020/21 | 2019/20 |
|--|--------------|--------------|
| | £000 | £000 |
| Opening balance | 6,675 | 7,250 |
| Additions | | |
| Net increase/ decrease in market value | 625 | -575 |
| Closing balance | 7,300 | 6,675 |

Note 17. Investments

Note 17a. Movement in the value of investments

| | Opening value at 1 April 2020 | Purchases cost | Sales proceeds | Change in market value | Closing value at 31 March 2021 |
|-----------------------------|----------------------------------|------------------|-------------------|------------------------|-----------------------------------|
| | £000 | £000 | £000 | £000 | £000 |
| Northern LGPS assets | 32,579 | 84,691 | -6,336 | 18,661 | 129,595 |
| Bonds | 1,387,188 | 335,004 | -425,563 | 19,182 | 1,315,811 |
| Equities | 9,499,515 | 553,678 | -488,961 | 2,548,187 | 12,112,419 |
| Index linked securities | 736,119 | 53,161 | -52,570 | -1,591 | 735,119 |
| Pooled funds | 1,214,360 | 18,485 | -21,990 | 248,677 | 1,459,532 |
| Direct property | 6,675 | 0 | 0 | 625 | 7,300 |
| Cash Deposits | 254,625 | 1,098,393 | -931,008 | -7 | 422,003 |
| Cash at bank re investments | 46,842 | 0 | -5,250 | 0 | 41,592 |
| Other investment debtors | 53,918 | 4,235 | 0 | 0 | 58,153 |
| Other investment creditors | -51,239 | 37,249 | 0 | 0 | -13,990 |
| Totals | 13,180,582 | 2,184,896 | -1,931,678 | 2,833,734 | 16,267,534 |

| | Opening value at 1 April 2019 | Purchases cost | Sales proceeds | Change in market value | Closing value at 31 March 2020 |
|-----------------------------|----------------------------------|------------------|-------------------|------------------------|-----------------------------------|
| | £000 | £000 | £000 | £000 | £000 |
| Northern LGPS assets | 261 | 33,031 | 0 | -713 | 32,579 |
| Bonds | 1,512,233 | 535,266 | -534,984 | -125,327 | 1,387,188 |
| Equities | 10,415,004 | 836,634 | -433,408 | -1,318,715 | 9,499,515 |
| Index linked securities | 679,524 | 59,833 | -54,480 | 51,242 | 736,119 |
| Pooled funds | 1,387,123 | 31,970 | -97,447 | -107,286 | 1,214,360 |
| Direct property | 7,250 | 0 | 0 | -575 | 6,675 |
| Cash Deposits | 269,242 | 1,169,499 | -1,188,432 | 4,316 | 254,625 |
| Cash at bank re investments | 25,261 | 21,581 | 0 | 0 | 46,842 |
| Other investment debtors | 48,560 | 5,358 | 0 | 0 | 53,918 |
| Other investment creditors | -15,356 | 0 | -35,883 | 0 | -51,239 |
| Totals | 14,329,102 | 2,693,172 | -2,344,634 | -1,497,058 | 13,180,582 |

The change in market value of investments during the year includes all increases and decreases in market value of investments held at any time during the year, including profits and losses realised on sales of investments during the year. A further analysis of the asset split between overseas and UK can be found in note 23.

Note 17b. Investments analysis by security type

| | 2020/21 £000 | 2019/20 £000 |
|-------------------------------------|-------------------|-------------------|
| Northern LGPS assets | 129,595 | 32,579 |
| Bonds | | |
| Public sector quoted | 782,562 | 926,917 |
| Other quoted | 533,249 | 460,271 |
| | 1,315,811 | 1,387,188 |
| Equities | 12,112,419 | 9,499,515 |
| Index-linked securities | 735,119 | 736,119 |
| Pooled funds | | |
| Hedge funds quoted | 105,585 | 94,967 |
| Property quoted | 606,022 | 609,425 |
| Other | 747,925 | 509,968 |
| | 1,459,532 | 1,214,360 |
| Direct property | 7,300 | 6,675 |
| Cash deposits | 422,003 | 254,625 |
| Cash in bank | 41,592 | 46,842 |
| Other Investment assets | 58,153 | 53,918 |
| Other Investment liabilities | -13,990 | -51,239 |
| Total | 16,267,534 | 13,180,582 |

Note 17c. Stock lending

| | 2020/21 | 2019/20 |
|------------------------|--------------|--------------|
| | £000 | £000 |
| Stock lending | | |
| Income – bonds | 176 | 228 |
| Income – UK equities | 396 | 648 |
| International equities | 1,782 | 1,924 |
| | 2,354 | 2,800 |
| Less – costs | -76 | -90 |
| Total | 2,278 | 2,710 |

As at 31 March 2021, the value of stock on loan to market makers was £660m (31 March 2020 £890m) and this was covered by collateral totalling £702m (31 March 2020 £960m) which includes an appropriate margin. The collateral includes basket of UK Equities (£163 million), United Kingdom Gilts (£159million), US Equities (£191 million) and Government Debt (£17 million).

Note 18. Fair value – basis of valuation

The classification of assets within the fair value hierarchy is determined using the criteria set out in IFRS13 Fair Value Measurement. The basis of the valuation of each class of investment asset is set out below. There has been no change in the valuation techniques used during the year. All assets have been valued using fair value techniques which represent the highest and best price available at the reporting date. Transfers between levels are deemed to have occurred when there is a significant change to the level of observable and unobservable inputs used to determine fair value.

| Description of asset | Valuation hierarchy | Basis of valuation | Observable and unobservable | Key sensitivities affecting the valuations provided |
|--|---------------------|---|---|--|
| Market quoted equities. | Level 1 | Listed investments are shown at bid prices. The bid value of the investments is based on the bid market quotation of the relevant stock exchange. | Not required | Not required |
| Quoted bonds | Level 1 | Fixed interest securities are valued at a market value based on current yields | Not required | Not required |
| Unquoted bonds | Level 3 | Fund managers' capital statements | Evaluated price feeds | Not required |
| Pooled investments, unit trusts and quoted property funds. | Level 2 | Closing bid price where bid and offer prices are published closing single price where single price is published. Valuations for Property Funds are provided by Fund managers and where available closing bid price is used. | NAV – based pricing set on a forward pricing basis. | Not required |
| All unquoted, delisted or suspended assets, pooled investments - hedge funds, unit trusts and property funds | Level 3 | Closing bid price where bid and offer prices are published – closing single price where single price is published. | These are based on the net asset values provided by the fund managers. Values are normally received by West Yorkshire Pension Fund between 30 and 90 days after the month end to which they relate. The values reported in the financial statements are therefore based on December 2020 to March 2021, adjusted according to estimates of investment fund performance in March, as informed by fund managers. We gain assurance over valuations and capital statements provided by fund managers' comparing valuations to funds' audited accounts' | Valuations could be affected by material events occurring between the date of the financial statements provided and the pension funds own reporting date by changes to expected cashflows and by any differences between |

| | | | | |
|-----------------------------------|---------|--|---|--|
| | | | Net Asset Values and updated capital statements provided in subsequent periods. In the case of delisted assets we use latest available price or price advised by investment managers. | audited and unaudited accounts. |
| Freehold and leasehold properties | Level 3 | Valued at fair value at the year-end by CBRE independent valuers – in accordance with the RICS Valuation – Global Standards 2017 which incorporate the International Standards and the RICS Valuation – Professional Standards UK January 2014 (revised July 2017) ('The Red Book'). | Existing lease terms <ul style="list-style-type: none"> – Independent market research – Nature of tenancies – Estimated growth – Assumed vacancy levels – Estimated growth – Discount rate | Changes in rental growth, vacancy levels or discount rates could affect valuations as could changes to market prices. |
| Unquoted equity | Level 3 | Comparable valuation of similar companies in accordance with International Private Equity and Venture Capital Valuation Guidelines (2012). | These are based on valuations provided by the general partners to the private equity funds in which West Yorkshire Pension Fund has invested. They are prepared in accordance with the International Private Equity and Venture Capital Valuation Guidelines, which follow the valuation principles of IFRS and US GAAP. Valuations are performed annually and mainly as at the end of December. Cashflow adjustments are used to roll forward the valuations to 31 March as appropriate. | Valuations could be affected by material events occurring between the date of the financial statements provided and the pension funds own reporting date by changes to expected cashflows and by any differences between audited and unaudited accounts. |

Note 18a. Sensitivity of assets valued at level 3

The fund has determined that the valuation methods described in the table above are likely to be accurate within the following ranges and has set out below the potential impact on the closing value of investments held at 31 March 2020.

| | Assessed valuation range (+/-) | 31 March 2021 £m | Value on increase £m | Value on decrease £m |
|----------------------------------|--------------------------------|---------------------|-------------------------|-------------------------|
| Pooled investments – hedge funds | 10% | 105.3 | 115.8 | 94.8 |
| Property funds | 10% | 453.1 | 498.4 | 407.8 |
| Direct property | 10% | 7.3 | 8.0 | 6.6 |
| Private equity | 15% | 1,783.0 | 2,050.5 | 1,515.6 |
| Other assets | 10% | 33.2 | 36.5 | 29.9 |
| Total | | 2,381.9 | 2,709.2 | 2,054.7 |

| | Assessed valuation range (+/-) | 31 March 2020 £m | Value on increase £m | Value on decrease £m |
|----------------------------------|--------------------------------|---------------------|-------------------------|-------------------------|
| Pooled investments – hedge funds | 10% | 94.9 | 104.4 | 85.4 |
| Property funds | 10% | 427.8 | 470.6 | 385.0 |
| Direct property | 10% | 6.7 | 7.4 | 6.0 |
| Private equity | 15% | 1,552.9 | 1,785.8 | 1,320.0 |
| Other assets | 10% | 26.2 | 28.8 | 23.6 |
| Total | | 2,108.5 | 2,397.0 | 1,820.0 |

Financial instruments – valuation

Valuation of financial assets carried at fair value

The valuations of financial assets have been classified into three levels according to the quality and reliability of information used to determine the fair values. Transfers between levels are recognised in the year in which they occur.

Level 1

Level 1 fair value measurements are those derived from unadjusted quoted prices in active markets for identical assets or liabilities. Financial assets classified as level 1 comprise quoted equities, quoted bonds (fixed interest securities), quoted index linked securities and unit trusts.

Level 2

Level 2 valuations are those where quoted market prices are not available, for example where the financial asset is traded in a market that is not considered to be active or valuation techniques are used to determine fair value and where these techniques use inputs that are based significantly on observable market data. Financial assets classified as level 2 are quoted property funds.

Level 3

Level 3 portfolios are those where at least one input which could have a significant effect on the instrument's valuation is not based on observable market data. Such instruments would include unquoted equity investments and hedge funds, or unquoted property funds, which are valued using various valuation techniques that require significant judgement in determining appropriate assumptions.

The table below provides an analysis of the financial assets and liabilities of the fund that are carried at fair value in the fund's Net Asset Statement, grouped into levels 1 to 3 based on the degree to which the fair value is observable.

Note 18b. Valuation hierarchy

| 31 March 2021 | Level 1 | Level 2 | Level 3 | Total |
|---|---------------|------------|--------------|---------------|
| | £m | £m | £m | £m |
| Financial assets | | | | |
| Financial assets at fair value through profit and loss | 12,510 | 868 | 2,375 | 15,753 |
| Loans and receivables | 603 | 0 | 0 | 603 |
| Total financial assets | 13,113 | 868 | 2,375 | 16,356 |
| Non financial assets at fair value through profit and loss | | | | |
| Property | 0 | 0 | 7 | 7 |
| Financial liabilities | | | | |
| Financial liabilities at amortised cost | -35 | 0 | 0 | -35 |
| Total financial liabilities | -35 | 0 | 7 | -28 |
| | 13,078 | 868 | 2,382 | 16,328 |

| 31 March 2020 | Level 1 | Level 2 | Level 3 | Total |
|---|---------------|------------|--------------|---------------|
| | £m | £m | £m | £m |
| Financial assets | | | | |
| Financial assets at fair value through profit and loss | 10,113 | 655 | 2,101 | 12,869 |
| Loans and receivables | 410 | - | - | 410 |
| Total financial assets | 10,523 | 655 | 2,101 | 13,279 |
| Non financial assets at fair value through profit and loss | | | | |
| Property | 0 | 0 | 7 | 7 |
| Financial liabilities | | | | |
| Financial liabilities at amortised cost | -72 | 0 | 0 | -72 |
| Total financial liabilities | -72 | 0 | 7 | -65 |
| | 10,451 | 655 | 2,108 | 13,214 |

Reconciliation of fair value measurements within level 3

| Reconciliation of fair value measurements within level 3 | Market value 01-Apr-20 | Purchases | Sales | Change in 20/21 L1,L2 to L3 assets | Change in market value | Market value 31-Mar-21 |
|--|---------------------------|----------------|-----------------|---|------------------------------|------------------------------|
| | £000 | £000 | £000 | £000 | £000 | £000 |
| Pooled investments - Hedge funds | 94,967 | 0 | 0 | 0 | 10,361 | 105,328 |
| Property funds | 427,860 | 17,088 | -7,623 | 27,653 | -11,900 | 453,078 |
| Direct property | 6,675 | 0 | 0 | 0 | 625 | 7,300 |
| Private equity(inc NLGPS) | 1,552,901 | 304,073 | -231,639 | 10,180 | 147,483 | 1,782,998 |
| Other assets | 26,175 | 0 | -414 | 0 | 7,453 | 33,214 |
| Total | 2,108,578 | 321,161 | -239,676 | 37,833 | 154,022 | 2,381,918 |

Changes from level1 and Level2 to Level3 during 2020/21 are due to asset delisting or lack of observable inputs.

| Reconciliation of fair value measurements within level 3 | Market value 01-Apr-19 | Adj to 01-Apr-19 assets L2 to L3 | Purchases | Sales | Change in 19/20 L1,L2 to L3 assets | Change in market value | Market value 31-Mar-20 |
|--|---------------------------|---|----------------|-----------------|---|------------------------------|------------------------------|
| | £000 | £000 | £000 | £000 | £000 | £000 | £000 |
| Pooled investments - Hedge funds | 91,948 | 0 | 0 | -81 | 0 | 3,100 | 94,967 |
| Property funds | 356,494 | 0 | 5,733 | -19,961 | 86,623 | -1,029 | 427,860 |
| Direct property | 7,250 | 0 | 0 | 0 | 0 | -575 | 6,675 |
| Private equity(inc NLGPS) | 1,359,727 | 0 | 269,532 | -206,210 | 0 | 129,852 | 1,552,901 |
| Other assets | 0 | 34,505 | 0 | 0 | 0 | -8,330 | 26,175 |
| Total | 1,815,419 | 34,505 | 275,265 | -226,252 | 86,623 | 123,018 | 2,108,578 |

Note 19. Financial instruments – classification

The following table analyses the carrying value of the financial assets and liabilities by category and by net asset statement heading as at 31 March 2021. The table also includes Direct Property (non-financial instrument) for completeness.

| 31 March 2021 | Fair value through profit or loss £000 | Financial assets at amortised cost £000 | Financial liabilities at amortised cost £000 | Total financial instruments £000 |
|------------------------------------|---|---|--|---|
| Financial assets | | | | |
| Northern LGPS assets | 129,595 | 0 | 0 | 129,595 |
| Bonds | 1,315,811 | 0 | 0 | 1,315,811 |
| Equities | 12,112,419 | 0 | 0 | 12,112,419 |
| Index-linked securities | 735,119 | 0 | 0 | 735,119 |
| Pooled investment vehicles | 1,459,532 | 0 | 0 | 1,459,532 |
| Cash deposits | 0 | 422,003 | 0 | 422,003 |
| Cash at bank | 0 | 41,592 | 0 | 41,592 |
| Other investment balances | 0 | 58,153 | 0 | 58,153 |
| Debtors | 0 | 81,033 | 0 | 81,033 |
| Total financial assets | 15,752,476 | 602,781 | 0 | 16,355,257 |
| Financial liabilities | | | | |
| Other investment balances | 0 | 0 | -13,990 | -13,990 |
| Creditors | 0 | 0 | -21,365 | -21,365 |
| Total financial liabilities | 0 | 0 | -35,355 | -35,355 |
| Total | 15,752,476 | 602,781 | -35,355 | 16,319,902 |
| Non financial instruments | 7,300 | 0 | 0 | 7,300 |
| Total | 15,759,776 | 602,781 | -35,355 | 16,327,202 |
| 31 March 2020 | | | | |
| | Fair value through profit or loss £000 | Financial assets at amortised cost £000 | Financial liabilities at amortised cost £000 | Total financial instruments £000 |
| Financial assets | | | | |
| Northern LGPS assets | 32,579 | 0 | 0 | 32,579 |
| Bonds | 1,387,188 | 0 | 0 | 1,387,188 |
| Equities | 9,499,515 | 0 | 0 | 9,499,515 |
| Index-linked securities | 736,119 | 0 | 0 | 736,119 |
| Pooled investment vehicles | 1,214,360 | 0 | 0 | 1,214,360 |
| Cash deposits | 0 | 254,625 | 0 | 254,625 |
| Cash at bank | 0 | 46,842 | 0 | 46,842 |
| Other investment balances | 0 | 53,918 | 0 | 53,918 |
| Debtors | 0 | 54,197 | 0 | 54,197 |
| Total financial assets | 12,869,761 | 409,582 | 0 | 13,279,343 |
| Financial liabilities | | | | |
| Other investment balances | 0 | 0 | -51,239 | -51,239 |
| Creditors | 0 | 0 | -20,481 | -20,481 |
| Total financial liabilities | 0 | 0 | -71,720 | -71,720 |
| Total | 12,869,761 | 409,582 | -71,720 | 13,207,623 |
| Non financial instruments | 6,675 | 0 | 0 | 6,675 |
| Total | 12,876,436 | 409,582 | -71,720 | 13,214,298 |

All net gains or losses on financial instruments are on those classified as financial assets at fair value through profit or loss.

Note 20. Current assets – debtors

| | 2020/21 | 2019/20 |
|----------------------------------|---------------|---------------|
| | £000 | £000 |
| Contributions due from employers | 29,614 | 24,587 |
| Other debtors | 51,419 | 29,610 |
| Total | 81,033 | 54,197 |

Note 21. Current liabilities – creditors

| | 2020/21 | 2019/20 |
|---------------------------|----------------|----------------|
| | £000 | £000 |
| Unpaid benefits | -9,811 | -12,849 |
| Other current liabilities | -11,555 | -7,632 |
| Total | -21,366 | -20,481 |

Note 22. Related party transactions

In accordance with IAS24 Related Party Disclosures, material transactions with related parties not disclosed elsewhere are detailed below.

Administering body

Bradford Metropolitan District Council is a related party in its role as the Administering Authority for West Yorkshire Pension Fund.

In 2020/21, City of Bradford Metropolitan District Council charged West Yorkshire Pension Fund £444k in respect of support services provided (£444k in 2019/20). The support costs include a full year support for financial systems, payroll, HR, legal, internal audit and information technology services.

Employers

Employers are related parties in so far as they pay contributions to the Fund in accordance with the appropriate Local Government Pension Scheme (LGPS) Regulations. A list of employers who have contributed to the fund during the reporting period can be found in Section 5 this report. Contributions owed by employers in respect of March 2021 payroll are included within total debtor in note 20.

Members

The Metropolitan Councils of Bradford, Leeds, Kirklees, Wakefield and Calderdale appoint a number of members to the Investment Advisory Panel, the Joint Advisory Group and the Local Pension Board. Six of these members are in receipt of pension benefits from the Fund.

There have been no material transactions between any member or their families and the Pension Fund.

Key management personnel

No senior officers responsible for the administration of the Fund have entered into any contract, other than their contract of employment with City of Bradford Metropolitan District Council, for the supply of goods or services to the Fund.

IAS 24 requires entities to disclose key management personnel compensation. The Fund has identified key management personnel as the Director West Yorkshire Pension Fund and the Chief Executive of Bradford Council. The combined compensation for these officers, attributable to West Yorkshire Pension Fund, is £143k (2019/20 £128k). Details of the remuneration for these two posts are included in Note 33 of the City of Bradford Metropolitan District Council's statement of accounts.

Note 23. 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.

The management of risk is set out in the fund's Investment Strategy Statement, which in turn is driven by the Funding Strategy Statement. The full text of these statements can be found at the end of this document and also at www.wypf.org.uk

The investment strategy is managed by the Investment Advisory Panel, whose responsibility it is to ensure that the fund's investment portfolio, which is managed in-house, agrees with policy and strategy with regard to asset allocation.

The fund routinely monitors all risks in accordance with the fund's risk management strategy.

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 to market risk from its investment activities, particularly 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.

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 fund and its investment advisors undertake appropriate monitoring of market conditions and benchmark analysis.

The fund's asset holdings are spread across more than 800 UK companies, and almost 1,000 foreign companies, and a range of unit trusts and managed funds.

Risk is controlled by reviewing on a continuous basis the risk attached to the fund's asset allocation relative to the fund-specific benchmark, to ensure that any major divergence from the benchmark is acceptable.

Custodian risk is controlled through continuous monitoring and periodic review of the custodial arrangements.

Risk is also monitored in relation to the funding position of the fund and the investment requirements that flow from it, in conjunction with the fund actuary.

Counter-party and cash management risk is controlled by the in-house investment management team through the setting of appropriate limits for exposure with any individual organisation.

b. Price risk

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 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. The selection of securities and other financial instruments is monitored by the fund to ensure it is within limits specified in the fund’s investment strategy.

Price risk – sensitivity analysis

Potential price changes are determined based on the observed historical volatility of asset class returns. Riskier assets such as equities will display greater potential volatility than bonds for example, so the overall outcome will depend largely on asset allocation. The fund has determined that the following movements in market price risk are reasonably possible for the 2019/20 reporting period.

| Asset type | 2019/20 Potential market movement +/- (%p.A.) | 2019/20 Potential market movement +/- (%p.A.) |
|----------------------------------|---|---|
| UK corporate bonds | 25.40 | 12.30 |
| UK equities | 31.20 | 18.80 |
| UK public sector bonds | 4.60 | 7.20 |
| UK index-linked | 5.90 | 3.60 |
| UK pooled funds-properties | 1.50 | 3.10 |
| UK pooled funds-other | 1.50 | 3.10 |
| UK direct property | 16.60 | 7.30 |
| Overseas corporate bonds | 5.80 | 9.30 |
| Overseas equities | 39.30 | 7.50 |
| Overseas public sector Bonds | 5.80 | 9.30 |
| Overseas index-linked | 0.90 | 3.60 |
| Overseas pooled funds-properties | 1.50 | 3.10 |
| Overseas pooled funds-other | 1.50 | 3.10 |
| Cash deposits | 1.50 | 2.00 |
| Cash at bank | 1.50 | 0.01 |
| Other investment assets | 0 | 0 |
| Other investment liabilities | 0 | 0 |

| Asset type | Value as at | Value as at |
|----------------------------------|-------------------|--------------------|
| | 31-Mar-21 | 31-Mar-20 |
| | £000 | £000 |
| UK corporate bonds | 441,838 | 362,039 |
| UK equities | 6,150,463 | 4,977,267 |
| UK public sector bonds | 549,861 | 672,778 |
| UK index-linked | 645,331 | 640,816 |
| UK pooled funds-properties | 529,604 | 522,465 |
| UK pooled funds-other | 311,391 | 228,283 |
| UK direct property | 7,300 | 6,675 |
| Overseas corporate bonds | 91,410 | 98,232 |
| Overseas equities | 6,091,551 | 4,554,827 |
| Overseas public sector Bonds | 232,701 | 254,139 |
| Overseas index-linked | 89,788 | 95,303 |
| Overseas pooled funds-properties | 76,419 | 86,960 |
| Overseas pooled funds-other | 542,119 | 376,653 |
| Cash deposits | 422,003 | 254,625 |
| Cash at bank | 41,592 | 46,842 |
| Other investment assets | 58,153 | 53,918 |
| Other investment liabilities | -13,990 | -51,239 |
| Total | 16,267,534 | 13,180,582? |

This can then be applied to the period end asset mix as follows.

| Asset type | Value as at | Percentage | Value on | Value on |
|----------------------------------|-------------------|------------|-------------------|-------------------|
| | 31-Mar-21 | change | increase | decrease |
| | £000 | % | £000 | £000 |
| UK corporate bonds | 441,838 | 25.40 | 554,065 | 329,611 |
| UK equities | 6,150,463 | 31.20 | 8,069,407 | 4,231,519 |
| UK public sector bonds | 549,861 | 4.60 | 575,155 | 524,567 |
| UK index-linked | 645,331 | 5.90 | 683,406 | 607,256 |
| UK pooled funds-properties | 529,604 | 1.50 | 537,548 | 521,660 |
| UK pooled funds-other | 311,391 | 1.50 | 316,062 | 306,720 |
| UK direct property | 7,300 | 16.60 | 8,512 | 6,088 |
| Overseas corporate bonds | 91,410 | 5.80 | 96,712 | 86,108 |
| Overseas equities | 6,091,551 | 39.30 | 8,485,531 | 3,697,571 |
| Overseas public sector Bonds | 232,701 | 5.80 | 246,198 | 219,204 |
| Overseas index-linked | 89,788 | 0.90 | 90,596 | 88,980 |
| Overseas pooled funds-properties | 76,419 | 1.50 | 77,565 | 75,273 |
| Overseas pooled funds-other | 542,119 | 1.50 | 550,251 | 533,987 |
| Cash deposits | 422,003 | 1.50 | 428,333 | 415,673 |
| Cash at bank | 41,592 | 1.50 | 42,216 | 40,968 |
| Other investment assets | 58,153 | 0 | 58,153 | 58,153 |
| Other investment liabilities | -13,990 | 0 | -13,990 | -13,990 |
| Total | 16,267,534 | | 20,805,720 | 11,729,348 |

| Asset type | Restated Value as at 31-Mar-20 £000 | Percentage change % | Value on increase £000 | Value on decrease £000 |
|----------------------------------|--|---------------------------|------------------------------|------------------------------|
| UK corporate bonds | 362,039 | 12.30 | 406,570 | 317,508 |
| UK equities | 4,977,267 | 18.80 | 5,912,993 | 4,041,541 |
| UK public sector bonds | 672,778 | 7.20 | 721,218 | 624,338 |
| UK index-linked | 640,816 | 3.60 | 663,885 | 617,747 |
| UK pooled funds-properties | 522,465 | 3.10 | 538,661 | 506,269 |
| UK pooled funds-other | 228,283 | 3.10 | 235,360 | 221,206 |
| UK direct property | 6,675 | 7.30 | 7,162 | 6,188 |
| Overseas corporate bonds | 98,232 | 9.30 | 107,368 | 89,096 |
| Overseas equities | 4,554,827 | 7.50 | 4,896,439 | 4,213,215 |
| Overseas public sector Bonds | 254,139 | 9.30 | 277,774 | 230,504 |
| Overseas index-linked | 95,303 | 3.60 | 98,734 | 91,872 |
| Overseas pooled funds-properties | 86,960 | 3.10 | 89,656 | 84,264 |
| Overseas pooled funds-other | 376,653 | 3.10 | 388,329 | 364,977 |
| Cash deposits | 254,625 | 2.00 | 259,718 | 249,533 |
| Cash at bank | 46,842 | 2.00 | 47,779 | 45,905 |
| Other investment assets | 53,918 | 0 | 53,918 | 53,918 |
| Other investment liabilities | -51,239 | 0 | -51,239 | -51,239 |
| Total | 13,180,583 | | 14,654,325 | 11,706,842 |

Alternative (universe) assets have been restated and the assets have now been split between UK and overseas Pooled funds - other

c. 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 fund and its investment advisors 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 2021 and 31 March 2020 is set out below. These disclosures present interest rate risk based on the underlying financial assets at fair value.

| Asset type | 31 March 2021 £000 | 31 March 2020 £000 |
|---------------|--------------------------|--------------------------|
| Bonds | 1,315,811 | 1,387,188 |
| Cash deposits | 422,003 | 254,625 |
| Cash at bank | 41,592 | 46,842 |
| Total | 1,779,406 | 1,688,655 |

Interest rate risk – sensitivity analysis

The fund 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. The assumed interest rate volatility is 100 basis point (BPS) per annum.

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 change in interest rates.

| Asset type | Value as at 31 March 2021 £000 | Value on increase +100BPS £000 | Value on decrease -100BPS £000 |
|---------------|---|---|---|
| Bonds | 1,315,811 | 1,328,968 | 1,302,652 |
| Cash deposits | 422,003 | 426,223 | 417,783 |
| Cash balances | 41,592 | 42,008 | 41,176 |
| Total | 1,779,406 | 1,797,199 | 1,761,611 |

| Asset type | Value as at 31 March 2020 £000 | Value on increase +100BPS £000 | Value on decrease -100BPS £000 |
|---------------|---|---|---|
| Bonds | 1,387,188 | 1,401,060 | 1,373,316 |
| Cash deposits | 254,625 | 257,171 | 252,079 |
| Cash at bank | 46,842 | 47,310 | 46,374 |
| Total | 1,688,655 | 1,705,541 | 1,671,769 |

d. 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 following table summarises the fund's currency exposure as at 31 March 2021 and 31 March 2020.

| Currency exposure – asset type | Value as at 31 March 2021 £000 | Value as at 31 March 2020 £000 |
|--------------------------------|---|---|
| Overseas corporate bonds | 91,410 | 98,232 |
| Overseas equities | 6,091,551 | 4,554,827 |
| Overseas public sector bonds | 232,701 | 254,139 |
| Overseas index-linked | 89,788 | 95,303 |
| Overseas properties | 76,419 | 86,960 |
| Overseas unit trusts | 542,119 | 394,203 |
| Total overseas assets | 7,123,988 | 5,483,664 |

Currency risk – sensitivity analysis

Section STATEMENT OF ACCOUNTS

Following analysis of historical data the fund considers the likely volatility associated with foreign exchange rate movements to be 6.0%, (2019/20 6.0%). A 6.0% 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.

| Asset type | Value as at 31 March 2021 £000 | Value on increase £000 | Value on decrease £000 |
|------------------------------|---|------------------------------|------------------------------|
| Overseas corporate bonds | 91,410 | 96,895 | 85,925 |
| Overseas equities | 6,091,551 | 6,457,044 | 5,726,058 |
| Overseas public sector bonds | 232,701 | 246,663 | 218,739 |
| Overseas index-linked | 89,788 | 95,175 | 84,401 |
| Overseas properties | 76,419 | 81,004 | 71,834 |
| Overseas unit trusts | 542,119 | 574,646 | 509,592 |
| Total overseas assets | 7,123,988 | 7,551,427 | 6,696,549 |

| Asset type | Value as at 31 March 2020 £000 | Value on increase £000 | Value on decrease £000 |
|------------------------------|---|------------------------------|------------------------------|
| Overseas corporate bonds | 98,232 | 104,126 | 92,338 |
| Overseas equities | 4,554,827 | 4,828,117 | 4,281,537 |
| Overseas public sector bonds | 254,139 | 269,387 | 238,891 |
| Overseas index-linked | 95,303 | 101,021 | 89,585 |
| Overseas properties | 86,960 | 92,178 | 81,742 |
| Overseas unit trusts | 376,653 | 399,252 | 354,054 |
| Total overseas assets | 5,466,114 | 5,794,081 | 5,138,147 |

e. 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. 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.

The credit risk connected with stock lending is managed by holding collateral with a greater value than the amount of stock lent out at any one time. In addition, the fund is fully indemnified by our financial securities custodian on stock lending activities. Stock lending and the associated collateral at the year-end are detailed in note 17c.

f. 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 there are adequate cash resources available to meet its commitments. This will particularly be the case for cash, from the cashflow matching mandates from the main investment strategy to meet pensioner payroll costs, and also cash to meet investment commitments.

Note 224. Contractual commitments

At 31 March 2021 West Yorkshire Pension Fund had the following undrawn commitments.

| Asset class | Investment value at 31 March 2021 | Undrawn commitments |
|----------------|-----------------------------------|---------------------|
| | £m | £m |
| Private equity | 1,549 | 1,237 |
| Property funds | 596 | 76 |
| Total | 2,145 | 1,313 |

At 31 March 2020 West Yorkshire Pension Fund had the following undrawn commitments.

| Asset class | Investment value at 31 March 2020 | Undrawn commitments |
|----------------|-----------------------------------|---------------------|
| | £m | £m |
| Private equity | 1,520 | 1,147 |
| Property funds | 609 | 70 |
| Total | 2,129 | 1,217 |

Undrawn commitments relate to outstanding call payments due on unquoted limited partnership funds held in private equity, property and infrastructure parts of the portfolio. The amounts 'called' by these funds are irregular in both size and timing over a period of between four and six years from the date of each original commitment.

Note 25. Accounting developments

Accounting standards that have been issued before 1 January 2020 but not yet adopted by the Cipfa code of practice on local authority accounting and consequently are not yet adopted by the fund. These are listed below:

- **IFRS 9 Financial Instruments:** the updated standard deals with concerns about how IFRS 9 classifies particular prepayable financial assets. In addition, the IASB clarified an aspect of the accounting for financial liabilities following a modification.
- **IAS 19 Employee Benefits:** the latest amendment harmonises accounting practices and provide more relevant information for decision-making. An entity applies the amendments to plan amendments, curtailments or settlements occurring on or after the beginning of the first annual reporting period that begins on or after 1 January 2019.
- **IFRIC 23 Uncertainty over income tax treatments:** provides additional guidance on income tax treatment where there is uncertainty.
- **IAS 28 Long-term interests in Associates and Joint Venture:** the latest amendment provide clarity that an entity applies IFRS 9 'Financial Instruments' to long-term interests in an associate or joint venture that form part of the net investment in the associate or joint venture but to which the equity method is not applied.

The introduction of, and amendments to, the above accounting standards are not expected to have a material impact on this financial statement in the period of initial application.

Note 26. Investment Strategy Statement

West Yorkshire Pension Fund has prepared an Investment Strategy Statement (ISS) published under Regulation 7 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016. The fund has also prepared a Funding Strategy Statement (FSS) in accordance with Regulation 58 of the Local Government Pension Scheme Regulations 2013. Full details of the ISS and the FSS are included in this report and are available on the fund's website www.wypf.org.uk

Appendix A

Resolving Complaints

Internal dispute resolution procedure

With pensions being such a complicated issue it's inevitable that occasionally disagreements between members, employers and WYPF arise.

When disagreements do happen we do all we can to try to resolve them informally and reach an agreement.

But this isn't always possible. The scheme provides a formal way for disagreements to be resolved: the internal dispute resolution procedure (IDRP).

The IDRP is a two-stage process.

Stage 1 gives scheme members a chance to have a disagreement reviewed by either the employer or WYPF, depending on whom the dispute is against. The review will be undertaken by an 'adjudicator', specified by the body which was responsible for making the original decision being appealed. The member must apply for a review under Stage 1 within six months of the disagreement coming to light.

If the scheme member or their employer is not happy with the outcome of the stage 1 review, they can refer the matter to the administering authority for review under the procedure's second stage.

If further help is needed

The Pensions Advisory Service (TPAS) can also help with resolving disputes if both stages of the IDRP have not provided an agreement.

The Pensions Ombudsman settles disputes and investigates complaints that TPAS has not been able to settle. The ombudsman's decision is final and binding on all the parties to a dispute.

Policing pension schemes

The Pensions Regulator was set up following the 1995 Pensions Act. Its main role is to protect pension scheme members. From 1 April 2015 the Pensions Regulator's remit was extended to cover the administration of public service pension schemes. The Pensions Regulator issued a code of practice on governance and administration of public service pension schemes which provides practical guidance in relation to the exercise of functions under relevant pensions legislation and sets out standards of conduct and practice expected from those who exercise those functions.

Appendix B

Further Information and Contacts

WYPF senior management team

| | |
|---|--|
| Director – West Yorkshire Pension Fund | Rodney Barton Phone: 01274 432317 E-mail rodney.barton@wypf.org.uk |
| WYPF administration | |
| Head of Employer Services & Compliance | Caroline Blackburn Phone 01274 434523 E-mail caroline.blackburn@wypf.org.uk |
| Assistant Director Fin, Admin & Govnance | Yunus Gajra Phone 01274 432343 E-mail yunus.gajra@wypf.org.uk |
| Service Centre Group Head of Service | Grace Kitchen Phone 01274 434266 E-mail grace.kitchen@wypf.org.uk |
| Head of Finance | Ola Ajala Phone 01274 434534 E-mail ola.ajala@wypf.org.uk |
| WYPF investments | |
| Assistant Director – UK | Debra Hopkins Phone 01274 432318 E-mail debra.hopkins@wypf.org.uk |
| Assistant Director – UK | Joanna Wilkinson Phone 01274 432038 E-mail joanna.wilkinson@wypf.org.uk |
| Assistant Director (Overseas) | Colin Standish Phone 01274 432748 E-mail colin.standish@wypf.org.uk |

Our Aldermanbury House office is open Monday to Friday between 8.45am and 4.30PM.

Company information

West Yorkshire Pension Fund
(Administered by City of Bradford Metropolitan District Council)
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Email **pensions@wypf.org.uk**

Appendix C

Glossary of Terms

Glossary of terms

Active member

An employee who is currently paying pension contributions.

Actuarial valuation

West Yorkshire Pension Fund's actuary carries out an actuarial valuation every three years and recommends the level of contributions for each of the fund's participating employers for the following three years. The valuation will measure the size of the fund against its future liabilities and set contribution rates according to the fund's deficit or surplus.

Additional voluntary contributions (AVCs)

These are extra payments to increase future benefits. Members can also pay AVCs to provide additional life cover.

All local government pension funds have an in-house AVC scheme that members can invest money in through an AVC provider, often an insurance company or building society.

Administering authority

The LGPS is run by administering authorities, for example county councils, in accordance with regulations approved by parliament. Each administers their own fund, into which all contributions are paid. Every three years, independent actuaries carry out a valuation of each fund and set the rate at which the participating employers must contribute to fully fund the payment of scheme benefits for that fund's membership.

Admission body

An admission body is an employer that chooses to participate in the scheme under an admission agreement. These tend to be employers such as charities and contractors.

Asset allocation

This is putting an investment strategy in place that tries to balance risk against

reward by adjusting the percentage of each asset in an investment portfolio according to an investor's risk tolerance, goals and investment time frame.

Best Value

Best Value was introduced in England and Wales by the Local Government Act 1999. Its provisions came into force in April 2000. The aim was to improve local services in terms of both cost and quality. A Best Value authority must make arrangements to secure continuous improvement in the way in which its functions are exercised, taking into account a combination of economy, efficiency and effectiveness.

Brent oil price

Brent Crude is a major trading classification of sweet light crude oil that serves as a benchmark price for purchases of oil worldwide. It is quoted in US\$ in price per barrel.

Career average revalued earnings (CARE) pension scheme

From 1 April 2014, for every year they pay into the LGPS, scheme members get a pension of 1/49th of their pay, which is added to their pension account and revalued every year in line with a government treasury order currently linked to the Consumer Prices Index.

Cash equivalent value (CEV)

This is the cash value of a member's pension rights for the purposes of divorce or dissolution of a civil partnership.

Consumer Price Index (CPI)

This is a method of measuring the changes in the cost of living, similar to the Retail Price Index. From April 2011 the amount pensions are increased annually is based on movement in the Consumer Price Index during the 12 months to the previous September.

Contracted out

The LGPS is contracted out of the State Second Pension Scheme (S2P). This means that, up to state pension age, members pay reduced National Insurance contributions between the lower and upper earnings limits, unless they opted to pay the married woman's/widow's reduced rate of National Insurance, and do not earn a pension under S2P.

Commutation

This is giving up part or all of the pension payable from retirement in exchange for an immediate lump sum.

Convertible shares

These are shares that include an option for holders to convert into a predetermined number of ordinary shares, usually after a set date.

Custodian

This is a financial institution that holds customers' securities for safekeeping to minimise the risk of theft or loss. Most custodians also offer account administration, transaction settlements, collection of dividends and interest payments, tax support and foreign exchange.

Data governance

This refers to the overall management of the availability, usability, integrity, and security of data used in an enterprise. A sound data governance programme includes a governing body, a defined set of procedures, and a plan to execute those procedures.

Death grant

This is a lump sum paid by the pension fund to the dependants or nominated representatives of a member who dies.

Deferred pensioner

A former member of the LGPS who has left the scheme, but still has benefits in the scheme and will collect a pension from the LGPS on retirement.

Deficit payments

Pension schemes have a legal requirement to reduce any deficit – the difference between a scheme’s assets and its liabilities – over time, by making additional payments.

Denomination

This is the face value of a banknote, coin, or postage stamp, as well as bonds and other fixed-income investments. Denomination can also be the base currency in a transaction, or the currency a financial asset is quoted in.

Designating body

Designating bodies are bodies that can designate employees for access to the scheme. Employees of town and parish councils, voluntary schools, foundation schools, foundation special schools, Transport for London, and the Children and Family Court Advisory and Support Service, among others, can be designated for membership of the scheme.

Discretion

The power given by the LGPS to enable a council or administering authority to choose how they will apply the scheme in respect of certain of its provisions. Under the LGPS they must consider certain of these discretionary provisions and pass resolutions to form a policy of how they will apply them. For the remaining discretionary provisions, they are advised to do so. They have a responsibility to act with ‘prudence and propriety’ in formulating their policies and must keep them under review.

Direct property

Direct investment in property is buying all or part of a physical property. Property owners can receive rent directly from tenants and realise gains or losses from the sale of the property.

Eligible councillor

This is a councillor or an elected mayor (other than the Mayor of London) who is eligible for membership of the LGPS in accordance with the scheme of allowances published by an English

county council, district council or London borough council or by a Welsh county council or county borough council.

Employer covenant

This is an employer’s legal obligation and financial ability to support their defined benefit pension scheme now and in the future. Assessing the strength of the covenant helps decide the appropriate level of risk when setting investment strategy.

Equity risk premium

Also referred to as simply equity premium, this is the excess return that investing in the stock market provides over a risk-free rate, such as the return from government treasury bonds. This excess return compensates investors for taking on the relatively higher risk of equity investing.

Financial instruments

These are tradable assets of any kind. They can be cash, evidence of an ownership interest in an entity, or a contractual right to receive or deliver cash or another financial instrument.

Fixed income securities

A fixed-income security is an investment that provides a return in the form of fixed periodic payments and the eventual return of principal at maturity. Unlike a variable-income security, where payments change based on some underlying measure such as short-term interest rates, the payments of a fixed-income security are known in advance.

Fund of funds (FoF)

This is a fund that holds a portfolio of other investment funds.

Guaranteed minimum pension (GMP)

The LGPS guarantees to pay a pension that is at least as high as a member would have earned had they not been contracted out of the State Earning Related Pension Scheme (SERPS) at any time between 6 April 1978 and 5

April 1997. This is called the guaranteed minimum pension (GMP).

General partners

These are owners of a partnership with unlimited liability. General partners are often managing partners who are active in the daily operations of a business.

Index-linked bonds

These are bonds in which payment of income on the principal is related to a specific price index – often the Consumer Price Index. This feature provides protection to investors by shielding them from changes in the underlying index. The bond’s cashflows are adjusted to ensure that the holder of the bond receives a known real rate of return.

Internal rates of return (IRR)

This is the discount rate often used in capital budgeting that makes the net present value of all cash flows from a particular project equal to zero.

Local government

The term local government in this report also covers police and fire civilian staff, the Mayor of London and members of the London Assembly, the chairman of the London Transport Users’ Committee, employees of a National Probation Service local board or Probation Trust, a registration officer, a coroner, a rent officer, employees of a valuation tribunal, employees of a passenger transport authority, employees of the Environment Agency, non-teaching employees of an academy, an Education Action Forum or a Further or Higher Education Corporation.

Myners’ principles

This is a set of principles based on Paul Myners’ 2001 report, Institutional Investment in the United Kingdom.

The Myners’ principles for defined benefit schemes cover:

- effective decision-making
- clear objectives
- risk and liabilities
- performance assessment

- responsible ownership
- transparency and reporting.

Ordinary shares

An ordinary share represents equity ownership in a company and entitles the owner to vote at general meetings of that company and receive dividends on those shares if dividend is payable.

Pension board

Pension boards make sure each scheme complies with governance and administration requirements. Boards may have additional duties, if scheme or other regulations specify them. They must have an equal number of employer representatives and member representatives, plus other types of members, like independent experts. All pension board members have a duty to act in line with scheme regulations and other governing documents.

Pension liberation fraud

Members with deferred benefits may be approached by companies offering to release funds early from these benefits.

The Pensions Regulator has advised pension funds to make members aware of the potential warning signs of pension liberation fraud.

Personal pension

A personal pension plan is usually purchased from a financial services company, such as an insurance company, bank, investment company or building society. Members usually pay into the plan every month and employers can also contribute to the plan.

Policy statement

This is a statement that councils and administering authorities must produce, setting out the policies they have resolved to follow in exercising certain discretions under the LGPS.

Pooled funds

These are aggregated funds from multiple individual investors. Investors

in pooled fund investments benefit from economies of scale for lower trading costs, diversification and professional money management.

Private equity

Private equity is equity capital that is not quoted on a public exchange. Private equity consists of investors and funds that make investments directly into private companies or conduct buyouts of public companies that result in a delisting of public equity. Capital for private equity is raised from retail and institutional investors, and can be used to fund new technologies, expand working capital within an owned company, make acquisitions, or to strengthen a balance sheet.

Quality management

This makes sure that an organisation, product or service is consistent. It has four main components: quality planning, quality control, quality assurance and quality improvement. West Yorkshire Pension Fund has been assessed and certified as meeting the requirements of ISO9001:2008.

Quantitative easing

Quantitative easing (QE) is when a central bank creates new money electronically to buy financial assets like government bonds with the aim of directly increasing private sector spending in the economy and returning inflation to target.

Related party transactions

This is an arrangement between two parties joined by a special relationship before a deal, like a business transaction between a major shareholder and a corporation.

Retail Prices Index

This is another method of measuring the changes in the cost of living. It reflects the movement of prices covering goods and services over time. Until April 2011, the amount by which pensions were increased annually was based on movement in the Retail Price Index during the 12 months to the previous September. From April 2011

the government changed the amount by which pensions increase from Retail Price Index to Consumer Price Index.

Rule of 85

Under previous regulations, when a member elected to retire before age 65, the Rule of 85 test was used to find out whether the member retired on full or reduced pension benefits. The agreement of the employer was required for employees who wished to retire before the age of 60. If the sum of the member's age and the number of whole years of their Scheme membership was 85 or more, benefits were paid in full; if the total was less than 85, the benefits were reduced. The employer had the power to waive the reduction on compassionate grounds and to pay the benefits in full. The Rule of 85 was not relevant where a member was made redundant, or was retired on grounds of efficiency or ill health.

The Rule of 85 was abolished on 1 October 2006. However, members contributing to the LGPS prior to this date will have some or all of their pension benefits protected under this rule.

Scheduled body

Means a body which is either statutorily obliged to join the LGPS or, in the case of parish councils, has a statutory right to do so.

State Earnings Related Pension Scheme (SERPS)

This is the extra earnings related part of the state pension that employed people could earn up to 5 April 2002. LGPS members were automatically contracted out of SERPS, and most paid lower national insurance contributions as a result. SERPS was replaced by the State Second Pension (S2P) from 6 April 2002.

Spot rate

This is the price quoted for immediate settlement on a commodity, a security or a currency. It's based on the value of an asset at the moment of the quote, and this in turn is based on how much buyers

are willing to pay and how much sellers are willing to accept, which depends on factors such as current market value and expected future market value.

Stakeholder pension

This is a low-cost private pension; they became available from 6 April 2001. They are meant for people who currently do not have a good range of pension options available to save for their retirement. Contributors use their own money to build up a pension fund.

State pension age

This is the earliest age people can receive the state basic pension. State pension age is currently age 65 for men. State pension age for women is currently being increased to be equalised with that for men. The government has announced that it will speed up the pace of state pension age equalisation for women, so that women's state pension age will reach 65 by November 2018.

State Second Pension (S2P)

The State Second Pension (formerly SERPS) is the additional state pension, payable from state pension age by the Department for Work and Pensions. LGPS members are contracted out of S2P and most pay lower national insurance contributions as a result.

