

GLOUCESTERSHIRE PENSION FUND **2021/22**



ANNUAL REPORT

CONTENTS

	PAGE
Introduction	3
01 Independent Investment Advisor's Report	8
02 Overall Fund Management	15
2.1 Scheme management and advisors	16
2.2 Risk management	17
03 Financial Performance	19
04 Investment Policy and Performance Report	25
05 Scheme Administration	35
5.1 Administration arrangements	36
5.2 Value for money statement	37
5.3 Summary of activity	38
5.4 Key performance data	39
5.5 Other information	41
5.6 Internal Disputes Resolution Procedure	50
06 Pensions Administration Strategy	51
07 Executive Summary on the Last Triennial Valuation	58
08 Actuarial Report on Fund	61
09 Rates & Adjustment Certificate	64
10 Governance	71
10.1 Pension Board	72
10.2 Governance Compliance	75
10.3 Governance Policy & Compliance Statement	76
11 Fund Account, Net Assets Statement and Notes	88
12 Asset Pools	142
13 Funding Strategy Statement	150
14 Investment Strategy Statement	181
15 Communications