Statutory compliance

This means following the laws on a given issue.

Stock lending

This is loaning a stock, derivative, or other security to an investor or firm. It requires the borrower to put up collateral (cash, security or a letter of credit). When stock is loaned, the title and the ownership is transferred to the borrower, and title is returned at the end of the loan period.

Subsumption

This is when a new company takes over an old company so that the old company becomes one with the new.

Transfer value

A transfer value is a cash sum representing the value of a member's pension rights.

Transferred service

Any pension members have transferred into the LGPS from a previous pension arrangement that now counts towards their LGPS membership.

Treasury management

This is the administration of an organisation's cashflow as well as the creation and governance of policies and procedures that ensure the company manages risk successfully.

Unitised funds

A unitised fund is a fund structure that allows investors to pool assets while retaining individual net asset values for each participant and keeping track of historical fund records. Each investor in the fund is accounted for separately and has their own unit – their own class of shares of the portfolio's total assets.

Voting policy

This is how West Yorkshire Pension Fund applies its shareholder voting rights. West Yorkshire Pension Fund will vote as follows.

For – when the proposal meets best practice guidelines and is in shareholders' long-term interests.

Abstain – when the proposal raises issues which do not meet best practice guidelines but either the concern is not regarded as sufficiently material to warrant opposition or an oppose vote could have a detrimental impact on corporate structures or the issue is being raised formally with the company for the first time.

Oppose – when the proposal does not meet best practice guidelines and is not in shareholders' interests over the long term.

The voting policy will be applied to all reportable companies held by the fund.

In supporting any resolution of any type, West Yorkshire Pension Fund will only vote on a resolution if:

- the resolution deals with one substantive issue and is not bundled with other items
- the resolution is fully explained and justified by the proposers, and
- there is full disclosure of information relevant to the consideration of a resolution and such information is presented in a fair and balanced way.

West Yorkshire Pension Fund's voting policy is available in full at www.wypf.org.uk

Appendix D

Pension Administration Strategy

Contents

1. Regulatory framework and purpose
2. Review of the strategy
3. Liaison and communication
4. Employer duties and responsibilities
5. Payments and charges
6. Administering authority duties and responsibilities
7. Unsatisfactory performance
8. Appendices
 - a. Authorised contacts form
 - b. Schedule of charges
 - c. Charging levels

1. Regulatory framework and purpose

1.1 The regulations

This strategy is made under Regulation 59 of The Local Government Pension Scheme Regulations (LGPS) 2013.

In line with these regulations West Yorkshire Pension Fund (WYPF) employers have been consulted on the strategy, and a copy has been sent to the secretary of state.

1.2 Purpose

This Strategy outlines the processes and procedures to allow WYPF and employers to work together in a cost-effective way to administer the LGPS whilst maintaining an excellent level of service to members. It recognises that working co-operatively and collaboratively will be key to achieving these aims.

2. Review of the strategy

This Strategy will be reviewed as soon as reasonably possible following any changes to the regulations, processes or procedures that affect the strategy or on a tri-annual basis if this occurs sooner.

Changes to this strategy will be made following consultation with employers and a copy of the updated strategy will be sent to the secretary of state.

WYPF will constantly seek to improve communications between itself and the employers.

Employers are welcome to discuss any aspect of this strategy with WYPF at any time and may make suggestions for improvement to the strategy.

3. Liaison and communication

3.1 Authorised contacts for employers

Each employer will nominate a contact to administer the three main areas of the LGPS:

- a **strategic contact** for valuation, scheme consultation, discretionary statements and IDRPs
- an **administration contact** for the day-to-day administration of WYPF, completing forms and responding to queries,
- a **finance contact** for completion and submission of monthly postings and co-ordination of exception reports, and
- a **nominated payroll contact** who is the responsible third-party contact who can maintain a payroll authorised user list.

If they wish, employers may also nominate additional contacts via an employer authorised user list.

All contacts will receive a login name and password that allows them to access the Civica employer portal for online administration and the combined remittance and monthly return.

When registering, each contact should complete a Main contact registration form and Authorised user list form, and sign WYPF's user agreement for the secure administration facility.

The three main contacts are responsible for ensuring that contacts are maintained by notifying WYPF when one leaves and registering new contacts where necessary.

3.2 Liaison and communication with employers

WYPF will provide the following contact information for employers and their members:

- A named Pension Fund Representative for regulatory or administration queries, training, advice and guidance.
- A named Finance Business Partner to assist with the monthly returns process
- A dedicated contact centre for member queries

In addition to this, WYPF takes a multi-channel approach to communication with its employers.

| Format of communication | Frequency | Method of distribution |
|--|--------------------------------------|-------------------------------|
| Pension Fund Representatives | 8.30am to 4.30pm Monday to Friday | Face-to-face/telephone/e-mail |
| Website | Constant | Web |
| Fact card | 1 per year | Mail |
| Fact sheets | Constant | Web |
| Employer guide | Constant | Web/electronic document |
| <i>Ad hoc</i> training | As and when required | Face-to-face |
| Update sessions | 2 per year | Meeting |
| Annual meeting | 1 per year | Meeting |
| Manuals/toolkits | Constant | Web/electronic document |
| <i>Pension Matters</i> and <i>Xtra</i> | 12 per year and as and when required | E-mail |
| Social media | Constant | Web |
| <i>Ad hoc</i> meetings | As and when required | Face-to-face |
| Workshops | 10 per year | Face-to-face |

4. Employer duties and responsibilities

When carrying out their functions employers must have regard to the current version of this strategy.

4.1 Events for notification

| Event | Preferred method of notification | Other methods available | Target | Acceptable performance |
|--|-----------------------------------|-------------------------|---|---|
| Monthly postings (submitted via secure portal) | Approved spreadsheet | None | 19th day of the month following the month in which contributions were deducted | 100% compliance of returns received in target |
| New starters | Monthly return | | Notified via the monthly return, WYPF will process the data within 2 weeks following monthly return submission | 90% compliance or better |
| Change of hours, name, payroll number, or job title | Monthly return (exception report) | Web form | Notified via monthly returns, WYPF will process the data within 2 weeks following monthly return submission For exception report output from the monthly return, change data response must be provided to WYPF within 2 weeks of receipt of the exception report | 90% compliance or better |
| | | | If the employer is not using monthly return, then information is due within 6 weeks of change event | |

| Event | Preferred method of notification | Other methods available | Target | Acceptable performance |
|--|---|-------------------------|--|--------------------------|
| 50/50 and main scheme elections | Monthly return | | Notified by the employer via monthly return, WYPF will process the data within 2 weeks following monthly data submission | 90% compliance or better |
| Service breaks/absence | Web form | | Within 6 weeks of the date of the absence commencing | 90% compliance or better |
| Under 3 month opt-outs | Monthly return | | Notified by the employer via monthly return, WYPF will process the data within 2 weeks following monthly data submission | 90% compliance or better |
| Leavers | Monthly return Web form Monthly returns (exception reports) | | Notified by the employer via monthly return, WYPF will process the data within 2 weeks following monthly data submission, else within 6 weeks of leaving For exception reports leaver forms must be provided to WYPF within 2 months of receipt of the exception report | 90% compliance or better |
| Retirement notifications | Web form | | 10 days before the member is due to retire unless the reason for retirement is ill health or redundancy | 90% compliance |
| Death in service notifications | Web form | | Within 3 days of the date of notification | 100% compliance |

4.2 Responsibilities

Employers are responsible for ensuring that member and employer contributions are deducted at the correct rate, including any additional contributions.

WYPF is not responsible for verifying the accuracy of any information provided by the employer for the purpose of calculating benefits under the provisions of the Local Government Pension Scheme. That responsibility rests with the employer.

Any over-payment as a result of inaccurate information being supplied by the employer shall be recovered from that employer.

In the event of WYPF being fined by The Pensions Regulator, this fine will be passed on to the relevant employer where that employer's actions or inaction caused the fine.

4.3 Discretionary powers

The employer is responsible for exercising the discretionary powers given to employers by the regulations. The employer is also responsible for compiling, reviewing and publishing its policy to employees in respect of the key discretions as required by the regulations.

4.4 Member contribution bands

Employers are responsible for assessing and reassessing the contribution band that is allocated to a member. The employer must also inform the member of the band that they have been allocated on joining the scheme and when they have been reallocated to a different band.

4.5 Internal dispute resolution procedure (IDRP)

Employers must nominate an adjudicator to deal with appeals at stage one of the IDRP where the dispute is against a decision the employer has made or is responsible for making. Employers are responsible for providing details of the IDRP and the adjudicator in writing to members when informing them of decisions they have made.

5. Payments and charges

5.1 Payments by employing authorities

Employing authorities will make all payments required under the LGPS regulations, and any related legislations, promptly to WYPF and /or its Additional voluntary contribution (AVC) providers (Prudential/Scottish Widows) as appropriate.

5.2 Paying contributions

Member and employer contributions can be paid over at any time and should be accompanied by a monthly postings submission, the latest date contributions can be paid is the 19th day of the month following the month in which the deductions were made. Where the 19th falls on a weekend or bank holiday, the due date becomes the last working day prior to the 19th.

5.3 AVC deductions

Employers will pay AVCs to the relevant provider within one week of them being deducted.

5.4 Late payment

The employer is reported to The Pensions Regulator where contributions are received late in accordance with the regulator's code of practice.

5.5 Payment method

Contributions (but not AVCs) should be paid to WYPF by BACS payment direct to WYPF's bank account.

5.6 Early retirement and augmentation costs

Employers have the option to pay the full early retirement cost or pay by instalments over 5 years, depending on their ability to pay. Interest is charged if the option to pay by instalments is taken, and the annual interest used Base Rate + 1%.

All augmentation cost must be paid in full in one payment.

5.7 Interest on late payment

In accordance with the LGPS regulations, interest will be charged on any amount overdue from an employing authority by more than one month.

5.8 Employer contributions

Employers' contributions rates are not fixed and employers are required to pay whatever is necessary to ensure that the portion of the fund relating to their organisation is sufficient to meet its liabilities.

5.9 Actuarial valuation

An actuarial valuation of the fund is undertaken every three years by the fund actuary. The actuary balances the fund's assets and liabilities in respect of each employer and assesses the appropriate contribution rate and deficit payment if appropriate for each employer for the subsequent three years.

5.10 Administration charges

The cost of running WYPF is charged directly to the fund; the actuary takes these costs into account in assessing employers' contribution rates.

6. Administering authority duties and responsibilities

When carrying out their functions WYPF will have regard to the current version of the strategy.

6.1 Scheme administration

WYPF will ensure that workshops and annual meetings are held on a regular basis and actively seek to promote the Local Government Pension Scheme via the following events.

- Employer annual meeting
- Member annual meeting
- Pre-retirement courses
- New starters induction courses
- Complete guide to administration
- Your responsibilities
- Monthly contributions
- Ill Health retirement

6.2 Responsibilities

WYPF will ensure the following functions are carried out.

- 6.2.1 Provide a helpdesk facility for enquiries, available during normal office hours, providing a single point of access for information relating to the LGPS
- 6.2.2 Create a member record for all new starters admitted to the LGPS
- 6.2.3 Collect and reconcile employer and employee contributions
- 6.2.4 Maintain and update members' records for any changes received by WYPF
- 6.2.5 At each actuarial valuation WYPF will forward the required data in respect of each member and provide statistical information over the valuation period to the fund actuary so that they can determine the assets and liabilities for each employer
- 6.2.6 Communicate the results of the actuarial valuation of the fund to each employer

- 6.2.7 Provide every active, deferred and pension credit member with a benefit statement each year
- 6.2.8 Provide estimate of retirement benefits on request by the employer
- 6.2.9 Calculate and pay retirement benefits, deferred benefits and death in service benefits in accordance with LGPS rules, members' options and statutory limits.
- 6.2.10 Comply with HMRC legislation

6.3 Decisions

WYPF will ensure that members are notified of any decisions made under the scheme regulations in relation to their benefits within 10 working days of the decision being made and will ensure the member is informed of their right of appeal.

6.4 Discretionary powers

WYPF will ensure the appropriate policies are formulated, reviewed and publicised in accordance with the scheme regulations.

6.5 Internal dispute resolution procedure (IDRP)

WYPF will deal with employer appeals at stage two of the IDRP.

WYPF will nominate an adjudicator to deal with appeals at stage one and stage two of the IDRP where the appeal is against a decision WYPF has made or is responsible for making.

6.6 Fund performance levels

The minimum performance targets are shown below.

| Service | Days | Minimum target |
|---|----------|----------------|
| 1. New member records created | 10 | 85% |
| 2. Update personal records | 10 | 85% |
| 3. Posting monthly contributions to member records | 10 | 90% |
| 4. Calculate and action incoming transfer values | 2 months | 100% |
| 5. Deferred benefits – payment of lump sums | 3 | 85% |
| 6. Provide details of deferred benefit entitlement | 10 | 85% |
| 7. Refund of contributions – notification of entitlement | 5 | 85% |
| 8. Refund of contributions – payment | 5 | 85% |
| 9. Action agreed transfers out on receipt of acceptance | 10 | 85% |
| 10. Provide estimate of retirement benefits | 10 | 85% |
| 11. Retirement benefits – payment of lump sum | 3 | 85% |
| 12. Retirement benefits – recalculation of pension/lump sum | 10 | 85% |
| 13. Calculation and payment death benefits on receipt of all necessary information | 5 | 85% |
| 14. Make death grant payment to the member's nomination (provided all relevant information is received) | 1 month | 100% |
| 15. Percentage of telephone calls answered within 20 seconds | | 90% |
| 16. Annual benefit statements issued to deferred members by | | 31 May |
| 17. Annual benefit statements issued to active members by | | 31 August |
| 18. Make payment of pensions on the due date | | 100% |
| 19. Issue P60s to pensioners within statutory deadlines | | 100% |
| 20. Provide information on request in respect of pension share on divorce within legislative timescales | | 100% |
| 21. Implement Pension Share Orders within legislative timescales | | 100% |
| 22. Undertake annual reviews to establish continuing entitlements to pensions for children over the age of 17 | | 100% |
| 23. Implement changes in pensioner circumstances for the next available pensioner payroll | | 100% |

7. Unsatisfactory performance

7.1 Measuring performance

Both employer and WYPF targets will be measured on a quarterly basis using the Civica document management system. Employers will be notified of their performance level each quarter.

WYPF performance levels will be published on a quarterly basis in the employer newsletter. Overall employer and WYPF performance will be published by WYPF in the Report and Accounts.

7.2 Unsatisfactory performance

Where an employer materially fails to operate in accordance with the standards described in this strategy, and this leads to extra costs being incurred by the administering authority, the administering authority may issue a written notice to the employer requiring that these extra costs be met by the employer. A schedule of charges is detailed in Appendix B.

Appendix a – Main contact registration and authorised user list

Main contact registration form

| | | | | | |
|---|--|--|---|------------------------------------|--|
|  West Yorkshire Pension Fund | |  Lincolnshire Pension Fund | | main contact registration oct 2016 | |
| Main contact registration form | | | | | |
| Employer name and location code | | | | | |
| Employer address | | | | | |
| <p>Important: please read the guidance note on Managing your WYPF contacts before you complete this form.</p> | | | | | |
| Strategic contact | | | | | |
| Name | | Address if different from above | | | |
| Job title | | | | | |
| Phone | | Specimen signature | | | |
| Email | | | | | |
| Administration contact | | | | | |
| Name | | Address if different from above | | | |
| Job title | | | | | |
| Phone | | Specimen signature | | | |
| Email | | | | | |
| Finance contact | | | | | |
| Name | | Address if different from above | | | |
| Job title | | | | | |
| Phone | | Specimen signature | | | |
| Email | | | | | |
| Contact at third-party payroll provider (if applicable and not listed above) | | | | | |
| Name | | Company name and address | | | |
| Job title | | | | | |
| Phone | | Specimen signature | | | |
| Email | | | | | |
| Date signatures valid from | | | Signed (by current authorised signatory) | | |
| | | | | | |

Appendix b – Schedule of charges

| Performance areas | Reason for charge | Basis of charge |
|--|---|---|
| 1. Any overpayment made to a member due to inaccurate information provided by an employer will be recovered from employer, if the total overpaid is more than £50. | If the overpaid amount is the result of the employer's error, and the amount is over £50, then as such it will be recharged to the employer, plus costs of resolving and recovering the overpayment. If the overpayment is recovered from the member, then the amount recovered will be passed back to the employer, less any cost of overpayment recovery actions. | Actual amount overpaid + admin charge (admin charge will be based on managerial input at level III), minimum half day charge of £110 + VAT + cost of recovery actions (court and legal fees). Any part or all of this charge may be waived at head of service discretion. |
| 2. Contributions to be paid anytime but latest date by 19th of month (weekends and bank holidays on the last working day before 19th) | Due by 19th month – late receipt of funds, plus cost of additional time spent chasing payment. | Number of days late interest charged at base rate plus 1%. |
| 3. Monthly return due anytime but latest by 19th month, errors on return, i.e. employer/employee rate deducted incorrectly, exception reporting errors to be resolved within two months. | Due by 19th month, any additional work caused by late receipt of information incorrect information, incorrect contributions. | Failure to provide appropriate information, resulting in significant work will result in admin charge (at Senior Pensions Officers level II) at £136 + VAT a day. This may be waived at head of service discretion. |
| 4. Change in member detail | If submitted via monthly data, WYPF will process data within 2 weeks following monthly data submission. For exception reports output from monthly returns, change data response must be provided to WYPF within 2 weeks of receipt of the exception report. | Failure to provide appropriate information, resulting in significant work will result in admin charge (at Pensions Officer level I) at £96 + VAT a day. This may be waived at head of service discretion. |
| 5. Early leavers information | If submitted via monthly data, WYPF will process data within 2 weeks following monthly data submission, else within 6 weeks of date of leaving. For exception reports leaver forms provided to WYPF within two months of receipt of the exception report. | Failure to provide appropriate information, resulting in significant work will result in admin charge (at pension officers level I) at £96 + VAT a day. This may be waived at head of service discretion. |
| 6. Retirement notifications | Due 10 working days before last day of employment unless the reason for retirement is ill health or redundancy – additional work caused by late receipt of information. | Failure to provide appropriate information, resulting in significant work will result in admin charge (at senior pension officers level II) at £136 + VAT a day. This may be waived at head of service discretion. |
| 7. Death in membership | Due within 3 working days of the notification – additional work caused by late receipt of information. | Failure to provide appropriate information, resulting in significant work will result in admin charge (at pension manager level III) at £220 + VAT a day. This may be waived at head of service discretion. |
| 8. AVC deducted from pay to be paid anytime but latest date by 19th month. (weekends and bank holidays on the last working day before 19th) | Additional investigative work caused through lack of compliance by employer. | Failure to comply by employer, causing additional work for WYPF will result in admin charge (at pension officers level I) at £96 + VAT a day. This may be waived at head of service discretion. |
| 9. Re-issue of invoices | Charge based on number of request. | Additional work caused by reproducing invoices will result in admin charge (at pension officer level I) at £96 + VAT a day. This may be waived at head of service discretion. |

| Performance areas | Reason for charge | Basis of charge |
|--|--|---|
| 10. Authorised officers list not updated – Pension Liaison Officers, monthly contributions responsible officers | Costs of additional work resulting from employer's failure to notify WYPF of change in authorised officers list. | Failure to comply by employer, causing additional work for WYPF will result in admin charge (at Pensions Officer level I) at £96 + VAT a day. This may be waived at head of service discretion. |
| 11. Security breach on system re data protection | Recharge employers any fines imposed on us in this event | Actual amount fine imposed + admin charge (admin charge will be based on managerial input at level III) at £220 + VAT a day. This charge may be waived at head of service discretion. |
| 12. Member requests estimate | The first estimate provided in each financial year is free, then subsequent estimates are chargeable. | 1st request in each financial year is free. Additional request is charged at a notional charge of £50 + VAT is made. This charge is for each member's record folder reference. |
| 13. Pension sharing order | For pension sharing order work, each party will be charged according to the instruction in the court order. | The charge is £250 + VAT for this work. |
| 14. Miscellaneous items: <ul style="list-style-type: none"> • Benefit recalculation • Member file search and record prints • Supplementary information requests | Where information is requested by members that is in addition to routine information. | A notional charge of £50 + VAT will be levied. This charge is for each members record folder reference. |

Appendix c – Charging Levels

Charges will be made on half a day basis, but for less than a quarter day no charge will be made and for more than half a day a full-day charge will be made.

| Charge levels | I | II | III |
|-----------------|-----|------|------|
| Daily charge | £96 | £136 | £220 |
| Half day charge | £48 | £68 | £110 |

- Level I – work at Pensions Officer level
- Level II – work at Senior Pensions Officer level
- Level III – work at Pensions Manager level

Appendix E

Funding Strategy Statement

Funding Strategy Statement (FSS)

1. Introduction

1.1 The Local Government Pension Scheme Regulations 2013 provide the statutory framework under which the Administering Authority is required to prepare a Funding Strategy Statement (FSS). The key requirements for preparing the FSS can be summarised as follows:

After consultation with all such persons as it considers appropriate, including officers and elected members and other employer representatives, the Administering Authority will prepare, maintain and publish their funding strategy;

In preparing the FSS, the Administering Authority must have regard to:-

- the statutory guidance issued by CIPFA for this purpose; and
- the Investment Strategy Statement (ISS) published under Regulation 7 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 (as amended) (“The Investment Regulations”).

The FSS must be revised and published in accordance with Regulation 58 of the Local Government Pension Scheme Regulations 2013 (as amended), whenever there is a material change in either the policy on the matters set out in the FSS, or ISS.

- 1.2 Benefits payable under the Local Government Pension Scheme (LGPS) are guaranteed by statute and thereby the pension promise is secure. The FSS addresses the issue of managing the need to fund those benefits over the long term, whilst at the same time facilitating scrutiny and accountability through improved transparency and disclosure.
- 1.3 The LGPS is a defined benefit scheme under which the benefits are specified in the governing legislation, currently the Local Government Pension Scheme Regulations 2013 (as amended) (“the Regulations”).
- 1.4 Employer contributions are determined in accordance with the Regulations which require that an actuarial valuation be completed every three years by the actuary, to include a rates and adjustments certificate. The primary rate of employers' contributions to the Fund should be set so as to “secure its solvency”. The actuary must have regard to the desirability of maintaining as nearly constant a primary rate of employer contribution as possible in addition to the requirement to secure the solvency of the pension fund and the long term cost efficiency of the Scheme, so far as relating to the pension fund. The actuary must also have regard to the FSS in carrying out the valuation.

2. Purpose of Funding Strategy Statement (FSS)

- 2.1 Funding is the making of advance provision to meet the cost of accruing benefit promises. Decisions taken regarding the approach to funding will, therefore, determine the rate or pace at which this advance provision is made. Although the regulations specify the fundamental principles on which funding contributions should be assessed, the implementation of the funding strategy is the responsibility of the Administering Authority, acting on professional advice provided by the actuary.
- 2.2 The purpose of this FSS is to set out the processes by which the Administering Authority:
- 2.2.1 establishes a clear and transparent fund-specific strategy which will identify how employers' pension liabilities are best met going forward;
- 2.2.2 supports the regulatory requirement that it is desirable to maintain as far as possible stable primary employer contribution rates;
- 2.2.3 ensures that the regulatory requirements to set contributions so as to ensure the solvency and long-term cost efficiency of the Fund are met;
- 2.2.4 takes a prudent longer-term view of funding the liabilities.
- 2.3 It should be stressed at the outset that, supplementary to the regulatory requirement to consider the desirability of maintaining a constant primary employer contribution rate as referred to in 2.2.2 above, a key priority for the Administering Authority is to bring stability to employers' total contributions through gradual increases (or

decreases) phased in over a number of years. Views will be taken on what is reasonable and appropriate for employer contributions and, therefore, the degree of risk inherent within the funding targets and associated periods for recovery of deficits or return of surpluses.

- 2.4 The intention is for this strategy to be both cohesive and comprehensive for the Fund as a whole, recognising that there will be conflicting objectives which need to be balanced and reconciled. Whilst the position of all employers will be referred to in the FSS, its focus should at all times be on those actions which are in the best long-term interests of the Fund. Consequently, the FSS must remain a single strategy for the Administering Authority to implement and maintain.

3. Aims and Purpose of the Pension Fund

3.1 The aims of the Fund are to:

- 3.1.1 enable primary employer contribution rates to be kept as constant as possible and (subject to the Administering Authority not taking undue risks) at reasonable cost to the taxpayers, scheduled, designating, and admission bodies,
- 3.1.2 enable overall employer contributions to be kept as constant as possible and (subject to the Administering Authority not taking undue risks) at reasonable cost to the taxpayers, scheduled, designating, and admission bodies whilst achieving and maintaining the solvency of the Fund, which should be assessed in light of the risk profile of the Fund and the risk appetite of the Administering Authority and employers alike
- 3.1.3 manage employers' liabilities effectively and ensure that sufficient resources are available to meet all liabilities as they fall due. The Fund has a significant positive cash flow in terms of income received, including investment income, offset by monies payable; and
- 3.1.4 maximise the returns from investments within reasonable risk parameters.

3.2 The purpose of the Fund is to:

- 3.2.1 receive monies in respect of contributions from employers and employees, transfer values and investment income; and
- 3.2.2 pay out monies in respect of Scheme benefits, transfer values, costs, charges and expenses as defined in the LGPS Regulations and as required in the Investment regulations.

4. Responsibilities of Key Parties

- 4.1 The sound management of the Fund relies on all interested parties exercising their duties and responsibilities conscientiously and diligently. The key parties in this statement are the Administering Authority, Scheme employers and the actuary.
- 4.2 The Administering Authority should:
- 4.2.1 operate a pension fund;
- 4.2.2 collect employee and employer contributions, investment income and other amounts due to the pension fund;
- 4.2.3 invest all monies held in accordance with the ISS;
- 4.2.4 maintain adequate records for each Scheme member;
- 4.2.5 exercise discretions within the regulatory framework, taking into account the cost of decisions;
- 4.2.6 take measures as set out in the regulations to safeguard the fund against the consequences of employer default;
- 4.2.7 ensure sufficient cash is available to meet liabilities as they fall due;

- 4.2.8 pay from the pension fund the relevant entitlements as stipulated in the Regulations;
 - 4.2.9 provide membership records and financial information to the actuary promptly when required;
 - 4.2.10 prepare and maintain a Funding Strategy Statement and Investment Strategy Statement in proper consultation with interested parties;
 - 4.2.11 monitor all aspects of the Fund's performance and funding and amend the FSSISS accordingly;
 - 4.2.12 manage the valuation process in consultation with the actuary;
 - 4.2.13 effectively manage any potential conflicts of interest arising from its dual role as both fund administrator and Scheme employer; and
 - 4.2.14 enable the Local Pension Board to review the valuation process as set out in their terms of reference.
- 4.3 Each individual employer should:
- 4.3.1 deduct contributions from employees' pay correctly;
 - 4.3.2 pay all ongoing contributions, including their own as determined by the actuary, and any additional contributions promptly by the due date;
 - 4.3.3 develop a policy on certain discretions and exercise those discretions as permitted within the regulatory framework, taking into account the cost of decisions;
 - 4.3.4 make additional contributions in accordance with agreed arrangements in respect of, for example, award of additional pension and early retirement strain;
 - 4.3.5 provide adequate membership records to the Administering Authority promptly as required;
 - 4.3.6 notify the Administering Authority promptly of all changes or proposed changes to membership which affect future funding;
 - 4.3.7 notify the Administering Authority promptly of possible or intended changes that could affect the basis of participation in the Fund which affect future funding; and
 - 4.3.8 be aware that responsibility for compensatory added years, which the Administering Authority pays on behalf of the employer as a paying agent, lies with the employer which awards and is recharged for the cost of compensatory added years.
 - 4.3.9 pay any exit payments required in the event of their ceasing participation in the Fund.
- 4.4 The Fund Actuary should:
- 4.4.1 prepare triennial valuations including the setting of employers' contribution rates at a level to ensure fund solvency and long-term cost efficiency after agreeing assumptions with the Administering Authority and having regard to the FSS and the Regulations;
 - 4.4.2 prepare advice and calculations in connection with bulk transfers and individual benefit-related matters such as pension strain costs, ill health retirement costs, etc;
 - 4.4.3 provide advice and valuations on the exiting of employers from the Fund.
 - 4.4.4 provide advice to the Administering Authority on bonds or other forms of security to mitigate against the financial effect on the fund of employer default;
 - 4.4.5 assist the Administering Authority in assessing whether employer contributions need to be revised between valuations as permitted or required by the regulations; and
 - 4.4.6 ensure that the Administering Authority is aware of any professional guidance or other professional requirements which may be of relevance to his or her role in advising the Fund.

5. Solvency Issues, Target Funding Levels and Long-term Cost Efficiency

Risk Based Approach

- 5.1 The Fund adopts a risk based approach to funding strategy. In particular the discount rate (for the secure scheduled bodies) has been set on the basis of the assessed likelihood of meeting the funding objectives. The Administering Authority has considered 3 key decisions in setting the discount rate:
- 5.1.1 the long-term Solvency Target (i.e. the funding objective - where the Administering Authority wants the Fund to get to);
 - 5.1.2 the Trajectory Period (how quickly the Administering Authority wants the Fund to get there), and
 - 5.1.3 the Probability of Funding Success (how likely the Administering Authority wants it to be now that the Fund will actually achieve the Solvency Target by the end of the Trajectory Period).
- 5.2 These three choices, supported by complex (stochastic) risk modelling carried out by the Fund Actuary, define the discount rate (investment return assumption) to be adopted and, by extension, the appropriate employer contributions payable. Together they measure the riskiness (and hence also the degree of prudence) of the funding strategy. These are considered in more detail below.

Solvency Target

- 5.3 The Administering Authority's primary aim is the long-term solvency of the Fund. Accordingly, employers' contributions will be set to ensure that 100% of the liabilities can be met over the long term using appropriate actuarial assumptions.
- 5.4 The Fund is deemed to be solvent when the assets held are equal to or greater than the value of the Fund's liabilities assessed using appropriate actuarial methods and assumptions. The Administering Authority believes that its funding strategy will ensure the solvency of the Fund because employers collectively have the financial capacity to increase employer contributions should future circumstances require, in order to continue to target a funding level of 100%.
- 5.5 For secure Scheduled Bodies and Admission Bodies where a Scheme Employer of sound covenant has agreed to subsume its assets and liabilities following cessation, the Solvency Target is set:
- 5.5.1 at a level advised by the Fund Actuary as a prudent long-term funding objective for the Fund to achieve at the end of the Trajectory Period,
 - 5.5.2 based on continued investment in a mix of growth and matching assets intended to deliver a return above the rate of increases to pensions and pensions accounts (Consumer Price Index (CPI)).
- As at 31 March 2019 the long-term rate of CPI is assumed to be 2% p.a. and a prudent long-term investment return of 2% above CPI is assumed.
- As at 31 March 2019 the solvency discount rate is therefore of 4% p.a.
- 5.6 For Admission Bodies whose liabilities are expected to be orphaned following exit, a more prudent approach will be taken. The Solvency Target will be set by considering the valuation basis which would be adopted should the body leave the Fund. For most such bodies, the Solvency Target will be set commensurate with assumed investment in Government bonds after exit.
- 5.7 For scheduled bodies with no guarantee from local or central government and Admission Bodies where there is no subsumption commitment but which continue to admit new members to the Fund and are considered by the Administering Authority to be sufficiently financially secure, the Solvency Target will take into account the fact that the employer's exit is not expected to take place for a considerable period of time.

Probability of Funding Success

- 5.8 The Administering Authority considers funding success to have been achieved if the Fund, at the end of the Trajectory Period, has achieved the Solvency Target. The Probability of Funding Success is the assessed chance of this happening based on asset-liability modelling carried out by the Fund Actuary.

With effect from 31 March 2019 the discount rate, and hence the overall required level of employer contributions, has been set such that the Fund Actuary estimates there is a 75% chance that the Fund would reach or exceed its Solvency Target after 25 years (the Trajectory Period).

Funding Target

- 5.9 The Funding Target is the amount of assets which the Fund needs to hold at the valuation date to pay the liabilities at that date as indicated by the chosen valuation method and assumptions and the valuation data. The valuation calculations, including future service contributions and any adjustment for surplus or shortfall, set the level of contributions payable and dictate the chance of achieving the Solvency Target at the end of the Trajectory Period (defined above). The key assumptions used for assessing the Funding Target at the 2019 Valuation are summarised in Appendix 1.
- 5.10 Consistent with the aim of enabling the primary rate of employers' contributions to be kept as nearly constant as possible, contributions are set by use of the Projected Unit valuation method for most employers. The Projected Unit method is used in the actuarial valuation to determine the cost of benefits accruing to the Fund for employers who continue to admit new members. This means that the future service contribution rate is derived as the cost of benefits accruing to employee members over the year following the valuation date expressed as a percentage of members' pensionable pay over that period. The future service rate will be stable if the profile of the membership (age, gender etc) is stable.
- 5.11 For employers who no longer admit new members, the Attained Age valuation method is normally used. This means that the contribution rate is derived as the average cost of benefits accruing to members over the period until they die, leave the Fund or retire. This approach should lead to more stable employer contribution rates than adoption of the Projected Unit method for closed employers.

Funding Targets and assumptions regarding future investment strategy

- 5.12 For Scheduled Bodies whose participation in the Fund is considered by the Administering Authority to be indefinite and Admission Bodies with a subsumption commitment from such Scheduled Bodies, the Administering Authority assumes indefinite investment in a broad range of assets of higher risk than risk free assets. This is known as the scheduled and subsumption body funding target.
- 5.13 For other Scheduled Bodies the Administering Authority may without limitation, take into account the following factors when setting the funding target for such bodies:
- 5.13.1 the type/group of the employer
 - 5.13.2 the business plans of the employer;
 - 5.13.3 an assessment of the financial covenant of the employer;
 - 5.13.4 any contingent security available to the Fund or offered by the employer such as a guarantor or bond arrangements, charge over assets, etc.

At the 2019 valuation by virtue of having taken account of some of the above factors, the Administering Authority has adopted a less risky (more prudent) funding target than the scheduled and subsumption body funding target for scheduled bodies in the HE/FE sector. This is the intermediate funding target and the precise target depends upon the employer's assessed level of risk.

- 5.14 For Admission Bodies where there is no subsumption commitment but which continue to admit new members to the Fund and are considered by the Administering Authority to be sufficiently financially secure, the Administering Authority may assume continued investment in a broad range of assets of higher risk than risk free assets despite the approach taken on exit. This is known as the intermediate funding target and the precise target depends upon the employer's assessed level of risk. At the 2019 valuation this applies to admission bodies in the housing and HE/FE sectors.
- 5.15 For all other Admission Bodies whose liabilities are expected to be orphaned on exit the Administering Authority will have regards to the potential timing of such exit and any likely change in the notional or actual investment strategy as regards the assets held in respect of the body's liabilities at the date of exit. This is known as the (ongoing orphan admission bodies funding target. It is not the same as the exit basis.

- 5.16 The Fund is deemed to be fully funded when the assets are equal to or greater than 100% of the Funding Target, where the funding target is assessed based on the sum of the appropriate funding targets across all the employers/groups of employers.

Recovery Periods

- 5.17 Where a valuation reveals that the Fund is in surplus or deficit relative to the Funding Target, subject to any smoothing of contribution changes employers' contributions will be adjusted to target 100% funding over the Recovery Period. The Fund has a target of achieving the Funding Target within a maximum period of 22 years. Whilst this is longer than the expected average future period of membership of active members, the Administering Authority considers this is reasonable in the context of the LGPS as a statutory scheme and it is a prudent approach when the Fund's assets are greater than the liabilities (sum of the employers' funding targets). The recovery period is also based on the assumption that the Scheme (and the majority of the employers) will continue for the foreseeable future, and that favourable investment performance can play a valuable role in achieving adequate funding over the long term.
- 5.18 If the assets of the scheme relating to an employer are less than the Funding Target at the date of any actuarial valuation, a recovery plan will be put in place, which is expected to require additional contributions from the employer to meet the deficit. Each employer will be informed of its deficit to enable it to make the necessary allowance in their business and financial plans. The Recovery Period in relation to an employer or group of employers is the period over which any adjustment to the level of contributions in respect of a surplus or deficit relative to the Funding Target for that employer or group of employers is payable.
- 5.19 Additional contributions to meet any shortfall will be expressed as a monetary amount, and will increase annually in line with the assumption for pay growth used for the valuation unless a different increase rate is agreed between the employer and Administering Authority. The recovery period for which the additional contributions are payable will normally be subject to the following limits: -
- 5.19.1 scheduled bodies whose participation is deemed to be indefinite, designating and open admission bodies with subsumption guarantees from such bodies - 22 years
 - 5.19.2 open admission bodies without a subsumption guarantee and no fixed or known term of participation and scheduled bodies with no local or central government guarantee - 22 years, although the Administering Authority reserves the right to adopt a shorter period if it has concerns about the employer's strength of covenant
 - 5.19.3 admission bodies with a fixed or known term of participation - remaining period of participation (including those with a subsumption commitment)
 - 5.19.4 other admission bodies (i.e. those closed to new entrants) – average future working life of current active members (or period to contract end date if shorter)
- 5.20 In determining the Recovery Period to apply for any particular employer, the Administering Authority may take into account, without limitation, the following factors:
- 5.20.1 the type/group of the employer
 - 5.20.2 the size of the funding shortfall or surplus;
 - 5.20.3 the business plans of the employer;
 - 5.20.4 the assessment of the financial covenant of the employer;
 - 5.20.5 any contingent security available to the Fund or offered by the employer such as a guarantor or bond arrangements, charge over assets, etc.
 - 5.20.6 the views of the subsuming employer where the funding target adopted is dependent upon another employer subsuming the assets and liabilities post-exit

Employer Contributions

- 5.21 As part of each valuation separate employer contribution rates are assessed by the actuary for each participating employer or group of employers.

- 5.22 Employer contributions required to meet the cost of future accrual of benefits for members after the valuation date (the “primary contribution rate”) are assessed based on each employer or group of employers’ membership, funding target and appropriate funding methodology.
- 5.23 The primary rates may be reduced if the employer or group’s notional sharer of the Fund (its assets compared to its funding target) is calculated to be in surplus. Alternatively, additional employer contributions may be required to rectify a shortfall of assets below the funding target. These past service (“secondary”) contributions are assessed taking into account the experience and circumstances of each employer, following a principle of no cross-subsidy, between the various employers in the Fund, except in relation to death in service and (with effect from 1 April 2014) tier 1 and 2 ill health retirement experience where experience is shared across all employers. In attributing the overall investment performance achieved on the assets of the Fund to each employer a pro-rata principle has been adopted. From 1 March 2018 the investment performance will be allocated on a monthly basis via the unitisation process (applied retrospectively to 1 April 2016 in respect of any inter-valuation calculations where the employer asset value is taken from the output of the unitisation model).
- 5.24 The method and assumptions for assessing employer contributions at the 2019 Valuation are set out in Appendix 1.
- 5.25 The Administering Authority, following consultation with the participating employers, has adopted the following constraints for setting individual employer contribution rates:
- 5.25.1 a maximum Recovery Period of 22 years. Employers will have the freedom to adopt a recovery plan on the basis of a shorter period if they so wish where their notional share of the Fund is in deficit. A shorter period may be applied in respect of particular employers where the Administering Authority considers this to be warranted.
- 5.25.2 where changes in employer contribution rates are required following completion of the actuarial valuation, the increase or decrease may be implemented in steps as long as the regulatory objectives of solvency and long-term cost efficiency are met.
- 5.25.3 on the exit of an employing authority’s participation in the Scheme, the Fund Actuary will be asked to complete an exit valuation. Any deficit in the Fund in respect of the employer will be due to the Fund as a termination contribution, or by the Fund as an exit credit respectively, unless it is agreed by the Administering Authority and the other parties involved that the assets and liabilities relating to the employer will transfer within the Scheme to another participating employer. Details of the approach to be adopted for such an assessment on exit are set out in the separate Policy on New Employers and Exit Valuations document at Appendix 2.
- 5.26 With regard to the funding for early retirement costs, all employers are required to make capital payments to the Fund to cover the costs of early retirements. This excludes the costs involved with deaths in service and ill health retirements which are built into the employer’s contribution rate. For deaths in service and tier 1 and tier 2 ill health retirements the experience will be spread across all employers.
- 5.27 Two key principles making up the funding strategy and to be adopted for the 2019 actuarial valuation are to:
- 5.27.1 provide stability in primary employer contribution rates and secondary employer contribution amounts where possible, avoiding wide fluctuations year on year. To achieve this stability and ensure gradual movements in employers’ contribution levels, the practice of phasing any increases or decreases in employers’ contribution requirements up to 6 years from 1 April 2020 will be adopted where appropriate and required;
- 5.27.2 retain a maximum 22-year recovery period for meeting any deficit (or using up any surplus) as adopted at previous valuations.
- 5.28 It may not be possible to adopt the two principles outlined in paragraph 5.25 for some or all of the employers identified in paragraphs 5.19.2, 5.19.3 and 5.19.4, although wherever possible they will be applied. Individual decisions may have to be taken for each employer featuring in these three groups with regard to an appropriate recovery period and whether the phasing of increases or decreases in contribution rates is feasible. Decisions on these issues will have regard to the Administering Authority’s views on the strength of an employer’s covenant, to its membership profile, and to its anticipated future period of participation in the Fund.
- 5.29 The strategic aim of the Fund is to operate within a funding range of 90% to 110%. Whenever the Fund as a whole is operating within this range of funding then for the majority of ‘high covenant’ employers it is anticipated that their

- 5.30 contribution rates will remain stable as long as the requirement for contributions to be set so as to ensure the solvency and long-term cost efficiency of the Fund are still met. For other employers the Administering Authority will have regard to the potential for participation to cease, and require changes in contribution rates accordingly.

Long-term cost efficiency

- 5.31 The Administering Authority believes that measures taken to maintain stability of employer contributions are not inconsistent with the statutory objective for employer contributions to be set so as to ensure the long-term cost efficiency of the Fund. In particular, retention of a 22-year recovery period for the majority of employers ensures any surplus is not used up too quickly (through certifying contributions below the primary contribution rate)

Smoothing of Contribution rates for admission bodies

- 5.32 The Administering Authority recognises that a balance needs to be struck as regards the financial demands made of admission bodies. On the one hand, the Administering Authority requires all admission bodies to be fully self-funding, such that other employers in the Fund are not subject to expense as a consequence of the participation of those admission bodies. On the other hand, requiring achievement of full funding over a short time horizon may precipitate failure of the body in question, leading to costs for other participating employers.
- 5.33 Where the Administering Authority considers it necessary to relax the requirement that the contribution rate targets full funding temporarily, the Administering Authority will engage with the largest employers in the Fund with a view to seeking agreement to this approach.
- 5.34 The implication of this is that, where justified on affordability grounds, contribution rates for admission bodies subject to the ongoing orphan funding target may be relaxed i.e. set at a level lower than full funding would require. However, where deficit payments are being deferred, the bodies should be aware that, all things being equal, this will lead to a higher contribution requirement in future. It is expected, such bodies should pay contributions equal to the cost of benefits accruing for their members calculated on the ongoing funding target plus a contribution towards any shortfall. Should an employer exit the Fund during the period when contribution rates have been relaxed, the full value of the employer's liabilities in the Fund will be taken into account in the exit valuation, i.e. the employer will, in effect, be required to make up any additional underfunding by virtue of contributions having been relaxed.

Notional sub-funds (unitisation)

- 5.35 In order to establish contribution rates for individual employers or groups of employers the Fund Actuary notionally subdivides the Fund assets between the employers, as if each employer had its own notional sub fund within the Fund.
- 5.36 This subdivision is for funding purposes only. It is purely notional in nature and does not imply any formal subdivision of assets, nor ownership of any particular assets or groups of assets by any individual employer or group.
- 5.37 With effect from 1 April 2016 a unitised approach has been taken to track the notional employer sub-funds. The unitisation model will use the notional sub-funds as at 31 March 2016 (the date of the last actuarial valuation) as its starting point and allocates all Fund cashflows between employers on a monthly basis as agreed with the Administering Authority. The Administering Authority believes this results in a more accurate and transparent allocation of assets to employers and reduces the likelihood of unintended cross-subsidies between employers than other approaches. Further information on the model and how it operates is available on request.

Former Participating Bodies

- 5.38 Where an employer ceases to participate in the Fund, the Administering Authority will obtain an exit valuation from the actuary on the assumption that, unless a subsumption arrangement is in place, the assets will be assumed to be invested in low risk investments and this will be sufficient to meet the liabilities. This approach reduces the risk that a deficit could arise on these liabilities in future which would incur a cost for the other employers in the Fund. Further details of the Administering Authority's policy for exit valuations are set out in Appendix 2.
- 5.39 Liabilities in the Fund which are already orphaned will be assumed to be 100% funded on the appropriate funding target at each valuation. This will be achieved by notionally re-allocating assets within the Fund as required.

6. Link to investment policy set out in the Investment Strategy Statement (ISS)

- 6.1 In assessing the value of the Fund's liabilities in the valuation, allowance has been made for future investment returns, as described in Appendix 1, which takes into account the investment strategy adopted by the Fund, as set out in the ISS.
- 6.2 It is possible to construct a portfolio that represents a lower risk investment position and one which closely matches the liabilities should there be no employers to fund the liabilities in future. Such a portfolio would consist of a mixture of long-term index-linked and fixed interest gilts.
- 6.3 Investment of the Fund's assets in line with the least risk portfolio would minimise fluctuations in the value of the Fund's assets between successive actuarial valuations. However, if, at the valuation date, the Fund had been invested in this portfolio, then in carrying out the valuation it would not be appropriate to set the discount rate by considering the returns on growth assets such as equities. On this basis the discount rate would be lower, the assessed value of the Fund's liabilities valuation would be significantly higher, and the declared funding level would be correspondingly reduced
- 6.4 Departure from a least risk investment strategy, in particular to include a significant element of Equity investment, gives the prospect that out-performance by the assets will, over time, reduce the employers' contribution requirements. The funding target might in practice therefore be achieved by a range of combinations of funding plan, investment strategy and investment performance.
- 6.5 The Fund's current benchmark investment strategy, as set out in its ISS, is that the biggest proportion of the Fund's investments will be in Equities. This type of investment bias is intended to maximise growth in the value of assets over the long term. The expected rate of return and the target set for investment returns in the ISS are reviewed annually as a matter of course, and the relationship with the requirements of the FSS are considered at the same time.

7. Identification of risks and counter-measures

- 7.1 Whilst the activity of managing the Fund exposes the Administering Authority to a wide range of risks, those most likely to impact on the funding strategy are investment risk, liability risk, liquidity/maturity risk, regulatory/compliance risk, employer risk and governance risk.

Investment risk

- 7.2 This covers items such as the performance of financial markets and the Fund's (pool) investment managers, asset reallocation in volatile markets, leading to the risk of investments not performing (income) or increasing in value (growth) as forecast. Examples of specific risks would be:
- 7.2.1 assets not delivering the required return (for whatever reason, including manager underperformance)
 - 7.2.2 systemic risk with the possibility of interlinked and simultaneous financial market volatility
 - 7.2.3 insufficient funds to meet liabilities as they fall due
 - 7.2.4 inadequate, inappropriate or incomplete investment and actuarial advice is taken and acted upon
 - 7.2.5 counterparty failure

- 7.3 The specific risks associated with assets and asset classes are:
- 7.3.1 equities – industry, country, size and stock risks
 - 7.3.2 fixed income - yield curve, credit risks, duration risks and market risks
 - 7.3.3 alternative assets – liquidity risks, property risk, alpha risk
 - 7.3.4 money market – credit risk and liquidity risk
 - 7.3.5 currency risk
 - 7.3.6 macroeconomic risks
- 7.4 The Fund mitigates these risks through diversification, investing in a wide variety of markets and assets, and through the use of specialist managers with differing mandates in addition to the internal investment management team, which has a wide variety of experience within its members.
- 7.5 The performance of both markets and managers is reviewed regularly by the Investment Advisory Panel, which has the appropriate skills and training required to undertake this task.

Liability risk

- 7.6 The main risks include discount rates, pay and price inflation, changing retirement patterns, mortality and other demographic risks.
- 7.7 The Administering Authority will ensure that the Fund Actuary investigates demographic experiences at each valuation and reports on developments. The demographic assumptions are intended to be best estimate, informed by Fund experience and wider evidence where needed e.g. the mortality assumptions are informed by a postcode analysis carried out by the Fund Actuary's specialist longevity team and the projections model released by the Continuous Mortality Investigations of the Institute of Faculty of Actuaries. If the Administering Authority becomes aware of any material changes in population mortality which may also be reflected in the Fund's experience it will ask the Fund Actuary to report on the effect on the funding position and employer contributions.
- 7.8 The Fund Actuary will also provide quarterly funding updates to assist the Administering Authority in its monitoring of the financial liability risks. The Administering Authority will, as far as practical, monitor changes in the age profile of the Fund membership early retirements, redundancies and ill health early retirements in the Fund, and, if any changes are considered to be material, ask the Fund Actuary to report on their effect on the funding position and employer contributions.
- 7.9 If significant liability changes become apparent between valuations, the Administering Authority will notify the affected participating employers of the anticipated impact on costs that will emerge at the next valuation and consider whether to require the review the bonds that are in place for Admission Bodies. It will also consider the extent to which such changes can or should be allowed for in exit valuations, taking advice from the Fund Actuary.

Liquidity and Maturity risk

- 7.10 This is the risk of a reduction in cash flows into the Fund, or an increase in cash flows out of the Fund, or both, which can be linked to changes in the membership and, in particular, a shift in the balance from contributing members to members drawing their pensions and employer activity where an employer consolidates its LGPS membership in another fund, leading to a transfer out of the Fund. Changes in the funding position and hence (secondary) employer contributions can also affect the cashflow position since it is not always possible to deliver complete stability of contributions. Changes within the public sector and to the LGPS itself may affect the maturity profile of the LGPS and have potential cash flow implications. For example,
- 7.10.1 budget cuts and headcount reductions could reduce the active (contributing) membership and increase the number of pensioners through early retirements;
 - 7.10.2 an increased emphasis on outsourcing and other alternative models for service delivery may result in falling active membership (e.g. where new admissions are closed),
 - 7.10.3 public sector reorganisations may lead to a transfer of responsibility between different public sector bodies, (e.g. to bodies which do not participate in the LGPS),
 - 7.10.4 scheme changes and lower member contributions, as provisionally agreed as part of the Scheme Advisory Board cost management process will lead to lower member contributions which may not be immediately matched by higher employer contributions;
 - 7.10.5 an increase in the take up of the 50/50 option (whether on affordability grounds or to avoid tax charges) will reduce member contributions to the Fund.
- 7.11 The Administering Authority seeks to maintain regular contact with employers to mitigate against the risk of unexpected or unforeseen changes in maturity or other changes leading to cashflow or liquidity issues.

Regulatory and compliance risk

- 7.12 Regulatory risks to the scheme arise from changes to general and LGPS specific regulations, taxation, national changes to pension requirements, or employment law. There are a number of uncertainties associated with the benefit structure at the current time including:
- 7.12.1 How Government will address the issues of GMP indexation and equalisation beyond expiry of the current interim solution from 6 April 2021
 - 7.12.2 The McCloud/Sargeant cases which ruled that the transitional protections implemented in the Firefighters' and Judges' Pension Schemes are illegal be age discrimination, and what that remedy might be in the LGPS in terms of its scope and form .
 - 7.12.3 The outcome of the cost management process and whether the agreement reached in relation to the Scheme Advisory Board (SAB) process for member contributions to be reduced and benefits enhanced to achieve an additional cost of 0.9% of pay
- 7.13 There are a number of consultations which have been issued in recent years, some of which represent proposed changes which were first raised a number of years ago, including a cap on exit payments by public sector employers, new Fair Deal arrangements and greater flexibility on employer exit from the LGPS. Some of these may affect funding and pose a risk to the Fund. The Government has also consulted on changes to the valuation cycle although the Administering Authority understands that the 2022 valuation is definitely going ahead as planned.

7.14 The Administering Authority will keep abreast of all the changes to the LGPS, both proposed and confirmed and discuss any proposals which may affect funding with the Fund Actuary as required. The Administering Authority will normally respond to consultations on these matters where they have an impact on the Fund, and it would encourage employers, who frequently have a greater interest in proposed changes, to respond independently.

Employer risk

7.15 These risks arise from the ever-changing mix of employers, from short-term and ceasing employers, and the potential for a shortfall in payments and/or orphaned liabilities.

7.16 The Administering Authority maintains a knowledge base on its employers, their basis of participation and their legal status (e.g., charities, companies limited by guarantee, group/subsidiary arrangements) and uses this information to inform the FSS. It has also developed a framework for analysing the risk posed by the larger Tier 3 employers and introduced additional funding targets at the 2019 valuation to reduce the risk of employers failing and exiting the Fund with a material shortfall relative to the exit liabilities. It does not consider it appropriate (or affordable for the employers concerned) to eliminate the risk of an unmet exit deficit and will ask the Fund Actuary to review the funding position of the short term and Tier3 employers between triennial valuations where it believes this is appropriate.

Governance risk

7.17 Governance risk is essentially one of communication between employer and the Fund, where, for example, an employer fails to inform the Fund of major changes, such as the letting of a contract involving the transfer of significant numbers of staff to another employer, including a wholly owned company which does not participate in the Fund, or only participate. or an admission body closing the scheme to new entrants.

7.18 The Fund seeks to maintain regular contact with employers to mitigate this risk, and has Pension Fund Representatives for this purpose. The Fund would also advise employers to pay past service deficit payments as lump sums, rather than as a percentage of payroll, to avoid an under payment accruing as a result of a reduction of the payroll.

7.19 To protect the Fund on the admission of a new employer, the existing scheme employer (which should liaise with the Fund) or the Fund if there is no existing scheme employer, will undertake a risk assessment and determine the requirement for a bond or indemnity, which should be reviewed annually. The Fund will commission triennial reviews of any bonds as part of its risk management.

7.20 The Fund will monitor employers with a declining membership, and may introduce a more conservative funding strategy for such employers.

Climate Change

7.21 The Systemic risk posed by climate change and the policies implemented to tackle them will fundamentally change economic, political and social systems and the global financial system. They will impact every asset class, sector, industry and market in varying ways and at different times, creating both risks and opportunities to investors. The Administering Authority and Investment Advisory Panel keeps the effect of climate change on future returns under review and will commission modelling or advice from the Funds Actuary on the potential effect on funding as required.

8. Monitoring and Review

- 8.1 The Administering Authority has taken advice from the Fund Actuary in preparing this Statement, and will consult with senior officials of all the Fund's participating employers.
- 8.2 A full review of this Statement will occur no less frequently than every three years, to coincide with completion of a full valuation. Any review will take account of the current economic conditions and will also reflect any legislative changes.
- 8.3 The Administering Authority will monitor the progress of the funding strategy between full actuarial valuations. If considered appropriate, the funding strategy will be reviewed (other than as part of the triennial valuation process), for example:
- 8.3.1 if there has been a significant change in market conditions, and/or deviation in the progress of the funding strategy.
 - 8.3.2 if there have been significant changes to the Scheme membership, or LGPS benefits.
 - 8.3.3 if there have been changes to the circumstances of any of the employing authorities to such an extent that they impact on or warrant a change in the funding strategy
 - 8.3.4 if there have been any significant special contributions paid into the Fund.

APPENDIX 1

Actuarial Valuation as at 31 March 2019

Method and assumptions used in calculating the funding target

The actuarial method to be used is the Projected Unit method, under which member benefits are projected to increase in line with the salary increases and revaluation of pension accounts (as appropriate) until that member is assumed to leave active service by death, retirement or withdrawal from service.

Principal assumptions

Investment return (discount rate)

The discount rates adopted vary according to the solvency target as set out in section 5.

For the 2019 valuation the discount rate is 4.35% p.a (the scheduled and subsumption body funding target), with the exception of:

Admission Bodies which will ultimately give rise to Orphan liabilities where the discount rate is 3.3% in service (equivalent to the yield on long-dated fixed interest gilts at a duration appropriate for the Fund's liabilities plus an asset out-performance assumption of 2.0%) and 1.6 % (left service), which is intended to be equivalent to the yield on long-dated fixed interest gilts at the valuation date but which has, in the interests of affordability and stability of employer contributions, been increased by 0.3 % in light of the market expectations of a future increase in gilt yields. This is the ongoing orphan admission body funding target.

Housing associations, universities and colleges, where a risk assessment has been carried out and the employer has been allocated to one of the intermediate funding targets.

Inflation (Retail Prices Index (RPI) and Consumer Prices Index (CPI) inflation)

The RPI inflation assumption is taken to be the Capital Market Assumption at the valuation date as produced by Aon Hewitt Limited. In formulating the Capital Market Assumption, both consensus forecasts and the inflation risk premium are considered.

The CPI inflation assumption at the valuation date is set as RPI inflation less 1.1% per annum. The deduction has been set having regard to the estimated difference between RPI and CPI arising from the difference in the calculation approach between the two indices. This estimate (and hence the assumed difference between CPI and RPI) will vary from time to time.

Salary increases

The assumption for real salary increases (salary increases in excess of consumer price inflation) will be determined by an allowance of 1.25% p.a. over the consumer price inflation assumption as described above.

Pension increases

Increases to pensions are assumed to be in line with the inflation (CPI) assumption as determined above. This is modified appropriately to reflect any benefits which are not fully indexed in line with the CPI (e.g. Guaranteed Minimum Pensions in respect of service prior to April 1997).

Post-retirement Mortality Base Rates

Normal Health: Standard SAPS S2N Normal Health tables, year of birth base rates, adjusted by a scaling factor as set based on Fund experience.

Ill-health: Standard SAPS S2 Ill-health tables, year of birth base rates adjusted by a scaling factor as set based on Fund experience.

Future improvement to base rates

An allowance for improvements in line with CMI_2018 for men or women as appropriate, with a long term rate of improvement of 1.50% p.a, sk of 7.5 and parameter A of 0.0.

Other Demographic Assumptions

Allowance is made for withdrawals from service, death on service and retirements due to ill health.

McCloud/Cost Cap

0.9% of pay has been added to employer contributions based on Fund-specific calculations carried out by the Fund Actuary. This figure has been calculated across the Fund as a whole on the scheduled and subsumption body funding target assuming the following remedy:

- Compensation will apply to members who joined before 1 April 2014 (see below)
- Benefits will be the better of those accrued in the 2014 Scheme or those accrued in the 2008 Scheme, backdated to 1 April 2014 (i.e. an 'underpin' approach).
- Compensation will apply to members who retire from active service with immediate pension benefits, through normal health or ill health retirement (this is because transitional protections only applied to member retiring from active service with immediate pension)
- The remedy will not apply to spouses' or dependants' benefits. This is because transitional protections only applied to members' benefits.

The cost is split 0.2% of pay in respect of past service and 0.7% of pay in respect of future service where the past service cost has been spread over a recovery period of 22 years.

Method and assumptions used in calculating the cost of future accrual

The cost of future accrual (primary contribution rate) will be calculated using the same actuarial method and assumptions as used to calculate the funding target.

Funding method

For most employers, the actuarial method to be used is the Projected Unit method with a one-year control period. For employers who do not permit new employees to join the Fund, the actuarial method to be used is the Attained Age method. Under both funding methods member benefits are protected to increase in line with revaluation of pension accounts until that member is assumed to leave active service by death, retirement or withdrawal from service.

Assumptions used in calculating contributions payable under the Recovery Plan

The contributions payable under the Recovery Plan are calculated using the same assumptions as those used to calculate the funding target

Summary of key whole Fund principal financial assumptions used for calculating funding target and cost of future accrual (the “primary contribution rate”) for the 2019 actuarial valuation

| | |
|---|--|
| Discount rate (in service) | <p>4.35% for Secure Scheduled bodies 4.1% Intermediate (low risk Scheduled Bodies)</p> <p>3.95% Intermediate (low risk Admission Bodies and medium risk Scheduled Bodies)</p> <p>3.8% Intermediate (medium risk Admission Bodies and higher risk Scheduled Bodies)</p> <p>3.3% Ongoing Orphan Admission Bodies</p> <p>Orphan Admission Bodies and Intermediate funding target (see paragraph 5.15)</p> |
| Discount rate (left service) | <p>4.35% Secure Scheduled Bodies 4.1% Intermediate (low risk Scheduled Bodies)</p> <p>3.95% Intermediate (low risk Admission Bodies and medium risk Scheduled Bodies)</p> <p>3.8% Intermediate (medium risk Admission Bodies and higher risk Scheduled Bodies)</p> <p>1.6% Ongoing Orphan Admission Bodies</p> |
| Rate of general pay increases | 3.35% |
| Rate of price inflation (RPI) | 3.2% |
| Rate of price inflation (CPI) | 2.1 % |
| Rate of pension increases (on benefits in excess of GMPs) | 2.1% |
| Rate of pension increases on post-88 GMPs | 1.9% |
| Rate of deferred pension increases | 2.1% |
| Rate of GMP increases in deferment | 3.35% |

Policy on New Employers and Exit Valuations

1. Background

This Document explains the policies and procedures of the West Yorkshire Pension Fund (“the Fund”) in the treatment of employers including on commencement or admission, considerations in respect of the participation of existing Admission Bodies, and the methodology for assessment of an exit payment on exit of employers in the Fund, administered by City of Bradford Metropolitan District Council (“the Administering Authority”). This Policy supplements the general funding policy as set out in the Funding Strategy Statement and should be read in conjunction with that statement.

It should be noted that this statement is not exhaustive and individual circumstances may be taken into consideration where appropriate.

Where the information relates to a particular type of employer, this will be explained. If no type of employer is indicated the information relates to all employers in the Fund.

The Administering Authority's aim is to minimise risk to the Fund by ensuring that the employers participating in the Fund are managed in a way that ensures they are able to adequately fund the liabilities attributable to them and, in particular to pay any deficit due when leaving the Fund.

The Administering Authority has an obligation to pursue all liabilities owed so any shortfall from an individual employer does not fall back on other employers.

2. New Employers

Types of Admission Body

The following bodies are types of potential admission body -

- a) a body which provides a public service in the United Kingdom which operates otherwise than for the purposes of gain and has sufficient links with a Scheme employer for the body and the Scheme employer to be regarded as having a community of interest (whether because the operations of the body are dependent on the operations of the Scheme employer or otherwise);
- b) a body, to the funds of which a Scheme employer contributes;
- c) a body representative of-
 - (i) any Scheme employers, or
 - (ii) local authorities or officers of local authorities;
- d) a body that is providing or will provide a service or assets in connection with the exercise of a function of a Scheme employer as a result of-
 - (i) the transfer of the service or assets by means of a contract or other arrangement,
 - (ii) a direction made under section 15 of the Local Government Act 1999 (Secretary of State's powers),
 - (iii) directions made under section 497A of the Education Act 1996;

- e) a body which provides a public service in the United Kingdom and is approved in writing by the Secretary of State for the purpose of admission to the Scheme.

An employer who wishes to join the Fund may apply to the Administering Authority for admission. If admitted, that employer becomes an Admission Body and specified categories of its employees can participate as members of the Fund.

The Administering Authority is responsible for deciding whether an application from an employer to become an Admission Body within the Fund should be declined or accepted. The employer must meet the requirements set out in Part 3 of Schedule 2 to the LGPS Regulations, and, where appropriate, the additional requirements set out by the Administering Authority.

The Administering Authority will generally only consider admission if the body in question is based wholly or mainly in West Yorkshire or has clear links to an existing Scheme employer of the Fund, the body has a sound financial standing and appropriate security is in place (see section on bonds, indemnities and guarantees below). The Administering Authority's preference is for a Scheme employer to provide a subsumption commitment in respect of any new admission bodies wishing to join the Fund. Where a subsumption commitment is in place, the funding target for the admission body will generally be the same as that appropriate to the subsuming employer, unless the circumstances dictate otherwise. Where such a commitment is not available, the orphan body funding target will generally be adopted, for the new admission to protect the Fund as set out in paragraph 5.6 of the Funding Strategy Statement and explained further below. In the extreme, the Administering Authority may exercise its discretion to refuse admission to the Scheme for any admission bodies with no subsumption commitment if this is considered appropriate to protect the interests of the Fund. However, for paragraph 1(d) admissions where the body undertakes to meet the requirements of the regulations the Administering Authority must admit the eligible employees of that body to the Fund.

The Admission Body is required to have an "admission agreement" with the Fund, which sets out (in conjunction with the Regulations) the conditions of participation and which employees (or categories of employees) are eligible to be members of the Fund. The Administering Authority has a template admission agreement which it will generally expect to be entered into without amendment. Details are available on request.

Bonds, Indemnities and Guarantees

The Administering Authority will seek to minimise the risks that a new Admission Body might create for the Fund and the other employers in the Fund. These risks will be taken into account by the Administering Authority in considering the application for admission, and the Administering Authority may put in place conditions on any approval of admission to the Fund to minimise these risks, such as a satisfactory guarantee, indemnity or bond and a satisfactory risk assessment. An indemnity / bond is a way of insuring against the potential cost of the Admission Body failing by reason of insolvency, winding up or liquidation and hence being unable to meet its obligations to the Fund.

Admission bodies under paragraph 1(d)(i) of Part 3 of Schedule 2 to the 2013 Regulations (generally admissions as a result of a Best Value transfer), are required to carry out an assessment of the level of risk arising on premature termination of the provision of service or assets by reason of insolvency, winding up, or liquidation of the admission body. This assessment has to be to the satisfaction of the Scheme employer (i.e the employer letting the contract) and the

Administering Authority. Where the Administering Authority is satisfied as to the strength of covenant of the Scheme employer, it will not usually require a minimum level of cover in order to be "satisfied" with the risk assessment, as the risk on premature termination will fall on the Scheme employer. The Administering Authority's policy is to seek actuarial advice in the form of a "risk assessment report" provided by the Fund's Actuary which can be shared with the Scheme employer on the understanding that the Fund Actuary cannot provide advice to the Scheme employer. Based on this assessment, the Scheme employer and the Administering Authority should decide whether or not to require the admission body to enter into an indemnity or bond and if so at what level. The risk must be kept under review throughout the period of the admission and assessed at regular intervals and otherwise as required by the Administering Authority.

Where, for any reason, it is not desirable for a 1(d)(i) admission body to enter into an indemnity or body the admission body must secure a guarantee from the Scheme employer. In the event of unfunded liabilities on the termination of the admission, the Scheme employer's contribution rate to the Fund would be revised accordingly. In most cases it is expected that the Scheme employer will provide a subsumption commitment whereby the assets and liabilities of the outgoing admission body post-exit are "subsumed" into the Scheme employer's liabilities and notional pool of Fund assets.

Where the liabilities cannot be fully met by a guarantor or insurer, the Regulations provide that:

the letting employer will be liable in an outsourcing situation; and

in all other cases the liabilities will fall on all the other employing authorities within the Fund.

Other admission bodies are required to carry out an assessment of the level of risk arising on premature termination of the provision of service or assets by reason of insolvency, winding up, or liquidation of the admission body. This assessment has to be to the satisfaction of the Administering Authority. The Administering Authority's policy is to seek actuarial advice in the form of a "risk assessment report" provided by the Fund's Actuary. Based on this assessment, the Administering Authority will decide whether or not to require the admission body to enter into an indemnity or bond and if so at what level. Where, for any reason, it is not desirable for an admission body to enter into an indemnity or body the admission body must secure a guarantee from:

- a) a person who funds the admission body in whole or in part;
- b) a person who-
 - (i) owns, or
 - (ii) controls the exercise of the functions of, the admission body; or
- c) the Secretary of State in the case of an admission body-
 - (i) which is established by or under any enactment, and
 - (ii) where that enactment enables the Secretary of State to make financial provision for that admission body.

or

 - (iii) which is a provider of probation services under section 3 of the Offender Management Act 2007 (power to make arrangements for the provision of probation services) or a person with whom such a provider has made arrangements under subsection (3)(c) of that section.

Ultimately, an indemnity or bond or guarantee is designed to protect the Fund in the event that unfunded liabilities are present after the termination of an admission body.

When an admission agreement comes to its end, or is prematurely terminated for any reason, employees may transfer to another employer, either within the Fund or elsewhere. If this is not the case the employees will retain pension rights within the Fund, either deferred benefits or immediate retirement benefits. Early retirements can, in particular, create a strain on the Fund and so give rise to unfunded liabilities.

In the event that unfunded liabilities arise that cannot be recovered from the admission body, the indemnity or bond provider or guarantor these will normally fall to be met by the Scheme employer in the case of paragraph 1(d) admission bodies or the Fund as a whole (i.e. all employers) in the case of other admission bodies. In this latter case the shortfall would normally fall on the employers pro-rata to their liabilities in the Fund. Unless the shortfall amount were material, the allocation of the shortfall to all employers in the Fund would be carried out at the next formal actuarial valuation. Alternatively, if the guarantor for the outgoing admission body was also a participant in the Fund, the outgoing admission body's assets, liabilities and the funding deficit could be subsumed by the guarantor within the Fund.

Funding Target

The funding target depends upon what will happen to the liabilities in respect of the employees of the employer on exit of that employer.

Subsumed liabilities

Where an admission body ceases its participation in the Fund such that it will no longer have any contributing members, it is possible that another employer in the Fund agrees to provide a source of future funding in respect of any emerging deficiencies in respect of those liabilities.

In such circumstances the liabilities are known as subsumed liabilities (in that responsibility for them is subsumed by the accepting employer). For such liabilities the Administering Authority will assume that the investments held in respect of those liabilities will be the same as those held for the rest of the liabilities of the accepting employer. Generally, if the subsuming employer is considered to be of sufficiently sound covenant and likely to participate in the Fund indefinitely, e.g. being one of the 5 main Councils, this will mean assuming continued investment in more risky investments than Government bonds.

New academies are currently considered to qualify as indefinite participants in the Fund with full taxpayers backing, as they have a guarantee from the Department for Education. However, this guarantee is subject to review and where the Administering Authority believes the guarantee is no longer sufficient to cover the risks posed by the number of academies in the Fund, the Administering Authority will review the approach taken to the Funding Target for new academies and any admission bodies for which an academy provides a subsumption commitment and also the default approach taken to the notional assets transferred to academies upon conversion.

For any new scheduled bodies joining the Fund, the Administering Authority may, without limitation, take into account the following factors when setting the funding target for such bodies:

the type/group of the employer

the business plans of the employer;

an assessment of the financial covenant of the employer;

whether the employer is a part 1 Schedule 2 or Part 2 Schedule 2 employer and if the latter. The likelihood of new members joining the Fund

any contingent security available to the Fund or offered by the employer such as guarantor or bond arrangements, charge over assets, etc.

Orphan liabilities

Where an employer ceases its participation in the Fund such that it will no longer have any contributing members, unless any residual liabilities are to become subsumed liabilities, the Administering Authority will act on the basis that it will have no further access for funding from that employer once any exit valuation, carried out in accordance with Regulation 64, has been completed and any sums due have been paid. Residual liabilities of employers from whom no further funding can be obtained are known as orphan liabilities.

The administering authority will seek to minimise the risk to other employers in the Fund that any deficiency arises on the orphan liabilities such that this creates a cost for those other employers to make good the deficiency. To give effect to this, the Administering Authority will seek funding from the outgoing employer sufficient to enable it to match the liabilities with low risk investments, generally Government bonds.

To the extent that the Administering Authority decides not to match these liabilities with Government bonds of appropriate term, the returns achieved on the Fund's assets will be allowed for when calculating the employer's notional assets for the purpose of the tracking of any future surplus or deficit in relation to the orphan liabilities.

The Administering Authority ensures that it has sufficient investment in Government bonds to cover the orphan liabilities and at each triennial valuation the Fund Actuary notionally allocates assets to ensure the orphan liabilities are met in full, where those liabilities are measured by reference to the yield on gilts

Ongoing calculations for employers subject to the orphan admission body funding target will be carried out using assumptions which are intended to broadly target the eventual exit position.

Initial notional asset transfer

When a new employer commences in the Fund, and members transfer from another employer in the Fund, a notional transfer of assets is needed from the original employer to the new employer.

When a new admission body starts in the Fund, they will usually start as fully funded. This means that any past service surplus or deficit for the members who are transferring to the new employer remains with the original employer and does not transfer to the new employer.

Another option for the initial notional asset transfer is to allow for the funding level of the original employer, and therefore to transfer any past service surplus or deficit in respect of the transferring membership to the new employer. For new admission bodies the Administering Authority will only agree to a deficit transferring to the new admission where a subsumption commitment is in place from a long-term secure scheduled body or other appropriate security is in place. This share of Fund approach would normally apply to new scheduled bodies where members are transferring from another employer in the Fund, such as new academies upon conversion to Academy status.

Unless specific instruction is received in relation to a new academy and the agreement is reflected in the Commercial Transfer Agreement, the Administering Authority's policy is that an unadjusted share of Fund approach is adopted by the Actuary in notionally re-allocating assets from the Local Education Authority to the academy on conversion in respect of the transferring liabilities subject to a maximum transfer of assets equal to the transferring liabilities. This unadjusted share of the Fund approach means there is no prior allocation of assets to fully fund any deferred and pensioner liabilities. The policy has been discussed and agreed with the 5 main Councils in the Fund which have education responsibilities.

Where the new employer will participate in a pool of employers, for example where a multi-academy trust has requested that its academies be treated as a single employer, the notional asset transfer would be to the relevant pool of employers.

In calculating the notional assets to transfer to a new employer the Actuary will consider the liabilities based on the confirmed benefits of the LGPS at the date of joining. However, for new employers joining after 31 March 2019 it may be necessary for the asset transfer to be revisited once the current uncertainties relating to the benefit structure of the LGPS from 1 April 2019 (see paragraph 7.12 above) are resolved.

Employer Contribution Rate**Initial Rate**

When a new employer joins the Fund, the Fund's Actuary determines the initial employer contribution rate payable.

An interim contribution rate may be set pending a more accurate calculation by the Fund Actuary of the employer contribution rate payable. Currently the interim contribution rate is 20% of pay. The Administering Authority will change these interim contribution rates following each triennial Actuarial Valuation and at any other time at its discretion.

When a new academy joins a multi-academy trust where a single contribution rate applies, it will pay a minimum of the employer's contribution rate applicable to the Trust until the next triennial Actuarial Valuation at which time the contributions for the Trust will be reviewed. The Trust may elect to increase the contributions for all employers in the Trust before the next triennial Actuarial Valuation where the addition of a new academy is likely to lead to an increase as advised by the Fund's actuary. In other cases, the Fund's actuary will calculate an individual contribution rate for the new employer to be paid from commencement.

The employer contribution rate will be set in accordance with the Funding Strategy Statement, taking into consideration elements such as:

Any past service or transferred liabilities

Whether the new employer is open or closed to new entrants

The funding target that applies to the employer

The funding level on commencement and, where there is a surplus or deficit, whether the admission agreement is fixed term or not, whether open or closed and the period of any fixed term contract period or average future working lifetime of the employee membership (as appropriate)

Other relevant circumstances as determined by the Administering Authority on the advice of the Fund Actuary and following discussion with the ceding employer as appropriate.

Review of Employer Contribution Rates

The Regulations require a triennial Actuarial Valuation of the Fund. As part of each Actuarial Valuation the contributions paid by each employer in the Fund are reviewed and may be increased or reduced.

The employer contributions payable by employers may also be reviewed outside of the triennial Actuarial Valuations where there has been a material change of circumstances, such as the basis of admission changing from open to closed or where it otherwise appears likely that the admission body may exit from the Fund, as permitted by Regulation 64(4).

The Administering Authority monitors the active membership of closed admission bodies and will commission a valuation from the Actuary under Regulation 64(4) where it has reason to believe that the admission body may become an exiting employer before the next triennial Actuarial Valuation.

3. Cessation of participation

Where an employing authority ceases participation, whether by ceasing to be a Scheme employer (including ceasing to be an admission body participating in the Fund), or having no active members contributing to the Fund, a cessation valuation will be carried out in accordance with Regulation 64. That valuation will take account of any activity as a consequence of cessation of participation regarding any existing contributing members (for example any bulk transfer payments due) and the status of any liabilities that will remain in the Fund. When employees do not transfer to another employer they will retain pension rights within the Fund, i.e. either as a deferred pensioner or immediately taking retirement benefits.

The assumptions adopted to value the departing employer's liabilities for the exit valuation will depend upon the circumstances. In particular, the cessation valuation will distinguish between residual liabilities which will become orphan liabilities, and liabilities which will be subsumed by other employers. For orphan liabilities the Funding Target on exit will anticipate investment in low risk investments such as Government bonds. This is to protect the other employers in the Fund, as upon exit, the employer's liabilities will become "orphan" liabilities within the Fund, and there is no recourse to that (former) employer if a shortfall emerges in relation to these liabilities after the exit date.

For subsumed liabilities the exit valuation will generally anticipate continued investment in assets similar to those held in respect of the subsuming employer's liabilities, i.e. if the outgoing employer has a subsumption commitment from another employer in the Fund, the Administering Authority's policy is that the starting point for assessing the liabilities on exit is the ongoing funding target appropriate to the subsuming body. However, in determining the approach to adopt on exit the Administering Authority will also have regard to factors, including but not limited to

- The degree of funding risk attributable to the outgoing employer during its participation in the Fund;
- The contributions paid by the outgoing employer to the Fund during its participation and;
- The circumstance in which the subsumption commitment was granted and any conditions attaching to that commitment.

And will then determine, on the advice of the Fund Actuary, the appropriate funding target to be adopted on exit when assets and liabilities are being subsumed.

Where any of the liabilities are transferring to a successor body, e.g. on a contract being re-let, the funding target of that successor body will not influence the assumptions adopted for the exit valuation and any shortfall between the value of the liabilities assessed on the appropriate exit basis and the funding target for the successor body (e.g. if this is being set up fully funding on an orphan admission body funding target) will generally be assumed to be met by the letting authority unless otherwise agreed between the parties, to the satisfaction of the Administering Authority.

For exits on or after 1 April 2019 the Actuary will add 1% to the value of the exiting employer's liabilities as a prudent margin given the possibility of additional liabilities arising due to the McCloud/Sargeant case and GMP indexation and equalisation. However, the Administering Authority will not seek to recalculate the exit liabilities for exits on or after 1 April 2019 where the exit deficit (or credit) has already been paid as at the date this Statement comes into effect.

In determining this margin for prudence the Administering Authority has had regard to guidance prepared by the SAB¹ and the advice of the Fund Actuary. It will be kept under regular review as further information on the McCloud/Sargeant case becomes available.

Regardless of whether the residual liabilities are orphan liabilities or subsumed liabilities, the departing employer will be expected to make good the funding position disclosed by the exit valuation. In other words, the fact that liabilities may become subsumed liabilities does not remove the possibility of an exit payment being required from the outgoing employer.

However, where agreed between the parties the deficit may be transferred to the subsuming employer or guarantor, in which case it may be possible to simply transfer the former admission body's members and assets to the subsuming body, without needing to crystallise any deficit. Where the guarantee only covers the exit deficit, it is assumed that the departing employer's liabilities will still become orphaned within the Fund.

If there are liabilities which cannot be recovered from the exiting employer or any bond/indemnity. These will fall to be met by the Fund as a whole (i.e. all other employers) unless there is a guarantor or successor body within the Fund.

Any deficit would normally be levied on the departing employer as a single capital payment although, under exceptional circumstances, the Administering Authority may, at its sole discretion, allow phased payments as long as this is permitted under the Regulations (currently Regulation 64).

At successive triennial Actuarial Valuations, the Actuary will allocate assets within the Fund equal to the value of the orphan liabilities so that these liabilities are fully funded. This may require a notional reallocation of assets from the ongoing employers in the Fund.

Exit Credits

Where an exit valuation discloses that there is a surplus in the Fund in respect of the exiting employer, and this surplus is due to be paid to the exiting employers, the Administering Authority will, unless otherwise agreed with the employer, pay the exit credit to the employer within 3 months of the later of the exit date and the date when the employer has provided all the necessary information required by the Administering Authority to enable the Fund Actuary to calculate the final liabilities on exit.

In relation to employers exiting on or after 14 May 2018, where there is an agreement between the departing employer and its subsuming body that a condition of the subsumption commitment is there is no return of surplus to the departing employer on exit, and the Administering Authority is provided with written instruction to this effect, all of the former employer's assets and liabilities in the Fund will be transferred to the subsuming body, without an exit credit being paid to the departing employer. In the absence of satisfactory evidence of such an arrangement being in place, the administering authority will pay any exit credit to the departing employer as required by the Regulations.

Multi-academy trusts

Where an employer within a multi-academy trust (MAT) fails, unless that academy is an employer in its own right there is no power within the Regulations for the Administering Authority to commission an exit valuation under Regulation 64, unless it considers that the MAT itself may become an existing employer and so a valuation under Regulation 64(4) is appropriate. In that case, where an employer within the MAT has failed, irrespective of whether or not the Department for Education guarantee applies, the liabilities of the exiting academy will fall to be funded by the remaining employers within the MAT rather than becoming orphaned liabilities. The Administering Authority may direct the Fund Actuary to take this failure into account and adjust the contributions payable by the remaining employers within the MAT at the next triennial Actuarial Valuation. The Administering Authority may also direct the Fund Actuary to carry out a valuation of the liabilities of the exiting academy in the fund at the date of exit in order to assess the effect of its failure on the remaining employers within the MAT, and ensure the remaining MAT employers (and any new employers joining the MAT) are aware to the extent of these liabilities.

Where employers within a MAT are individual scheme employers for the purpose of the Regulations, and an academy within the MAT leaves or fails, an exit valuation will be carried out as at the date of exit. Where there is no successor body and the Department for Education guarantee does not make good any shortfall on exit, the Administering Authority would seek to recover any unpaid deficit from the remaining employers within the MAT where those employers participate in the Fund. Rather than requiring a lump sum payment, the Administering Authority may instead act on the assumption that the remaining MAT employers have provided a subsumption commitment, which includes subsumption of the unpaid deficit which would then fall to be recovered from ongoing contributions. In that case the Administering Authority will instruct the Fund Actuary to allocate the assets and liabilities of the outgoing academy across the remaining employers in the MAT.

Where academies move between multi-academy trusts, for example where a MAT winds up and its academies transfer into different MATs (whether existing MATs within the Fund or newly-established MATs), the Administering Authority may direct the Fund Actuary to carry out a valuation of the liabilities of any academy moving between MATs and of all academies within the exiting MAT. Where the exiting MAT is the scheme employer, and hence an individual funding position has not been maintained for the constituent academies, the assets notionally allocated to each of its academies will be derived by assuming each has the same funding level as the MAT as a whole. The calculation of the assets and liabilities in these circumstances is to ensure that both the former and new MAT are aware of the value of the assets and liabilities transferring and to ensure that the residual position of the exiting MAT (if any of its liabilities are not transferring to a new academy or MAT) is correctly assessed for the purpose of invoking the Department for Education guarantee.

Suspension notices

Regulation 642A permits the suspension of an employer's liability to make an exit payment for up to 3 years where the Administering Authority believes that the employer is likely to have one or more active members contributing to the Fund within the period specified in the suspension notice. The Administering Authority considers that it is appropriate to exercise that discretion in relation to Town and Parish Councils where there is a reasonable expectation that a member will join in the near future (e.g. before the next triennial Actuarial Valuation). In that case, the Fund will advise the employer of the exit amount calculated by the Actuary and serve a written suspension notice on the employer. Whilst under such a suspension notice, the employer must continue to pay any deficit payments certified to the Fund as if it were an ongoing employer and the actuary will recalculate any deficit and contributions due at the next Actuarial Valuation. If there are no new members by the time the suspension notice expires the Fund Actuary will carry out an exit valuation as at the date the suspension notice expires.

4. Responsibilities of employers in the Fund

Individual employers, Multi Academy Trust or the Department for Education will pay for any legal and actuarial costs incurred by the Fund on their behalf.

Employers should have regard to the Administering Authority's administration strategy and their responsibilities as set out in the Funding Strategy Statement at all times.

All employers need to inform the Administering Authority of any changes to their organisation that will impact on their participation in the Fund. This includes changes of name or constitution or mergers with other organisations or other decisions which will or may materially affect the employer's Fund membership, including but not limited to:

- an admission body closing to new entrants
- a scheduled body setting up a wholly owned company to employ new staff
- merging with another organization, whether a participant in the Fund or not (e.g. colleges merging under the Area Review process or housing companies merging)
- an application by a 6th form college to become a 16-19 academy, including whether successful or not
- a material change in the funding of the organization including a reduction in grants from local or central government or a shift in the balance of funding
- a large scale redundancy exercise which could materially reduce the employer's active membership

Employers considering outsourcing any services should have regard to and adhere to the requirements of the Fair Deal Policy/Best Value direction. They should also advise the Administering Authority at the earliest opportunity and before any transfer of staff so that the necessary paperwork and calculations can be completed.

Appendix F

Governance Compliance Statement

Governance Compliance Statement

1. Introduction

- 1.1 The Governance Compliance Statement has been prepared in accordance with the Local Government Pension Scheme Regulations 2013 (Regulation 55) and its predecessor, Regulation 31 of the Local Government Pension Scheme Regulations 2008 (as amended).
- 1.2 City of Bradford Metropolitan District Council, as administering authority for West Yorkshire Pension Fund (WYPF), has delegated legal and strategic responsibility for WYPF to the Governance and Audit Committee. The council has established three bodies to assist and support the Governance and Audit Committee in overseeing the fund, namely the WYPF Pension Board, WYPF Investment Advisory Panel and the WYPF Joint Advisory Group. Under the council's financial regulations, the Director – West Yorkshire Pension Fund has day-to-day responsibility for the management of the fund. The Strategic Director – Corporate Services at Bradford Council, as the council's Section 151 Officer, has responsibility for signing the fund's year-end accounts.

2. Governance and Audit Committee

- 1.3 The Governance and Audit Committee shall comprise five members. Either the chair or deputy chair of the committee shall not be a member of the executive but at least one member shall also be a member of the West Yorkshire Pension Fund Joint Advisory group and/or Investment Advisory Panel.

Quorum

The quorum of the committee shall be three members.

Roles and functions

- 1.4 The functions of the committee affecting West Yorkshire Pension Fund are to:
 - 1.4.1 approve the statement of accounts and related documents in accordance with the Accounts and Audit Regulations 2015
 - 1.4.2 receive matters of a financial nature the external audit request be considered by a member body, including any that may concern the council's governance arrangements
 - 1.4.3 consider the effectiveness of the risk management arrangements, control environment and associated anti-fraud and anti- corruption arrangements
 - 1.4.4 seek assurance that action is being taken on risk related issues determined by auditors and inspectors
 - 1.4.5 review the financial statements, external auditor's opinion and reports to members and monitor management action in response to the issues raised by external audit
 - 1.4.6 discharge the function contained in Part H of Schedule 1 of the Local Authorities (function and responsibilities) (England) Regulations 2000 (functions relating to local government pensions) and Part 1, paragraph 48 (Maladministration Payments) including those relating to the Investment Advisory Panel and the Joint Advisory Group
 - 1.4.7 review summary internal audit reports and the main issues arising and seek assurance that action has been taken where necessary, and
 - 1.4.8 consider the reports of external audit and inspection agencies.

The minutes of meetings of the Investment Advisory Panel, Joint Advisory Group and Pension Board are submitted to the Committee.

3. WYPF Investment Advisory Panel

- 1.5 The WYPF Investment Advisory Panel (referred to as 'the panel') comprises 19 representatives. WYPF covers the geographical area of five metropolitan authorities, namely the West Yorkshire district councils of Bradford (administering authority), Calderdale, Kirklees, Leeds and Wakefield. Each of the five West Yorkshire district councils has two councillor representatives on the panel.
- 1.6 The other nine representatives on the panel comprise of three trade union representatives (two from UNISON and one from GMB), two external investment advisers, two scheme members, the Director – WYPF and a Chief Finance Officer from the West Yorkshire district councils on a two-year rotational basis. A facility also exists for an additional councillor representative to be co-opted onto the panel each year in the event that one of the three largest political groups in West Yorkshire is not represented on the panel through the ten councillors nominated by the five district councils. The co-opted councillor will be from Bradford Council as administering authority.
- 1.7 All representatives on the panel have equal voting rights.
- 1.8 For each municipal year a chair of the panel is nominated by the two Bradford Council councillor representatives on the panel, and a deputy chair is elected from other members on the panel. A Bradford councillor on the panel will also be a member of the Governance and Audit Committee.
- 1.9 The Panel meets on a quarterly basis in January, April, July and October each year. The Panel may hold a 'special' meeting at any time in the year to deal with any urgent or specific areas of business.
- 1.10 The panel has overall responsibility for overseeing and monitoring the management of WYPF's investment portfolio and investment activity.
- 1.11 In this capacity, the panel will be responsible for formulating the broad future policy for investment. Not only will it be necessary to ensure that monies accruing to the fund are invested to greatest advantage, it will also have responsibility for monitoring the progress of all existing investments. As with all trustees, members of the panel should not allow their own personal interests, social, moral or political views to influence their decisions.
- 1.12 At the meetings of the panel the overall investment portfolio will be reviewed and any necessary adjustments to the spread of investments made as well as decisions taken about the investment of new money.
- 1.13 Prior to each meeting, the Director – West Yorkshire Pension Fund will arrange to supply all members of the panel with information to enable these tasks to be undertaken. This will include a current distribution of the assets of the fund, schedules of all investments purchased or sold since the previous panel meeting, views from the fund's external investment advisers, and a complete list and up-to-date valuation of the investment portfolio.
- 1.14 Decisions are taken on how the new money available for the investment is to be allocated to major asset classes on the portfolio. However, the panel having once determined the level of overall investment, the specific selection of the individual securities will be left to the discretion of the in-house investment managers.
- 1.15 The external investment advisers on the panel will be able to guide other members of the panel in their investment adjudication.
- 1.16 In the event of conflict of opinion arising at Panel meetings relating to any investment proposal, the proposal will be put to the vote.
- 1.17 The quorum of the Investment Advisory Panel shall be four councillor representatives who represent not less than three constituent Councils, the Director – WYPF or his/her nominee, and one external investment adviser.
- 1.18 The Governance and Audit Committee shall have the right, in accordance with financial regulations, to overrule any decision taken by the panel if, in its opinion, the decision is not in the best interests of the WYPF.

4. WYPF Joint Advisory Group

- 1.19 The WYPF Joint Advisory Group (referred to as 'the group') comprises 20 representatives. There are three councillor representatives from each of the five West Yorkshire district councils, three trade union representatives, and two scheme members. All representatives on the group have equal voting rights.
- 1.20 There is no set pattern for meetings of the group, and the group will meet on such days as they may determine.

- 1.21 For each municipal year a chair is nominated by the Bradford Council representatives and a deputy chair is elected from amongst the other members of the group.
- 1.22 The group has overall responsibility for overseeing and monitoring WYPF's pension administration function, and for reviewing and responding to proposed changes to the Local Government Pension Scheme. In addition, the group will approve the budget estimates for the pension administration and investment management functions of WYPF, and also receive WYPF's annual Report and Accounts.
- 1.23 The quorum of the Joint Advisory Group shall be five councillor representatives who represent not less than four constituent councils.
- 1.24 The Governance and Audit Committee shall have the right, in accordance with financial regulations, to overrule any decision taken by the group if, in its opinion, the decision is not in the best interests of WYPF.

5. WYPF Pension Board

- 1.25 The WYPF Pension Board was established in 2015 in accordance with the requirements of Public Service Pensions Act 2013 and in accordance with regulation 106 of the Local Government Pension Scheme Regulations 2013.
- 1.26 The board's role is to assist the council as scheme manager in ensuring the effective and efficient governance and administration of the LGPS including securing compliance with the Local Government Pension Scheme regulations and any other legislation relating to the governance and administration of the LGPS; securing compliance with the requirements imposed in relation to the LGPS by The Pensions Regulator; and any other such matters as the LGPS regulations may specify.
- 1.27 The WYPF Pension Board comprises eight representatives. There are four member representatives from the trade unions (two from UNISON, and one each from Unite and GMB) and four employer representatives (one councillor from Bradford Council who will act as chair, two other councillors from the other district councils, and one employer representative nominated from all the other employers in the fund).
- 1.28 The board meet quarterly on such dates as they determine.
- 1.29 The quorum of the board shall be three (chair plus one employer representative and one member representative).

6. Annual meetings

- 1.30 Each year, usually in October, WYPF holds an employer annual meeting and a separate scheme member annual meeting.
- 1.31 At each annual meeting a keynote address is given by a guest speaker on a related pensions topic. The Director – WYPF will provide an update on the activities of the fund during the past year, and the fund's two external investment advisers will provide economic and stock market data together with details of WYPF's own investment strategy and performance.

7. Training/expenses/facility time

- 1.32 A bespoke training seminar is held each year for members of the Investment Advisory Panel, Joint Advisory Group and pension board. In addition, all members are given the opportunity to attend the annual Local Government Pensions Committee's Trustees Training Fundamentals event, which is a three-day training course for pension fund trustees.
- 1.33 All members are provided with details of upcoming conferences/seminars/briefings that are of relevance to their work and members can opt to attend any that they feel will be of benefit to them.
- 1.34 No member or representative on the Investment Advisory Panel, Joint Advisory Group or WYPF Pension Board shall be remunerated for undertaking this role. However, expenses incurred in the attending meetings, training events will be reimbursed. The cost is met by the fund.
- 1.35 The trade unions and active member representatives on the Investment Advisory Panel, Joint Advisory Board and WYPF Pension Board should liaise with their employers as to whether facility time is granted for attending meetings and training events relating to the Investment Advisory Panel, Joint Advisory Group and WYPF Pension Board.

8. Register of interests

1.36 All voting members of the Investment Advisory Panel, Joint Advisory Group and WYPF Pension Board must complete a 'declaration of acceptance of office' form and annually complete a 'conflict of interest' form.

Appendix G

Communications Policy

Communications Policy 2020/21

This policy is published as a requirement under regulation 61 of the Local Government Pension Scheme Regulations 2013.

Introduction

West Yorkshire Pension Fund (WYPF), Lincolnshire Pension Fund (LPF) and Hounslow Pension Fund (HPF) entered into a collaboration agreement for shared service from April 2015. The funds are administered jointly by WYPF, referred to in this policy as 'the administrator'.

This policy has been prepared to meet our objectives about how we communicate with key stakeholders. The administrator currently administers the Local Government Pension Scheme (LGPS) for 700 employers and has over 100,000 active members in the LGPS. We also administer the Councillor Pension Scheme and the Firefighters' Pension Schemes both old and new for a number of fire authorities. This policy is effective from January 2019 and will be reviewed annually.

Our stakeholders

For all of the schemes that we administer, our stakeholders include:

- members
- representatives of members
- prospective members
- employing authorities.

Key objectives

- Communicate the scheme regulations and procedures in a clear and easy to understand style
- Use plain English for all our communications with stakeholders
- Identify and use the most appropriate communication method to take account of stakeholders' different needs
- Use technologies to provide up to date and timely information to stakeholders
- Engage with our stakeholders face-to-face when possible

Evaluation and continuous development

To ensure we are meeting the expectations of our stakeholders and to evaluate the effectiveness of our communications we will use the following methods:

- feedback questionnaires
- monitoring compliments and complaints, and
- customer surveys.

To ensure continuous development we plan to:

- continue to increase the number of registered users for MyPension.
- broaden our use of digital platforms to engage stakeholders
- improve the web provision for firefighters, and
- increase the information we give to employing authorities when they join the scheme or change main contacts.

Communications events 2020/21 – Local Government Pension Scheme (LGPS)

| Communication | Format | Frequency | Method of distribution |
|--|------------------------------|--|----------------------------|
| LGPS active members (including representatives of active members and prospective members) | Newsletter | 2/3 per year | Mail |
| | Annual meeting | 1 per year | Meeting |
| | Annual benefit statement | 1 per year | Mail |
| | www.wypf.org.uk | Constant | Web |
| | Member fact card | On request/constant | Print/web |
| | Member fact sheets | On request/constant | Print/web |
| | Introduction to WYPF | On employer request | Presentation |
| | Your pension explained | On employer request | Presentation |
| | Pre-retirement | On employer request | Presentation |
| | Pension surgeries/dropins | On employer request | Face-to-face |
| | Contact centre | 8.45 to 4.30 Monday to Friday | Face-to-face/ phone/e-mail |
| | Scheme booklet | Constant | Web |
| | New member pack | On joining | Mail |
| | Social media | Constant | Web |
| LGPS deferred members (including representatives of deferred members) | Newsletter | 1 per year | Mail |
| | Annual benefit statement | 1 per year | Mail |
| | Annual meeting | 1 per year | Meeting |
| | www.wypf.org.uk | Constant | Web |
| | Contact centre | 8.45 to 4.30 Monday to Friday | Face-to-face/phone/e-mail |
| | Social media | Constant | Web |
| LGPS pensioner members (including representatives of retired members) | Newsletter | 2 per year | Mail |
| | Annual meeting | 1 per year | Meeting |
| | www.wypf.org.uk | Constant | Web |
| | Contact centre | 8.45 to 4.30 Monday to Friday | Face-to-face/phonee-mail |
| | Pension advice | As and when net pension varies by 25p or more | Mail |
| | P60 | 1 per year | Mail |
| | Social media | Constant | Web |

Communications events 2020/21 – firefighters

| Communication | Format | Frequency | Method of distribution |
|---|--------------------------|---------------------|------------------------|
| Firefighter active members (including representatives of active members and prospective members) | Newsletter | At least 1 per year | Mail |
| | Annual benefit statement | 1 per year | Mail |
| | www.wypf.org.uk | Constant | Web |
| | Introduction to WYPF | On employer request | Presentation |

| Communication | Format | Frequency | Method of distribution |
|---|----------------------------|---|---------------------------|
| | Your pension explained | On employer request | Presentation |
| | Pre-retirement | On employer request | Presentation |
| | Pension surgeries/drop-ins | On employer request | Face to face |
| | Contact centre | 8.45 to 4.30 Monday to Friday | Face-to-face/phone/e-mail |
| | Scheme booklet | Constant | Web |
| Firefighter deferred members (including representatives of deferred members) | Annual benefit statement | 1 per year | Mail |
| | www.wypf.org.uk | Constant | Web |
| | Contact centre | 8.45 to 4.30 Monday to Friday | Face-to-face/phone/e-mail |
| Firefighter – pensioner members (including representatives of pensioner members) | www.wypf.org.uk | Constant | Web |
| | Contact centre | 8.45 to 4.30 Monday to Friday | Face-to-face/phone/e-mail |
| | Pension advice | As and when net pension varies by 25p or more | Mail |
| | P60 | 1 per year | Mail |

Communications events 2020/21 – councillors

| Communication | Format | Frequency | Method of distribution |
|--|--------------------------|-------------------------------|---------------------------|
| Councillor members (including representatives of members) | Newsletter | 1 per year | Mail |
| | Annual meeting | 1 per year | Meeting |
| | Annual Benefit Statement | 1 per year | E-mail |
| | www.wypf.org.uk | Constant | Web |
| | Ad hoc meetings | When required | Meeting/face-to-face |
| | Contact centre | 8.45 to 4.30 Monday to Friday | Face-to-face/phone/e-mail |
| | Social media | Constant | Web |

Communications events 2019/20 – employing authorities

| Communication | Format | Frequency | Method of distribution |
|------------------------------|------------------------------|-------------------------------|---------------------------|
| Employing authorities | Pension Fund Representatives | 8.30 to 4.30 Monday to Friday | Face-to-face/phone/e-mail |
| | Website | Constant | Web |
| | Fact card | 1 per year | Mail |
| | Fact sheets | Constant | Web |
| | Employer guide | Constant | Web/electronic document |
| | Ad hoc training | When required | Face-to-face |
| | Update sessions | 2 per year | Meeting |
| | Annual meeting | 1 per year | Meeting |
| | Manuals/toolkits | Constant | Web/electronic document |
| | Pension Matters and round-up | 12 per year and when required | Wordpress blog and e-mail |
| | Social media | Constant | Web |
| | Ad hoc meetings | When required | Face-to-face |

| Communication | Format | Frequency | Method of distribution |
|---------------|-----------|-------------|------------------------|
| | Workshops | 10 per year | Face-to-face |

Member contacts

Contact centre

Phone (01274) 434999

Email wypf@bradford.gov.uk

Postal address

WYPF

PO Box 67

Bradford

BD1 1UP

Employer contacts

Stuart Duncombe (Team Manager – Business Relations) 01274 432763

Pension Fund Representatives

David Parrington 01274 433840

Sheryl Clapham 01274 432541

Lisa Darvill 01274 432540

Kaele Pilcher 01274 432739

Anisa Patel 01274 437588

WYPF Management

Rodney Barton Director – WYPF

Yunus Gajra Assistant Director Fin, Admin & Governance

Grace Kitchen Head of Service – Members Services

Ola Ajala Head of Finance

Caroline Blackburn Head of Employer Services and Compliance

Appendix H

Investment Strategy Statement

Investment Strategy Statement

1. Introduction

- 1.1. The Investment Strategy Statement has been prepared in accordance with the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016.
- 1.2. City of Bradford Metropolitan District Council became the administering authority of West Yorkshire Pension Fund in 1986. The fund covers the five district councils of West Yorkshire together with numerous other employers.

2. Investment decision making process

- 2.1. The council has delegated all its functions as administering authority of the pension fund to the Governance and Audit Committee. The Director – West Yorkshire Pension Fund, who reports to the Chief Executive, has day-to-day control of the management of all aspects of the fund's activities. The Governance and Audit Committee utilises the Investment Advisory Panel as the vehicle for overseeing the fund's investment functions.
- 2.2. The panel determines the investment policy of the fund and has ultimate responsibility for investment strategy. The panel undertakes its responsibilities through taking appropriate advice from external advisers, supported by the in-house investment management team.
- 2.3. Once the investment strategy has been set at the quarterly meetings of the panel, the in-house investment management team undertakes sector and stock selection on a discretionary basis to implement the strategy.

3. Variety of investments to be held

- 3.1. West Yorkshire Pension Fund will hold investments in fixed-interest securities, equities, index-linked securities, managed and unitised funds (including property unit Trusts), alternative investments, and cash deposits, covering all the world markets.
- 3.2. A proportion of the fund's investments will be held in emerging markets, both through direct investments and pooled vehicles.
- 3.3. The fund will invest in private equity, infrastructure, hedge funds and listed alternatives, which together with property will be classed as alternative investments.
- 3.4. The fund will not invest directly in unquoted companies, except where such investment is part of a pooled arrangement or joint venture with one or more pension funds.
- 3.5. Stock lending will be actively pursued up to a 35% limit. The Investment Advisory Panel initially agreed this on 20 October 2005, and considers this decision annually.

4. Suitability of particular types of investment

- 4.1. The biggest proportion of the fund's investment will be in equities. This type of investment bias is intended to maximise growth in the value of assets over the long term.
- 4.2. Fixed-interest securities, index-linked securities, alternative investments and cash deposits will make up the balance of investment. The distribution of investments between the asset classes will vary based on perceived economic and market conditions.
- 4.3. The fund's planned asset allocation strategy will be linked to a fund-specific benchmark, and for 2016/17 the fund will invest within the following control ranges for each asset class. Depending on market conditions, the fund may stray outside the control ranges on occasions before adjustments are made to rectify the situation. This table will be updated whenever the Investment Advisory Panel decides on changes to the control ranges.

| | Range % |
|-------------------------------------|------------------|
| Bonds – total | 14–20 |
| UK Fixed-interest gilts | 2–8 |
| UK Index-linked gilts | 2–8 |
| Corporate bonds | 1–7 |
| Global bonds | 1–5 |
| Equities – total | 57.5–72.5 |
| UK equities | 30–40 |
| Overseas equities | 25–40 |
| Property | 3–7 |
| Private equity | 3–7 |
| Private infrastructure | 2–6 |
| Hedge funds | 0–4 |
| Listed alternatives UK | 0–4 |
| Listed alternatives overseas | 0–2 |
| Cash | 0–5 |

5. Risk

- 5.1. To minimise risk, the investment portfolio of the fund will be continually monitored and reviewed, and the portfolio will be well diversified as evidenced by the fact that the fund's equity holdings are spread across more than 300 UK companies, 700 foreign companies, and a range of unit trusts and managed funds.
- 5.2. Risk will also be controlled by reviewing on a continuous basis the risk attached to the fund's asset allocation relative to the fund-specific benchmark, to ensure that any major divergence from the benchmark is acceptable.
- 5.3. The fund recognises the risks and opportunities associated with climate change, and will seek to measure carbon exposure within the equity portfolio and reduce that exposure over time. The fund will continue to increase investment in low-carbon technology and renewable energy in order to encourage and facilitate further progression toward a cleaner economy.
- 5.4. Custodian risk is controlled through continuous monitoring and periodic review of the custodial arrangements.
- 5.5. Risk is also monitored in relation to the funding position of the fund and the investment requirements that flow from it, in conjunction with the fund actuary.
- 5.6. Counter-party and cash management risk is controlled by the in-house investment management team through the setting of appropriate limits for exposure with any individual organisation.

6. Expected return on investments

The fund's investment portfolio will be actively managed by internal managers, supported by the external investment advisers, and the fund's annual investment return will be measured against the fund-specific benchmark. The expected return on investments will be to achieve +0.5% per annum above the fund-specific benchmark annualised over 3-year rolling periods, and linked to an under-performance limit of 1.5% against the benchmark in any one year, as measured independently by an approved third party.

7. Collaborative investment and pooling

- 7.1. WYPF has signed a memorandum of understanding with the Greater Manchester and Merseyside Pension Funds to create the Northern LGPS ('the Pool') in order to meet the criteria for pooling investments released by government on 25 November 2015.

- 7.2. The three funds submitted their pooling proposal to government in July 2016 and the Department for Communities and Local Government provided confirmation in January 2017 that it is content for the funds to proceed with the formation of the Pool as set out in the July 2016 proposal. The proposal is available on the website
- 7.3. Based on 31 March 2015 asset values, the total value of assets, across the three participating funds, to be invested in the Pool is £35.416bn, which is in excess of the £25bn criteria set by government. All assets other than day-to-day cash used for scheme administration purposes will be invested via the Pool once transition is complete. Day-to-day cash is assumed to be 1% of total assets for each fund.
- 7.4. For the immediate future after inception of the Pool, the fund's public-market assets will continue to be held in segregated mandates owned directly by the administering authority, but managed by the Pool. A single custodian will be appointed by the Pool, which will simplify the future consolidation of mandates.
- 7.5. All non-listed assets will be managed by the Pool from its formation. Subject to value for money requirements being fulfilled, new investments (i.e. those entered into after the formation of the Pool) in private market assets will be made on a shared ownership basis, via either collective investment vehicles or limited partnerships.
- 7.6. Legacy private market assets (i.e. those entered into prior to the formation of the Pool) will be run-off on a segregated basis.
- 7.7. This approach will be reviewed periodically going forwards to ensure this continues to demonstrate value for money, particularly following any changes to funds' strategic asset allocations, pool management arrangements or taxation policy in the UK or internationally.
- 7.8. The reviews will take place no less than every 3 years.
- 7.9. Once established it is intended that the Pool will provide the following services to the participating authorities on an in-house basis.
- Implementation of the strategic asset allocations of the participating authorities
 - Management of UK and overseas equities and bonds
 - Selection of private equity, infrastructure & property funds.
 - Direct UK infrastructure investment via a collective investment vehicle
 - Legal and accounting support
- 7.10. It is intended that the Pool will externally procure the following services.
- External fund management for certain mandates
 - Common custodian for the Pool (plus depositaries and fund administrators where required for any pooled funds that are established for non-listed assets)
 - Investment management systems
 - Audit services
 - Performance analytics
 - Responsible Investment advisory services
 - Value for money reviews of structure
- 7.11. A Pool Oversight Board will be established to:
- provide oversight of the Pool; and
 - act as a forum for the participating authorities to express the views of their pension committees.
- 7.12. The Oversight Board's primary roles are to ensure that the Pool is effectively implementing the participating authorities' strategic asset allocations and to oversee reporting to the participating authorities' pension committees.
- 7.13. The legal structure of the Oversight Board is expected to be a joint committee. There will be clear separation of duties between the Oversight Board and the Pool. The Oversight Board will not be undertaking any regulated activities.
- 7.14. The Pool's governing documentation will grant the Oversight Body and each administering authority certain powers regarding the operation of the Pool, which can be used to ensure the effective performance of the Pool.

- 7.15. Reporting processes of the Pool will include regular written reports on the performance of Pool investments to the Oversight Body, which will be discussed at formal meetings.
- 7.16. Officers of the Pool will also report to and present directly to the administering authorities' pension committees and local pension boards as appropriate.
- 7.17. A report on the progress of asset transfers will be made to the Scheme Advisory Board annually.

8. Transaction costs

- 8.1. The in-house team of investment managers utilise a list of brokers to provide a dealing service for share transactions undertaken. Commission paid to all brokers on UK and overseas share transactions are at competitive rates negotiated by the in-house investment managers.
- 8.2. Transaction fees and custody fees are paid to HSBC for transactions on terms agreed with HSBC under the contract for banking and custody services.

9. Environmental, social and corporate governance policy

- 9.1. Investment decisions are taken based on financial and commercial considerations so as to yield the best return by way of income and capital appreciation. If it is shown that particular types of social, environmental and ethical investment can produce at least comparable returns, then the fund will invest in such companies as part of the normal investment process.
- 9.2. The fund will actively invest in low carbon and renewable energy technology where suitable opportunities arise, in order to encourage a move toward a lower carbon economy. The fund will increase exposure via infrastructure funds, equity investments and alternative investments. The fund will continue to encourage companies to consider climate change and environmental risk in their business strategies, and will co-sign shareholder resolutions at company annual general meetings where appropriate.
- 9.3. The voting policy of West Yorkshire Pension Fund is viewed as a fundamental contribution towards socially responsible investment. The fund is committed to ensuring that the companies in which it has a shareholding adopt sound principles of corporate responsibility, particularly in relation to environmental and employment standards. The fund will utilise its shareholding wherever possible, through the voting policy and engagement, to exert influence on those companies falling short of acceptable standards.
- 9.4. WYPF is a member of the Local Authority Pension Fund Forum (LAPFF), a special interest group of the Local Government Association, which comprises over 70 local authority pension funds with combined assets of over £175 billion. The forum exists to promote the investment interests of local authority pension funds, and in particular to maximise their influence as shareholders to promote corporate social responsibility and high standards of corporate governance amongst the companies in which they invest. The forum issues research and guidance relating to climate change and employment standards and promotes best investment practice for the Local Government Pension Scheme nationally. The forum regularly engages directly with large companies in this regard and has been effective in improving companies understanding of the requirements of investors. Representatives of the LAPFF have attended the annual general meetings of companies where shareholder resolutions have been brought, and these have been well received by the companies involved.
- 9.5. WYPF is also a member of the Institutional Investors Group on Climate Change (IIGCC). The IIGCC seeks to promote a better understanding of the implications of climate change amongst its members and other institutional investors, and to encourage companies and markets in which its members invest to address any material risks and opportunities to their businesses associated with climate change and a shift to a lower carbon economy.
- 9.6. The WYPF first became a signatory to the Carbon Disclosure Project (CDP) in 2007. The CDP seeks information from over 2,750 companies world-wide on their Greenhouse Gas Emissions.

10. Exercise of rights attached to investments

- 10.1. West Yorkshire Pension Fund will exercise its voting rights at the annual and extraordinary general meetings of all UK companies, European companies within the Eurotop 300, US companies in the S&P 500, Japanese companies in the TOPIX index, and companies in all other countries, in which the fund has a shareholding. The voting policy to be adopted by the fund at these meetings will be based on the latest 'Shareholder Guidelines' issued by the Pensions and Investment Research Consultants Limited (PIRC), an independent adviser to the pensions industry that provides policy research and analysis on shareholder issues. These 'Shareholder Guidelines' encompass principles of the UK Corporate Governance Code published by the Financial Reporting Council. Details of the fund's voting policy, and its voting activity, are published on the fund's website.
- 10.2. Special resolutions at UK companies are voted on based upon guidance from the LAPFF and PIRC.
- 10.3. The fund will normally take up its entitlement to rights issues when offered at a discount to the current market price.

11. Myners' Report

- 11.1. In 2000, the government commissioned a 'Review of Institutional Investment in the United Kingdom' by Paul Myners of Gartmore Fund Management Group. Paul Myners published the outcome of his review in a report in March 2001. In response to the proposals contained in the review, the Government issued a set of investment principles. Since then HM Treasury has undertaken a review of the principles following a consultation, which was based on a study commissioned by the Government and carried out by the National Association of Pension Funds. The outcome of the consultation has been to produce a smaller number of high-level principles, and they cover the six areas of effective decision making: clear objectives; risk and liabilities; performance assessment; responsible ownership; transparency and reporting.
- 11.2. The extent to which WYPF has adopted these investment principles is described in the following paragraphs in accordance with the guidance issued by the Secretary of State for Communities and Local Government.

12. Effective decision-making

The Investment Panel encompasses a range of expertise, supported by external investment advisers and the in-house team of investment managers. In fact, the external investment advisers and senior investment managers attend all meetings of the panel so as to provide the necessary expert advice to support the panel members in coming to their decisions. Great emphasis is placed on training for panel members, and a number of initiatives on this front have been, and continue to be, developed. Attempts are being made to ensure that panel members have a minimum tenure of appointment of at least three years on the panel so as to ensure continuity and a build-up of experience. An annual business plan for the panel is produced.

13. Clear objectives

Members of the panel take a long-term view in setting investment objectives. Investment objectives are set for the fund itself, which have due regard to the fund's Investment Strategy Statement and Funding Strategy Statement. Investment return targets are also set for the managers and external investment advisers in order to encourage added value commensurate with a measured and controlled level of volatility.

14. Risk and liabilities

Panel members focus entirely on asset allocation, with day-to-day stock selection left to the discretion of the in-house investment managers. Active management is adopted with appropriate risk controls as reflected in a well-diversified portfolio of investments

15. Performance assessment

The panel formally monitors the investment performance of the fund annually at one of its meetings, and an assessment is made of the in-house managers' and external investment advisers' performance against the investment

target return. Since 2005 the fund has used a fund-specific benchmark to compare actual asset allocation and investment returns. Arrangements have been put in place for several years now for the external investment advisers to assess the effectiveness of the panel itself on an annual basis.

16. Responsible ownership

WYPF actively votes its shares in all UK companies, the top 300 European companies, the US S&P 500 companies, the Japanese TOPIX companies and in companies in all other countries, in which it has a shareholding. WYPF also jointly engages with companies through its membership of the Local Authority Pension Fund Forum, the Institutional Investors Group on Climate Change, and the Carbon Disclosure Project.

17. Transparency and reporting

The Investment Strategy Statement is regularly updated and is available on the fund's website. Details of the fund's voting policy and voting activity are also published on the website.

Appendix I

Conflict of Interest Policy

1. Introduction

- 1.1 Conflicts of interest have always existed for those with Local Government Pension Scheme (LGPS) administering authority responsibilities as well as for advisers to LGPS funds. This simply reflects the fact that many of those managing or advising LGPS funds will have a variety of other roles and responsibilities, for example as a member of the scheme, as an elected member of an employer participating in the LGPS or as an adviser to more than one LGPS administering authority. In addition, they may have an individual personal, business or other interest which might conflict, or be perceived to conflict, with their role managing or advising LGPS funds.
- 1.2 It is generally accepted that LGPS administering authorities have both fiduciary and public law duties to act in the best interests of both the scheme beneficiaries and participating employers. This, however, does not preclude those involved in the management of the fund from having other roles or responsibilities which may result in an actual or potential conflict of interest. Accordingly, it is good practice to document within a policy, such as this, how any such conflicts or potential conflicts are to be managed.
- 1.3 This is the conflict of interest policy of West Yorkshire Pension Fund (WYPF), which is managed by City of Bradford MDC (CBMDC). The policy details how actual and potential conflicts of interest are identified and managed by those involved in the management and governance of WYPF whether directly or in an advisory capacity.
- 1.4 This conflict of interest policy is established to guide Joint Advisory Group, Investment Advisory Panel, pension board members, officers and advisers. Along with other constitutional documents, including the various codes of conduct, it aims to ensure that they do not act improperly or create a perception that they may have acted improperly. It is an aid to good governance, encouraging transparency and minimising the risk of any matter prejudicing decision making or management of the fund otherwise.

2. Aims and objectives

- 2.1 In relation to the governance of the fund, the administering authority's objectives are to ensure that:
 - 2.1.1 all staff and Joint Advisory Group, Investment Advisory Panel and pension board members charged with the financial administration and decision-making with regard to the fund are fully equipped with the knowledge and skills to discharge the duties and responsibilities allocated to them
 - 2.1.2 the fund is open in all its dealings and readily provides information to interested parties
 - 2.1.3 all relevant legislation is understood and complied with
 - 2.1.4 the fund is at the forefront of best practice for LGPS funds, and
 - 2.1.5 all conflicts of interest are managed appropriately

The identification and management of potential and actual conflicts of interest is therefore integral to the administering authority achieving its governance objectives.

3. Application of this policy

- 3.1 This conflict of interest policy applies to all Joint Advisory Group, Investment Advisory Panel and pension board members, including scheme member and employer representatives, whether voting members or not. It applies to all members of WYPF management team.
- 3.2 This policy and the issue of conflicts of interest in general must be considered in light of each individual's role, whether this is a management, advisory or assisting role.
- 3.3 The Director – WYPF will monitor potential conflicts for less senior officers involved in the daily management of the pension fund and highlight this policy to them as appropriate.
- 3.4 This policy also applies to all advisers and suppliers to the fund, whether advising the Joint Advisory Group, Investment Advisory Panel, pension board or fund officers, in relation to their role in advising or supplying the fund.
- 3.5 In this policy, reference to advisers includes all advisers, suppliers and other parties providing advice and services to the administering authority in relation to pension fund matters. This includes but is not limited to actuaries, investment consultants, independent advisers, benefits consultants, third-party administrators, fund managers, lawyers, custodians and AVC providers. Where an advisory appointment is with a firm rather than an individual, reference to 'advisers' is to

the lead adviser(s) responsible for the delivery of advice and services to the administering authority rather than the firm as a whole.

- 3.6 In accepting any role covered by this policy, those individuals agree that they must:
- 3.6.1 acknowledge any potential conflict of interest they may have
 - 3.6.2 be open with the administering authority on any conflicts of interest they may have
 - 3.6.3 adopt practical solutions to managing those conflicts, and
 - 3.6.4 plan ahead and agree with the Administering Authority how they will manage any conflicts of interest which arise in future.
- 3.7 The procedures outlined later in this policy provide a framework for each individual to meet these requirements.

4. Legislative and related context

- 4.1 There are a number of requirements relating to the management of potential or actual conflicts of interest for those involved in LGPS funds which are included in legislation or guidance. These are summarised in Appendix 1.

5. Other administering authority requirements

- 5.1 Individuals to whom this policy applies may also be required to adhere to other requirements in relation to conflicts of interest. This includes:
- 5.1.1 Joint Advisory Group, Investment Advisory Panel and Pension Board members who are required to adhere to the CBMDC Members' Code of Conduct
 - 5.1.2 employees who are required to adhere to the CBMDC Employees' Code of Conduct
 - 5.1.3 advisers who are expected to have their own policies or protocols.
- 5.2 Further information is provided in Appendix 2.

6. What is a conflict or potential conflict and how will it be managed?

- 6.1 The Public Service Pensions Act 2013 defines a conflict of interest as a financial or other interest which is likely to prejudice a person's exercise of functions. Therefore, a conflict of interest may arise when an individual:
- 6.1.1 has a responsibility or duty in relation to the management of, or provision of advice to, the LGPS fund administered by CBMDC, and
 - 6.1.2 at the same time, has:
 - 6.1.2.1 a separate personal interest (financial or otherwise) or
 - 6.1.2.2 another responsibility in relation to that matter,
- giving rise to a possible conflict with their first responsibility. An interest could also arise due to a family member or close colleague having a specific responsibility or interest in a matter.
- 6.2 Some examples of potential conflicts are included in Appendix 3.
- 6.3 CBMDC encourages a culture of openness and transparency and encourages individuals to be vigilant; have a clear understanding of their role and the circumstances in which they may have a conflict of interest, and of how potential conflicts should be managed.
- 6.4 CBMDC will evaluate the nature of any dual interests or responsibilities that are highlighted and assess the impact on pension fund operations and good governance were an actual conflict of interest to materialise. Ways in which conflicts of interest may be managed include:
- 6.4.1 the individual concerned abstaining from discussion, decision-making or providing advice relating to the relevant issue

- 6.4.2 the individual being excluded from the meeting(s) and any related correspondence or material in connection with the relevant issue
 - 6.4.3 a working group or sub-committee being established, excluding the individual concerned, to consider the matter outside of the formal meeting (where the terms of reference permit this to happen)
- 6.5 Provided that the administering authority (having taken any professional advice deemed to be required) is satisfied that the method of management is satisfactory, CBMDC shall endeavour to avoid the need for an individual to resign due to a conflict of interest. However, where the conflict is considered to be so fundamental it cannot be effectively managed, or where a Pension Board member has an actual conflict of interest as defined in the Public Service Pensions Act 2013, the individual will be required to resign from their role.

7. Responsibility

- 7.1 The administering authority for the WYPF fund must be satisfied that conflicts of interest are appropriately managed. For this purpose, the Director – WYPF is the designated individual for ensuring the procedure outlined below is adhered to.
- 7.2 However, it is the responsibility of each individual covered by this policy to identify any potential instances where their personal, financial, business or other interests might come into conflict with their pension fund duties.

8. Operational procedures

8.1 Declaration at appointment

- 8.1.1 On appointment to their role or on the commencement of this policy if later, all individuals will be provided with a copy of this policy and be required to complete a Declaration of Interest form. The information contained in this declaration will be collated into the pension fund's register of conflicts of interest.

8.2 Declaration at meetings

- 8.2.1 At the commencement of any Joint Advisory Group, Investment Advisory Panel, pension board or other formal meeting where pension fund matters are to be discussed, the chair will ask all those present who are covered by this policy to declare any new potential conflicts.
- 8.2.2 These will be recorded in the fund's Register of Conflicts of Interest. In addition, the latest version of the register will be made available by the Director – WYPF to the chair of every meeting prior to that meeting.
- 8.2.3 Any individual who considers that they or another individual has a potential or actual conflict of interest which relates to an item of business at a meeting must advise the chair and the Director – WYPF prior to the meeting, where possible, or state this clearly at the meeting at the earliest possible opportunity. The chair, in consultation with the Director – WYPF, should then decide whether the conflicted or potentially conflicted individual needs to leave the meeting during the discussion on the relevant matter or to withdraw from voting on the matter.
- 8.2.4 If such a conflict is identified outside of a meeting the notification must be made to the Director – WYPF and where it relates to the business of any meeting, also to the chair of that meeting. The Director – WYPF, in consultation with the chair where relevant, will consider any necessary action to manage the potential or actual conflict.
- 8.2.5 Where information relating to any potential or actual conflict has been provided, the Director – WYPF may seek such professional advice as he or she thinks fit (such as legal advice from the Monitoring Officer) on how to address any identified conflicts.
- 8.2.6 Any such potential or actual conflicts of interest and the action taken must be recorded in the fund's Register of Conflicts of Interest.

8.3 Annual declaration

- 8.3.1 Every 12 months all individuals will complete a new Declaration of Interest confirming that their information contained in the register is correct or highlighting any changes that need to be made to the declaration.

8.4 Conduct at meetings

- 8.4.1 There may be circumstances when a representative of employers or members wishes to provide a specific point of view on behalf of an employer (or group of employers) or member (or group of members). The administering authority requires that any individual wishing to speak from an employer's or member's viewpoint must state this

clearly, e.g. at a pension board or Joint Advisory Group or Investment Advisory Panel meeting, and that this will be recorded in the minutes.

9. Operational procedures for advisers

9.1 Although this policy applies to all of the key advisers, the operational procedures outlined in 8.1 and 8.3 above relating to completing declarations do not apply to advisers. Instead all advisers must:

- 9.1.1 be provided with a copy of this policy on appointment and whenever it is updated
- 9.1.2 adhere to the principles of this policy
- 9.1.3 provide, on request, information to Director – WYPF as to how they will manage and monitor actual or potential conflicts of interests relating to the provision of advice or services to CBMDC as administering authority, and
- 9.1.4 notify the Director – WYPF immediately should a potential or actual conflict of interest arise.

All potential or actual conflicts notified by advisers will be recorded in the fund's Register of Conflicts of Interest.

10. Monitoring and reporting

10.1 The fund's Register of Conflicts of Interest may be viewed by any interested party by appointment during normal business hours. In addition, information relating to conflicts of interest will be published in the fund's annual Report and Accounts.

10.2 In order to identify whether the objectives of this policy are being met, the administering authority will review the Register of Conflicts of Interest on an annual basis and consider whether there has been any potential or actual conflicts of interest that were not declared at the earliest opportunity.

11. Key risks

11.1 The key risks to the delivery of this policy are outlined below, all of which could result in an actual conflict of interest arising and not being properly managed. The Director – WYPF will monitor these and other key risks and consider how to respond to them, taking advice from the City Solicitor where required. The key risks are:

- 11.1.1 insufficient training or poor understanding in relation to individuals' roles on pension fund matters
- 11.1.2 Insufficient training or failure to communicate the requirements of this policy
- 11.1.3 Absence of the individual nominated to manage the operational aspects of this policy and no one deputising or failure of that individual to carry out the operational aspects in accordance with this policy, and
- 11.1.4 Failure by a chair to take appropriate action when a conflict is highlighted at a meeting.

12. Costs

12.1 All costs related to the operation and implementation of this policy will be met directly by WYPF. However, no payments will be made to any individuals in relation to any time spent or expenses incurred in the disclosure or management of any potential or actual conflicts of interest under this policy.

Appendix J

Risk Management Report

WYPF Risk Management Report

Introduction

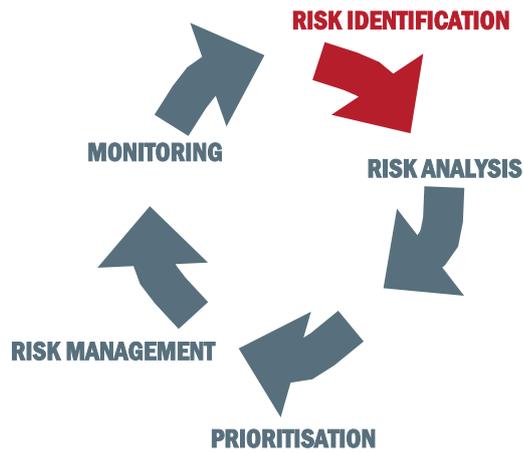
WYPF's Risk Management Plan establishes the process for implementing proactive risk management as part of the overall management of the pension fund. The purpose of risk management is to identify potential problems before they occur, so that risk handling activities may be planned and invoked as needed to mitigate adverse impacts on achieving objectives. Risk management is a continuous, forward looking process that addresses issues that could endanger the achievement of critical objectives and includes the early risk identification through the collaboration and involvement of relevant stakeholders.

WYPF has identified risks which have been rated and plotted on a matrix and a risk tolerance line agreed in order to prioritise the risks. The risk matrix measures each risk for its likelihood and impact in terms of its potential for affecting the ability of WYPF to achieve its objectives.

The process

Risk identification

The first of five stages of the risk management cycle requires risk identification. This has been achieved through discussion with senior managers and covers 13 categories of risk as shown below.



Identified risks

| Scenario | Short name |
|-------------------------------|--|
| Economic | |
| 1 | Demographic changes |
| 2 | Valuation continues to register a deficit in the pension fund |
| 3 | Governance (Strategic) |
| 4 | Reduction in proportion of active members |
| 46 | Admissions and Guarantors |
| 51 | Obtaining ISAE 3402 reports |
| 61 | Employer no longer able to meet its liabilities to the fund |
| Political | |
| 3 | Governance (Strategic) |
| 5 | Service has a good, well respected status among members – this could change |
| 6 | Council elections could bring about a change in change of Investment Panel and JAG members |
| 7 | Bradford initiatives |
| 8 | Central Government regionalisation agenda |
| 9 | Central Government Pensions policy |
| 40 | Governance (Operational) |
| 45 | Industrial Action |
| 55 | Impact of Central Government Budget cuts |
| Technological | |
| 10 | Improved Pensions and Investments systems are not developed and adopted |
| 12 | Lack of information sharing with employers |
| 13 | Disaster Recovery |
| 15 | Current software providers pulls out of the market or are taken over. |
| 16 | Internal Fraud |
| 17 | Loss of ICT staff |
| 44 | Payroll failure |
| 47 | Loss of sensitive/personal data |
| 50 | Unauthorised access to personal/sensitive data |
| 62 | Cyber crime |
| Legislative/Regulatory | |
| 19 | Lots of legislative/regulatory change with no resource given to implement |
| 35 | Administration of the LGPS |
| 58 | Investment Pooling |
| 59 | Northern Pool custodial contract |
| 60 | HSBC Global, security and Custodial (GSC) + Banking Contract |
| 63 | Compliance with requirements of GDPR |
| 64 | LGPS regulation changes as a result of McCloud ruling |

Managerial/Professional

| | |
|-----------|---|
| 21 | Greater level of support expected by district councils than other employers |
| 22 | Recruitment and retention of experienced staff |
| 49 | Key staff on long term absence |

Finance

| | |
|--------------|---|
| 23 | Finance aren't always involved in other sections' decision making processes |
| 31(a) | External fraud – Life Certificates |
| 31(b) | External fraud – Returned payments/payslips |
| 31(c) | External fraud – Children in full time education |

| | |
|----|-----------------------------------|
| 36 | Maximise Council surplus balances |
| 40 | Governance (Operational) |
| 41 | Pressure on General Fund |
| 42 | Admin costs |
| 48 | Prompt payment of pension |
| 65 | Loss of shared service contracts |

Physical –**Competitive**

| | |
|----|--|
| 27 | Lack of PIs and overall performance management framework |
|----|--|

Customer / Citizen

| | |
|----|-----------------------|
| 43 | Customer Satisfaction |
|----|-----------------------|

Social

| | |
|---|---|
| 4 | Reduction in proportion of active members |
|---|---|

Partnership / Contractual

Shared Service with the fire authorities

| | |
|----|---|
| 57 | Lincolnshire Pension Fund and Hounslow Pension Fund Shared Services |
|----|---|

Risk analysis, profile and tolerance

The risks are assessed for impact and likelihood and plotted onto a matrix. The impact is measured as being negligible, marginal, critical or catastrophic. The likelihood is measured as being almost impossible, very low, low, significant, high or very high. Appendix 1 shows all the risks that are rated on the profile.

The top risks facing WYPF are identified as:

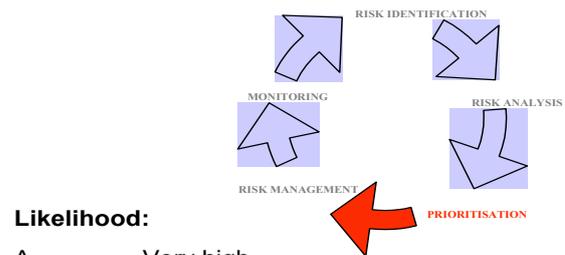
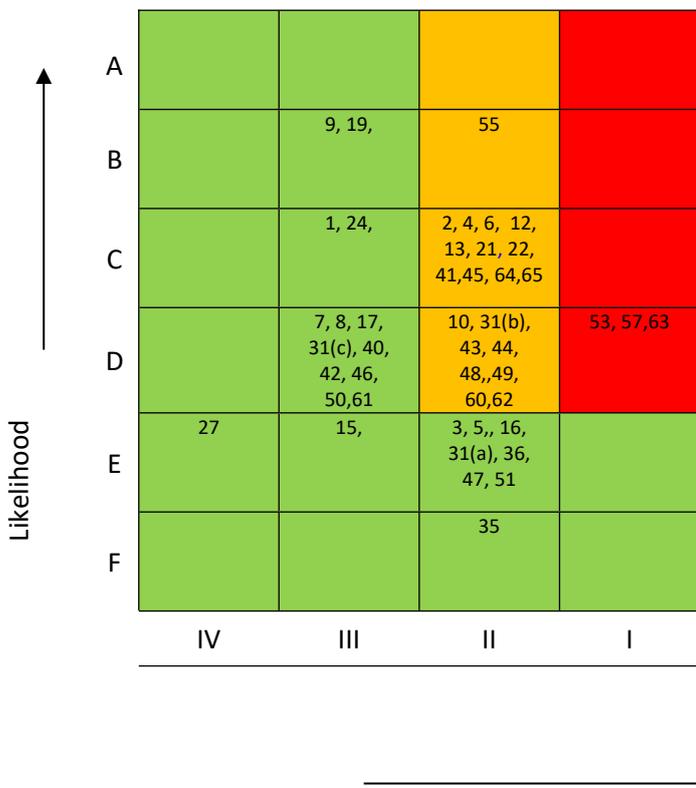
| Scenario | Short name |
|----------|--|
| 2 | Valuation continues to register a deficit in the pension fund |
| 4 | Reduction in proportion of active members |
| 6 | Council elections could lead to change in Investment Panel and JAG and Pension Board members |
| 10 | Improved Pensions and Investments systems are not developed |
| 12 | Lack of information sharing with employers |
| 13 | Disaster recovery |
| 21 | Greater level of support expected by District Councils than other Employers |
| 22 | Recruitment and retention of experienced staff |
| 31(b) | External fraud – Returned payments/payslips |
| 41 | Pressure on General Fund |
| 43 | Customer Satisfaction |
| 44 | Payroll failure |
| 45 | Industrial Action |
| 48 | Prompt payment of pension |
| 49 | Key staff on long term absence |
| 53 | Fire Authority Shared Service |

| | |
|----|---|
| 55 | Impact of Central Government Budget cuts |
| 57 | Lincolnshire Pension Fund and LB of Hounslow Shared Service |
| 58 | Investment Pooling |
| 62 | Cyber Crime |
| 63 | Compliance with requirements of GDPR |
| 64 | LGPS regulation changes as a result of McCloud ruling |
| 65 | Loss of shared service contracts |

To determine the section’s appetite to risk, each of the squares on the matrix are considered to decide if WYPF are prepared to live with a risk in that box or if it needs to be actively managed. This set a theoretical tolerance line. Those risks above the line requiring further scrutiny and those below the line having sufficient control in place. The tolerance line is agreed at risks with a low or greater likelihood and a critical impact.

As part of a regular review, 46 risks have been identified and framed into scenarios. The risks identified have been rated, 23 of these above their acceptable tolerance level, 23 below the tolerance line. The results are shown on the following risk profile.

WYPF Risk profile – January 2021



- Likelihood:**
- A Very high
 - B High
 - C Significant
 - D Low
 - E Very low
 - F Almost impossible

- Impact:**
- I Catastrophic
 - II Critical
 - III Marginal
 - IV Negligible

Risk management and monitoring

Management Action Plans (MAPs) frame the risk management actions that are required. They map out the target for each risk i.e. to reduce the likelihood, impact or both. They also include targets and critical success factors to allow the risk management action to be monitored.

The risk assessment identified that significant levels of activity are required to manage the risks. Many of the key risks require immediate attention and it is important that having identified risks that could have critical impact, that the required action is undertaken.

MAP's were then agreed for those risks above the tolerance line and are specified below:

| | Rating | Risk description and Action / Controls already in place | Adequacy of action/ control to address risk | Required management action/ control | Responsibility for action | Critical success factors & KPI's | Review frequency | Key dates | Opportunity |
|---|--------|---|---|---|---------------------------|---|------------------|-----------------------------------|---|
| 2 | C2 | <p>If the Fund is in deficit employer contributions could increase which could lead to employers defaulting on their liabilities.</p> <p>Triennial Valuation undertaken on the Fund using a range of financial assumptions as agreed with the Fund Actuary. If the financial assumptions are not borne out in practice, because of a range of reasons not least :</p> <ul style="list-style-type: none"> • Falls in expected investment returns • Fall in markets values • Rising inflation • members living longer <p>the funding position of the fund could deteriorate</p> | <p>Training for Joint Advisory, Panel and Board members provided by the Actuary at the beginning of the Triennial Valuation exercise to aid assumption decision making</p> <p>Due to potentially decreasing payroll deficit amounts are set as -monetary amounts at the valuation</p> <p>Recovery period for deficit amounts assessed at each valuation to eliminate deficit within 22 years</p> <p>Monitoring of closed employers</p> <p>Quarterly funding updates provided by Funds Actuary</p> | <p>Deteriorating funding positions could result in an increased employers deficit contributions to eliminate deficit</p> <p>Growth is built into the medium financial plan, stepped increases for low to medium risk employers as per the FSS</p> | Director WYPF JAG | Funding position to remain within 90 to 110% | triennial | Every three years - 31 March 2022 | Active engagement with employers' and members to reduce cost impact and increase membership. |
| 4 | C2 | Reduction in proportion of active members | <p>Publicise the scheme and the benefits of membership in regular newsletters, website, ABS's, annual meetings as detailed in the Funds Communication Policy.</p> <p>Introduction of Auto Enrolment has increased membership.</p> | <p>Fund becomes more mature due to ageing and reduction in active members by outsourcing.</p> <p>Client base nationwide – employers 400+ including 5 district councils.</p> | Yunus Gajra | <ul style="list-style-type: none"> • Fund continues to show as positive cashflow • The ISS is regularly reviewed to ensure its consistent with maturity profile of the Fund | Annually | Ongoing | Increase membership by publicising the scheme and the benefits of membership in regular newsletters, website, ABS's, annual meetings. |

| | Rating | Risk description and Action / Controls already in place | Adequacy of action/control to address risk | Required management action/ control | Responsibility for action | Critical success factors & KPI's | Review frequency | Key dates | Opportunity |
|----|--------|---|---|---|---------------------------|---|------------------------|-----------|--|
| 6 | C2 | Council elections could bring about a change to Investment Panel, JAG and Pension Board members | Training plans for new members to be drawn up. Seek views from District Councils to nominate members for 3 years to ensure consistency | Establish working relationships with the constituent Members as soon as possible. Be prepared to provide relevant training to political groups. | Rodney Barton | Member satisfaction Continuing support for officers | Panel and JAG meetings | | Establish a standard training plan for new members, programmed training review for Panel and JAG members and use members feedback to further develop. |
| 10 | D2 | Civica Pensions Admin System will not lead to improvements, efficiency and cost savings, or developments do not meet WYPF requirements. | Regular account meetings with Civica Senior Management. Representation on various user groups: <ul style="list-style-type: none"> • Civica user group • LGPS group • Payroll user group | Ensure regular attendance and report back from the User Groups/Meetings as necessary. | Yunus Gajra | Improved systems , costs savings, better reporting, employer internet, member internet facilities available, increase the number of UPM auto calculations Develop product that meets WYPF requirements | Quarterly | Ongoing | Regular market testing to see if better systems on the market, Effective and efficient system, with scalable capacity to support shared services. |
| 12 | C2 | Too much information is supplied by employers on paper medium. | Enhancements to UPM2 are continuing. Monthly Returns expanded to increase the information supplied electronically | Develop employers web site | Yunus Gajra/Ola Ajala | Increase in electronic medium of info sharing Improvements in KPI's 1, 4a, 4b, 6 and 8 | Annual | Ongoing | Develop Employers' website to use that as the main medium for communication. Build scalable system capacity, improved vfm for shared services. |

| | Rating | Risk description and Action / Controls already in place | Adequacy of action/ control to address risk | Required management action/ control | Responsibility for action | Critical success factors & KPI's | Review frequency | Key dates | Opportunity |
|--------|--------|--|--|---|---|--|------------------|-----------|--|
| 13 | C2 | Disaster recovery | Disaster recovery plan in place with Bradford Council for pensions and investments systems (refer to Business Continuity Plan). | Staff enabled to work from home with access to all systems. | Yunus Gajra | Full disaster recovery plan in place which enables business to operate as usual during any disaster | Annual | Ongoing | System resilience, essential in providing 3 rd party services – shared services. |
| 21 | C2 | Greater level of support required / expected by some employers | Employer Training courses available or charge for the additional work | Monitor number and type of requests for support | Yunus Gajra | Reduce the number of non standard requests | Monthly | Ongoing | Provide more online training. Could be offered to other LGPS funds. |
| 22 | C2 | Recruitment and retention of experienced staff in Pensions Administration, | Career grades in place for majority of staff to encourage professional training. Training Plans in place for all staff. Regular review of structure. Restructure of WYPF completed September 2020 | Monitor salaries in both public and private sector. Increase flexible working to retain staff, home working available to all staff. Looking at 2 to 3 days in the office. | Man Rev | Motivated and responsive staff Minimal staff turn over No breaches of time limits or maladministration issues | 6 monthly | Ongoing | Carry out a periodical review of salaries and grades. Attractive flexible working, home working and mobile working |
| 31 (b) | D2 | External Fraud | Generally adequate but any future opportunities will be investigated. Participation in NFI. Life Certificates to high risk pensioners annually. Life certificates to low risk categories sent out every 7 years as a minimum. Returned payments or pay advices, records are immediately suspended. Close working relationship with Internal Audit. Accurate Data engaged to support the work to find addresses of lost contact Deferred members | Increased communications with pensioners to ensure contact with members is maintained. Participation in NFI twice a years, use of death screen facility to track deaths – | Grace Kitchen | No cases of fraud or earlier discovery Establish tighter controls in system for production of data for NFI exercise | Annual | | Carry out regular data cleansing exercises –. |
| 41 | C2 | Pressure on General Fund due to fluctuations in funding levels | Dependent on markets and mortality rates | Discussion of volatility reduction in investment returns. Varying actuarial assumptions and recovery periods for deficits. Asset and liability study being done. | Investments Committee In house Investments team | Stable and affordable contribution rates | Ongoing | | Long term business planning for the fund and increase covenant activities with employers to support employers' with cost management and planning |

| | Rating | Risk description and Action / Controls already in place | Adequacy of action/ control to address risk | Required management action/ control | Responsibility for action | Critical success factors & KPI's | Review frequency | Key dates | Opportunity |
|----|--------|---|--|---|---------------------------|---|------------------|----------------------|---|
| 43 | D2 | Customer satisfaction drops below acceptable levels | Newsletters issued regularly to members, Monthly info. update to employers ABS's to current and deferred members Member Annual meeting Employer Annual meeting Large employer group meeting Seminars for employers Leaver questionnaires Employer satisfaction questionnaires Complaints procedures Web site Published ISS Published FSS Contact Centre Member of Plain English Campaign 'Pensions Administration Strategy' document issued to each employing authority participating in the Fund. Governance compliance statement and Communications policy published. | Revise ISS each year Review annually: Pensions Administration Strategy, Communication Strategy | Yunus Gajra JAG | Reduction in complaints Reduction in IDRPs cases. Attract new bodies to the Fund More timely info from employers, Improved employer satisfaction KPI 8 | Annual | Annually | Attract new business to the Fund |
| 44 | D2 | Payroll failure | Payroll contingency plan in place Disaster Recovery plan in place | Review plans | Yunus Gajra/Grace Kitchen | No effect on service provision | As required | Ongoing review | Able to run payrolls for other Funds. Opportunity to provide disaster recovery to other funds. |
| 45 | C2 | Industrial Action | Contingency plans in place | Review plans if required | Management Review | Minimal impact on customers. No delays to developments | As required | | Flexible working available to all staff. |
| 48 | D2 | Prompt payment of pension | Timetable published in advance of pay dates | Ensure timetable is followed | Grace Kitchen | Pensions are paid on the due date | As required | | Able to run payrolls for other Funds |
| 49 | D2 | Key staff on long term absence | Document all procedures to ensure cover is available from other staff. | Monitor absences and take action at key dates. Delegation and succession planning. | Senior Managers | No effect on service provision | As required | As required Annually | A register of casual staff is maintained to provide cover at short notice. |
| 53 | D1 | Fire Authority Shared Service | Adequate | Regular meetings with the Fire Authorities | Yunus Gajra | Business as usual with no impact on WYPF membership and service | Quarterly | Ongoing | Provide service for other FA's/ |

Appendix RISK MANAGEMENT REPORT

| | Rating | Risk description and Action / Controls already in place | Adequacy of action/control to address risk | Required management action/ control | Responsibility for action | Critical success factors & KPI's | Review frequency | Key dates | Opportunity |
|----|--------|--|--|--|---------------------------|---|------------------|-----------|--|
| 55 | B2 | Impact of Central Government Budget cuts | Impact on workloads and membership numbers | Monitor workloads and LGPS membership numbers | Management Review | Meet KPI targets and membership levels | Ongoing | Ongoing | Increase staffing numbers – benefit for local economy. |
| 57 | D1 | Lincolnshire, LB of Hounslow and LB Barnet Pension Fund Shared Service | Governance arrangements in place (regular client meetings, Collaboration Board, attendance at Pensions Committee). | Regular shared service meetings and Collaboration Board meetings with LPF, Barnet and LB of Hounslow. Increased staffing resource – new client manager. | Yunus Gajra | Business as usual with no impact on WYPF membership and service | Ongoing | Ongoing | Provide service for other LA Funds |
| 62 | D2 | Threat of cyber crime | Adequate | Regular review by Bradford ICT of Firewalls, anti-virus programs to identify latest threats. WYPF also carry out penetration testing on the Fund's website and secure portal. Staff training / awareness, increased IT equipment / asset control. Routine blog to employers and members to raise cyber crime awareness | Yunus Gajra | Business as usual with no impact on data or services | Ongoing | Ongoing | Safeguard and protect WYPF data and systems. |
| 63 | D1 | Compliance with GDPR requirements | Review letters/internal processes and procedures, Privacy statements, data share agreements, contracts with 3 rd parties, Security breach process, website. Use of Galaxkey for secure emails, Use of secure portals to share information with key stakeholders, mandatory data protection training for staff. Accreditation to ISO 27001 | Security policies in place, Mandatory Training for Staff | Yunus Gajra | A reduction in security breaches | Ongoing | | |

| | Rating | Risk description and Action / Controls already in place | Adequacy of action/control to address risk | Required management action/ control | Responsibility for action | Critical success factors & KPI's | Review frequency | Key dates | Opportunity |
|----|--------|--|---|---|--|---|------------------|---|---|
| 64 | C2 | Not enough resources to deal with Compliance with the McCloud ruling | Identify members potentially impacted by the ruling and: 1) engage with Civica for calculations to be amended 2) amend in house processes and work instructions 3) recalculate DB's, retirements, transfers out, aggregations, trivial commutations and death benefits since 1 April 2014. | Respond to McCloud consultation to ensure enough notice to changes if given Analyse membership to identify those affected Planning of resources to address additional work in the Service Centre | Technical and Development Manager WYPF IT Service Centre Manager | Identifying members in scope. Civica calculations updated Recalculating pension benefits and payment of any arrears or balances to members/beneficiaries /3 rd parties.. | Ongoing | Oct 20 and then when regs issued. (1 April 2022) | |
| 65 | C2 | Loss of shared service contracts | Contract requirements are fulfilled | Maintain a healthy working relationship with each client by: <ul style="list-style-type: none"> • Having regular client meetings • Providing monthly client reports • Involve clients in major decisions • Managing admin costs efficiently • Meet KPI's and other contractual obligations • Ensure value for money for clients and WYPF | Yunus Gajra | Contracts are renewed | On-going | Contract end dates | Bid for new contracts to replace any that we might lose. Invest in increase system automation to reduce impact. |

The risks identified but below their acceptable tolerance level require no further action at this time.

Future review and revision of risks

It is important that this work is monitored and measured and that management action plans are reassessed regularly to ensure that progress is being made and the targets can be met. In addition, each risk is owned where possible by one member of the management team to ensure that there is high level support, understanding and monitoring of the work that is required as part of the plans.

The management team have agreed that the timescale for re-visiting these risks in order to assess if they are still relevant and to identify new scenarios should be quarterly at Management Review.

Appendix 1 Risks register

| No | Rating | Cluster | Short name | Vulnerability | Trigger | Consequence |
|----|--------|----------|---|--|--|--|
| 1 | C3 | Economic | Demographic changes | Demographic changes are happening but are not always built into financial and resource planning. (Customer base nationwide – current members 101,079, deferred members 85,696, frozen refunds/undecided leavers 10,663, pensioners 100,869. Total 248,528 as at 31/03/2021) | Demographics not built into future planning | <ul style="list-style-type: none"> • Budget doesn't meet demand • Criticised for not providing a good service • Bad publicity |
| 2 | C2 | Economic | Valuation continues to register a deficit in the pension fund | Rise in contribution rates to eliminate deficit. Growth is built into the medium term financial plan, stepped increases for low to medium risk employers as per FSS | Investment returns < actuarial and FSS assumptions Rise in longevity (Funding level remains the main comparator) | <ul style="list-style-type: none"> • Contribution rate rises • Budget cuts and/or council tax increases • Bad publicity for employers • Bad publicity for WYPF • Bad publicity for LGPS • Increased Central Government pressure for changes to LGPS • Admitted bodies review provision of LGPS to employees • Admitted bodies to WYPF seek reduced rates with other LGPS providers • Political impact • Customer complaints about 'pension pay-offs' |

| No | Rating | Cluster | Short name | Vulnerability | Trigger | Consequence |
|----|--------|--------------------|---|--|--|---|
| 3 | E2 | Political/Economic | Governance (Strategic) | <p>Understanding of issues at high officer and Member level. Clear risk, return and contribution objectives Consistent FSS and ISS documents in place</p> <p>The purpose of the FSS is : to establish a clear and transparent fund-specific strategy which will identify how employers' pension liabilities are best met and must be consistent with the published Investment Strategy Statement and the Fund's actuarial assumptions. It should support the aim of maintaining as nearly constant employer contribution rates as possible, taking into account risks in both the liability profile and volatility of asset returns.</p> | Un-coordinated operation caused by lack of understanding | <ul style="list-style-type: none"> • The organisation does not exercise proper strategic control over the management of its pension fund at the highest strategic level • Lack of knowledge and understanding of Members leading to too much reliance on officers and external advisors and do not challenge advice • panel composition not representative of all bodied in the Fund • Overall investment objectives do not represent what members of panels consider necessary to meet the Fund's liabilities given their understanding of contributions likely to be received from employers and employees and do not take account of their attitude to risk • Unstable contribution rates • Too much reliance put on benchmarking with other funds, without considering the specific circumstances of WYPF |
| 4 | C2 | Social/Economic | Reduction in proportion of active members | <p>Fund becomes more mature due to ageing and reduction in active members by outsourcing. Client base nationwide – employers 190 including 5 district councils.</p> | <p>Reducing take up of admitted body status Continuing outsourcing</p> | <ul style="list-style-type: none"> • Fund stop showing net inflows of cash • Investment strategy no longer consistent with maturity profile • FSS and ISS become out of date • Less time to make up any deficits so more unstable contribution rates |
| 5 | E2 | Political | Service has a good, well respected status among members – this could change | The service has a good professional status. It is well respected by members and therefore the budget isn't affected. | Service loses it's status/reputation | <ul style="list-style-type: none"> • Budget cut • Actively look at outsourcing/partnership • Look at alternatives • Project process unmanageable • Lack of trust in information provided • Closer scrutiny of pension fund activities |
| 6 | C2 | Political | Council elections could bring about a change to Investment Panel ,JAG and Pension Board members | Panel members and Chair are very effective and knowledgeable and give good support to the service. There is a good relationship. | Major changes to composition of panels | <ul style="list-style-type: none"> • Loss of effective support • Learning curve |

| No | Rating | Cluster | Short name | Vulnerability | Trigger | Consequence |
|----|--------|---------------|---|---|---|--|
| 7 | D3 | Political | Bradford initiatives | The fund is not autonomous and decision taken at a high level in Bradford and for Bradford could risk the efficiency of our business. the imposition of what we perceive to be unsuitable regimes upon WYPF by CBMDC can undermine the performance of the section and forcibly distract WYPF management from their prime responsibilities for long periods. Partnerships entered into on WYPF's behalf by CBMDC may not be suitable for WYPF's needs. Initiatives divert management time from core activities | WYPF as a financial service provider and not a LG service provider not recognised or considered | <ul style="list-style-type: none"> • Loss of control over budget spend • Imposition of "Bradford" systems inappropriate to WYPF • Politicises JAG and Investment Panel • Service delivery reduced • Diversion from core activity |
| 8 | D3 | Political | Central Government regionalisation agenda | Possible regionalisation of pension funds Could be asked to compete against other LG Funds or the private sector | Becomes Government policy | <ul style="list-style-type: none"> • Admin costs rise to unacceptable levels • Culture change • Cost pressure • Fail to become provider for Yorkshire region • Staff relocation • Staff redundancies • Bad publicity for Bradford • Become provider for Yorkshire • Increased resource requirement • Good publicity |
| 9 | B3 | Political | Central Government Pensions policy | Independent Commission on Public Service Pensions set up to look at reforms to public sector pension schemes. | Increased complexity | <ul style="list-style-type: none"> • Risk of non-compliance – bad publicity and fines • Dilutes development of systems • Increased admin costs • Increased communications costs |
| 10 | C2 | Technological | Improved Pensions and Investments systems are not developed and adopted | Increased WYPF and Civica resources required to develop and adopt system. | Major parts of the system do not work efficiently or accurately. | <ul style="list-style-type: none"> • E-government cannot be supported • Increased time and support needed for number crunching • Less added value support |
| 12 | C2 | Technological | Lack of information sharing with employers | Most information from employers is still paper based no direct feeds from their payroll and HR to the UPM system. Requires Pensions to work closely with employers and the Bfd-I partnership to ensure contribution returns are both correct and received on time to enable details to be provided to the Actuary for the Valuation and for Annual Benefit Statements. | Don't progress direct input or do but on a piecemeal basis Deadlines not met | <ul style="list-style-type: none"> • People can't access vital information in a timely manner • Sustainability issues • Transcription errors • Delays • Invalid employer contribution rates set • Invalid ABS's sent to members • ABS's not sent to members • Non compliance • Bad publicity • Key objective not met |
| 13 | C2 | Technological | Disaster recovery | Pension and Investments systems are supported by a disaster | Minor incident occurs | <ul style="list-style-type: none"> • Can't back up the data |

| No | Rating | Cluster | Short name | Vulnerability | Trigger | Consequence |
|----|--------|---------------|---|---|---|--|
| | | | | <p>recovery plan but some systems aren't including the e-mail system and the main council systems and communication links</p> <p>ICT – risk of loss of service because of physical disaster, system failure or deliberate attack. An offsite backup regime is in place for Pensions. Onsite backups are kept in a fire proof safe. System failure – protected by service and maintenance contracts WYPF is dependent on CBMDC for virus protection and firewalls etc.</p> <p>Link with 35</p> | Major incident occurs | <ul style="list-style-type: none"> • Loss of service • Permanent data loss • Loss of income • Inability to pay pensioners |
| 15 | E3 | Technological | Current software providers pull out of the market or are taken over | Current providers – Civica | Civica not that well established in LG pensions sector but are starting to win LG business. | <ul style="list-style-type: none"> • other systems available but enforced change time consuming • pressure on staff |
| 16 | E2 | Technological | Internal Fraud | Risk of fraud by illicit alterations to our data security is in place using passwords, change logs etc. but there remains a residual risk. WYPF is dependant on CBMDC's firewall to prevent attacks on its servers from outside the council. | fraud | <ul style="list-style-type: none"> • Loss of data • Corrupt data • Incorrect payments • Breach of DP Act |
| 17 | D3 | Technological | Loss of IT staff | More attractive salaries in the private sector may attract experienced IT staff | Impact of Bradford-i | <ul style="list-style-type: none"> • Learning curve • Pressure on remaining staff • Reduction in service delivery • Delays in development work |

| No | Rating | Cluster | Short name | Vulnerability | Trigger | Consequence |
|----|--------|-----------------------------|---|---|--|--|
| 19 | B3 | Legislative/ Regulatory | Lots of legislative /regulatory change with no resource given to implement it | Lots of legislative/regulatory change resulting in additional work with no resource given to implement them. Changes to Regs must be made aware to members, employers and staff. The service endeavours to respond but is balancing resources. The unit has given a high commitment to professional training to its staff which may not be maintainable | Insufficient resources to respond to legislative/regulatory changes adequately | <ul style="list-style-type: none"> • Benchmarking costs rise • Increased pressure on staff • Don't adopt legislation • Service criticised • Duties and responsibilities not fully adopted • Ombudsman cases • Incorrect payment of benefits • Growing complexity of administration • Risk of non compliance • Key objective not met • studies not completed • general pensions knowledge declines • give ill advice • pressure on staff • staff don't have up to date, consistent knowledge and understanding |
| 21 | C2 | Managerial/ Professional | Greater level of support expected by district councils than other employers | Bradford council and to a lesser extent the other 4 councils, request information from Pensions which should be available from their own HR department. | Resources diverted from other employers | <ul style="list-style-type: none"> • Staff frustrated • Reduced level of service to other employers |
| 22 | C2 | Managerial/ Professional | Recruitment and retention of experienced staff in Pensions Administration | Problems with recruitment and retention – the need to train people up, the need for continual process re-engineering. Managers of similar age Difficulties in attracting staff to Bradford | Recruitment and retention of staff does not improve | <ul style="list-style-type: none"> • Pressures on existing staff • Activities are ineffectively carried out • Difficulties in succession planning • Pressure to offer more lucrative packages • Reliance on agency/temporary staff • Escalating staff costs • Gaps appear in structures • Adverse impact on service delivery • Loss of experienced staff • Stagnation • Carrying vacancies |
| 24 | C3 | Finance | Finance aren't always involved in other sections' decision making processes | Sections powers v financial responsibility. Sections act independently and don't always ask for advice, increase in delegated powers. Finance section isn't always involved in the decision making process. | Finance is unaware of structures/ approaches | <ul style="list-style-type: none"> • Act 'ultra vires' • Promises made that can't be met |
| 27 | E4 | Competitive | Lack of PIs and overall performance management framework | Local Best Value PIs in Pensions. There are LGPC PIs but they are not adequate to monitor overall performance and a new system needs to be introduced with monitoring as part of service planning. There are competing priorities and every authority is struggling to define PIs. Link with 8 | Don't develop PIs within an overall performance framework | <ul style="list-style-type: none"> • Can't manage performance effectively • Fail to meet explicit objective |

| No | Rating | Cluster | Short name | Vulnerability | Trigger | Consequence |
|-------|--------|-------------------------|--|---|--|---|
| 31(a) | E2 | Finance | External Fraud – Life Certificates | To introduce further measures which may reduce the number of overpaid pensions and potential fraud cases, particularly in the case of un-notified deaths | Further measures not introduced | <ul style="list-style-type: none"> • overpaid pensions • court cases • time commitment • key objective not met |
| 31(b) | D2 | Finance | External Fraud – Returned payments/payslips | To introduce further measures which may reduce the number of overpaid pensions and potential fraud cases, particularly in the case of un-notified deaths | Further measures not introduced | <ul style="list-style-type: none"> • overpaid pensions • court cases • time commitment • key objective not met |
| 31(c) | D3 | Finance | External Fraud – Children in full time education | To introduce further measures which may reduce the number of overpaid pensions and potential fraud cases. | Further measures not introduced | <ul style="list-style-type: none"> • overpaid pensions • court cases • time commitment • key objective not met |
| 35 | F2 | Legislative /Regulatory | Administration of the LGPS | Administer WYPF so as to provide occupational pensions for employees of the participating employers in accordance with statutory requirements Link with 13 | Unable to provide service | <ul style="list-style-type: none"> • key objective not met |
| 36 | E2 | Finance | Maximise Council surplus balances | Maximise the returns from external investment of any surplus cash balances of the Council | | <ul style="list-style-type: none"> • loss of income • key objective not met |
| 40 | D3 | Finance | Governance (Operational) | Expectation clearly set out for all advisors – Fund Managers, Advisors, Custodian, and Actuary | Accounts now have coordinated statements for panel, advisors, performance expectations of dept and the long term funding strategy statement , strategic asset allocation etc. Targets / statements all clear, consistent and in place. WM to measure performance quarterly. In house targets for Q analyses for individual fund managers (ongoing) | <ul style="list-style-type: none"> • Panels, fund managers, advisors operate in an un-coordinated way or set their own parameters for performance • Individuals performance not gauged and remedied where necessary • Sub-optimal performance of investments • Poor long term investment performance • Missing assets • Disputes over title • Late reports • Changes to assumptions mid stream • Targets not set • Timescales not set |
| 41 | C2 | Finance | Pressure on General Fund | Funding level is a fundamental guide to the solvency of the Fund Maturity of the scheme influences the investment strategy adopted Employer contribution rate | Funding level falls to unacceptable level | <ul style="list-style-type: none"> • Low funding level will raise ER's contribution rate • ER's contribution rate unsustainable pressure on LGPS from Central Govt. • Employers cease admitting new members • Employers stop joining the Fund • Then becomes risk 4 |

Appendix RISK MANAGEMENT REPORT

| No | Rating | Cluster | Short name | Vulnerability | Trigger | Consequence |
|----|--------|-------------------------|--|--|--|--|
| 42 | D3 | Finance | Admin costs | Costs / all Fund members SF3 and Cipfa | Poor benchmarking returns | <ul style="list-style-type: none"> Review in-house provision Budget cuts Service cuts Partnership arrangements Bad publicity |
| 43 | D2 | Customer/Citizen | Customer Satisfaction | Level of complaints received Consultation with all stakeholders: What WYPF provides How good is the provision | Unacceptable level of complaints Not seen to act on consultation | <ul style="list-style-type: none"> Fines Bad publicity Shrinking user base |
| 44 | D2 | Technological | Payroll failure | Contingency plans in place | BACS failure UPM system failure Hardware failure | Worst case scenario, around 70,000 53,287 pensions not paid on time |
| 45 | C2 | Political | Industrial Action | Possible industrial action over reforms to LGPS | Ballot in favour of action and no Government intervention | <ul style="list-style-type: none"> Pensions not paid Backlog of work on return Delayed SAP implementation Additional admin work to input strike breaks |
| 46 | D3 | Economic | Admissions and Guarantors | In the past WYPF has had a fairly relaxed policy on admissions which has resulted in bodies being admitted without guarantees if the body was believed to be financially sound | Admitted body with no guarantor or bond – admission agreement comes to its end or is prematurely terminated then the costs of unfunded liabilities met by the Fund itself (i.e. all employers) | <ul style="list-style-type: none"> Increase in employer contribution rate across the Fund Increase in liabilities across the Fund Possible bad publicity |
| 47 | E2 | Technological | Loss of sensitive personal data | Data on laptops/USB devices and data sent by email is encrypted | Loss of data | <ul style="list-style-type: none"> Data falls in the wrong hands and used for criminal purposes Bad publicity Loss of trust and confidence in WYPF |
| 48 | D2 | Finance | Prompt payment of pensions on the due date. | An annual timetable is prepared showing key dates when stages of payroll have to be done by to ensure payment is made on pay date | BACS Failure Problems encountered at key stages delaying follow on stages | <ul style="list-style-type: none"> Pensioners not getting paid on time Cause financial hardship Damage to WYPF reputation Increase in number of complaints. Callers/Visitors |
| 49 | D2 | Managerial/Professional | Key staff on long term absence | The absence of key staff who specialise in a particular role and there is no immediate deputy to cover in their absence | Absence Management | <ul style="list-style-type: none"> Impact on service provision (Staff, Employers, Scheme Members etc) Crucial tasks are not performed |
| 50 | D3 | Managerial/Professional | Access to sensitive/personal data by staff | All new staff undergo a DBS check, Access to certain records is restricted | Where DBS checks reveal a relevant conviction | <ul style="list-style-type: none"> Information could be passed on Records updated inappropriately Contravene DP Act |
| 51 | E2 | Financial | Failure to obtain ISAE 3402 reports from Hedge Fund and Currency Fund Managers | Wouldn't know what risks are being taken and what controls they have in place | Failure to obtain reports | <ul style="list-style-type: none"> Funds might go bust resulting in losses for the Fund |
| 53 | E3 | Partnership/Contractual | Fire Pension Scheme Administration | WYPF administers the Fireman's Pensions Scheme on behalf of 11 Fire Authorities | Lose contracts | <ul style="list-style-type: none"> Will not be able to provide a pensions administration service to the FA's Will not be able to pay pensions or process work ICT systems not available Damage to WYPF Reputation Bad publicity |

| No | Rating | Cluster | Short name | Vulnerability | Trigger | Consequence |
|----|--------|-------------------------|---|---|---|---|
| | | | | | | <ul style="list-style-type: none"> • Loss of income |
| 55 | B2 | Political | Impact of Government Budget cuts | Cuts in Local Authority budgets will lead to a reduction in workforce. | Increase in member contribution rate | <ul style="list-style-type: none"> • Increase in opt outs from the scheme • Reduction in public sector workforce leading to reduction in pension scheme membership • Possible strike action |
| 56 | D2 | Financial | Monthly Contribution Returns | This has replaced annual returns and will lead to greater efficiencies. | The LGPS 2014 and the move to a career average scheme | <ul style="list-style-type: none"> • Salary details will not be posted to members records • Benefits will not be able to be calculated accurately • IT systems will not be action the returns from Employers • Timescales not met |
| 57 | D1 | Partnership/Contractual | Lincolnshire and LB of Hounslow Pension Fund Shared Service | To provide a pensions administration Shared Service from 1 April 15 (LPF) and 1 August 18 (LB of Hounslow) | Collaborative working with other Pension Funds | <ul style="list-style-type: none"> • Will not be able to provide a pensions administration service to LPF or LB of Hounslow • Will not be able to pay pensions or process work • ICT systems not available • Damage to WYPF Reputation • Bad publicity • Loss of income |
| 61 | D3 | Financial | Employers deficits | Managed through assumptions used at valuation. Employers monitored at regular intervals for membership changes. | Employer's deficits/ liabilities are large amounts and employers are not able to pay when exiting the Fund. | <ul style="list-style-type: none"> • The liabilities at exit which are not meet by the employer will be passed on to all the other employers in the fund through the next triennial valuation. |
| 62 | D2 | Technological | Cyber Crime | A cyber attack will put data at risk and data may fall in the wrong hands. | A successful cyber attack | <ul style="list-style-type: none"> • Vulnerable to extortion • Damage to WYPF reputation • Impact on service delivery • Bad publicity • Fines by tPR |
| 63 | D1 | Legislative /Regulatory | Compliance with GDPR requirements | Documents and processes are not updated with requirements. | A breach of GDPR | <ul style="list-style-type: none"> • Massive fines by the ICO • Damage to WYPF reputation • Bad publicity • Loss of contracts |
| 64 | C2 | Legislative | LGPS regulation changes due to McCloud ruling | Benefits paid to member (or in respect of) are incorrect (underpaid) | Regulation changes | <ul style="list-style-type: none"> • Large volume of recalculations • Underpayment of pension benefits • Recalculations not done in a timely manner |

Appendix K

WYPF Pension Board – Knowledge and Understanding Framework

1. Legislative requirements

- 1.1 In accordance with the Pensions Act 2004, every individual who is a member of a pension board must be conversant with:
 - 1.1.1 the rules of the Local Government Pension Scheme (LGPS), in other words the regulations and other regulations governing the LGPS (including the Transitional Regulations, earlier regulations and the Investment Regulations), and
 - 1.1.2 any document recording policy about the administration of the fund which is for the time being adopted in relation to the fund.
- 1.2 Board members should also have knowledge and understanding of:
 - 1.2.1 the law relating to pensions, and
 - 1.2.2 SUCH other matters as may be prescribed.
- 1.3 Board members' legal responsibilities begin from the day they take up their role and therefore they should immediately start to familiarise themselves with the documents as referred to in Appendix A and the law relating to pensions.
- 1.4 Board members must ensure they have the appropriate degree of knowledge and understanding to enable them to properly exercise their functions as a member of the board.
- 1.5 Board members are required to be able to demonstrate their knowledge and understanding and to refresh and keep their knowledge up to date. Board members should maintain a written record of relevant training and development.
- 1.6 The Scheme Manager is required to maintain and develop the framework.

2. Degree of knowledge and understanding

- 2.1 Being conversant with the rules of the LGPS and any documents recording policy about the administration of the fund means having a working knowledge so they can be used effectively when carrying out their role of assisting the administering authority.
- 2.2 Board members should understand the rules and documents in enough detail to know where they are relevant to an issue and where a particular provision or policy may apply. Details of West Yorkshire Pension Fund's (WYPF) policies etc. can be found at Appendix A.
- 2.3 The rules of the LGPS include the LGPS Regulations, Investment Regulations, Transitional Regulations (including earlier regulations as defined in the transitional regulations) to the extent they remain applicable, and any statutory guidance referred to in the regulations.
- 2.4 To ensure knowledge and understanding of the pension board is maintained, 50% of the board will be appointed on a two-year rolling basis. Any member replaced before the expiry of their normal term will serve for the remainder of that term only, when they will be eligible to service for further full terms in accordance with the terms of reference.

3. Induction training

- 3.1 As part of the induction training, board members are required to undertake the Pensions Regulator's online toolkit training. This training will enable board members to learn about meet the minimum level of knowledge and understanding introduced in the Pensions Act 2004.
- 3.2 The toolkit included nine Essential Learning for Trustee compulsory modules and seven Public Sector Toolkit compulsory learning modules.
- 3.3 The nine Essential Learning for Trustees compulsory modules test pension board members' knowledge in the following areas.
 - 3.3.1 Introducing pension schemes

- 3.3.2 The trustee's role
- 3.3.3 Running a scheme
- 3.3.4 An introduction to investment
- 3.3.5 How a defined benefit scheme works
- 3.3.6 Funding your defined benefit scheme
- 3.3.7 Defined benefit recovery plans. Contributions and funding principles
- 3.3.8 Investment in a defined benefit scheme
- 3.4 The seven Public Sector Toolkit compulsory modules test pension board member knowledge in the following key areas.
 - 3.4.1 Conflicts of Interest
 - 3.4.2 Managing risk and internal controls
 - 3.4.3 Maintaining accurate member data
 - 3.4.4 Maintaining member contributions
 - 3.4.5 Providing information to members and others
 - 3.4.6 Resolving internal disputes
 - 3.4.7 Reporting breaches of the law
- 3.5 The Pensions Regulator website is **www.thepensionsregulator.gov.uk/public-service-schemes.aspx**
- 3.6 A document which will help identify training needs and be used to record and reflect on the training once completed can be found at **www.thepensionsregulator.gov.uk/docs/PS-assessing-your-learning-needs.doc**

4. Training

- 4.1 Board members are expected to attend regular training events.
- 4.2 In addition to the Pensions Regulator Toolkit, pension board members will be invited to undertake training and development as detailed in the CIPFA Knowledge and Skills framework.
- 4.3 Training will be delivered through a variety of methods including:
 - 4.3.1 in-house training days provided by officers and/or external providers
 - 4.3.2 training as part of meetings provided by officers and/or external advisers
 - 4.3.3 external training events
 - 4.3.4 circulation of reading material
 - 4.3.5 attendance at seminars and conferences offered by industry-wide bodies, and
 - 4.3.6 links to online training.

5. CIPFA Knowledge and Skills Framework

- 5.1 In an attempt to determine the right skill set involved in decision making CIPFA has developed a technical knowledge and skills framework
- 5.2 In total there are six areas of knowledge and skills identified as the core technical requirements for those working in public sector pensions:
 - 5.2.1 pensions legislative and governance context
 - 5.2.2 pensions accounting and auditing standards

- 5.2.3 financial services procurement and relationship management
 - 5.2.4 investment performance and risk management
 - 5.2.5 financial markets and products knowledge, and
 - 5.2.6 actuarial methods, standards and practices.
- 5.3 Training Needs Analysis can be used to help assist board members and scheme managers to identify areas of the CPIFA Knowledge and Understanding Framework where training is required.

Appendix A

Documented policies you must have a working knowledge of.

| Member and employer information | Location |
|--|--|
| Member booklets, announcements and other key member and employer communications, which describe the fund's policies and procedures, including AVC guides). | www.wypf.org.uk |
| Relevant policies | |
| Conflicts of Interest Policy | www.wypf.org.uk/Member/PensionBoard/WYPF/PensionBoard_WYPF_Index.aspx |
| Internal Dispute Resolution Procedure | www.wypf.org.uk/Member/Publications/Booklets |
| Reporting of Breaches Procedure | www.wypf.org.uk/Member/PensionBoard/WYPF/PensionBoard_WYPF_Index.aspx |
| WYPF policy statements | |
| Statement of Investment Principles | |
| Funding Strategy Statement | |
| Pensions Administration Strategy | www.wypf.org.uk/Member/Publications/policyStatements |
| Communication Policy | |
| Governance Compliance Statement | |
| WYPF Discretionary Policy Statement | Supplied on request |
| Others | |
| actuarial valuation Report and Rates and Adjustment Certificate | www.wypf.org.uk/Member/publications/Valuation |
| WYPF Risk Register | Supplied on request |
| Annual Report and Accounts | www.wypf.org.uk/Member/Publications/ReportAndAccounts |
| Investment management and activity | www.wypf.org.uk/Member/Investments |

Appendix B

Pension Knowledge and Understanding training analysis

| | Training required Yes/No | Date training received |
|--|--------------------------|------------------------|
| Background and understanding of the legislative framework of the LGPS | | |
| <ul style="list-style-type: none"> • Differences between public service pension schemes like the LGPS and private sector trust-based schemes • Role of the IPSPC and its recommendations • Key provisions of the 2013 Act • The structure of the LGPS and the main bodies involved including the responsible authority, the administering authority, the Scheme Advisory Board, the local pension board and the LGPS employers • An overview of local authority law and how administering authorities are constituted and operate • LGPS rules overview (including the regulations, the transitional regulations and the investment regulations) | | |
| General pensions legislation applicable to the LGPS | | |
| <ul style="list-style-type: none"> • Automatic enrolment (Pensions Act 2008) • Contracting out (Pension Schemes Act 1993) • Data protection (Data Protection Act 1998) • Employment legislation including anti-discrimination, equal treatment, family-related leave and redundancy rights • Freedom of information (Freedom of Information Act 2000) • Pensions sharing on divorce (Welfare Reform and Pensions Act 1999) • Tax (Finance Act 2004) • IORP Directive | | |
| Role and responsibilities of the local pension board | | |
| <ul style="list-style-type: none"> • Role of the local pension board • Conduct and conflicts • Reporting of breaches • Knowledge and understanding • Data protection | | |
| Role and responsibilities of the administering authority | | |
| <ul style="list-style-type: none"> • Membership and eligibility • Benefits and the payment of benefits • Decisions and discretions • Disclosure of information • Record keeping • Internal controls • Internal dispute resolution • Reporting of breaches • Statements, reports and accounts | | |

| | Training required Yes/No | Date training received |
|---|--------------------------|------------------------|
| Funding and Investment | | |
| <ul style="list-style-type: none"> • Requirement for triennial and other valuations • Rates and adjustments certificate • Funding strategy statement • Bulk transfers • Permitted investments • Restrictions on investments • Statement of investment principles • CIPFA guidance • Appointment of investment managers • Role of the custodian | | |
| Role and responsibilities of scheme employers | | |
| <ul style="list-style-type: none"> • Explanation of different types of employers • Additional requirements for admission bodies • Automatic enrolment • Deduction and payment of contributions • Special contributions • Employer decisions and discretions • Redundancies and restructuring (including the Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006) • TUPE and outsourcing (including Fair Deal and the Best Value Authorities Staff Transfers (Pensions) Direction 2007) | | |
| Tax and contracting out | | |
| <ul style="list-style-type: none"> • Finance Act 2004 • Role of HMRC • Registration • Role of 'scheme administrator' • Tax relief on contributions • Taxation | | |
| Role of advisers and key persons | | |
| <ul style="list-style-type: none"> • Officers of the administering authority • Fund actuary • Auditor • Lawyers • Investment managers • Custodians • Administrators – in house versus third party • Procurement of services • Contracts with third parties | | |

| | Training required Yes/No | Date training received |
|--|--------------------------|------------------------|
|--|--------------------------|------------------------|

Key bodies connected to the LGPS

An understanding of the roles and powers of:

- Courts
- Financial Services Authority
- HMRC
- Information Commissioner
- Pensions Advisory Service
- Pensions Ombudsman
- The Pensions Regulator

Appendix L

WYPF Pension Board – Terms of Reference

1. Introduction

- 1.1 City of Bradford Metropolitan District Council (referred to as 'the council'), as scheme manager, as defined under section 4 of the Public Service Pensions Act 2013, has delegated legal and strategic responsibility for West Yorkshire Pension Fund (WYPF) to the Governance and Audit Committee. The council has established two bodies to assist and support the Governance and Audit Committee in overseeing the fund, namely the WYPF Investment Advisory Panel and the WYPF Joint Advisory Group.
- 1.2 In accordance with section 5 of the Public Service Pensions Act 2013 (the Act) and under 106 of the Local Government Pension Scheme Regulations 2013 (as amended) (the Regulations), the council is required to establish a pension board. The WYPF Pension Board is separate from the WYPF Investment Advisory Panel and the WYPF Joint Advisory Group.
- 1.3 This document sets out the terms of reference for the WYPF Pension Board.

2. Objectives

- 2.1 The role of the pension board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 is to assist the council as scheme manager in ensuring the effective and efficient governance and administration of the LGPS including:
 - 2.1.1 securing compliance with the Local Government Pension Scheme regulations and any other legislation relating to the governance and administration of the LGPS
 - 2.1.2 SECURING compliance with the requirements imposed in relation to the LGPS by the Pensions Regulator, and
 - 2.1.3 any other such matters as the LGPS regulations may specify.

3. Establishment

The Board is established on 1 April 2015 subsequent to approval by the Governance and Audit Committee on 20 March 2015.

4. Membership and appointment for pension board members

- 4.1 Membership of the pension board shall be eight in number. The pension board will consist of equal numbers of member and employer representatives.
- 4.2 Pension board representatives must not participate in or act as members of the Joint Advisory Group or Investment Advisory Panel.

5. Employer representatives

- 5.1 Employers who participate in the fund will nominate four representatives to sit on the pension board as employer representatives from the following sources.
 - 5.1.1 Three representatives will be from West Yorkshire councils, one of these three will be appointed in accordance with 7.1 below.
 - 5.1.2 One representative will be from the other employing bodies. This representative shall be selected by City of Bradford MDC following a process where all employers will be asked to submit their interest in undertaking this role.

6. Member representatives

- 6.1 Member representatives shall either be scheme members or have capacity to represent scheme members of WYPF
- 6.2 Relevant trade unions, who have agreed to represent all categories of the membership, will nominate four representatives to sit on the pension board as member representatives.

7. The chair

- 7.1 The Council as scheme manager will appoint one councillor from the City of Bradford Metropolitan District Council, independent of Joint Advisory Group, Investment Advisory Panel or Governance and Audit Committee, to sit as the chair on the pension board

7.2 The chair of the board shall:

- 7.2.1 ensure that the board delivers its purpose as set out in these terms of reference
- 7.2.2 ensure that meetings are productive and effective and that opportunity is provided for the views of all members to be expressed and considered, and
- 7.2.3 SEEK to reach consensus and ensure that decisions are properly put to a vote when it cannot be reached. Instances of a failure to reach a consensus position will be recorded and published.

8. Attendance at meetings

8.1 Each pension board member should endeavour to attend all pension board meetings during the year. In the event of consistent non-attendance by any pension board member then the tenure of the membership should be reviewed at the next pension board meeting.

9. Term of office/appointment

- 9.1 Subject to paragraph 5.2, pension board representatives will normally serve for a period of four years and may be reappointed to serve further terms so long as they remain relevant members (pursuant to paragraph 4 above).
- 9.2 Upon initial establishment of the board in 2015 50% of members (comprising of two member representatives and two employer representatives) shall be appointed for a term of only two years in order to establish appointment on a rolling basis.
- 9.3 Employer bodies and organisations retain the right to withdraw representatives and identify replacements on occasion.
- 9.4 Pension board members may be reappointed without limitation on terms subject to the pension board being satisfied as to the transparency and proper application of the appointment process in use.

10. Termination

- 10.1 Other than by ceasing to be eligible a pension board member may normally only be removed from office during a term of appointment by the agreement of the board.
- 10.2 Board membership may be terminated prior to the end of the term of office due to:
 - 10.2.1 a member representative no longer being a representative of the body on which their appointment relied
 - 10.2.2 an employer representative no longer holding the office or employment or being a member of the body on which their appointment relied.
 - 10.2.3 a board member no longer being able to demonstrate their capacity to attend and prepare for meetings or participate in required training.
 - 10.2.4 the representative being withdrawn by the nominating body and a replacement identified.
 - 10.2.5 a board member has a conflict of interest which cannot be managed in accordance with the board's conflict policy.
 - 10.2.6 a board member who is an elected member becomes a member of Joint Advisory Group and Investment Advisory Panel.
 - 10.2.7 a board member who is an officer of City of Bradford MDC becomes responsible for the discharge of any function of the administering authority under the LGPS regulations.

11. Number of meetings

- 11.1 The pension board will normally meet twice a year. The chair may call meetings more frequently if deemed necessary or if requested on matters considered urgent.
- 11.2 In exceptional circumstances, meetings can be conducted via communications between members of the board including telephone conferencing and emails.

12. Creation of working groups/sub boards

12.1 The pension board may establish sub-committees and working groups as and when required. The pension board will be responsible for developing and agreeing the terms of reference and membership of any sub-committees. The pension board will also be responsible for outlining the purpose of any working group, its membership and detailing when and how that working group should report back.

13. Code of conduct and conflicts of interest policy

13.1 The principles included in the council's code of conduct for members applies to all members of the pension board. The code of conduct is set out in part 4 of the council's constitution: http://www.bradford.gov.uk/bmdc/government_politics_and_public_administration/about_bradford_council/council_constitution

13.2 No person may be appointed to the pension board that has a significant conflict of interest. A conflict of interest is defined as a financial or other interest which is likely to prejudice a person's exercise of functions as a member of the pension board. It does not include a financial or other interest arising merely by virtue of that person being a member of the scheme or any connected scheme for which the board is established.

13.3 All voting members of the pensions board must complete a declaration of acceptance of office form, and a disclosure of financial and other interest form.

13.4 At each meeting any interests which may lead to conflicts in specific agenda items must be declared.

14. Voting rights

14.1 All representatives on the pension board have equal voting rights. Decisions made by the pensions board shall be on a majority basis. In the event of there not being a majority the chair shall have the casting vote.

15. Other attendees

15.1 The pensions board will extend an invitation to attend to other members of staff and advisers as it may from time to time consider appropriate.

16. Secretariat services to the board

16.1 Pension board meetings will be administered by City of Bradford MDC Committee secretariat in accordance with the rules and procedures of City of Bradford MDC 'Constitution of the council and Executive Arrangements'. All reasonable costs will be met by the fund.

17. Agenda

17.1 Prior to each meeting the Director – West Yorkshire Pension Fund will arrange to supply all members of the board with an agenda and relevant information. The agenda and any relevant documents will be issued at least five working days in advance of the meeting, except in exceptional circumstances with the agreement of the chair.

18. Quorum

18.1 The quorum of the pension board shall be three (chair plus one employer representative and one member representative).

19. Publication

19.1 In accordance with the act, the council shall publish information about the board to include:

19.1.1 the names of Board members and their contact details

19.1.2 the representation of employers and member on the board

19.1.3 the role of the board

19.1.4 these terms of reference

20. Allowances/expenses

20.1 No member or representative of the pension board shall be remunerated for undertaking this role. However, expenses incurred in attending meetings of the board and attending training events, shall be reimbursed to all members and the cost will be met by the fund.

21. Knowledge and understanding and capacity of representative members

21.1 Every individual who is a member of the pension board must be conversant with:

21.1.1 the rules of the LGPS, in other words the regulations and other regulations governing the LGPS (such as the Transitional Regulations and the Investment Regulations)

21.1.2 the requirements of The Pensions Regulator

21.1.3 any document recording policy about the administration of the fund which is for the time being adopted in relation to the fund, and have knowledge and understanding of:

- the law relating to pensions, and
- such other matters as may be prescribed.

21.2 A Knowledge and Understanding Policy and Framework will be maintained by WYPF.

21.3 Pension Board members shall attend and participate in training arranged in order to meet and maintain the requirements set out in the Knowledge and Understanding Policy and Framework.

21.4 Employer and member representatives should be able to demonstrate their capacity to attend and complete the necessary preparation for meeting and participate in training as required.

22. Accountability

22.1 The board should in the first instance report its requests, recommendations or concerns to the committee. In support of this any member of the board may attend a committee meeting as an observer.

22.2 The board should report any concerns over a decision made by the committee subject to the agreement of at least 50% of voting board members provided that all voting members are present. If all voting members are not present then the agreement should be of all voting members who are present, where the meeting remains quorate.

22.3 On receipt of a report the committee shall within a reasonable period, consider and respond to the board.

22.4 Where the board is not satisfied with the response received it may request that a notice of its concern be placed on the website and in the fund's annual report.

22.5 Where the board is satisfied that there has been a breach of regulation which has been reported to the committee and has not been rectified within a reasonable period of time it is under an obligation to escalate the breach.

22.6 The appropriate internal route for escalation is to the administering authority monitoring officer.

23. Budget

23.1 The pension board is to be provided with adequate resources to fulfil its role. The council will allocate an annual budget to cover the expenses of the board.

24. Core functions

24.1 The first core function of the board is to assist the council in securing compliance with the regulations, any other legislation relating to the governance and administration of the scheme, and requirements imposed by The Pensions Regulator in relation to the scheme.

24.2 The second core function of the board is to assist the council to ensure the effective and efficient governance and administration of the scheme.

24.3 In support of its core functions the board may make a request for information to the Committee with regard to any

aspect of the council's function. Any such request should be reasonably complied with in both scope and timing.

24.4 In support of its core functions the board may make recommendations to the Committee which should be considered and a response made to the board on the outcome within a reasonable period of time.

25. Data protection

25.1 The pension board is considered a committee of and part of the council's legal entity. The council is and remains the data controller responsible for DPA compliance, including for processing carried out by the pension board, where processing is carried out as a data controller, or where personal data use by the Pension Board is not carried out for and on behalf of any other separate legal entity.

25.2 The pension board will therefore adhere to the data protection policies of the council.

26. Review of terms of reference

26.1 These terms of reference shall be reviewed on each material change to those parts of the regulations covering local pension boards and at least every two years.

26.2 These terms of reference were adopted on 20 March 2015 on behalf of the council (Governance and Audit Committee).



Report of the Director, West Yorkshire Pension Fund, to the meeting of West Yorkshire Pension Fund Pension Board to be held on 14 September 2021.

G

Subject:

West Yorkshire Pension Fund five-year internal audit plan 2021/22 to 2025/26

Summary statement:

This report presents the latest five year internal audit plan for West Yorkshire Pension Fund (WYPF). The plan is reviewed annually between WYPF finance team and CBMDC internal audit by carrying out a detailed assessment of WYPF business risks, pensions and investment regulatory compliance environments, and service developments.

The latest plan has been reworked to take account of Covid-19 impact on services and operations. It is also anticipated that internal audit resources may be moved at short notice to support high risk areas. In order to manage audit work plan, address emerging risks and maintain sector intelligence there is a regular monthly meeting between CBMDC Internal Audit Manager and WYPF Financial Controller; and a quarterly meeting with the Director of WYPF.

Rodney Barton
Director WYPF

Portfolio:

Report Contact: Ola Ajala
Financial Controller WYPF
Phone: (01274) 434 534
E-mail: ola.ajala@wypf.org.uk

Overview & Scrutiny Area:

1 SUMMARY

- 1.1 This report presents the latest annual internal audit plan 2021/22 and 5 year plan. We reviewed a number of key service areas in terms of business and operational risks, with specific focus on new statutory and compliance areas. As in previous years we are also looking at both inherent and emerging risks.
- 1.2 In 2018/19 we increased internal audit resources and as a result we are conducting more in depth internal audit reviews, engaging more with Northern LGPS partners on issues and we also hold more frequent business review meetings with internal auditors to improve business knowledge and intelligence, resulting in improved internal audit service quality and best practise for WYPF.
- 1.3 All internal audit recommendations in 2020/21 were delivered within agreed timescales. In addition to the five year plan we also meet with Internal Audit to agree a detailed resource plan for each audit during the financial year allowing CBMDC internal audit and WYPF service managers to deliver all internal audit reviews planned in the year. To conclude each year's internal audit plan we review internal audit recommendations, which provides key governance information on risk management and control.

Key information provided in this report are:

- a) WYPF Five-year internal audit plan 2021/22 to 2025/26
- b) List of internal audits completed during 2021/22

2 WYPF Annual Internal audit plan 2021/22

- 2.1 This year we planned to carry out 13 separate audits, we delivered 11 in 2020/21. Occasionally the number of audit reviews are increased to address emerging risks, in 2019/20 a total of 13 reviews were carried out. High risk service areas such as UK and Overseas Equities are repeated each year, medium risk services are covered within two to three years and low risk areas are covered within four to five years. There is adequate resource to deliver one-off service reviews by Internal Audit. We hold monthly risk management review meetings and at the meeting we review service activities and consider the need to refocus audit activities to cover emerging service risks. This approach has improved internal audit engagements, ensuring service improvements and improved risk management.
- 2.2 Our service target is to improve on internal audit opinions and recommendations, by working with CBMDC internal audit, to review, strengthen controls and anticipate key operational and regulatory changes. In order to maintain quality of audit reviews finance officers are working with managers to look at previous recommendations to ensure current improved controls remain effective, and where controls are identified as insufficient, managers and finance officers work with CBMDC internal audit to design and implement improved controls.

2.3 In light of the Covid-19 impact on our services we have added business continuity to our plan for 2021/21. We are also looking at:

- Fraud scams
- Shared service admissions
- Northern LGPS collaboration on private equities

2.4 Detailed internal audit plan.

| West Yorkshire Pension Fund Five Year Audit Plan 2021 - 2026 | Frequency | Last Audit | Recommendations | Days | 21/22 | 22/23 | 23/24 | 24/25 | 25/26 |
|--|------------------|------------|-----------------|-----------|------------|------------|------------|------------|------------|
| Liaison work with management | | | | 10 | Yes | Yes | Yes | Yes | Yes |
| Annual Accounts Verification | Annual | Sep/20 | 1 | 10 | Yes | Yes | Yes | Yes | Yes |
| | | | | | | | | | |
| Benefits | | | | | | | | | |
| Local Government Scheme Contributions | Every 2 Years | Nov/18 | 0 | 20 | Yes | | Yes | | |
| New Pensions and Lump Sums - WYPF | | | | | | | | | |
| - Normal and Early Retirements | 5 Yearly | Oct/19 | 1 | 25 | | | | Yes | |
| - Death in Service, Post Retirement Widow and Dependent Benefits | 5 Yearly | Mar/17 | 0 | 25 | Yes | | | | |
| - Ill Health Pensions | 5 Yearly | Feb/19 | 1 | 25 | | | Yes | | |
| - Flexible Retirements | 5 Yearly | Nov/20 | 2 | 25 | | | | | Yes |
| - Deferred Pensions | 5 Yearly | Mar/18 | 0 | 25 | | Yes | | | |
| Transfers Out | 3 Yearly | Oct/20 | 0 | 20 | | | | | Yes |
| Transfers In | 3 Yearly | Oct/19 | 2 | 20 | Yes | | | Yes | |
| Reimbursement of Agency Payments | 5 Yearly | Mar/18 | 2 | 20 | | Yes | | | |
| Life Existence / Certificates | 5 Yearly | Oct/15 | 0 | 20 | | | | | Yes |
| AVC Arrangements | 5 Yearly | Sep/17 | 0 | 20 | | Yes | | | |
| Admission of New Bodies | 5 Yearly | Feb/20 | 0 | 20 | | | | Yes | |
| Pensioners Payroll | Twice in 5 Years | Nov/20 | 0 | 25 | | | Yes | | Yes |
| Purchase of Additional Pension | 5 Yearly | Mar/17 | 2 | 20 | Yes | | | | |
| Annual Benefits Statements | Twice in 5 Years | Mar/20 | 0 | 20 | | Yes | | Yes | |
| Fire Service New Pensions and Lump Sums | Twice in 5 years | Dec/20 | 1 | 20 | | | Yes | | Yes |
| - Normal and Early Retirements | 3 Yearly | | | 20 | | Yes | | | Yes |
| - Ill Health and Death Benefits | 3 Yearly | | | 20 | | | Yes | | |
| - Deferred Pensions | 3 yearly | | | 20 | | | | Yes | |
| | | | | | | | | | |
| Investments | | | | | | | | | |
| UK and Overseas Equities | Annual | Mar/20 | 0 | 15 | Yes | Yes | Yes | Yes | Yes |
| UK Fixed and Index Linked Public and Corporate Bonds | 3 Yearly | Sep/19 | 0 | 15 | | Yes | | Yes | |
| UK and Overseas Unit Trusts (Property and Other) | 3 Yearly | Mar/20 | 1 | 15 | | Yes | | Yes | |
| Fund of Hedge Funds | 5 Yearly | Jun/16 | 1 | 15 | | | | | Yes |

| West Yorkshire Pension Fund Five Year Audit Plan 2021 - 2026 | Frequency | Last Audit | Recommendations | Days | 21/22 | 22/23 | 23/24 | 24/25 | 25/26 |
|---|------------------|-------------------|------------------------|-------------|--------------|--------------|--------------|--------------|--------------|
| UK and Overseas Private Equities | 3 Yearly | Jun/19 | 3 | 15 | Yes | | | Yes | |
| Global Bonds | 5 Yearly | Dec/18 | 0 | 15 | | | Yes | | |
| Treasury Management (Short Term Cash Lending) | Annual | Dec/19 | 0 | 15 | Yes | Yes | Yes | Yes | Yes |
| Stock Lending | 5 Yearly | Oct/17 | 1 | 15 | Yes | | | | |
| Compliance with IAP Investment Decisions and Policies | 3 Yearly | Nov/16 | 0 | 15 | | | Yes | | Yes |
| Verification of Assets | 5 Yearly | Jan/18 | 0 | 15 | | | | | Yes |
| NLGPS Collaborative Work - NPEP | New | New | | 20 | Yes | | | | |
| | | | | | | | | | |
| Other Audits | | | | | | | | | |
| Counter Fraud Work | New | New | | 15 | Yes | | | | |
| Business Continuity | New | New | | 20 | Yes | | | | |
| Shared Service Partner Admission | New | New | | 25 | Yes | | | | |
| Transfer of Data to New Pensions System | | Jul/12 | 0 | | | | | | |
| Monthly Contribution Data Usage | | Aug/15 | 6 | | | | | | |
| Information Governance Including GDPR | | May/19 | 7 | | | | | | |
| Transfer of Data From Outside Bodies | | Jun/19 | 6 | | | | | | |
| Pooling Arrangements | | Mar/19 | 1 | | | | | | |
| Custodial Transfer Arrangements | | Jul/20 | 0 | 20 | | | | | |
| Accuracy of Contributions Recorded on Member Records | | Feb/20 | 7 | 20 | | | | | |
| GLIL | | Jul/20 | 1 | 15 | | | | | |
| ISAE 3402 (Support Work) | | 2018/19 | | 15 | | | | | |
| WYPF ICT | | | | 15 | | Yes | | | |
| | | | | | | | | | |
| Contingency | | | | 15 | Yes | Yes | Yes | Yes | Yes |
| No of Audits | | | | | 13 | 11 | 10 | 11 | 12 |
| Days | | | | Days | 260 | 215 | 205 | 215 | 240 |

3 Internal Audits completed during 2020/21

Listed below is a summary of reviews that were carried out during the financial year 2020/21.

Transfer of Custodial Arrangements

- 3.1 This piece of work looked at the high level controls in place to manage the transfer of assets to the new custodial provider, the Northern Trust Bank. No issues were identified as a result of this audit.

Pensioners Payroll

- 3.2 The pensioner's payroll process was reviewed, the majority of these payments are made, mainly on a monthly basis, to almost 141,000 pensioners. The process was

found to be well controlled and did not result in any recommendations being made.

New Pensions and Lump Sums Flexible Retirements

- 3.3 This audit examined the calculation of the annual pension and the lump sum following a member's decision to retire on a flexible basis. The standard of control in this process was found to be good, with two recommendations for improvement being made and implemented. We are monitoring the new controls to ensure delivery of required improvements and where necessary we will redesign these controls.

Transfers Out

- 3.4 This was an audit of the risks to the process where individuals cease to be employed by an admitted body of the West Yorkshire Pension Fund and transfer their pension benefits into a new pension scheme. The control environment was found to be of an excellent standard with no recommendations arising from the work carried out.

Review of the West Yorkshire Pension Fund 2019/20 Accounts

- 3.5 This is an annual account review process, that ensures the final account is consistent with internal control reviews carried out by our Internal Audit Team during the year.

New Pensions and Lump Sums Fire and Rescue Authorities

- 3.6 West Yorkshire Pension Fund provides an administration service for the payment of nineteen fire and rescue authority pensions. This audit examined the calculation of the annual pension and the lump sum following a Fire Pension member's decision to retire. The control environment was largely as required resulting in one recommendation for improvement and implemented. We are monitoring the new control to ensure delivery of required improvements and where necessary we will redesign the control.

Equities

- 3.7 Since November 2019, all quoted investments are now held under the custody of the Northern Trust Bank (previously HSBC), and represent a significant proportion of the West Yorkshire Pension Fund investment portfolio, the annual audit review of this asset class found the process to be well controlled.

Treasury Management

- 3.8 This audit reviewed the arrangements in place for Treasury Management, to ensure that surplus cash is invested in the most appropriate ways. Controls in this area were found to be excellent.

4 OTHER CONSIDERATIONS

- 4.1 Internal audit is an integral part of our risk management and financial control systems.

5 FINANCIAL & RESOURCE APPRAISAL

- 5.1 There are no other financial implications from this report. Operations reported in this report are key to our financial controls, asset safeguards and value for money.

6 RISK MANAGEMENT AND GOVERNANCE ISSUES

6.1 Internal audit is a key element of financial risk management and governance tools and provides evidence of key controls in operation during the financial year.

7 LEGAL APPRAISAL

7.1 There are legal implications for this report.

8 OTHER IMPLICATIONS

None

9 RECOMMENDATION

- That this reviewed and report is noted.

10 APPENDICES

None



Report of the Director, West Yorkshire Pension Fund, to the meeting of the WYPF Local Pension Board to be held on 14 September 2021.

H

Subject: West Yorkshire Pension Fund (WYPF) production of annual benefit statements for members 2021.

Summary statement:

This report updates the Local Pension Board on WYPF annual benefit statement (ABS) production project 2021 for all members entitled to receive an ABS for the calendar year 2021.

Local government pension schemes (LGPS) funds are required to provide active, deferred, deferred pensioners and credit members with an annual benefit statement, within five months of the fund's scheme year end of 31 March, therefore a deadline of 31 August 2021.

Specific legislative requirement is provided by Regulation 89 of the LGPS Regulations 2013

Management confirm that WYPF has complied with LGPS Regulations 2013 on ABS.

In order to manage our carbon footprint and increase our digital service offering to members and employers we have moved our ABS production to online. Members are encouraged to register for our online service for members "MyPension" to access their ABS.

Recommendation

The Pension Board note this report

Rodney Barton
Director WYPF

Portfolio:

Report Contact: Ola Ajala
Financial Controller WYPF
Phone: (01274) 434 534
E-mail: ola.ajala@wypf.org.uk

Overview & Scrutiny Area:

1 SUMMARY

- 1.1 In addition to the primary legislative requirements of the LGPS 2013 Regulations, The Pension Regulator (tPR) also requires all LGPS funds to meet the 31 August deadline each year and where a fund significantly breach this requirement, the fund must self-report the fact to the tPR and a plan of action that will remedy such failure as soon as possible.
- 1.2 As of 31 August 2021 WYPF performance report on ABS 2021:

| Annual benefit statements 2021 | | | | |
|---|---------------|-----------------|----------------|----------------|
| | Active | Deferred | Total | |
| WYPF members 31 March 2021 | 93,292 | 84,125 | 177,417 | 177,417 |
| Waiting for data and response to queries from employers | -338 | | -338 | |
| On going pension administration work by WYPF | -207 | -627 | -834 | |
| | | | | -1,172 |
| Number of cases to be produced | 92,747 | 83,498 | 176,245 | 176,245 |
| Number of cases produced | 92,739 | 83,488 | 176,227 | 99.99% |
| Cases in production | 8 | - | 8 | 0.00% |

- 1.3 With the continued impact of Covid-19 and staff working from home, the result of the 2021 ABS project, is that 99.992% of statements were issued by the deadline of 31 August 2020, this is equivalent to 100%. Of the 1,172 cases still being worked on, 338 are due to late data from employers and complex cases that need further investigation. This is less than 1% of 177,417 members entitled to ABS in 2021 and as such not significant, therefore we do not need to self-report this as a breach to tPR.
- 1.4 We produce ABSs until January preceding the scheme year end. This is to allow late data notifications from employers and complex cases to be dealt with as far as possible. We anticipate that all the 1,172 complex and data notification cases above will be reduced to a handful by 31 January 2022.
- Shared services ABS production 2021**
- 1.5 In addition to the WYPF case, we also produce ABS for other funds, the overall result is provided below:

| Annual benefit statements 2020 for all shared service partners 31 March 2021 | | | | | | |
|---|------------------|---------------------|-----------------|---------------|---------------|----------------|
| | West | | | | | |
| | Yorkshire | Lincolnshire | Hounslow | Barnet | Fire | Total |
| Members 31 March 2021 | 177,417 | 46,281 | 13,566 | 17,410 | 20,703 | 275,377 |
| Waiting for data and response to queries from employers | -338 | -477 | -191 | -1,271 | -525 | -2,802 |
| On going pension administration work by WYPF | -834 | -103 | -29 | -160 | -9 | -1,135 |
| | | | | | | - |
| Number of cases to be produced | 176,245 | 45,701 | 13,346 | 15,979 | 20,169 | 271,440 |
| Number of cases produced | 176,227 | 45,558 | 13,333 | 14,625 | 20,114 | 269,857 |
| % Produced | 99.99% | 99.69% | 99.90% | 91.53% | 99.73% | 99.42% |
| Cases in production | 8 | 138 | 11 | 1,236 | - | 1,393 |

2 BACKGROUND

Annual benefit statement (ABS) workflow

- 2.1 Annual benefit statement production involves comprehensive planning and daily corrective processes using members, staff and employers' feedback. The current ABS workflow was developed by WYPF internally and has been in place since the launch of the LGPS career average scheme in April 2014. We moved away from annual data updates in April 2014, member data are updated daily using monthly data returns from employers. Data cleansing is carried out as part of the monthly data return processes. This means March returns are processed just like any other month and once March data is processed we start producing ABS for all members.

| |
|---|
| Plan |
| Data requirements |
| Deadlines - for submitting March monthly data returns 19 April |
| Employers communication |
| Key risks to delivery |
| Real time process reporting |
| |
| Test |
| UPM system update and test ABS processes |
| Secure remote printing facilities - ADARE |
| Test lost contacts production |
| Review ABS templates - internally, employers, Aon, members feedback |

| |
|---|
| |
| Deliver |
| March monthly returns - total pay for year |
| Pre - production tests |
| Production schedule 2k per day, alphabetic production by member or employers |
| Data breaches - wrong addresses - investigate, not resolved move to lost contact. |
| Use ABS report dashboards to monitor productions, issues, data checks etc. take corrective actions to refocus resources and deliver |
| |
| Review |
| Daily internal update Contact Centre to UPM, PRFs, Member Services and Finance |
| Process review September to December |
| January to March - update processes. |
| Review template December to February - Internally, LGA, Aon etc |
| |
| Start new year ABS project |
| End of February close old year production |
| 1st Week of April - Start new year ABS production |

2.2 The activities listed above are closely aligned to tPR best practice and we have been using this scheme since 2014, before we came under TPR's jurisdiction. We have been delivering over 99% of ABS by deadline since 2014. The various specialist internal services across WYPF have contributed to this annual success - from UPM Team, IT support, Finance Team, Member Services to Contact Centre.

3 Key checks on members' folders before ABS production

A comprehensive list of checks is carried out before ABS are produced, listed in the table below are some of the key checks:

| |
|--|
| Each member record eligible for ABS is checked for the following: |
| Check system for all eligible members |
| Check that all financial data are posted for each folder by finance |
| Investigate all folders not updated by 30 June |
| Check pay value over / under 10% of last year |
| Blocked Statements (Employer) |
| Check outstanding queries with employers |
| Based on employer queries quarantine case |
| Casual Hours missing (for folder pre April 2014) |
| Lost Contact |

| |
|------------------------------------|
| Address Query process running |
| Final pay missing |
| Blocked Statements (WYPF) |
| Linking Actual / transfer error |
| Interfund |
| Monthly > Earnings > CARE error |
| Specified process running |
| Impossible Case |
| Folder Scheme History errors |
| Folder Status History |
| Service errors |
| Pension Input errors |
| APC Contract/Contribution mismatch |
| Unapproved Changes |
| Marital Status blank/unknown |
| Pensions Increase |
| Production |
| Queue Address split |
| UK |
| Overseas |
| Lost Contacts |

4 **Reproduction of ABSs**

Whilst, reviewing our ABS production and addressing members queries we have identified that ABSs produced for University of Huddersfield staff will need to be reproduced. This is because we received erroneous data from University of Huddersfield. To manage IT capacity needed to reset the system and reproduce ABS for University of Huddersfield members, it was decided to revisit these bulk reproduction after the 31 August deadline.

5 **ABS sample template**

Reproduced in Appendix 1 is a sample active member ABS. Each year we produced about 20 variant ABS templates for LGPS and Fire schemes. More importantly, WYPF produce ABS with illustrative estimates for four key time lines:

- a.) Age 55
- b.) Age 60
- c.) Age 65
- d.) State pension age

The illustrations provided also give benefit with basic lump sum and maximum lump sum. This additional information on the statement has reduced the number of estimate requests received, as members have full information.

6 OTHER CONSIDERATIONS

This report should be considered with Agenda item 10 – breaches of law.

7 FINANCIAL & RESOURCE APPRAISAL

The full resources for producing ABSs is provided for within WYPF annual operational budget.

8 RISK MANAGEMENT AND GOVERNANCE ISSUES

The main risk associated with ABSs is failure to produce them by the annual deadline of 31 August. This risk is significantly reduced by the robust planning and workflow we implemented back in April 2014, reviewed annually and shaped by WYPF continuous improvement processes.

9 LEGAL APPRAISAL

WYPF is required by law to produce ABS for all members entitled to ABS by 31 August each year. This is also a requirement by the Pension Regulator, failure to comply could result in penalties, fines and other sanctions.

10 OTHER IMPLICATIONS

None

11 RECOMMENDATION

- That this report be considered and noted.

12 APPENDICES

Appendix 1 – sample ABS for an active member.

Pension statement at 31/03/2021

Mrs B Example
City Of Bradford Metropolitan District Council
Britannia House
Hall Ings
Bradford
BD1 1HX

Your member number: **12345678**

E-mail: pensions@wypf.org.uk

Telephone: 01274 434999

Statement produced on 06/05/2021

Your personal details

Check the details below and tell your employer if something is wrong.

Full name: Barnet Example

Date of birth: 28/10/1964

Employer: Barnet Education And Learning Service Ltd (BELS)

Pay reference: 987654B

Section of scheme at 31/03/2021: Main Section

Date joined scheme: 01/09/2009

Job title: Quality Assurance Officer, working full time

Value of your benefits at 31/03/2021



Final Salary Scheme

You were a member of the Final Salary Scheme from 01/09/2009 to 31/03/2014

| | |
|-----------------------------|------------------|
| Rate of pay at 31/03/2021: | £60,507.00 |
| Final Salary membership | 8 years 013 days |
| Final salary yearly pension | £7,093.68 |
| | and |
| One-off lump sum | £9,088.48 |



CARE Pension Scheme

You've been in the CARE Pension Scheme since 01/04/2014

| | |
|--|-------------|
| Total pensionable pay earned from 01/04/2020 to 31/03/2021 | £59,832.00 |
| Opening balance at 01/04/2020 | £6,963.87 |
| Cost of living adjustment | + £118.39 |
| Pension built up during year | + £1,221.06 |
| Closing balance at 31/03/2021 | £8,303.32 |

Important: if you think your pay looks wrong, tell your employer - your pension could be wrong too.

| | | |
|-----------------------------|---------------------|---|
| Final Salary pension | £7,093.68 |  |
| CARE closing balance | + £8,303.32 |  |
| Total yearly pension | = £15,397.00 | |
| and | | |
| One-off lump sum | £9,088.48 | |

To work out your **total yearly pension** we add together your:
A) Final Salary pension;
B) CARE closing balance



You're over 55 so you could decide to finish work and start drawing your pension straightaway. But the amounts payable might be lower than those shown above. The next page shows how much you would get if you retire soon.

Your pension estimates

- We've already adjusted the amounts here if you are drawing your benefits earlier or later than normal.
- We've assumed your pay will carry on as £59,832.00 each year. If your pay changes (for example, if you increase or decrease your hours or change your job), the figures here will change too.
- All **pension** amounts are yearly amounts. All **lump sum** amounts are a one-off payment, which is paid on the day you retire. Lump sums are usually paid tax-free.
- To work out your maximum one-off lump sum, you get £12 extra lump sum for every £1 of pension you give up. But you don't have to take the maximum - we ask you how much you want to take when you retire.
- Always ask **your employer** for a full **pension estimate** before you decide to retire.

1 What if I retire at the end of next month?

This is what you'd get if you finish work on 30/06/2021 and take your benefits from 01/07/2021:

| | | | | | | |
|-------------------|----------|------------|----|---|----------|------------|
| Standard benefits | Pension | £10,028.06 | OR | Maximum lump sum, by giving up pension | Pension | £6,846.25 |
| | Lump sum | £7,459.92 | | | Lump sum | £45,641.64 |

2 What if I retire on my 60th birthday?

This is what you'd get if you finish work on 27/10/2024 and take your benefits from 28/10/2024:

| | | | | | | |
|-------------------|----------|------------|----|---|----------|------------|
| Standard benefits | Pension | £14,543.38 | OR | Maximum lump sum, by giving up pension | Pension | £9,781.67 |
| | Lump sum | £8,070.57 | | | Lump sum | £65,211.09 |

3 What if I retire on my 65th birthday?

This is what you'd get if you finish work on 27/10/2029 and take your benefits from 28/10/2029:

| | | | | | | |
|-------------------|----------|------------|----|---|----------|-------------|
| Standard benefits | Pension | £24,046.79 | OR | Maximum lump sum, by giving up pension | Pension | £15,945.54 |
| | Lump sum | £9,088.48 | | | Lump sum | £106,303.48 |

4 What if I retire on my state pension date?

This is what you'd get if you finish work on 27/10/2031 and take your benefits from 28/10/2031:

| | | | | | | |
|-------------------|----------|------------|----|---|----------|-------------|
| Standard benefits | Pension | £28,869.52 | OR | Maximum lump sum, by giving up pension | Pension | £19,049.42 |
| | Lump sum | £9,154.83 | | | Lump sum | £126,996.03 |

Your CARE (Career Average Revalued Earnings) pension account

We revalue your CARE pension account on 1st April each year in line with the requirements of HM Treasury's Public Service Pensions Revaluation Order. It was increased by 1.7% on 01/04/2020, shown on the front page as **cost of living adjustment**. This is how your **pension built up during year** shown on the front page was worked out:

| | | | |
|-----------------------|----------|------------------|---|
| Main section pension | | £1,221.06 | <i>1/49th of £59,832.00</i> |
| 50/50 section pension | + | £0.00 | <i>1/98th of £0.00</i> |
| APCs | + | £0.00 | <i>pension bought by APCs you paid during 2020/2021</i> |
| Transfers in | + | £0.00 | <i>pension from your non-LGPS transfers received during 2020/2021</i> |
| Total for year | = | £1,221.06 | |

What's paid if I die before I leave this job?

One-off death grant:
£179,496.00

+

Partner's pension:
£9,549.07

If you die before you leave your job, your husband, wife, civil partner or an eligible cohabiting partner would get the partner's pension shown above, each year for the rest of their life. Your children may also be eligible for a pension. Read more at www.wypf.org.uk/deathgrant.

We think your marital status is married, so we've used this to work out the partner's pension above. If your marital status is different, the amount may be wrong. Contact us to update your marital status.

If you nominated someone to get your death grant, they would normally get at least 3 times your pensionable pay (an annual figure based on the pay you earned in the 12 weeks up to your death) when you die.

If you die while on reduced or no pay, the death grant and any dependants' benefits payable will be worked out on a notional pay figure based on the pay you would have received in the 12 weeks before reduction. This means the benefits could be lower than the figures quoted above.



You haven't told us who you'd want your death grant paying to, so we've included a form with this statement. For more information about death grants, or to download another copy of the form, visit www.wypf.org.uk/deathgrant

Your pension tax relief limits

Lifetime Allowance: the maximum amount of pension savings you can build up over your life that benefits from tax relief. The Lifetime Allowance for 2020/2021 is £1073100.

The estimated Lifetime Allowance that you have used at 31/03/2021 is **£317,028.48** (29.54%).

Annual Allowance: the maximum your benefits can grow each year without incurring a tax charge.

Your estimated pension savings for the year 2020/2021 are **£30,214.83** for member number 12345678. This figure is below the Standard Annual Allowance threshold of £40,000 but a lower allowance may apply to you if you have income exceeding £110,000.

If you have paid pension contributions in more than one job this year, or have another pension anywhere else, you need to add all your pension savings together. You can read more about this at www.wypf.org.uk/allowances.

Notes

Final Salary scheme

Membership

You built up total Final Salary membership of **8 years 013 days** on 31/03/2014 when the Final Salary scheme ended. It includes your transfers from other pension schemes that bought additional membership. Your membership up to 31/03/2008 is 2 years 300 days and your membership from 01/04/2008 to 31/03/2014 is 5 years 078 days.

As you haven't always been full-time, your membership has been adjusted. For example, if you worked 10 years at 18.5 hours per week out of a possible 37, you would have a total membership of 5 years.

Final Pay

Your employer told us your annual rate of pay at 31/03/2021 was **£60,507.00**. We used this pay to work out your Final Salary benefits. Certain elements of pay - for example, non-contractual overtime - were not classed as pensionable under the Final Salary scheme so aren't used to work out these benefits.

When you leave or retire, we normally work out your Final Salary benefits using the pensionable pay you earned in your final year, or one of the two previous years if that's higher.

How we work out your Final Salary benefits

Yearly Pension

Membership to 31/03/2008 x 1/80 x final pay **plus**

Membership from 01/04/2008 to 31/03/2014 x 1/60 x final pay

One-off lump sum

Membership to 31/03/2008
x 3/80 x final pay

CARE Pension Scheme

You're now in a CARE (Career Average Revalued Earnings) scheme, this means you know how much your pension will be when you retire. Your pension builds up at 1/49th of your pay each year (or 1/98th if you're in the 50/50 section). This means whatever pay you receive each year, you get 1/49th of it (or 1/98th) as a pension. The contributions you pay into the scheme have no bearing on the amount of pension you will get.

How to contact us

Phone: 01274 434999 **E-mail:** pensions@wypf.org.uk **Post:** WYPF, PO Box 67, Bradford BD1 1UP

We're continuing to provide a full service during the Coronavirus pandemic.

To protect our staff and members at this time, our offices are closed to visitors until further notice.

See our website www.wypf.org.uk for more detailed information about your pension statement and the LGPS. All amounts are based on our understanding of current LGPS and HMRC legislation and may be subject to change.

How we use your information City of Bradford Metropolitan District Council runs West Yorkshire Pension Fund, which administers the LGPS. We hold data about you so we can provide services to you and our stakeholders. We use this data to meet our legal obligations under the LGPS Regulations 2013 and other regulations. We have appointed Adare SEC Ltd to print and deliver your pension statement on our behalf. We share only data about you that they need to print and deliver your statement, and they will securely delete your data once this is done. For more information about how we collect and use your data and what your rights are, see www.wypf.org.uk/privacy If you have any questions about this, please contact us first.

PO Box 67
Bradford
BD1 1UP



www.wyph.org.uk



Pension administration by WYPF under a shared service arrangement



Lump Sum Death Grant - Expression of Wish form

Mrs B Example
City Of Bradford Metropolitan District Council
Britannia House
Hall Ings
Bradford
BD1 1HX

Statement produced on
06/05/2021

WYPF member number:
12345678

Use this form to nominate somebody to receive your death grant.
Use **BLOCK CAPITALS** and **black ink** if you can.

If I die, I would like you to pay my death grant to these people or organisations:

| Their full name | Date of birth | Relationship (if any) | Their address | Share (%) |
|-----------------|---------------|-----------------------|---------------|-----------|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Must add up to 100% ^^^^^^

Your signature: **Date:**

We will respect your wishes as far as we can, but we have the final decision about who your death grant is paid to. We'll register your nomination in your pension record, but you can change it at any time: just ask us for a new form. Remember to let us know about any changes to your beneficiaries or their details.

If you have more than one pension record with us, your nomination will apply to all your pension records unless you tell us otherwise.

Send this form to: **WYPF, PO Box 67, Bradford BD1 1UP**

Nominating somebody to receive your death grant

Why you should nominate somebody to receive your death grant?

You can nominate someone to get your death grant on the form overleaf. If you don't nominate someone, your death grant may be paid to your estate if you die.

But if you nominate someone to get your death grant:

- we can pay the money quickly; and
- your death grant won't be liable for Inheritance Tax.

The following information is to help you make your nomination. To make your nomination just fill in the form overleaf and send it to us.

Who can I nominate?

You can nominate:

- people;
- organisations, like charities; or
- both.

You can nominate as many different people and organisations as you want. So, if you put more than one down on the form, remember to say what share you want each to get.

Can I change my nomination once I've made it?

Yes. If you want to change your nomination at any time, please ask us for a new form, or get one from our website at www.wypf.org.uk

Important points to remember

- We will respect your wishes as far as we can, but we have the final decision about who your death grant is paid to.
- If there's a dispute, we will pay your death grant to your estate. This might make your death grant liable for Inheritance Tax.
- You can phone us on 01274 434999 if you have any queries.

Data Protection

The information we hold about you is protected under the Data Protection Act 1998.

We use the information we hold about you to process your pension benefits. You can ask us for a copy of the information we hold about you at any time.

The people you list in your nomination have the right to ask for a copy of the information we hold about them. But it's up to you to tell them if you want them to know about this right.

From time to time we need to give the information we hold about you to our advisors and other companies we choose to help us run the pension scheme. Under the National Anti-Fraud Initiative we also share and compare the information we hold about our members with information other public agencies hold.

However, be assured that we will never give details of your nomination to our advisors, companies we use to help us run the pension scheme, or other public agencies under the National Anti-Fraud Initiative.



Report of the Director of West Yorkshire Pension Fund to the meeting of West Yorkshire Pension Fund Pension Board to be held on 14 September 2021

I

Subject: Local Government Pension Scheme Regulations update

Summary statement:

This report updates the Pension Board on changes to the Local Government Pension Scheme (LGPS) 2014 and provides information on associated matters.

Recommendation:

It is recommended that Members note this report.

Rodney Barton
Director

Portfolio:

Report Contact: Tracy Weaver
Phone: (01274) 433571
E-mail: tracy.weaver@wypf.org.uk

1 Background

- 1.1 The career average Local Government Pension Scheme (LGPS) was introduced on 1 April 2014.
- 1.2 Since the introduction of the new LGPS there have been a number of consultations on proposed changes to the LGPS, following which amendment regulations have been issued.

2 Consultation on Fair Deal – Strengthening pension protection

- 2.1 On 10 January 2019 Ministry of Housing, Communities and Local Government (MHCLG) issued a consultation on Fair Deal – Strengthening pension protection.
- 2.2 The consultation closed on 4 April 2019, and we are still waiting for MHCLG to publish its response.

3 Consultation: Local valuation cycle and the management of employer risk

- 3.1 On 8 May 2019 MHCLG issued a 12 week policy consultation called ‘LGPS: Changes to the local valuation cycle and the management of employer risk’.
- 3.2 The consultation closed on 31 July 2019.
- 3.3 On 20 March 2020 the LGPS (Amendment) Regulations 2020 came into force. These regulations provide administering authorities with a discretion to determine the amount of exit credit which should be payable to an employer leaving the LGPS with a surplus.
- 3.4 The LGPS (Amendment) (No.2) Regulations 2020 came into effect from 23 September 2020. These regulations provide for new flexibilities that allow employer contributions to be reviewed between valuations, an exiting employer to enter into a Deferred Debt Agreement and an exit deficit to be paid in instalments. Following a consultation WYPF’s Funding Strategy Statement has been updated to include policies on applying these new flexibilities.
- 3.5 MHCLG has yet to publish its response to the other matters contained in the consultation, which included changes to the LGPS Local Valuation Cycle, and employers required to offer LGPS membership.

4 Other LGPS matters

- 4.1 McCloud and valuation guidance

It was reported on 21 December 2018 that the Court of Appeal determined the transitional protections that protected older judges and firefighters from the public sector pension scheme changes in 2015, were unlawfully discriminatory. This case is known as the ‘McCloud case’. Following the judgment, on 30 January 2019 the

Government published a written statement that paused the HMT cost management process for public service pension schemes, pending the outcome of the application to appeal the McCloud case to the Supreme Court. On 8 February 2019, LGPS England & Wales Scheme Advisory Board (SAB) confirmed it had no option but to pause its own cost management process pending the outcome of McCloud.

On 27 June 2019 the Supreme Court denied the Government's request for an appeal in the McCloud case in respect of age discrimination and pension protection.

The SAB set up two working groups to work with MHCLG in developing and implementing the LGPS McCloud remedy.

On 16 July 2020 both HMT and MHCLG published consultations on the McCloud remedy. The MHCLG consultation closed on 8 October 2020.

On 13 May 2021 Luke Hall, the Local Government Minister made a written statement on McCloud and the LGPS. The statement confirms the key changes to scheme regulations that will be made to remove age discrimination from the LGPS.

On 19 July 2021, H M Treasury formally introduced to Parliament the Public Service Pensions and Judicial Offices Bill, which makes provision to rectify the unlawful age discrimination identified by the McCloud judgment.

For the LGPS, Chapter 3 of Part 1 confirms which members will be in scope and what service is 'remediable'. Enabling legislation will allow for scheme regulations to be changed to implement the McCloud remedy.

The Bill is now awaiting its second reading in the House of Lords on 7 September 2021.

Alongside publication of the McCloud consultation, HMT announced that the pause of the cost control mechanism will be lifted and the process will be completed "next year". The SAB will also be re-examining its results from its cost management process.

On 15 June 2021 the Government Actuary published his final report on his review of the cost control mechanism. The report splits the review into a two-stage framework. Firstly, what can be done to the mechanism itself, and secondly, how the results can be validated. GAD explores some alternative approaches to the mechanism before suggesting that the cost cap mechanism is still good idea, assuming some improvements are made to it. Among the suggestions is that the corridor used to measure the cost of any changes is increased to +/-3%, apparently to allow for the volatility of the mechanism. For the validation stage, the report proposes that an affordability check is included and an additional layer of qualitative review is incorporated, presumably to act as a further level of insurance against unintended conclusions.

On 24 June 2021 HM Treasury launched consultations on proposed changes to the cost control mechanism and the SCAPE discount methodology.

4.2 Scheme Advisory Board's Good Governance Report

In 2019 SAB commissioned Hymans Robertson to prepare a report on the effectiveness of current LGPS governance models and to consider alternatives or enhancements to existing governance models which could strengthen the LGPS going forward.

On 31 July 2019 SAB published this report. The phase two report from the Working Groups to SAB was published in November 2019.

When it met on the 8th February 2021 the SAB agreed that the Good Governance – Final Report should be published and for the Chair to submit the Board's Action Plan to the Local Government Minister for consideration. SAB has now published its action plan and SAB are now waiting to see how MHCLG responds to its proposals.

4.3 Third Tier employers

In June 2018 Aon presented members of SAB with a summary of the final draft of its report to review the current issues in relation to third tier employers participating in the LGPS.

The report did not make any recommendations, instead it outlined a range of issues raised by stakeholders and how they envisage these concerns being resolved. A working group has been set up by SAB, but work has been put on hold due to competing priorities, in particular, work on the Board's cost cap arrangement.

5 Other matters

5.1 Money and Pensions Service - Pensions dashboard update

On 27 May 2021, the PDP launched a Call for input on staging. The purpose of the call for input is to gather feedback and insight from pension schemes that will inform Government policy on staging. The PDP is recommending that all public service pension schemes should be onboarded in the initial wave – a two-year period starting from April 2023. The call for input closed on 9 July 2021.

5.2 Pension Schemes Act 2021

Following completion of passage through Parliament of the Pensions Bill, on 11 February 2021 the Pension Schemes Act 2021 became law. However, the majority of provisions are not currently in force and regulations are needed to bring them into force and to provide detail about how they will work.

On 14 May 2021, the DWP launched a consultation on pension scams: empowering trustees and protecting members. The consultation proposes new requirements on trustees and scheme managers before a pension transfer can be completed.

5.3 Governance and Administration Survey 2020–21 results

TPR published the results from the Public Service Pension Scheme Governance and Administration Survey 2020-21 on 1 July 2021.

The survey found little change since 2019 for the key processes that TPR monitors as indicators of performance. Two-thirds of LGPS administering authorities who responded to the survey had all six processes in place. The six key processes are:

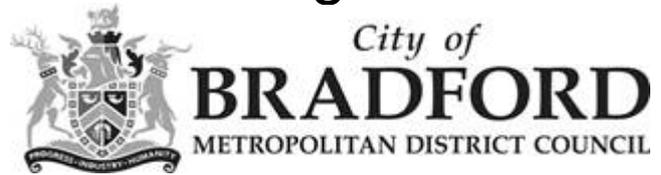
- have a documented policy to manage board members' conflicts of interest
- have access to the knowledge, understanding and skills needed to properly run the scheme
- have documented procedures for assessing and managing risk
- have processes to monitor records for accuracy and completeness
- have a process for resolving contribution payment issues
- have procedures to identify, assess and report breaches of the law.

The results also show improvements in risk management processes, cyber controls and the proportion of members receiving their annual benefit statement on time. Governance has generally stood up well given the unique challenges the last year has presented.

6 Recommendation

It is recommended that the Pension Board note the report.

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Report of the Director, West Yorkshire Pension Fund, to the meeting of West Yorkshire Pension Fund Pension Board to be held on 14 September 2021

J

Subject: WYPF Data Improvement Plan

Summary statement:

The Pension Regulator's (TPR) Code of Practice 14 and The Public Service Pensions (Record Keeping & Miscellaneous Amendments) Regulations 2014 set out the requirements for public sector pension funds to maintain comprehensive and accurate data on their members and their member's pension contributions.

Recommendation

It is recommended that the Local Pension Board note this report.

Rodney Barton
Director

Portfolio:

Report Contact: Caroline Blackburn
Phone: (01274) 434523
E-mail:
caroline.blackburn@bradford.gov.uk

1. SUMMARY

- 1.1 The Pension Regulator's (TPR) Code of Practice 14 and The Public Service Pensions (Record Keeping & Miscellaneous Amendments) Regulations 2014 set out the requirements for public sector pension funds to maintain comprehensive and accurate data on their members and their member's pension contributions.

2. BACKGROUND

- 2.1 In 2018, for the first time, Local Government Pension Funds were required to report on the quality of common and scheme-specific data in their Pension Regulator scheme returns.
- 2.2 The Pensions Regulators (tPR) guidance requires that scheme should:
- Continually review their data and carry out a data review exercise at least annually
 - Where a review of scheme's data identifies poor or missing data, a data improvement plan should be put in place to address these issues.
- 2.3 There are two types of data that should be measured: common data and scheme specific data.
- **Common data** – used to identify scheme members and includes name, address, national insurance number and date of birth.
 - **Scheme specific data** (also known as conditional data) – essential to calculate benefits entitlement such as pensionable pay and service history. It also encompasses data relating to events that occur during and individual's member ship, for example transfers.
- 2.4 As a result of measuring the data a data score is calculated. A data score is the percentage of members in the scheme that have been assessed as having complete and accurate common or scheme specific data.
- 2.5 WYPF has developed a Data Improvement Plan which identifies and prioritises actions to be taken to improve the data. A copy of WYPFs Data Improvement Plan can be found at Appendix A.

3. APPENDIX

- Appendix A – WYPF Data Improvement Plan

West Yorkshire Pension Fund

Data Improvement Plan

1. Introduction

- 1.1 This document defines the data improvement plan of the Pension Administration section of West Yorkshire Pension Fund (the Fund).
- 1.2 The Fund collects and holds large amounts of digital and paper based data and is heavily reliant on the timely receipt of quality data from employers, in order to effectively administer the Local Government Pension Scheme (LGPS).
- 1.3 Fundamentally, the purpose of the LGPS is to pay the correct pension benefits to its members when they become due. It is therefore imperative that the Fund achieves and maintains the highest possible data quality standards, to comply with its core functions and to ensure the cost effective use of resources.
- 1.4 The LGPS continues to face on-going legislative change with oversight of administration and governance now falling under the remit of the Pension Regulator, with a heightened responsibility on scheme managers and local pension boards to ensure data is readily available and fit for purpose at all times.
- 1.5 The legal requirements relating to scheme record keeping are set out in the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014.
- 1.6 The Pension Regulators guidance requires that schemes should:
 - Continually review their data and carry out a data review exercise at least annually
 - Where a review of the scheme's data identifies poor or missing data a data improvement plan should be put in place to address these issues

2. The Pension Regulator Annual Scheme Return

- 2.1 Annually the Pensions Regulator (tPR) issues a scheme return which should be completed and returned. From 2018 each Pension Fund is required to include in the return a Data Quality Score which has two types of data:
 - **Common data** – used to identify scheme members and includes name, address, national insurance number and date of birth.
 - **Scheme-specific data** – essential to calculate benefit entitlement such as pensionable pay and service history. It also encompasses data relating to events that occur during an individual's membership, for example transfers etc.
- 2.2 tPR has issued a quick guide on measuring scheme data which states that one piece of missing data, such as a current address on a deferred member's record should be reported to them as a failed record.

2.3 In summer 2019 the Local Government Association issued a revised list of Scheme-specific data that LGPS Funds should use to check their data against. Changes to WYPF data reconciliation reports were implemented in November 2019 and as result the data quality scores shown on the 2018/19 Data Improvement Plan and the score shown on the 2019/20 Data Improvement Plan are not comparable.

3 Key Objectives

The key objectives of this plan are to:

- Ensure member, pensioner, deferred and beneficiary records are maintained as accurately as possible to ensure benefits are paid correctly on time, members receive a high standard of service and the fund is able to meet legal obligations.
- Ensure Investment and Administration costs are reliable/correct.
- Ensure data supplied to the Fund's actuary for the valuation is as accurate as possible so the correct liabilities can be calculated.
- Ensure the Fund complies with tPR's Code of Practice.

4 Outcomes

Outcomes of an improvement in the data held by the Fund are:

- Improvement of tPR data score for Common and Scheme Specific (also known as conditional) data.
- Increase in the number of Annual Benefit Statements (ABS) issued by 31 August each year./members aware of the value of their benefits.
- Reduction in the number of Internal Dispute Resolutions (IDRPs) received for incorrect calculation of benefits or delays in paying benefits.
- Reduction in the number of queries from the Fund's Actuary at valuation time.
- Reduction in the number of queries received when ABS are sent out.
- Reduction in administration costs due to increased efficiency.
- Reduces the likelihood of the Government Actuary Department rejecting data for the scheme valuation.
- Improves accuracy for IAS19 valuations.
- Reduction in delays for calculating and paying retirement benefits, death benefits, transfers out.

- Reduction in the queries between WYPF and Employers
- Reduction of breaches recorded on the Breaches Register (e.g. due to ABS being issued late).

5 Additional general responsibilities relating to Data Improvement as follows:

5.1 Fund Officers

- Fund officers continually review and ensure data collected is fit-for-purpose and processes are in place to monitor accuracy and timeliness. All processes have working instructions in place to assist with staff training, understanding and compliance.
- Team Managers are responsible for ensuring that staff have the appropriate level of UPM access to fulfil their duties and access is withdrawn upon the member of staff leaving WYPF. This minimises the risk of accidental loss, errors and unauthorised activity.

5.2 Scheme Employers

- The Fund is reliant upon the accuracy, completeness and timeliness of data submitted by scheme employers and any third party agencies that they may utilise e.g. outsourced payroll providers.
- The Fund will work with scheme employers throughout the year to support the provision of data to the required standard.
- Details of the information employers are required to provide and the financial penalties should they fail to do so are detailed in the Fund's Pensions Administration Strategy.

6 Ongoing Data Cleansing

6.1 Monthly Returns data quality checks

WYPF embraced monthly contribution postings several years ago with the aim of simplification, systems integration, increased data accuracy and complete up to date member records. The benefits include ensuring that employee's contributions, member's personal details, and financial records are up to date, accurate and complete.

6.2 LGPS National Insurance Database

Administered by South Yorkshire Pension Fund Authority on behalf of the Local Government Association (LGA), the secure National Insurance Database was developed for Local Government Pension Scheme (LGPS) administering authorities to share data to prevent duplicate payment of death grants. This follows changes to Scheme Regulations in 2014 where payment of a death grant in respect of a member with entitlement across multiple membership categories is restricted to an aggregate payment value in relation to any active or pensioner/deferred membership. When processing the death of a scheme member, officers will check the LGPS National Insurance Database for the existence of membership at other LGPS Funds. (Please note not all LGPS administrators are part of this database).

6.3 'Tell Us Once' Service

The secure LGPS National Insurance Database also facilitates the integration of the Fund's membership profile into the Department of Work and Pensions (DWP) 'Tell Us Once' service (TUO). The service allows a person registering a death to request that the DWP pass on the deceased's information to other government services and council services. If the deceased is a member of the Fund, as determined by the LGPS National Insurance Database, an email notification is received informing the designated officers that a copy of the death certificate is accessible on the secure government gateway.

6.4 National Fraud Initiative

The National Fraud Initiative (NFI) matches electronic data within and between public and private sector bodies to prevent and detect fraud. These bodies include police authorities, local probation boards, fire and rescue authorities as well as local councils and a number of private sector bodies. WYPF submit data to National Fraud Initiative on a regular basis to identify deceased members and members who are no longer entitled to receive a pension.

6.5 Mortality screening and tracing service

WYPF engage with a Tracing Bureau for both monthly mortality screening and for members we don't have a current address for. For deferred members, where a current address for a lost contact cannot be found by the Tracing Bureau, a more detailed check is carried out 3 months before payment of pension is due.

6.6 Annual Benefits Statement (ABS) checks

Before producing an ABS each year certain checks are applied to active records to ensure accurate data is used in the production of the ABS. These checks include:

- Ensuring contributions are received for every month during the year,
- Checks to make sure there are no spikes in care pensionable pay,
- Checks to ensure the final pay has not increased by 20% or decreased by 10%,

- Checks to ensure there aren't any outstanding processes,
- Address check to compare the address held on the record and that supplied on the monthly return,
- Identifying casual workers.

If these checks identify further information is required from an employer the ABS production for this case will be blocked and a query will be referred back to the employer. Upon receipt of the appropriate information the record will be updated and the ABS will be released for production.

6.7 Deferred pensions increase

As part of the annual deferred pensions increase process certain data errors are identified and pensions increase is blocked until they are resolved. These errors include:

- Incorrect elements present,
- Spouse elements that don't match member elements,
- Incorrect dates for the first entry after the member is deferred,
- Data errors are corrected to allow deferred pensions increase to run on to individual deferred folders.

6.8 Annual deferred benefit statements

Before producing the annual deferred benefit statements data errors that would result in potentially incorrect statements being produced are identified. These include:

- Deferred pensions increase not updated
- Multiple 'normal payment' dates being held on the deferred folder
- Multiple entries for the same date shown on the pension history screen
- Initial entries on the pension history missing
- Service start date mismatches

Once these errors are resolved and the records is updated the deferred ABS will be released for production.

7 Data errors

When tackling data errors the following considerations will be used when making the decision on the priority of errors to be resolved:

- Priority identified on the error report
- Data improvement plans objectives

8. Frequency

Data Quality reports will be run on a quarterly basis to measure the data quality scores and identify any further action that may be required.

9 Appendices

- Appendix A details the Data Quality scores and errors
- Appendix B details to work planned to deal with the data errors identified.

Appendix A WYPF results

| | Dec 20 | April 21 | June 21 | Sept 21 |
|-------------------------|--------|----------|---------|---------|
| TPR Score – Common | 95.84 | 95.91 | 95.91 | |
| TPR score - Conditional | 88.83 | 89.30 | 88.97 | |

| Breakdown of activities | Dec 20 | April 21 | June 21 | |
|---|--------|----------|---------|--|
| Count of Missing, Bad or Temp NI Number | 428 | 441 | 425 | |
| Count of Forename(s) Missing | 1 | 1 | 1 | |
| Count of Gender Missing | | | 3 | |
| Count of Bad Date of Birth | 6 | 8 | 6 | |
| Count of Address Missing | 10586 | 10394 | 10362 | |
| Count of Postcode Missing | 136 | 136 | 136 | |
| Count of no date joined scheme | | 1 | | |
| Count of Folder Status/ Status History Mismatch | 28 | 37 | 91 | |
| Count of Multi FolderStatHist Entries on Same Day | 180 | 174 | 179 | |
| Count of Missing or Bad Expected Retirement Date | 1230 | 1256 | 1259 | |
| Count of No Folder Scheme History | 25 | 25 | 25 | |
| Count of Missing Date Joined Employer | 1 | 1 | 1 | |
| Count of Missing Earnings | 706 | 617 | 546 | |
| Count of Invalid Part Time Service Present | 2 | 2 | 2 | |
| Count of Missing CARE Benefit | 246 | 235 | 266 | |
| Count of Missing CARE Revaluation Rate | 30 | 11 | 34 | |
| Count of Invalid Contracted Out Date | 29 | 29 | 29 | |
| Count of Missing Initial Pension (Def) | 49 | 9969 | 52 | |
| Count of Invalid Deferred Payment Date | 60 | 9 | 11 | |
| Count of Missing Initial Care Pension (Def) | 175 | 174 | 172 | |
| Count of missing initial pension | | 2644 | | |
| Count of Missing CARE Initial Pension | 42 | 44 | 46 | |
| Count of start data inconsistency | 2610 | 2530 | 2509 | |
| Count of invalid transfer in present | 592 | 569 | 551 | |
| Count of no NI Contributions or GMP | 7658 | 7097 | 7517 | |
| Count of No Date of Leaving | 4 | 4 | 4 | |
| Count of Missing Benefit Crystallisation | 4 | 4 | 4 | |
| Count of Missing Benefit Crystallisation details | 6991 | 7097 | 7127 | |
| Count of Invalid AVC Data for Member | 2 | 2 | 2 | |
| Count of Missing Current Pension | 3977 | 3977 | 3971 | |
| Count of Missing Annual Allowance Calculation | 1581 | 123 | 1370 | |
| Count of Deferred – No Total Exit GMP | 17542 | 17454 | 17588 | |
| Count of No Post 88 Exit GMP | 8399 | 8463 | 8527 | |
| Count of missing marital status | 1 | 15 | 15 | |
| Count of No retirement details | 1 | 0 | | |

Appendix B at November 19

| Data Category | Category | Priority | Resolution required | Responsibility | Progress/ Notes | Deadline |
|--|-----------------|-----------------|--|--|------------------------|-----------------|
| Missing Ni Number | Common | Low | Ni number to be identified where possible | Service centre | Ongoing | Ongoing |
| Bad Date of birth | Common | Medium | Interrogate records | Service Centre | | Nov 22 |
| Missing Address | Common | Medium | Actives – Contact employer Deferred and preserved refunds use tracing service | Service Centre | Ongoing | Ongoing |
| Missing postcode | Common | | Actives – Contact employer Deferred and preserved refunds use tracing service | Service Centre | Ongoing | Ongoing |
| Missing or bad expected retirement date | Common | Medium | ICT to review if bulk update can be completed | ICT | | Nov 22 |
| Multifolder status history on the same day | Common | low | Review each record as they may have 2 entries on the same day in error | Service Centre and Pensioners Services | | Nov 23 |
| Folder status/ Status history mismatch | Common | Medium, | Review each case as it may be as a result of an change due to monthly postings | Finance | | Nov 23 |
| | | | | | | |
| No folder scheme | Scheme Specific | Medium | Interrogate records | Service centre/Pensioner | | Nov22 |

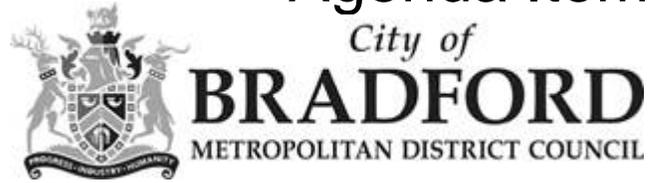
| | | | | | | |
|---|-----------------|--------|--|----------------|-----------|--|
| history | | | | services | | |
| No NI contribution or GMP | Scheme Specific | Medium | ICT to review the report as data is on the records | ICT | | Nov 22 |
| Missing Benefit Crystallisation record | Scheme Specific | Low | Interrogate records - All Pensioner records | SC5 | | Nov 23 |
| Missing Benefit crystallisation details | Scheme specific | Medium | ICT to consider bulk update | Ict | | Nov 22 |
| Missing date joined employer | Scheme Specific | Low | Majority of cases awaiting leaver / pensioner benefits calculating in the service Centre | Service Centre | Completed | Work dealt with in accordance with KPIs |
| Missing earnings | Scheme Specific | Low | Interrogate records | | | Nov 23 |
| Missing marital status | Scheme specific | Low | Interrogate record or default to married | Service Centre | | Nov 23 |
| Invalid transfer in present | Scheme Specific | Low | Interrogate records | Service Centre | | Nov 23 |
| Invalid AVC Data for member | Scheme Specific | Low | Interrogate records | Service Centre | | Nov 23 |
| Invalid part time service present | Scheme Specific | Low | Interrogate record | Service Centre | | Nov 23 |
| Missing CARE benefits | Scheme Specific | High | Majority of cases awaiting leaver/ pensioner benefits calculating in the Service Centre | Service Centre | | Work to be dealt with in accordance with KPI |

| | | | | | | |
|--------------------------------------|-----------------|--------|---|-----------------------|-----------|--|
| Missing CARE revaluation rate | Scheme Specific | Low | Majority of cases awaiting leaver/ pensioner benefits calculating in the Service Centre | Service Centre | | Work to be dealt with in accordance with KPI |
| Invalid Contracted out date | Scheme Specific | Low | Interrogate records | Service Centre | | Nov 23 |
| Missing Current Pension | Scheme Specific | medium | ICT to refine report | ICT | | Nov 22 |
| Missing Initial Pension (def) | Scheme Specific | High | As per KN – Historic cases which are updated on an annual basis via a report. KN to review | Service Centre | | Nov 21 |
| Invalid deferred payment date | Scheme Specific | Low | Team early leaver to investigate | Service Centre | | Nov 23 |
| Missing Initial CARE pension (def) | Scheme specific | Low | Team early leavers to investigate ICT may need to amend report to not include cases where member joined right at the end of the year and no care benefits | Service Centre ICT | | Nov 23 |
| No date of leaving | Scheme specific | Low | Interrogate record | Pensioner services | | Nov 23 |
| Missing CARE Initial Pension | Scheme Specific | Low | Interrogate records | Pensioner services | | Nov 23 |
| Missing SPA date (def) | Scheme Specific | Low | Interrogate record | Service Centre | Completed | Nov 23 |
| Missing Annual Allowance Calculation | Scheme Specific | Low | ICT to consider if bulk update can be done | ICT | | Nov 23 |

| | | | | | | |
|------------------------------|-----------------|-----|--|-----|--|--------|
| Start date inconsistent | Scheme Specific | Low | ICT to consider if bulk update can be done | ICT | | Nov 23 |
| Deferred – No total Exit GMP | Scheme Specific | Low | ICT to review report | ICT | | Nov 23 |
| No post 88 Exit GMP | Scheme Specific | Low | ICT to review report | ICT | | Nov 23 |

This improvement plan primarily aims to address the key issues identified from the Funds Data Quality review and data quality score and details the plans in place to improve the data we hold.

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Report of the Director, West Yorkshire Pension Fund, to the meeting of West Yorkshire Pension Fund Pension Board to be held on 14 September 2021

K

Subject: Register of Breaches of Law

Summary statement:

In accordance with the Public Service Pensions Act 2013, from April 2015 all Public Service Pension Schemes come under the remit of the Pensions Regulator.

Section 70 of the Pensions Act 2004 (the Act) imposes a requirement to report a matter to The Pensions Regulator as soon as is reasonably practicable where that person has reasonable cause to believe that:

- (a) a legal duty relating to the administration of the scheme has not been or is not being complied with, and
- (b) the failure to comply is likely to be of material significance to The Pensions Regulator in the exercise of any of its functions.

A Register of Breaches of Law is therefore maintained in accordance with the Pensions Regulator's requirements and WYPF Breaches procedure.

Recommendation

It is recommended that the Local Pension Board note the entries on the Register of Breaches of Law.

Rodney Barton
Director

Portfolio

Report Contact Caroline Blackburn
Phone: (01274) 434523
Email: caroline.blackburn@bradford.gov.uk

Overview & Scrutiny Area

1. **Background**

1.1 Section 70 of the Pensions Act 2004 (the Act) imposes a requirement to report a matter to the Pensions Regulator as soon as reasonably practicable where a person has reasonable cause to believe that:

- (a) a legal duty relating to the administration of the scheme has not been or is not being complied with, and
- (b) the failure to comply is likely to be of material significance to The Pensions Regulator in the exercise of any of its functions.

1.1 This requirement applies to:

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

1.2 The Act states that a person can be subject to a civil penalty if he or she fails to comply with this requirement without a reasonable excuse. The duty to report breaches under the Act overrides any other duties the individuals listed above may have. However, the duty to report does not override 'legal privilege'. This means that, generally, communications between a professional legal adviser and their client, or a person representing their client, in connection with legal advice being given to the client, do not have to be disclosed.

2. **Reporting Breaches Procedure**

2.1 A record of past breaches may be relevant in deciding whether to report a breach (for example it may reveal a systemic issue). WYPF maintains a record of all reported or unreported breaches.

2.2 The Register of Breaches of Law (reported or otherwise) is provided to each Joint Advisory Group meeting, and is also be shared with the Pension Board.

3 **Breaches**

The entries on the Register of Breaches for 2021/222 relate to:

- Delays with Prudential updating members accounts with contributions which have also delayed the payment of some retirement benefits. This breach is considered to be of material significance due to the number of members involved and the

ongoing and prolonged rectification of this issue. As a result, this issue has been reported to the Pensions Regulator.

5. Recommendations

It is recommended that the Local Pension Board note the entries and action taken on the Register of Breaches.

6 Appendix

- Appendix B – Register of Breaches 2021/22

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WYPF Breaches of Law 2021-2022

| Date | Category (eg administration, contributions, funding , investments) | Pensions Regulator code of practice | Description and cause of breach | Possible effect of breach and wider implications | Reaction of relevant parties to breach | Reported/Not reported | Outcome of report and or investigations | Outstanding Actions |
|----------|--|-------------------------------------|--|--|--|-----------------------|--|---------------------|
| May 2021 | <u>Administration</u> AVC contributions - Prudential. | | <p>WYPF has an agreement with Prudential to provide an AVC arrangement for its members as part of the Local Government Pension Scheme Regulations.</p> <p>Over the last few months we have received a number of complaints from members to say that their AVC contributions have not been allocated to their AVC accounts.</p> | <p>Delays in Settlement amounts paid to the Fund when members have retired. This has impacted on the Funds ability to pay pension benefits in a timely manner.</p> | <p><u>Prudential</u></p> <p>Prudential have informed us 'The processing delays have been caused in part by the implementation of a new system that has taken additional time to embed within our processes. This has had an impact on applying contributions to members' policies therefore delaying claims. The impact of COVID and the majority of colleagues working from home following the latest lockdown has also affected our productivity and recovery plans'.</p> <p>Prudential had informed WYPF that it had a recovery plan in place and were on target to clear all outstanding cash and claims by the middle of April however by the end of May and the issues had not been resolved satisfactorily.</p> <p>Prudential informed us they still have cases in backlog and whilst they have not met the initial target date for recovery they are making</p> | Reported | <p>What are the time scale for completion?</p> <p>According to Prudential they are hoping to 'stabilise' by the end of June.</p> <p>Additional information</p> <p>Prudential have said member's will not lose out on investment returns because of the delays and where appropriate they will pay compensation however this does not compensate WYPF for the additional time and work undertaken due to the delays caused by Prudential.</p> <p>WYPF regularly contact Prudential to chase up urgent cases, by e-mail and phone.</p> | |

WYPF Breaches of the Law 2021 -2022

| | | | | | | | |
|--|--|--|--|---|--|---|--|
| | | | | <p>good progress in clearing the outstanding claims and have introduced a number of measures to get back on track. Key measures introduced include:</p> <ul style="list-style-type: none"> • Weekend and overtime working • Recruitment of 50 full time colleagues into the service function, the majority of whom are focussed on claims. • Recruitment of 79 full time colleagues into the voice area to deal with the unprecedented increases in call volumes. (Prudential note: We are on track to have recruited these by the end of April 2021, train them and deploy them into the area by the end of May. We expect call wait time and abandonment rates to stabilise towards the end of June 2021). <p>WYPF WYPF have made advance payments of member's retirement lump sums so they do not encounter undue hardship. Their monthly pensions have not been paid to avoid any additional tax implications if they crystallise their benefits.</p> | | Looking to arrange a further meeting with Prudential. | |
|--|--|--|--|---|--|---|--|

WYPF Breaches of the Law 2021 -2022

| | | | | | | | | |
|--|--|--|--|--|--|--|--|--|
| | | | | | | | | |
|--|--|--|--|--|--|--|--|--|

Employers who failed to pay make pay over employees contributions by the appropriate date - April 2021 onwards

| Month | Employer | Date contributions due | Date paid | Value of late contributions | No of times late in last 6 months prior to this month | No of times late in last 12 months prior to this month |
|----------|---|------------------------|-----------|-----------------------------|---|--|
| April 21 | No employer paid late | | | | | |
| May 21 | South Kirby and Moorthorpe Town Council | 21 .06.21 | 23.06.21 | 4679.55 | 0 | 0 |
| | Consultant Cleaners Ltd (Westborough) | 21.06.21 | 30.06.21 | 1995.01 | 0 | 0 |
| June 21 | Prospect Services (Bradford 3) | 21.07.21 | 22.07.21 | 1690.27 | 0 | 0 |
| | Absolutely Cleaners Ltd (BSG) | 21.07.21 | 22.07.21 | 368.04 | 0 | 0 |
| | Absolutely Cleaners Ltd (Batley MAT) | 21.07.21 | 22.07.21 | 2329.09 | 0 | 0 |

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Report of the Director, West Yorkshire Pension Fund to the meeting of West Yorkshire Pension Fund Pension Board to be held on 14 September 2021.

L

Subject:

Pensions Administration

Summary statement:

This report gives an update on West Yorkshire Pension Fund's (WYPF) pensions administration activities over the last six months.

Recommendation:

It is recommended that the Pension Board note the report.

Mr Rodney Barton
Director

Portfolio:

Report Contact: Yunus Gajra
Assistant Director (Finance,
Administration and Governance)
Phone: (01274) 432343
E-mail: Yunus.gajra@bradford.gov.uk

Overview & Scrutiny Area:

1.0 Background

1.1 As well as providing pensions administration for WYPF scheme members, WYPF provides a full administration service to Lincolnshire Pension Fund, the London Borough of Hounslow and more recently the London Borough of Barnet and to nineteen Fire Authorities. This includes pensioner payroll (except for the London Borough of Hounslow), all member and scheme level events, reporting to statutory bodies, provision of data to external bodies such as actuaries, and local authorities for the production of the scheme accounts.

2.0 Performance and Benchmarking

2.1 The table below shows the performance against key areas of work for the period 1 January 2021 to 30 June 2021.

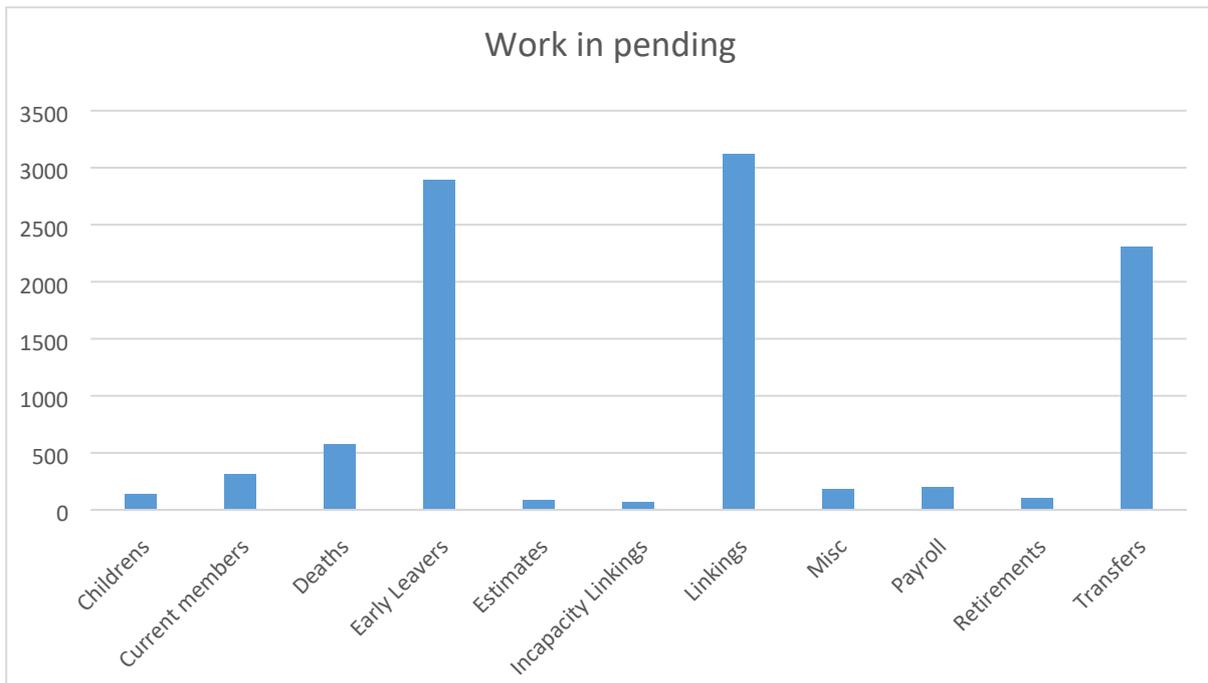
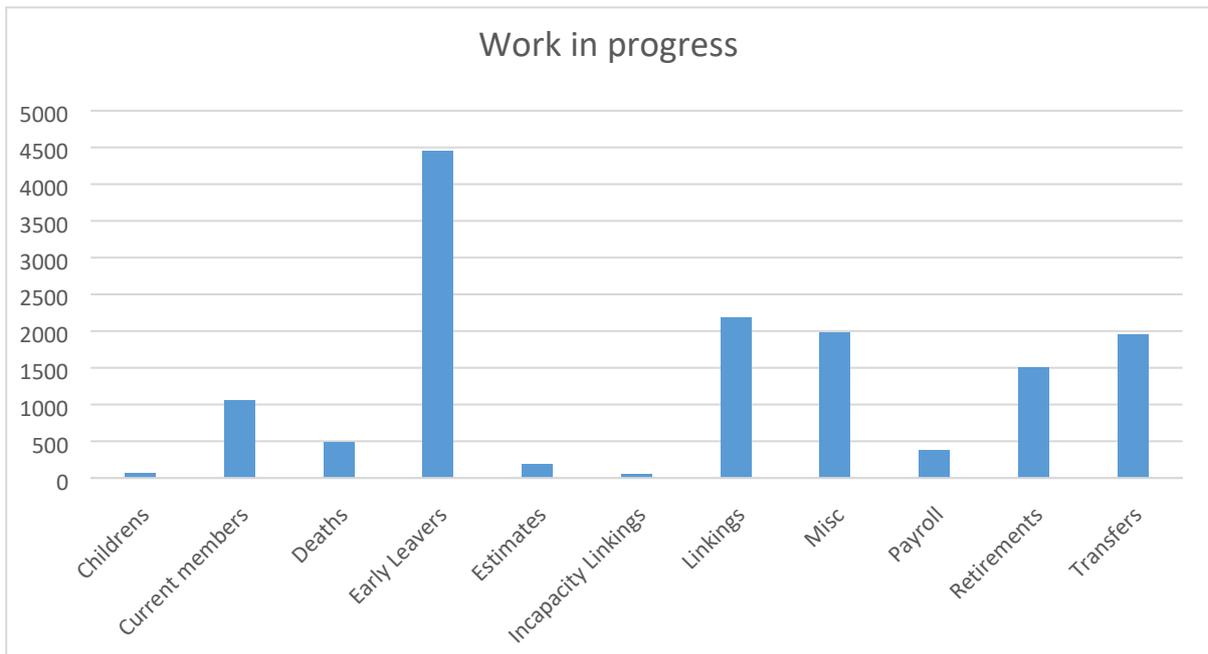
| WORKTYPE | TOTAL CASES | TARGET DAYS FOR EACH CASE | TARGET MET CASES | MINIUM TARGET PERCENT | TARGET MET PERCENT |
|--|-------------|---------------------------|------------------|-----------------------|--------------------|
| Transfer In Quote | 574 | 35 | 569 | 85 | 99.13 |
| Transfer In Actual | 387 | 35 | 373 | 85 | 96.38 |
| Divorce Settlement Pension Sharing order Implemented | 18 | 80 | 18 | 100 | 100 |
| Deferred Benefits Set Up on Leaving | 4730 | 20 | 4626 | 85 | 97.8 |
| Refund Quote | 1547 | 35 | 1527 | 85 | 98.71 |
| Refund Actual | 1167 | 10 | 1159 | 95 | 99.31 |
| Transfer Out Payment | 139 | 35 | 123 | 85 | 88.49 |
| Pension Estimate | 2450 | 10 | 2347 | 75 | 95.8 |
| Retirement Actual | 2343 | 3 | 2263 | 90 | 96.59 |
| Deferred Benefits Into Payment Actual | 2373 | 5 | 2229 | 90 | 93.93 |
| AVC In-house (General) | 819 | 20 | 797 | 85 | 97.31 |
| Deferred Benefits Into Payment Quote | 3091 | 35 | 2753 | 85 | 89.07 |
| Transfer Out Quote | 1050 | 20 | 976 | 85 | 92.95 |
| Monthly Posting | 5065 | 10 | 4519 | 95 | 89.22 |
| Divorce Quote | 349 | 20 | 325 | 85 | 93.12 |
| Change of Address | 3149 | 10 | 3056 | 85 | 97.05 |
| Change of Bank Details | 871 | Next payroll | 815 | 85 | 93.57 |
| General Payroll Changes | 1523 | Next payroll | 1506 | 85 | 98.88 |
| Age 55 Increase to Pension | 7 | Next payroll | 7 | 85 | 100 |
| NI adjustment to Pension at State Pension Age | 136 | Next payroll | 136 | 85 | 100 |
| Enquiry | 134 | 5 | 120 | 85 | 89.55 |
| DWP Request for information | 72 | 20 | 65 | 85 | 90.28 |
| Life certificate Received | 17 | 10 | 12 | 85 | 70.59 |
| Death Grant Nomination Form | 4780 | 20 | 4759 | 85 | 99.56 |

| Received | | | | | |
|--|-------------|---------------------------|------------------|-----------------------|--------------------|
| WORKTYPE | TOTAL CASES | TARGET DAYS FOR EACH CASE | TARGET MET CASES | MINIUM TARGET PERCENT | TARGET MET PERCENT |
| Spouse Potential | 118 | 20 | 109 | 85 | 92.37 |
| Death Grant to Set Up | 409 | 5 | 372 | 85 | 90.95 |
| Initial letter Death in Retirement | 2116 | 5 | 1995 | 85 | 94.28 |
| Death In Retirement | 2116 | 5 | 1674 | 85 | 79.11 |
| Initial Letter Death in Service | 74 | 5 | 71 | 85 | 95.95 |
| Death In Service | 74 | 5 | 58 | 85 | 78.38 |
| Initial letter Death on Deferred | 127 | 5 | 113 | 85 | 88.98 |
| Death on Deferred | 127 | 5 | 93 | 85 | 73.23 |
| Estimates for Deferred Benefits into Payment | 79 | 10 | 73 | 90 | 92.41 |
| Update Member Details | 7384 | 20 | 7368 | 100 | 99.78 |
| Pension Saving Statement | 27 | 2 | 27 | 100 | 100 |
| Payment of Spouses /Child Benefits | 840 | 5 | 663 | 90 | 78.93 |
| Phone Call Received | 16424 | 3 | 16138 | 95 | 98.26 |

Reasons for underperforming KPI's:

| Worktype | Reason |
|------------------------------------|--|
| Life certificate Received | Delays by members not returning certificates |
| Death In Retirement | Complex cases involving additional work/documents |
| Death In Service | Complex cases involving additional work/documents |
| Death on Deferred | Complex cases involving additional work/documents |
| Payment of Spouses /Child Benefits | Additional information required from beneficiaries |

2.2 Work in progress



The above graph shows the total volume of work in progress categorized into work groups. Work volumes will fluctuate depending on how much work comes in and how much work is completed. Some of the larger volume work cover:

Current Member – changes to member records, changes to AVC's, queries from

monthly postings

Early Leavers – calculation of refunds, calculation of deferred benefits, contribution postings queries

Linkings – multiple employments where member can link those employments

Misc – All other types of work i.e. phones calls to return, general enquiries.

Retirements - Retirement quotes and actuals, deferred benefits into payment (quote and actual)

Transfers – Transfers in and out (quote and actual), AVC transfers, Divorce

3.0 Scheme Information

3.1 Membership for all schemes administered as at June 21 was 470,031. A full breakdown between the different Funds and Schemes is shown at Appendix A.

3.2 Number of Employers in the West Yorkshire Pension Fund

| | Actives | Ceased | Total |
|------------------|----------------|---------------|--------------|
| Scheduled bodies | 269 | 4 | 273 |
| Admitted bodies | 142 | 7 | 149 |
| Total | 411 | 11 | 422 |

4.0 Praise and Complaints

4.1 As part of our commitment to improving our services we carry out a random survey of customers who have been in contact with us regarding their pension benefits. We also have an online survey which any member can complete at any time. An analysis of the WYPF responses received for the quarter April 21 to June 21 is shown:

Appendix B - WYPF

5.0 Employer Training

Training has now moved to online with WYPF setting up a number of webinars to be delivered every Tuesday. Topics covered were:

- Understanding employer discretions
- Processing pension statement Blocks and Quarantines
- Online forms and how to use them
- Ill health for deferred members
- Understanding term time only members

The sessions were attended by 252 people representing Employers from across all our LGPS shared service partners.

6.0 Internal Disputes Resolution Procedure (IDRP)

6.1 All occupational pension schemes are required to operate an IDRP. The LGPS has a 2-stage procedure. Stage 1 appeals, which relate to employer decisions or actions, are considered by a person specified by each employer to review decisions (the 'Adjudicator'). Stage 1 appeals relating to appeals against administering authority decisions or actions are considered the Director of WYPF. Stage 2 appeals are considered by the Chief Executive of the City of Bradford MDC.

A summary of the IDRP decisions for the period 1.7.20 to 31.12.20 is shown below:

| | Number of Determinations | Outcomes | Type |
|-------------------------|--------------------------|---|---|
| STAGE 1 | 10 | | |
| | | 10 Turned down | 2 Distribution of death grant 1 Incorrect deferred benefit statement 1 Wrongly permitted a transfer out. 1 Amount of partner's pension 1 Calculation of pension benefits 1 Entitlement to death benefits 1 Delay in repayment of AVC payment deducted in error 1 Not able to link previous membership 1 Not allowed to transfer due to requiring GMP to be paid |
| STAGE 2 | 14 | | |
| AGAINST EMPLOYER | 9 | 6 Turned down | 2 Not awarded ill health retirement |
| | | 3 Referred back to employer to reconsider | 1 Not awarded ill health retirement 1 Tier of ill health retirement awarded 1 Tier 3 ill health pension ceased |
| AGAINST WYPF | 5 | 5 Turned down | 1 Incorrect deferred benefit statement 1 Ceasing of child's pension 1 Not entitled to spouse's pension 1 Amount of widower's pension 1 Distribution of death grant |

7.0 Administration Update

7.1 Annual Benefit Statements (ABS) and Deferred Benefit Statements (DBS)

This year statements will be issued electronically. Members will be asked to sign up to the secure 'MyPension' portal to access their statements. However, members who prefer a paper version will be able to opt out and receive one. To date 99.1% of ABS and 99.9% of DBS have been produced.

7.2 Audits undertaken by Bradford Councils Internal Audit in the period:

a) Transfers In

It is audit's opinion that the standard of control of identified risks in the system is **excellent**.

The audit review has determined that the identified risks are being effectively managed. The control environment is as expected and supports the achievement of key business objectives.

Internal Audit made no recommendations for improvement.

7.3 ISO 9001 Quality Audits

The following internal quality audits were completed by WYPF staff:

Quality Records

Transfers In

Pensioner Services Incapacity Cases/National Fraud Initiative

Any suggestions for improvements to working practices will be analysed by the relevant managers.

7.4 Two new Fire clients, Northamptonshire and Cambridgeshire have joined WYPF's administration from 1st July 2021. This brings the total number of Fire Authorities under administration to 21.

7.5 Security Breaches

During this period seven Security Breaches were logged which were reported to the Council's Data Protection Officer. Two of the breaches were made by Employers. These were all deemed to be isolated incidents due to human error and were not reported to the ICO.

8.0 Staffing

8.1 WYPF is in the middle of a big recruitment campaign to replace staff that have

retired, left or been promoted as well as recruiting to new posts under the revised structure. A number of appointments have already been made whilst a number of posts are currently out to advert.

- 8.2 WYPF headcount is 179 established employees with an average age of 46.1, compared to the Council's average age of 46.5 (see Appendix C).
- 8.3 For the year ending 1 April 2021 the average number of days absence due to sickness is 5.48 per staff member. This compares with the Council average of 10.75 days (see Appendix D).
- 8.4 There were 13 new starters during the last 12 months (see Appendix E)
- 8.5 There were 6 leavers during the last 12 months, 3 of which were due to retirement (see Appendix F).

9.0 Member Portal

9.1 Web Registrations

The number of members registered for online member web are:

| Membership Type | Number | Percentage |
|-----------------|--------|------------|
| Active | 29,338 | 19.52% |
| Deferred | 15,523 | 11.37% |
| Pensioner | 22,010 | 13.81% |

10.0 Awards

WYPF were shortlisted by Pensions Age under the following categories:

DB Scheme of the Year
Pension Scheme Communication Award
Pension Administration Award

Although WYPF did not win any of the awards, it is a huge recognition to be shortlisted amongst a very high calibre of entries both from the public and private sector pension funds.

11.0 Conclusion

WYPF continue to provide an efficient, cost effective and high level of service to members and Employers within the Fund.

Appendices

| | |
|---|--------------------------|
| These are listed below and attached at the back of the report | |
| Appendix A | Membership Numbers |
| Appendix B | Customer Feedback - WYPF |
| Appendix C | Workforce Headcount |
| Appendix D | Absence Performance |
| Appendix E | Starters |
| Appendix F | Leavers |

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| <u>SCHEMENAME</u> | <u>ACTIVES</u> | <u>DEFS</u> | <u>PENS</u> | <u>BENS</u> | <u>PRESERVED</u> <u>REFUND</u> | <u>LEAVERS OPTIONS</u> <u>PENDING</u> | <u>Total</u> |
|--|----------------|-------------|-------------|-------------|-----------------------------------|--|--------------|
| Councillors | 0 | 91 | 142 | 17 | 0 | 0 | 250 |
| Gratuity Payments | 0 | 0 | 10 | 1 | 0 | 0 | 11 |
| WYPF | 100294 | 85454 | 89273 | 11319 | 11238 | 2135 | 299713 |
| Teachers Compensation | 0 | 0 | 1185 | 250 | 0 | 0 | 1435 |
| West Yorkshire Fire (1992 Scheme) | 44 | 90 | 2044 | 328 | 0 | 0 | 2506 |
| West Yorkshire Fire (2006 Scheme) | 2 | 91 | 8 | 4 | 2 | 0 | 107 |
| West Yorkshire Fire (2006/RDS Scheme) | 13 | 15 | 35 | 0 | 0 | 0 | 63 |
| West Yorkshire Fire (2015 Scheme) | 913 | 106 | 4 | 1 | 1 | 2 | 1027 |
| West Yorkshire Fire (2015/RDS Scheme) | 13 | 0 | 0 | 0 | 0 | 0 | 13 |
| South Yorkshire Fire (1992 Scheme) | 28 | 43 | 1113 | 195 | 8 | 0 | 1387 |
| South Yorkshire Fire (2006 Scheme) | 0 | 34 | 2 | 1 | 1 | 0 | 38 |
| South Yorkshire Fire (2006/RDS Scheme) | 0 | 2 | 14 | 0 | 0 | 0 | 16 |
| South Yorkshire Fire (2015 Scheme) | 567 | 65 | 4 | 1 | 0 | 7 | 644 |
| South Yorkshire Fire (2015/RDS Scheme) | 4 | 1 | 0 | 0 | 0 | 0 | 5 |
| North Yorkshire Fire (1992 Scheme) | 25 | 28 | 443 | 85 | 0 | 0 | 581 |
| North Yorkshire Fire (2006 Scheme) | 6 | 146 | 20 | 2 | 1 | 0 | 175 |
| North Yorkshire Fire (2006/RDS Scheme) | 11 | 25 | 55 | 2 | 0 | 0 | 93 |
| North Yorkshire Fire (2015 Scheme) | 551 | 216 | 13 | 3 | 10 | 1 | 794 |
| North Yorkshire Fire (2015/RDS Scheme) | 28 | 2 | 0 | 0 | 0 | 0 | 30 |
| Humberside Fire (1992 Scheme) | 25 | 43 | 833 | 150 | 0 | 0 | 1051 |
| Humberside Fire (2006 Scheme) | 6 | 111 | 11 | 2 | 2 | 0 | 132 |
| Humberside Fire (2006/RDS Scheme) | 26 | 7 | 69 | 4 | 0 | 0 | 106 |
| Humberside Fire (2015 Scheme) | 603 | 122 | 7 | 0 | 1 | 7 | 740 |
| Humberside Fire (2015/RDS Scheme) | 29 | 1 | 0 | 0 | 0 | 1 | 31 |
| Lincolnshire Councillors | 0 | 31 | 48 | 3 | 0 | 0 | 82 |
| Lincolnshire LGPS | 22830 | 25954 | 22529 | 2472 | 2467 | 338 | 76590 |
| Lincolnshire Fire (1992 Scheme) | 13 | 19 | 240 | 53 | 1 | 0 | 326 |
| Lincolnshire Fire (2006 Scheme) | 16 | 321 | 29 | 6 | 21 | 1 | 394 |
| Lincolnshire Fire (2006/RDS Scheme) | 13 | 12 | 39 | 0 | 0 | 0 | 64 |
| Lincolnshire Fire (2015 Scheme) | 539 | 279 | 7 | 4 | 14 | 29 | 872 |
| Lincolnshire Fire (2015/RDS Scheme) | 12 | 1 | 0 | 0 | 0 | 0 | 13 |
| Royal Berks Fire (2015/RDS Scheme) | 6 | 1 | 0 | 0 | 0 | 0 | 7 |
| Royal Berks Fire (1992 Scheme) | 23 | 62 | 416 | 52 | 1 | 2 | 556 |

| | | | | | | | |
|---|------|-----|------|-----|---|----|------|
| Royal Berks Fire (2006 Scheme) | 3 | 59 | 11 | 0 | 0 | 0 | 73 |
| Royal Berks Fire (2006/RDS Scheme) | 1 | 11 | 27 | 2 | 0 | 0 | 41 |
| Royal Berks Fire (2015 Scheme) | 370 | 90 | 1 | 0 | 0 | 7 | 468 |
| Bucks and MK Fire (1992 Scheme) | 14 | 39 | 356 | 73 | 1 | 0 | 483 |
| Bucks and MK Fire (2006 Scheme) | 2 | 161 | 16 | 11 | 2 | 0 | 192 |
| Bucks and MK Fire (2006/RDS Scheme) | 1 | 12 | 24 | 0 | 0 | 0 | 37 |
| Bucks and MK Fire (2015 Scheme) | 322 | 143 | 8 | 0 | 3 | 3 | 479 |
| Bucks and MK Fire (2015/RDS Scheme) | 2 | 0 | 0 | 0 | 0 | 1 | 3 |
| Devon and Somerset Fire (1992 Scheme) | 49 | 58 | 920 | 155 | 1 | 0 | 1183 |
| Devon and Somerset Fire (2006 Scheme) | 22 | 415 | 128 | 15 | 9 | 2 | 591 |
| Devon and Somerset Fire (2006/RDS Scheme) | 35 | 72 | 201 | 3 | 0 | 0 | 311 |
| Devon and Somerset Fire (2015 Scheme) | 1426 | 507 | 23 | 13 | 7 | 18 | 1994 |
| Devon and Somerset Fire (2015/RDS Scheme) | 45 | 6 | 2 | 0 | 0 | 2 | 55 |
| Dorset and Wiltshire Fire (1992 Scheme) | 28 | 61 | 644 | 95 | 3 | 0 | 831 |
| Dorset and Wiltshire Fire (2006 Scheme) | 13 | 274 | 31 | 11 | 3 | 0 | 332 |
| Dorset and Wiltshire Fire (2006/RDS Scheme) | 45 | 50 | 156 | 3 | 0 | 2 | 256 |
| Dorset and Wiltshire Fire (2015 Scheme) | 838 | 302 | 15 | 0 | 1 | 14 | 1170 |
| Dorset and Wiltshire Fire (2015/RDS Scheme) | 56 | 3 | 0 | 0 | 0 | 0 | 59 |
| Unknown Modified Scheme | 0 | 0 | 1 | 0 | 0 | 0 | 1 |
| Tyne and Wear Fire (1992 Scheme) | 36 | 73 | 1226 | 192 | 0 | 0 | 1527 |
| Tyne and Wear Fire (2006 Scheme) | 3 | 25 | 3 | 0 | 0 | 0 | 31 |
| Tyne and Wear Fire (2006/RDS Scheme) | 1 | 1 | 1 | 0 | 0 | 0 | 3 |
| Tyne and Wear Fire (2015 Scheme) | 504 | 23 | 0 | 0 | 0 | 15 | 542 |
| Northumberland Fire (1992 Scheme) | 9 | 18 | 278 | 51 | 0 | 0 | 356 |
| Northumberland Fire (2006 Scheme) | 6 | 86 | 10 | 4 | 2 | 0 | 108 |
| Northumberland Fire (2006/RDS Scheme) | 5 | 13 | 32 | 1 | 0 | 0 | 51 |
| Northumberland Fire (2015 Scheme) | 221 | 102 | 1 | 0 | 1 | 6 | 331 |
| Northumberland Fire (2015/RDS Scheme) | 3 | 3 | 2 | 0 | 0 | 0 | 8 |
| Norfolk Fire (1992 Scheme) | 16 | 45 | 385 | 69 | 0 | 0 | 515 |
| Norfolk Fire (2006 Scheme) | 9 | 103 | 18 | 12 | 0 | 0 | 142 |
| Norfolk Fire (2006/RDS Scheme) | 6 | 8 | 64 | 0 | 0 | 0 | 78 |
| Norfolk Fire (2015 Scheme) | 611 | 140 | 8 | 5 | 7 | 30 | 801 |
| Norfolk Fire (2015/RDS Scheme) | 15 | 0 | 0 | 0 | 0 | 1 | 16 |
| Staffordshire Fire (1992 Scheme) | 12 | 24 | 562 | 113 | 0 | 0 | 711 |
| Staffordshire Fire (2006 Scheme) | 9 | 313 | 23 | 4 | 2 | 0 | 351 |

| | | | | | | | |
|--|------|------|------|-----|------|------|-------|
| Staffordshire Fire (2006/RDS Scheme) | 12 | 35 | 84 | 2 | 0 | 0 | 133 |
| Staffordshire Fire (2015 Scheme) | 529 | 283 | 10 | 11 | 11 | 2 | 846 |
| Staffordshire Fire (2015/RDS Scheme) | 24 | 2 | 0 | 0 | 0 | 0 | 26 |
| LB Hounslow LGPS | 6376 | 7759 | 6607 | 856 | 1381 | 175 | 23154 |
| LB Hounslow Teachers Compensation | 0 | 0 | 145 | 40 | 0 | 0 | 185 |
| Hereford and Worcester (1992 Scheme) | 13 | 38 | 390 | 62 | 0 | 0 | 503 |
| Hereford and Worcester (2006 Scheme) | 13 | 128 | 25 | 6 | 1 | 0 | 173 |
| Hereford and Worcester (2006/RDS Scheme) | 17 | 11 | 38 | 0 | 0 | 0 | 66 |
| Hereford and Worcester (2015 Scheme) | 518 | 191 | 7 | 2 | 3 | 29 | 750 |
| Hereford and Worcester (2015/RDS Scheme) | 12 | 2 | 0 | 0 | 0 | 1 | 15 |
| Durham and Darlington (1992 Scheme) | 11 | 30 | 480 | 95 | 0 | 0 | 616 |
| Durham and Darlington (2006 Scheme) | 0 | 74 | 11 | 0 | 0 | 0 | 85 |
| Durham and Darlington (2006/RDS Scheme) | 5 | 10 | 26 | 0 | 0 | 0 | 41 |
| Durham and Darlington (2015 Scheme) | 442 | 120 | 5 | 0 | 0 | 0 | 567 |
| Durham and Darlington (2015/RDS Scheme) | 7 | 2 | 0 | 0 | 0 | 0 | 9 |
| East Sussex (1992 Scheme) | 27 | 62 | 503 | 98 | 1 | 0 | 691 |
| East Sussex (2006 Scheme) | 10 | 126 | 9 | 5 | 3 | 0 | 153 |
| East Sussex (2006/RDS Scheme) | 2 | 17 | 37 | 0 | 0 | 0 | 56 |
| East Sussex (2015 Scheme) | 515 | 160 | 4 | 2 | 1 | 4 | 686 |
| East Sussex (2015/RDS Scheme) | 10 | 3 | 0 | 0 | 0 | 0 | 13 |
| LB Barnet Councillors | 0 | 13 | 16 | 2 | 0 | 0 | 31 |
| LB Barnet LGPS | 8530 | 9760 | 7377 | 956 | 983 | 1677 | 29283 |
| LB Barnet Teachers Compensation | 0 | 0 | 383 | 41 | 0 | 0 | 424 |
| Derbyshire (1992 Scheme) | 16 | 36 | 595 | 100 | 0 | 0 | 747 |
| Derbyshire (2006 Scheme) | 4 | 133 | 16 | 10 | 5 | 0 | 168 |
| Derbyshire (2015 Scheme) | 618 | 166 | 8 | 0 | 8 | 1 | 801 |
| Leicestershire (1992 Scheme) | 23 | 35 | 542 | 80 | 2 | 0 | 682 |
| Leicestershire (2006 Scheme) | 6 | 144 | 20 | 4 | 10 | 0 | 184 |
| Leicestershire (2015 Scheme) | 512 | 127 | 8 | 0 | 1 | 1 | 649 |
| Nottinghamshire (1992 Scheme) | 31 | 43 | 714 | 115 | 1 | 0 | 904 |
| Nottinghamshire (2006 Scheme) | 6 | 159 | 26 | 9 | 6 | 0 | 206 |
| Nottinghamshire (2015 Scheme) | 584 | 156 | 11 | 0 | 0 | 0 | 751 |
| Cambridgeshire (1992 Scheme) | 10 | 21 | 375 | 55 | 4 | 1 | 466 |
| Cambridgeshire (2006 Scheme) | 1 | 207 | 0 | 1 | 4 | 2 | 215 |
| Cambridgeshire (2015 Scheme) | 449 | 196 | 7 | 0 | 3 | 1 | 656 |

| | | | | | | | |
|--------------------------------|-----|-----|-----|----|----|---|----------------|
| Northamptonshire (1992 Scheme) | 9 | 20 | 352 | 53 | 0 | 1 | 435 |
| Northamptonshire (2006 Scheme) | 3 | 97 | 0 | 1 | 11 | 1 | 113 |
| Northamptonshire (2015 Scheme) | 384 | 163 | 6 | 0 | 4 | 9 | 566 |
| Total Membership | | | | | | | 470,031 |

Customer Survey Results – WYPF Members (1st April to 30th June 2021)

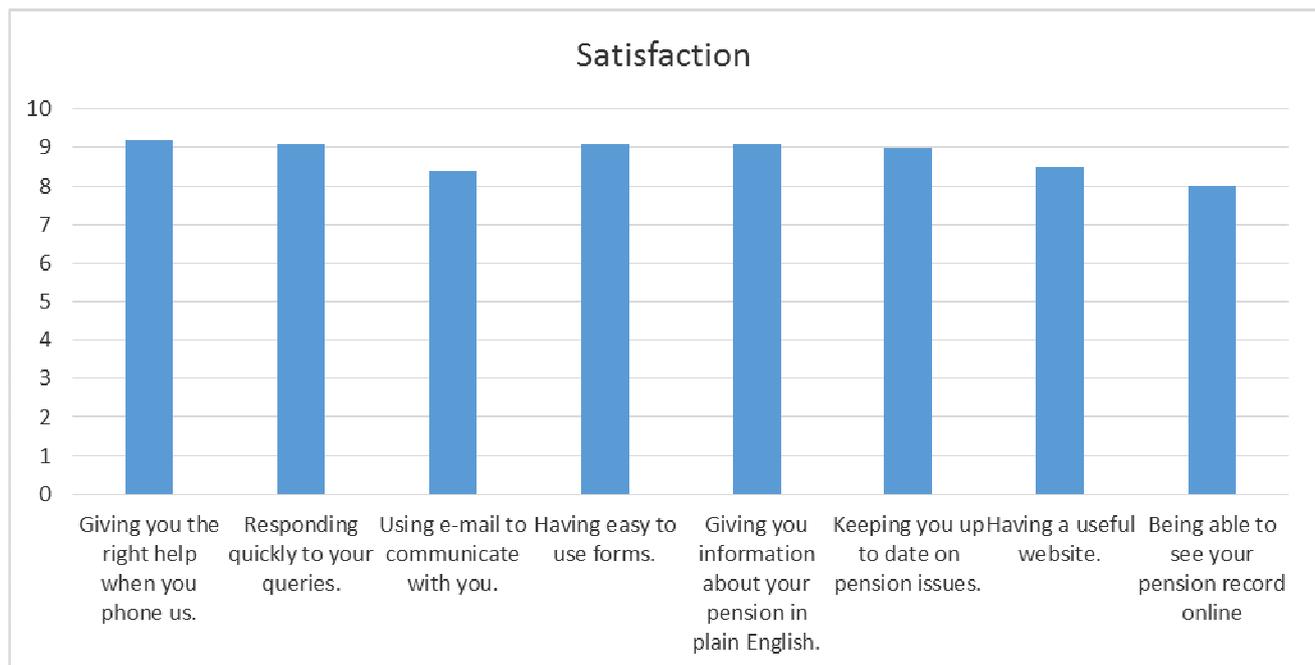
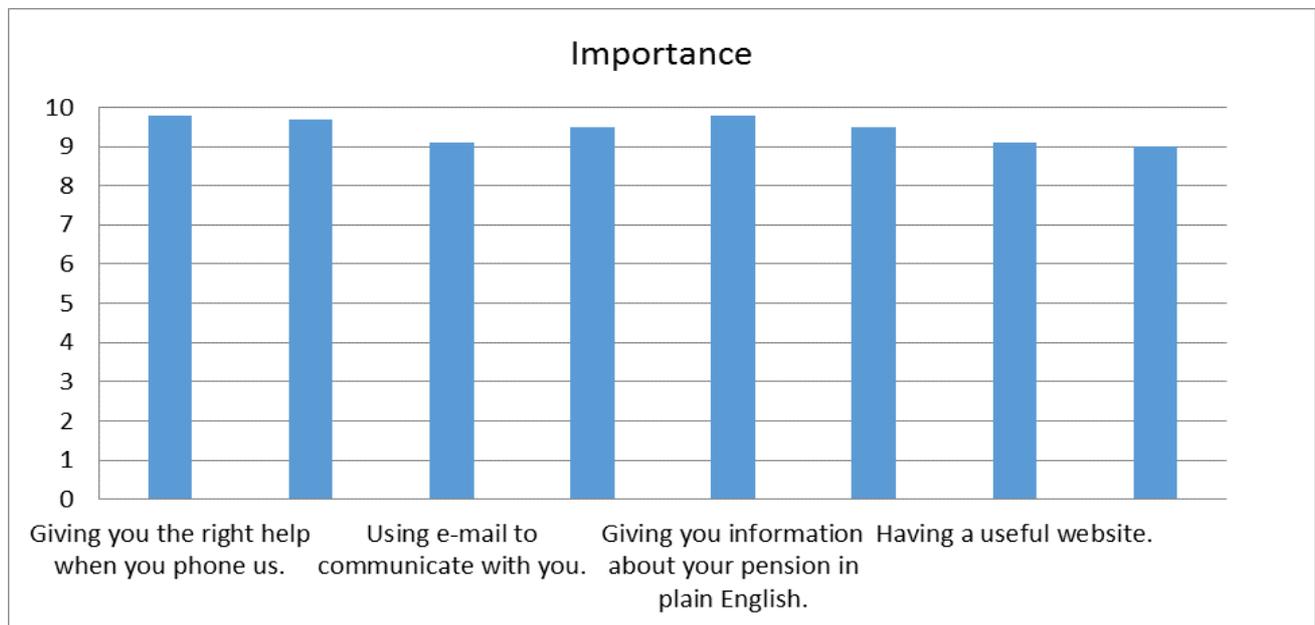
Over the quarter April to June, we received **10** online customer responses.

Over the quarter April to June **459** sample survey letters were sent out and **77 (16.8%)** returned:

Overall Customer Satisfaction Score:

| April to June 2020 | July to September 2020 | October to December 2020 | January to March 2021 | April to June 2021 |
|--------------------|------------------------|--------------------------|-----------------------|--------------------|
| 93.2% | 84.6% | 94.2% | 86.4% | 87.5% |

The charts below give a picture of the customers overall views about our services;



Sample of positive comments:

| Member Name /Number | Comments |
|-------------------------------|--|
| <p>895065 Phone Call</p> | <p>Call put through from Bal as caller wanted to speak to a manager.</p> <p>We have just had a lovely compliment from Mrs Hardisty 895065, she's called a couple of times and spoke to Steve and Heather, she said you were both amazing, explained everything, made it really easy to understand and clarified and went over things again to ensure she understood.</p> <p>She said you were both really knowledgeable and empathetic to her situation and wanted to say what a refreshing change it was to receive such a wonderful service, Saying it's not very often you receive this level of service and wanted to pass on her thanks of the experience she received.</p> |
| <p>Jill Rostron Email</p> | <p>I wanted to write to say I contacted WYPF yesterday and was very luck to get Steve who answered my call. I work for Kirklees Council and have a few different pensions running. I had a few queries about my pensions and I was quite confused about some of the paperwork I had received. Steve was extremely helpful, explained everything brilliantly well, very clearly and patiently and went over everything to make sure I understood. He was very knowledgeable gave me very good information and advice and answered all my many queries. He was polite and friendly and he is I think an absolute asset to your organisation and a perfect example of excellent customer service and how to deal with a customers multiple queries. He spent lots of time with me over two phone calls (I had to answer a work call in between) I felt he spent as much time as I wanted/needed on my queries, I felt listened to and very well looked after. I will be requesting to speak to Steve every time I need to ring WYPF as he was just brilliant!! I have no idea obviously whether he is a young man in your organisation or someone who has been with you for years, but he was extremely knowledgable, and was fantastic at explaining what can be a very confusing subject. I was quite nervous about ringing with all my queries but I needn't have been, after my call I felt completely informed, updated and organised with my pensions. As you can tell from this email I feel I had a most excellent service from your colleague and I asked Steve if your organisation had a compliments/complaints contact, he thanked me and offered me your email. So I apologise for the length of this email and taking up your time but felt it very important to pass on these comments after such great customer service. Please pass this onto whoever you need to in your company.</p> |
| <p>Helen Pratt Email</p> | <p>Hello,</p> <p>I would like to thank Dominic who helped me get to the bottom of a concerning problem regarding my pension and HMRC yesterday. HMRC had been intransigent when I endeavoured to tackle them on the code they had applied to my small pension. It was a DO code that meant I pay 40% tax. That code was to swallow all my lump sum and monthly pension. HMRC advisor would not listen to my pleas last week, she had mistakenly thought I was having a monthly pension the same as my lump sum.</p> <p>Dominic supplied me with the information to tackle HMRC and said if it was not resolved that he would put me in touch with a colleague in payroll to get further help. I did eventually resolve my tax code problem armed with the information Dominic had given me and being on the</p> |

| | |
|--------|---|
| | <p>phone for over an hour with another HMRC advisor.</p> <p>Over the last few months, I have had to contact WYPF several times due to redundancy and to clarify things. Staff at WYPF have been genial, polite, helpful, thorough and knowledgeable. I really appreciate their support.</p> <p>I just wanted to send a BIG THANK YOU for all the help I have received and I hope management appreciate what a good job their employees at WYPF do when working with pension members.</p> <p>Best wishes</p> |
| Online | <p>Exceptional service received on the phone and via post. Stuart Newbould was extremely helpful when I spoke to him on the phone, ensuring I had the right information to pass onto my new pension scheme to ensure that my old pension was transferred in time. Massively appreciate the time and extra guidance to ensure it went through smoothly.</p> |
| 477138 | <p>Brilliant. The service I received from you was very good and very efficient, contacting from you to receiving my pension was very quick.</p> |

Complaints/Suggestions:

| Member Number | Comments | Summary of Acknowledgement Letter Sent to Member |
|----------------------|--|--|
| 1142412 | <p>Good friendly telephone service but difficult process.</p> <p>Your staff are lovely and friendly but transfer process and forms are difficult to understand and follow. Very poor communication. I had to chase my case number of times</p> | <p>The member complained that her transfer out took to long to complete.</p> <p>The delays were due to forms being incorrectly completed and delays with both WYPF and the new scheme.</p> |

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Council Workforce

1 July 2021

Select a Department or Service to filter the information shown

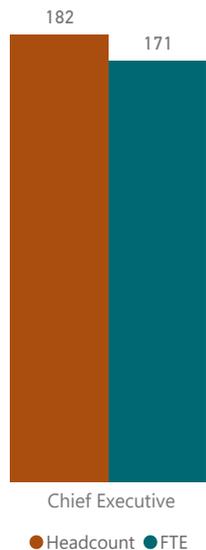
Dept

Chief Executive

Service

West Yorkshire Pension Fund

Council Headcount & True FTE

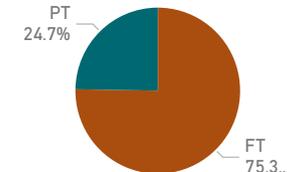
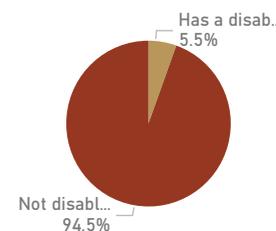
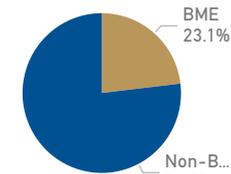
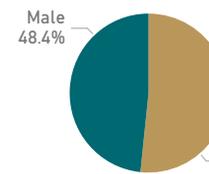


179
Established Employees

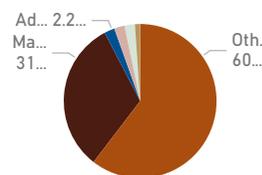
3
Temporary Employees

15
Casual Workers

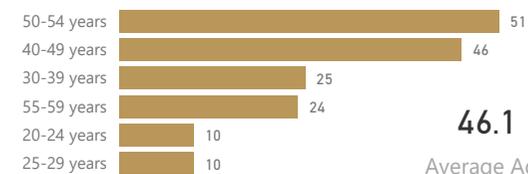
Protected Characteristics



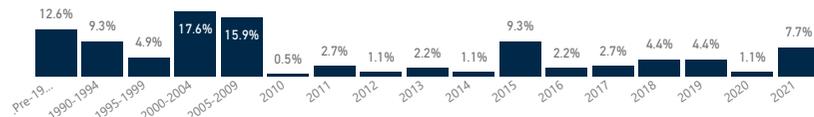
Job Types



Age Bands



Current Employee Start Year



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Absence Performance

Council staff in 12 month period to 1 April 2021

Select a Department or Category to filter the information shown:

Department: Sickness Category:

| Department BV12 Sickness Outturns | 2018 | 2019 | 2020 | 2021 |
|---|-------|-------|-------|-------|
| Chief Exec's & Office of the Chief Exec | 7.71 | 5.36 | 4.87 | 7.30 |
| Children's Services | 13.62 | 14.03 | 14.98 | 12.52 |
| Corporate Resources | 10.65 | 10.32 | 11.35 | 9.47 |
| Health & Wellbeing | 14.68 | 15.60 | 13.37 | 13.66 |
| Place | 13.01 | 14.06 | 13.58 | 9.23 |
| West Yorkshire Pension Fund | 6.79 | 6.14 | 6.05 | 5.48 |
| Council Total (excluding Schools) | 12.57 | 13.00 | 12.96 | 10.75 |

Total Sickness 2020/21

844

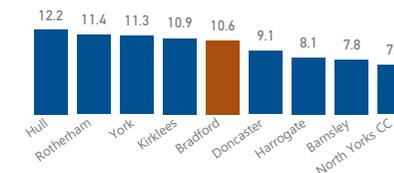
Total FTE Days Lost

Total Sickness 2020/21

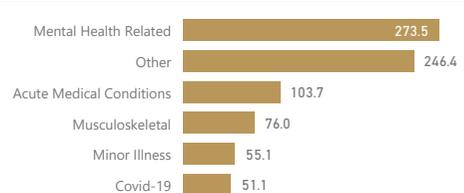
£124.2K

Total Sick Pay Cost

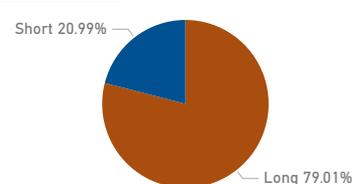
BV12 Local Authority Comparison 2018/19 (incl schools)



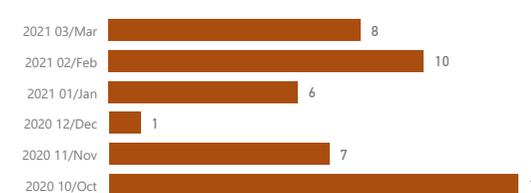
Sickness Category (FTE days) 2020/21



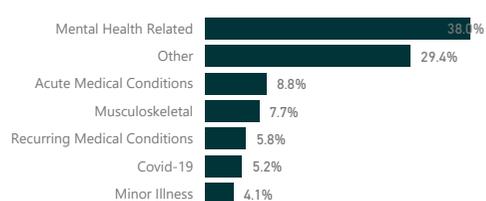
FTE Days by Term 2020/21



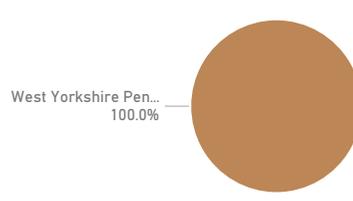
Sickness Spells Commenced per Month



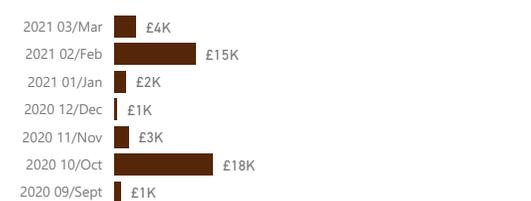
Sick Pay by Category (£) 2020/21



Sick Pay Costs Split 2020/21



Sick Pay Cost by Month Commenced (£)



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Starters

1 July 2021

Start Date

01/07/2020

30/06/2021

Number of Starters



Select a Department or Service to filter the information shown

Dept

Chief Executive

Service

West Yorkshire Pension Fund

Select an Employee type to filter the information shown (press CTRL key to make multiple selections from a single dropdown)

Age Band

All

BME

All

Disability

All

Employee Group

All

Gender

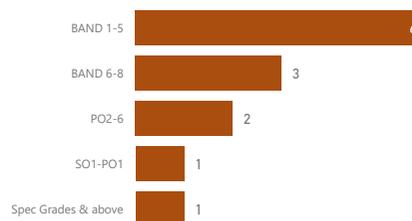
All

Payscale

All

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Starter Pay Band

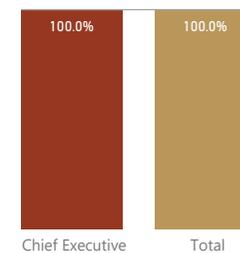


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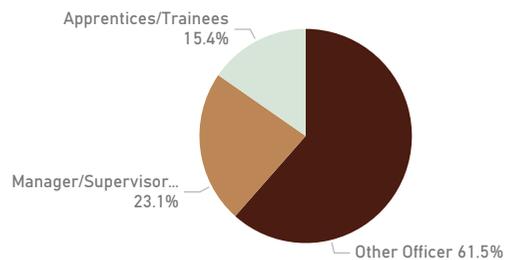
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Percentage of Starters



Starter Job Types



Starters Over Time



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Leavers

1 July 2021

Leaving Date

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Dept: Service:

Select an Employee type to filter the information shown (press CTRL key for multiple selections from a single dropdown)

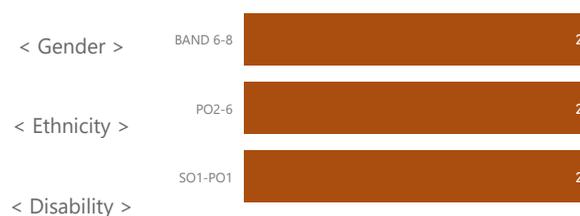
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Number of Leavers

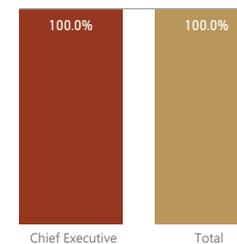


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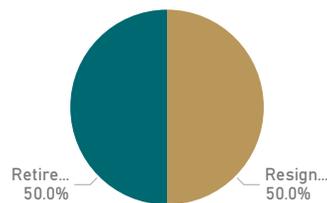
Leavers by Payscale



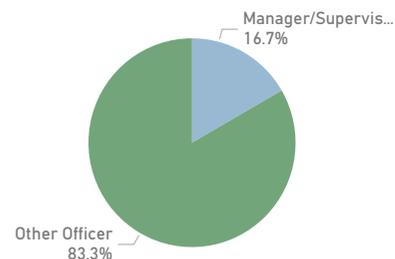
Percentage of Leavers



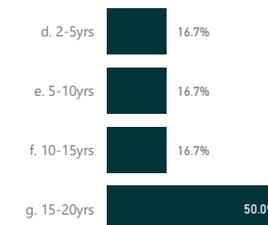
Leaving Reasons



Leaver Job Types



Leaver Length of Service



Leavers Over Time



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Report of the Director, West Yorkshire Pension Fund, to the meeting of West Yorkshire Pension Fund Pension Board to be held on 14 September 2021

M

Subject: McCloud – Effects on Local Government Pension Scheme (LGPS)

Summary statement:

In July 2020 the government released a long awaited consultation on applying the remedy to address the age discrimination inherent with the transitional protections that were adopted by the public service scheme in 2014.

Recommendation

The Local Pension Board note the report

.

Rodney Barton
Director

Portfolio

Report Contact Caroline Blackburn
Phone: (01274) 434523
Email: caroline.blackburn@bradford.gov.uk

Overview & Scrutiny Area

1. Background

1.1 In April 2014 a series of changes were made to the LGPS to reform the schemes benefits structure. These changes were implemented as part of a wider project across Government to reform public service pensions and put them on a more sustainable, affordable and fairer footing for the longer term.

1.2 In the LGPS these changes included:

- Moving benefits from a final salary to a career average basis, and
- Linking member's normal pension age with their state pension age.

1.3 Transitional protections for members nearing retirement were implemented to ensure older workers would not be any worse off as a result of the reforms.

1.4 In the McCloud and Sargent court cases the Court of Appeal found these transition protections unlawfully discriminated younger members.

2. Public Service Pensions and Judicial Offices Bill

2.1 Recently there has been a major step in the implementation of the "McCloud" age discrimination remedy with the Public Service Pensions and Judicial Offices Bill introduced before Parliament on 19 July 2021. The Bill amends the Public Service Pensions Act 2013 and its equivalent in Northern Ireland, making provision to rectify unlawful discrimination in the way in which schemes were reformed in 2015 (2014 for the LGPS in England and Wales) and includes retrospective measures.

2.2 As expected, it confirms the remedy period will cover membership from the date of reform (1 April 2014 or 2015) to 31 March 2022 for eligible members. For the LGPS (referred to as Chapter 3 schemes in the Bill), the Bill enables LGPS regulations to make provision for final salary benefits to be paid in respect of the remedy period (1 April 2014 to 31 March 2022), i.e. it is the enabling legislation which will allow the LGPS regulations to implement the McCloud remedy by extension of the underpin.

2.3 Further draft LGPS regulations are expected by the end of 2021. This will enable progress to be made on upgrading administration systems to allow for the changes as well as help administering authorities plan their communication and rectification programmes.

2.4 For unfunded schemes (Fire Pension scheme), the Bill confirms that the government will proceed with the deferred choice underpin, meaning that all eligible members will be treated as members of their legacy scheme for the period between 1 April 2015 and 31 March 2022, but with the choice of whether to take legacy or reformed scheme benefits when their pension becomes payable.

2.5 All public servants who continue in service from 1 April 2022 onwards will do so as members of their respective reformed scheme and the legacy schemes will be closed in relation to service after 31 March 2022. The Bill also sets out parameters for the treatment of changes in pension contributions and special cases. The provisions in relation to the unfunded schemes will come into force by 1 October 2023 at the latest.

2.6 There is no date is specified when the provisions will come into force for the LGPS, however a recent Written Ministerial Statement said that the Government's intention is that regulations for the LGPS will come into force on 1 April 2023.

3. Information required from employers

3.1 As a result all employers are required to provide details of any part time service or service breaks where this data is currently missing back to April 2014. This information will allow an accurate calculation of the benefits that would have awarded under the Final salary scheme for the underpin check.

3.2 Communications with employers requesting this information has already commenced.

4. Recommendations

The Local Pension Board note this report

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Report of the Director, West Yorkshire Pension Fund to the meeting of West Yorkshire Pension Fund Pension Board to be held on 14 September 2021.

N

Subject:

Pensions Dashboard

Summary statement:

This report gives an update on the progress of the introduction of the Pensions Dashboard.

Recommendation:

It is recommended that the Pension Board note the report.

Mr Rodney Barton
Director

Portfolio:

Report Contact: Yunus Gajra
Assistant Director (Finance,
Administration and Governance)
Phone: (01274) 432343
E-mail: Yunus.gajra@bradford.gov.uk

Overview & Scrutiny Area:

1.0 Background

- 1.1 In 2019, the UK government established the Money and Pensions Service (MaPS), which brought together the Money Advice Service, The Pensions Advisory Service and Pension Wise. These are also government-backed bodies created to improve awareness of pension assets, pension regulations and the options as you approach retirement. The Pensions Dashboard Programme was launched in April 2020, and while still a “work in progress”, the pieces of the jigsaw are starting to fall into place.
- 1.2 The goals for the Pensions Dashboard Programme are as follows:
 - Connect individuals with their pension assets under one account
 - Plain English will replace industry jargon
 - Create a dashboard to show estimated retirement income for individual pension pots, including the state pension.
 - Improve access to impartial guidance/regulated advice
 - Present pension information in a simple, easy to understand format
 - Increase awareness and confidence in the sector
 - Encourage empowerment and informed pension choices
 - Positive contribution to the overall financial well-being of individuals
- 1.3 The Money and Pensions Service will develop a dashboard (the MaPS dashboard) as part of its function to provide information and guidance on pensions, but other organisations will also provide dashboards.
- 1.4 The Pensions Schemes Bill introduced in January 2020, achieved Royal Assent on 11 February 2021 and became the Pensions Schemes Act 2021. It contains the legislation needed to compel pension providers to make individuals’ data available to them via dashboards.

2.0 Scale of the challenge

- 2.1 The task involves 52 million adults being connected to up to around 43,000 providers and schemes. Existing challenges include establishing a sufficiently secure identity verification process, working out how to match people accurately to their savings and addressing the varying types and quality of data held by different providers.
- 2.2 The Pensions Dashboard Programme (PDP) published the key data standards which will underpin pensions dashboards. Data standards provide a common language to describe the pensions information that will be found and displayed on the dashboards. Pension schemes will need to make sure that their data is consistent with the standards, so that members can access this through the dashboards. With onboarding to dashboards expected from 2023, the PDP urges all schemes to start preparing their data now.

3.0 Pensions Dashboard Ecosystem

- 3.1 A pensions dashboard will show a user their pensions information online, securely and all in one place. To make this work, multiple parties and technical services need to be connected – in what is referred to as an ecosystem.

The ecosystem encompasses dashboards themselves, data providers' find and view interfaces to the ecosystem, and the central digital architecture. The Pensions Dashboards Programme (PDP) is responsible for delivering the digital architecture and services, which will enable data providers and dashboard operators to inter-operate.

There is no central database within the ecosystem that holds personal information supplied by users or pensions information. Instead, the ecosystem functions like a giant switchboard, connecting users with their pensions via dashboards.

Following approval from government, procurement of the principal digital architecture for the pensions dashboards ecosystem has commenced.

A separate procurement exercise for the identity service, which will verify dashboard users really are who they say they are, will commence shortly.

Suppliers for both contracts are expected to be in place by October.

4.0 Indicative Timeline

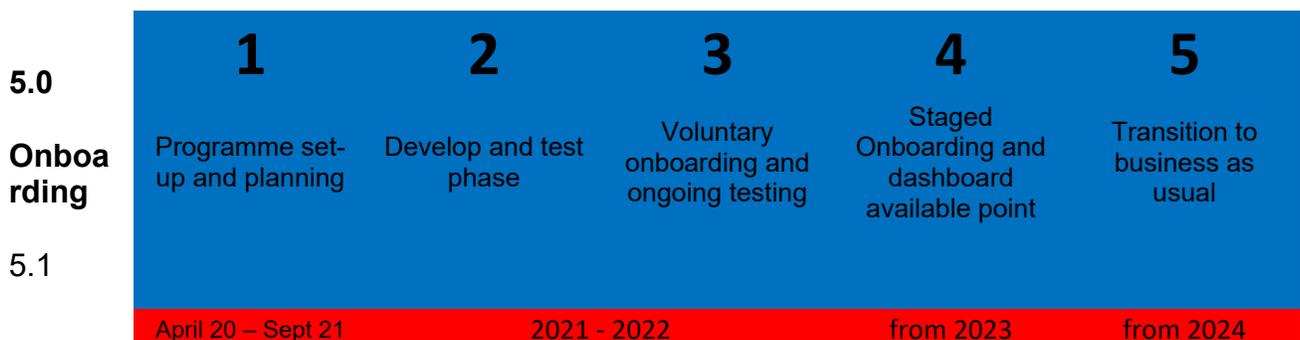
4.1 Implementing pensions dashboards is a significant undertaking and is constrained by several dependencies including legislation, availability of an identity service and the development of the ISP market which will impact delivery timelines. Given the scale of the complexity of the UK pensions industry, a staged approach to onboarding of providers and schemes will be necessary.

4.2 Only when:

- The security of the eco system is fully assured,
- The user experience has been extensively and robustly tested,
- User behaviours have been understood and any adverse impacts or unintended consequences mitigated,
- The right rules and regulations are in place, and
- The service has enough coverage of pension providers/schemes and enough information about those pensions so that it has been proved to meet a user need and be useful to a significant majority of people,

Will the service be made publicly available to any individual who wants to use it.

The indicative timeline is:



Voluntary onboarding – the PDP will continue to work towards the voluntary onboarding of providers to the dashboards ecosystem. They anticipate a two-stage voluntary onboarding approach. The first stage will involve working with system and ISP providers to connect into the dashboard ecosystem and test using synthetic data.

- 5.2 The second stage will be the voluntary onboarding of live schemes and arrangements using real data.

6.0 Staging

- 6.1 For practical reasons, pension providers will connect to the ecosystem over a period of time, rather than all at once. Given the sheer volume of providers involved, connection dates need to be staged to ensure a smooth implementation and mitigate operational risks. The approach needs to achieve a balance between being deliverable, taking into account the practical constraints and circumstances within the industry and regulators, the capacity of the pensions dashboards digital architecture and achieving the widest possible coverage as soon as possible, to enable people to find and view their pensions.

- 6.2 On 27 May 2021, the PDP launched a Call for input on staging. The purpose of the call for input is to gather feedback and insight from pension schemes that will inform Government policy on staging. The PDP is recommending that all public service pension schemes should be onboarded in the initial wave – a two-year period starting from April 2023. Attached (Appendix A) is the response from the Local Government Association (LGA). Questions 22 and 23 of the call for input relate specifically to public service pension schemes and the impact the McCloud judgment may have on their dashboard readiness.

7.0 Conclusion

- 7.1 Legislation is in place to compel pension providers to make individuals' data available to them via dashboards.
- 7.2 The pressures of the McCloud remedy and GMP equalisation and the requirement to stage early will only add to current pressures for administering authorities.
- 7.3 In order to meet the challenging timescales for the PDP programme, administering authorities will need to identify any data gaps and take action to improve data quality to ensure that they are ready to supply the right information to the dashboards once they are live.

8.0 Recommendation

It is recommended that the Pension Board note the report.

9.0 Appendices

Appendix 1 – LGA Response to call for input

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Pensions Dashboards Programme (PDP)

Answers to be submitted online

9 July 2021

Dear Sir or Madam

Pensions Dashboards: Staging Call for Input

Thank you for the Pensions Dashboards Programme (PDP) Call for Input seeking a wide range of views and evidence to inform government and FCA's policy in relation to staging.

I respond on behalf of the Local Government Association (LGA) and the Local Government Pensions Committee (LGPC).

The LGA is a politically led, cross-party membership organisation that works on behalf of councils to ensure local government has a strong, credible voice with national government. 328 councils in England including district, county, metropolitan, unitary, London boroughs and the City of London are members of the LGA. There are 22 Welsh unitary authorities in membership via the Welsh Local Government Association (WLGA). The LGPC is a committee of councillors constituted by the LGA, the WLGA and the Convention of Scottish Local Authorities (COSLA). The LGPC considers policy and technical matters affecting the Local Government Pension Scheme (LGPS) in England & Wales, a scheme which has approximately 6.1 million members.

This response sets out the LGA's view, where appropriate, on the questions posed in the Call for Input.

I hope the content is helpful; if you have any questions, please do not hesitate to contact me.

Yours faithfully



Jeff Houston
Head of Pensions

Questions raised in the Pensions Dashboards Call for Input

Responder details

Q1. We will be sharing the content of your responses with DWP, TPR and FCA to feed into the government's policy development. Please confirm you are happy to be identified when we are sharing

Yes.

Q2. Please tell us the name of the organisation on whose behalf you're responding.

I respond on behalf of the Local Government Association (LGA) and the Local Government Pensions Committee (LGPC).

Q3. Please select which category/categories of respondent best represents you

Public Service Pension Scheme.

Introduction

Q4. Based on the information, how long do you estimate you will need to be ready to connect, and why? From what point in your working assumptions does the lead time start (eg draft regulations, regulations laid before parliament, or approved)?

Connection time will depend on the approach taken by the 98 LGPS administering authorities (see below for an explanation of how the LGPS is administered).

If a national approach on behalf of the 98 LGPS administering authorities is taken, we estimate it will take around 18 months to be 'onboarding ready'. This timescale considers any public procurement requirements that may be necessary.

If each LGPS administering authority decides to onboard individually using their current software provider, we are not able to be definitive about timescales. This is because we have not received any information from the current LGPS pension software providers about timings; however, we estimate it will take at least 18 months.

We have assumed that the lead time starts from when the regulations are in force.

Background to the LGPS

There are three separate Local Government Pension Schemes in the UK. These are separate arrangements. There is one scheme for England & Wales (6.1 million

members), one scheme for Scotland (500,000 members) and another for Northern Ireland (250,000 members). Each scheme is governed by its own statutory legislation issued by each responsible authority.

The LGPS in England & Wales, and the LGPS in Scotland are administered by sub-scheme administrators. The LGPS Northern Ireland has one scheme administrator. These are called LGPS administering authorities. Each LGPS administering authority is responsible for administering the national scheme to which it belongs, at a local level, in line with statutory regulations. They are each, also responsible for maintaining a local pension fund. There are 98 LGPS administering authorities in total:

- 86 in England & Wales
- 11 in Scotland
- 1 in Northern Ireland

Each LGPS administering authority uses pensions administration software system. There are four different suppliers in total but two of the suppliers provide services to all but two of the 98 administering authorities.

In total, around 16,000 employers contribute to the three schemes on behalf of their employees and former employees. These are made up of (though not limited to):

- Local authorities
- Academy trusts
- Higher and further education bodies
- Fire and rescue authorities
- Police and Crime commissioners
- Transport bodies
- Admission bodies (these are normally private sector organisations).

Each employer has its own payroll software. There are numerous suppliers who provide the platform for payroll software.

Q5. [Pension & data providers:] If different from your response to Q4, how long would it take you be able to provide all the required view data?

The answer to this question is dependent on the view data that must be initially be provided. If we return the view data set out in:

- Paragraph 15 of the [Pensions Dashboards staging call for input](#), then we estimate that LGPS administering authorities will be dashboard ready within the same timescales as

quoted in our answer to question 4.

- [Data elements referenced 2.001 to 2.504 of the Data standards guide](#), then we estimate that LGPS administering authorities will take a further 12 months on top of the timescales quoted in our answer to question 4 to be dashboard ready. This is because the annual benefit statement routines will need to be rewritten.

Q6. Would response time be material to onboarding ie would longer response times for ERI or accrued value information (rather than real-time) facilitate earlier staging? If so, what sort of response time would make a difference?

It is not possible for LGPS administering authorities to provide 'real-time' information. It is likely that the information will be drawn from the data supplied on the annual benefit statement.

Regarding timescales please see our response to questions 4 and 5.

Q7. [Pension & Data Providers:] What further information, if any, do pension providers need to get ready for dashboards?

We need absolute confirmation as to what the minimum data requirements are for both the find and view data services for the LGPS. We would suggest the following minimum requirements:

Find service

- 1.001 First name
- 1.002 Surname
- 1.003 Date of birth
- 1.004 National insurance number

View data service

- 2.001 Unique reference number (national insurance number)
- 2.002 Pension name (Local Government Pension Scheme)
- 2.003 Pension type (DB)
- 2.004 Pension origin (workplace)
- 2.005 Pension status (active or inactive)
- 2.007 Pension retirement date (normal pension age)
- 2.101 Administrator reference (governance registration number)
- 2.102 Administrator name (name of LGPS administering authority)
- 2.103 to 2.114 Administrator contract details (link to national LGPS member website)

with contact details)

- 2.203 Employment end date (for inactive members only)
- 2.301 ERI type (DB and where appropriate DBL)
- 2.302 ERI basis (BSF)
- 2.303 ERI calculation date (previous 31 March)
- 2.304 ERI payable date (normal pension age)
- 2.305 ERI amount (estimate of annual pension and where applicable statutory lump sum at normal pension age)
- 2.307 ERI safeguarded benefits (True)
- 2.308 ERI unavailable (ERR, TRN or MAN)
- 2.401 Accrued type (DB and where appropriate DBL)
- 2.402 Accrued amount type (INC and where appropriate LS)
- 2.403 Accrued calculation date (previous 31 March)
- 2.404 Accrued payable date (normal pension age)
- 2.405 Accrued amount (estimate of annual pension and where applicable statutory lump sum at the previous 31 March)
- 2.406 Accrued safeguarded benefits (True)
- 2.407 Accrued unavailable (ERR, TRN or MAN)

Q8. Do you have any further evidence on consumer needs and/or the acceptability of a dashboards service displaying partial information for a limited time?

No.

PDP recommendations for staging

Q9. Do you see any barriers to early staging?

Yes, resources are already over stretched with the pressures of the McCloud remedy and GMP equalisation and the requirement to stage early will only add to this. Recruitment and retention of staff remains an issue across the sector.

In addition, we do not yet know if the information we provide on annual statements will have to take account of the McCloud remedy. If it does, we will need confirmation of when the requirement will apply from. The changes to pension software systems will need to tie in with the software changes needed for the dashboard. Because of the lack of certainty, there is the possibility that dashboard data could be different to the data that is included in the annual statements when the data becomes publicly available. This could undermine the value of pensions dashboards and potentially cause a considerable amount of work

for LGPS administering authorities in queries.

Q10. This question particularly applies to data providers, what is your appetite for staging early? Are there things PDP could do to encourage you to onboard earlier?

It would help if PDP could limit the amount of view data that must be supplied initially (as set out in our answer to question five).

Recommended scope for staging

Q11. Do you agree with our recommendation to prioritise occupational schemes with 1,000+ members and FCA regulated providers in the first two years?

Yes, subject to our response to question 9.

Wave one - Cohort one – master trusts and FCA regulated pension providers

Q12. Do you agree master trusts should be the first to stage? Do you have any further evidence that speaks to their deliverability?

Not applicable.

Q13. Do you agree that non-commercial master trusts should stage as part of the next cohort? In the absence of a legal definition of non-commercial, is 20,000 members a suitable proxy to differentiate them from master trusts competing in the AE space?

Not applicable.

Q14. Do you agree FCA regulated pension providers should be among the first to stage? Do you have any further evidence that speaks to their deliverability?

Not applicable

Q15. Taking into account any existing plans to consolidate systems, and the potential to use an ISP (in-house or external), what specific challenges, if any, do FCA regulated providers of personal pensions face in getting all or part of their business dashboard-ready? Please provide evidence of the nature and scale of those challenges and how those challenges might be overcome.

Not applicable.

Wave one - Cohort two – DC schemes used for AE with 1000+ members, largest to smallest

Q16. Do you agree that DC schemes used for AE should be the second cohort to stage? Do you have any evidence that speaks to the deliverability of this?

Not applicable.

Q17. Do you agree that non-commercial master trusts not included in cohort one should join cohort two?

Not applicable.

Q18. Do you agree with the rationale for requiring mixed benefit schemes with DC sections used for AE to be part of cohort two? Do you have any evidence on the impact of this? How far does this differ from current disclosure practice ie issuing annual benefit statements? What is the scale of the population impacted?

Not applicable.

Wave one - Cohort three – all remaining OPS (DB & DC) with 1000+ members, largest to smallest

Q19. Do you agree the largest DB schemes should be staged from Autumn 2023 and all DB schemes with 1,000+ members should be staged within the first wave (within two years from April 2023)? Do you have any evidence that speaks to the deliverability of this?

Yes, subject to our response to question 9.

Q20. [DB schemes:] What are the specific challenges for DB schemes in connecting to dashboards? Which data elements are challenging, and why? Please provide any supporting evidence.

Find data

Ref 1.016 – Country Code

LGPS pensions software does not routinely hold a valid ISO country code. If the address is in the UK, it is most likely that this field will be empty and thus default to GB. However, where the address is non-UK, it is not clear if LGPS administrators will hold a valid ISO country code.

View data

Ref 2.002 - Name of pension arrangement

A member of the LGPS can have multiple sets of benefits across multiple LGPS administering authorities. Therefore, this field will need to be the:

- name of the scheme (ie LGPS) and the name of the administering authority for the DB element
- name of the scheme (ie LGPS) and the name of the administering authority and name of the AVC provider for the accompanying defined contribution AVCs.

Ref 2.004 – Pension origin

The LGPS is a public sector workplace pension arrangement in all cases. As such, this field is not currently held on our software so will need to be added.

Ref 2.005 – Pension status

According to the data standards guide this will be a list of fixed value codes. The codes must be expanded to include frozen refunds and pension credit benefits.

Across the three LGPS schemes there are thousands of frozen refunds. The Scheme regulations allow a refund to remain unpaid until the individual decides whether to take payment of it or elect for a cash transfer sum (if eligible) to another registered pension scheme. Therefore, the description for this field will need to allow for frozen refunds in addition to deferred benefits.

Also, how are pension credits addressed? The data fields do not seem to cater for these benefits.

Ref 2.006 – Pension start date

A member's pensionable service history can be made up of many lines of service relating to different LGPS employments. The service line can also reference different employments within the same employer (because the member has chosen to join the benefits from different LGPS employments together). Without understanding why this date is needed, it is unclear what date should be used?

Also, how are pension credits addressed? Should this be the transfer day?

Ref 2.007 – Pension retirement date

We presume this date is the member's normal pension age without allowance for early or late payment?

Ref 2.008 – Pension link

The data standards confirm that this is an identifier used to link pension arrangements together, eg AVC pot with main scheme pension. However, members in the LGPS can have 'orphan AVCs'. These are AVCs that have no main scheme benefits attached (usually because the person has transferred out their main scheme benefits). In this scenario how would this field be completed?

Ref 2.201 – Employer name

The data standards confirm that this field should be completed with the name of the employer / employment which gave rise to the individual's pension. It confirms that the purpose of this field is to describe the employer to the individual.

A member's pensionable service history can be made up of many lines of service relating to different LGPS employments. The service line can also reference different employments within the same employer (because the member has chosen to join the benefits from different LGPS employments together). Therefore, we are unclear as to what name should be inserted?

Ref 2.202 – Employment start date

The data standards confirm that this field should be completed with a date identifying the start of the individual's employment which gave rise to the individual's pension. It confirms that the purpose of this field is to allow the individual to see the start of their employment period.

A member's pensionable service history can be made up of many lines of service relating to different LGPS employments. The service line can also reference different employments within the same employer (because the member has chosen to join the benefits from different LGPS employments together). Therefore, we are unclear as to what date should be inserted?

Ref 2.203 – Employment end date

The data standards confirm that this field should be completed with a date identifying the end of the individual's employment which gave rise to the individual's pension. It confirms

that the purpose of this field is to allow the individual to see the end of their employment period.

A member's pensionable service history can be made up of many lines of service relating to different LGPS employments. The service line can also reference different employments within the same employer (because the member has chosen to join the benefits from different LGPS employments together). Therefore, we are unclear as to what date should be inserted?

Ref 2.304 – ERI payable date

Members of the LGPS can have multiple tranches of protected benefits within a single benefit record. However, these benefits are all paid on the same day (excluding flexible retirement), regardless as to any protected payment date attached to a tranche of benefit. We are therefore unclear, as to the relevance of this description as the date will always be normal pension age?

Ref 2.305 – ERI amount

Where an LGPS member has benefits built up before 1 April 2008 in England & Wales (before 1 April 2009 in Scotland and Northern Ireland) an automatic 3/80th lump sum is built up. However, for benefits built up on or after those dates the cash lump sum is derived from conversion of pension to lump sum.

Can you confirm that the inclusion of a lump sum only refers to the automatic cash lump sum and not any lump sum derived from conversion of pension to lump sum?

Ref 2.405 – Accrued amount

Where an LGPS member has benefits built up before 1 April 2008 in England & Wales (before 1 April 2009 in Scotland and Northern Ireland) an automatic 3/80th lump sum is built up. However, for benefits built up on or after those dates the cash lump sum is derived from conversion of pension to lump sum.

Can you confirm that the inclusion of a lump sum only refers to the automatic cash lump sum and not any lump sum derived from conversion of pension to lump sum?

Q21. [Largest DB schemes, over 50,000 members:] When is the earliest in 2023 the largest DB schemes (over 50,000 members) could reasonably be expected to comply? Why? Please provide any supporting evidence.

Please see our responses to questions 4 and 5.

Q22. Do you agree that all public service schemes should be staged as early as possible within the first wave? Do you have any evidence that speaks to the deliverability of this?

See our response to question 9.

Q23. [Public sector schemes:] What specifically are the challenges presented by the McCloud Judgement for public service schemes in terms of dashboard readiness? What is the earliest that public service schemes could reasonably be expected to connect?

Please see our response to question 9 for the challenges the McCloud remedy poses and our response to questions 4 and 5 for timings.

Q24. Do you agree that all remaining DC schemes with 1,000+ memberships should be staged by the end of the first wave (within two years of April 2023)? Do you have any evidence that speaks to the deliverability of this?

Not applicable.

Wave two - Medium sized OPS (100 – 999 members) should form a second staging wave

Q25. Do you have any additional evidence on the ability of medium schemes to participate in pensions dashboards?

Not applicable.

Q26. Do you have any evidence about the potential impact on savers of deferring medium schemes until the bulk of large schemes have staged?

Not applicable

Wave three - Participation of small and micro OPS (<100 members) should be deferred to a subsequent staging phase

Q27. Do you agree that small and micro schemes should form a third wave, after large and medium schemes? If so, when would be a reasonable timeframe for staging these schemes, and why?

Not applicable.

Q28. Do you have any evidence about the potential impact on savers (eg lost pots) if small and micro schemes were delayed until after 2025?

Not applicable.

Proposed timeline for first wave

Q29. Do you have any evidence of practical obstacles to our recommended sequencing and timing for staging?

Please see our responses to questions 4, 5 and 9.

Q30. How well do our recommendations meet the policy objectives and staging principles?

We agree that the recommendation meet the policy objectives and staging principles.

Q31. Do you have any evidence on where lost pots are most likely to be located and the impact, therefore, of our staging recommendations on reconnecting savers with lost pots?

Not applicable.

Q32. Do you have any evidence on equalities impacts of staging and impacts on under-pensioned groups?

No.

Connecting to the ecosystem via an integrated service provider

Q33. As a data provider do you intend to connect your data via an ISP type solution? If not, what is your intended alternative?

It is likely that the majority of LGPS administering authorities (of which there are 98 in the UK) will connect their data via an ISP type solution. We are unaware of any administering authority that is not intending to connect by way of an ISP.

Q34. As a pension provider will you work with your existing software provider or seek an alternative ISP provider?

A number of options are current been explored.

Option 1

LGPS administering authorities (of which there are 98 in the UK) will work with their existing software provider to establish an individual ISP. There are two software providers who predominantly cover the LGPS market.

Option 2

We are exploring the possibility of extending the use of an established database to include the find and view elements required by the dashboards. That way LGPS administering authorities will not be required to establish individual ISPs, we will only need one ISP. This could potentially reduce the overall cost for the LGPS in England and Wales, and Scotland.

Option 3

On behalf of LGPS administering authorities we procure to create an ISP market.

Q35. If you are a software provider we would like to ask you a few more questions to further understand how your organisation is preparing for staging. Please choose Yes if you are happy to answer the four additional questions. Please choose No if you are not a software provider or you are a Software Provider not wanting to answer more questions.

Yes, as a prospective software provider.

Q36. [Software providers] As an existing software provider do you intend to extend your ISP offering beyond your existing client base?

Not applicable.

Q37. [Software providers] Are you considering developing and providing an ISP solution as a new entrant into the market? What sectors of the market do you envisage providing ISP solutions to?

We are considering extending the use of an existing database to include the find and view elements required by the dashboards for LGPS administering authorities (of which there are 98 in the UK) only. That way LGPS administering authorities will not be required to establish individual ISPs. We will only need one ISP. This will potentially reduce the overall cost for the LGPS.

By way of background, in 2015 a database was developed by the Local Government Pensions Committee (LGPC) Secretariat as part of the LGA. The LGPC takes

responsibility for the maintenance of the Database, future developments to the system's capabilities and ICT infrastructure ("the Database"). It was created for the purpose of better management of the LGPS and to protect public funds. Its current uses are set out in an Data Sharing Agreement (DSA) and must not be shared for any other purposes outside of DSA, except in respect of the extension of the Department for Work and Pensions (DWP) 'Tell Us Once' service to the LGPS.

Q38. [Software providers] What is the anticipated lead time for bringing ISP solutions to market?

Please see our response to question 4.

Q39. What factors will influence the pace at which ISP providers can connect clients to the dashboards ecosystem? What can be done to accelerate market coverage to better facilitate connectivity for data providers?

Not applicable.

PDP additional research

Q40. PDP would like to carry out additional research (In some cases we may commission an independent research organisation to carry out research on our behalf) with organisations who will be providing pension information for users to view on dashboards. We want to further understand what will be involved for you to successfully on-board with the pensions dashboards ecosystem and respond to these requests. If you're happy to be contacted about this, please include details of the people we can reach out to here:

Jeff Houston (Head of Pensions)

Telephone: 07786 681936

Email: jeff.houston@local.gov.uk

Lorraine Bennett (Senior Pensions Adviser – LGPC Secretariat)

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Jayne Wiberg (Pensions Adviser – LGPC Secretariat)

Telephone: 07979 715825

Email: jayne.wiberg@local.gov.uk



Report of the Director, West Yorkshire Pension Fund, to the meeting of West Yorkshire Pension Fund Pension Board to be held on 14 September 2021

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Subject: Training

Summary statement:

The training of Pension Board members to understand their responsibilities and the issues they are dealing with is a very high priority. Details of training courses, conferences and seminars listed may assist Board Members.

Recommendation

Consideration is given to attendance by Board Members at the events in Section 1 and members note the requirement to complete the Pension Regulators toolkit training.

Rodney Barton
Director

Portfolio:

Report contact: Caroline Blackburn
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E-mail: caroline.blackburn@wypf.gov.uk

1. Training Events

1.1 If any Pension Board member would like any specific training through one to one meetings with the in-house team, then this can be arranged.

1.2 Pension Board members should consider the following events.

- **PLSA Annual Conference**
12-14 October 2021, detail tbc
- **LAPFF Annual Conference**
8-10 December 2021, Bournemouth Hilton
- **LGA Fundamentals training programme 2021**
Leeds Day 1 - 21 October, Day 2 - 18 November, Day 3 - 8 December
Hybrid session Day 1 - 12 October, Day 2 - 9 November, Day 3- 2 December

Fundamentals is a bespoke three-day training course aimed at elected members and others who attend pension committees/panels and local pension boards. Past delegates include elected members, trade union representatives, member and employer representatives, as well as a variety of officers who attend/support committees and some private sector organisations who provide services to administering authorities. The course provides a scheme overview and covers current issues in relation to administration, investments and governance of the LGPS.

Attending all three days will assist delegates in meeting the relevant requirement for knowledge, skills and understanding either required in statute or encouraged by relevant guidance.

Each day has a different theme and will include sessions delivered by experts in their field. The event also provides delegates with valuable networking opportunities. Each day's programme will start at 10am, with registration and coffee from 9:30am, and close by 4pm with refreshments and lunch provided. For full details see the Training programme at Appendix A.

As usual, the training will take place in three locations, London, Leeds and Cardiff. The London sessions will be hybrid, so delegates will have the choice of attending in person or virtually. The sessions in Leeds and Cardiff will be face to face only.

- **LGA Annual Governance Conference**

The annual conference retains its popular lunchtime to lunchtime format. It will start on Thursday 20 January and end on Friday 21 January 2022. It will take place at the Marriott Highcliffe Hotel in Bournemouth. The programme is currently being finalised.

- **LGA circulars and bulletins**

Members can also make use of the LGA website where circulars, bulletins and updates are published on a regular basis.

<http://www.lgpsregs.org/index.php>

- **Scheme Advisory Board website**

Members can find lots of useful information on the Scheme Advisory Boards website

<https://www.lgpsboard.org/>

Members can also make use of web based training.

1.3 Pensions Regulator toolkit

All Pension Board members should complete the Pension Regulators toolkit training. Once completed a copy of the completion certificate should be given to the Head of Employer Services and Compliance.

The Trustee toolkit is a free, online learning programme aimed at trustees of occupational pension schemes.

The Trustee toolkit includes a series of online learning modules and downloadable resources developed to help you meet the **minimum** required level of knowledge and understanding introduced in the Pensions Act 2004.

<https://trusteetoolkit.thepensionsregulator.gov.uk/>

Other online training is available at **Aberdeen Standard Investments Learning Gateway**

Web based training provided by Aberdeen Standard Investments:

<https://www.aberdeenstandard.com/en/uk/adviser/investment-tools/learning-gateway>

2. Annual Meetings

This year both annual meetings will be held virtually on:

- Members Meeting – 2pm on 27 October 2021
- Employers Meeting – 2pm on 28 October 2021

3. Recommendations

Consideration is given to attendance by Board Members at the event in Section 1

Pension Board Members note the requirement to complete the Pension Regulators toolkit training.

Fundamentals - Day 1 – LEGAL FRAMEWORK OF THE LGPS

- 9:30 **Registration and Coffee**
- 9:30 **Chair's introduction to the day**
- 10:00 **The Legal Landscape**
- The LGPS in its legal context
 - General local authority legal issues
 - LGPS specific duties and responsibilities
 - Wider duties and responsibilities
 - What happens when things go wrong?
- 11:15 **Break**
- 11:30 **Governance Framework**
- The Hutton report
 - The Public Service Pensions Act 2013
 - The law governing -
 - The responsible authority (MHCLG)
 - Scheme advisory board
 - Local pension board
 - Asset pools
- 12:45 **Lunch**
- 1:30 **Benefit Structure**
- The basis of the LGPS
 - Final salary v CARE schemes
 - A tour of the 2014 Scheme
 - Administering authority and scheme employer roles
- 2:15 to 4:00 **(Break at 2:45)**
- 3:00 **Investment Framework**
- The Management and Investment of Funds Regulations – a history
 - Statement of investment principles
 - Investment Strategy Statement (ISS)
 - ISS statutory guidance
 - Funding strategy statement
 - Annual reports and auditing
- 3:55 **Course Review and Further Information**
- 4:00 **Close**

Fundamentals - Day 2 – LGPS INVESTMENTS

9:30 Registration and refreshments

9:55 Introduction from the Chair

10:00 Investing strategically Part 1

What is asset allocation and why it really drives return?

10.40 Investing strategically Part 2

What are the different asset classes and how do they work?

11.20 Break

11.40 The climate challenge

What are the options to minimise the risk of your portfolio to climate change and contribute to a low carbon world?

12.40 Lunch

1.30 The stewardship challenge

How to manage your managers and be an effective asset owner

2.10 The impact challenge

Taking account of the social impact of your investments and the opportunities to make a difference

2.50 Break

3.10 The 'crystal ball' challenge

The outlook for opportunities and risks over the medium and long term

4:15 Close

Fundamentals - Day 3 – DUTIES AND RESPONSIBILITIES

- 9:30 **Registration and Coffee**
- 9:30 **Chair's introduction to the day**
- 10:00
members **Duties and responsibilities of Pension Committee and Board**
- The evolving requirements
 - Committee vs Board - delegation and representation
 - The governance budget
 - The Pension Regulator's involvement
 - Standing agenda items, breaches of law, knowledge and training
 - Bodies with oversight over the LGPS
- 11:00 **Break**
- 11:15 **Preparing and maintaining Scheme strategies and policies**
- Mandatory and desirable policies in the LGPS
 - How strategies and policies assist the scheme manager
- 12:00 **MHCLG – a view from the bridge**
- The role of the ministry
 - Issues on the radar
- 12:45 **Lunch**
- 1:30 **The Local Pension Board - a case study**
- How the local pension board can improve service delivery
 - Good practice, scrutiny and supporting the board
- 2:15 to 4:00 **(Break at 2:45)**
- 3:00 **Valuations, Exit Payments and Funding Valuation**
- The purpose of an actuarial valuation
 - Assets and liabilities
 - How do liability calculations work?
 - What assumptions are used?
- Funding**
- What is the importance of funding strategy?
 - Different employers – different characteristics and objectives
 - Employer covenants
- 3:55 **Course Review and Further Information**
- 4:00 **Close**

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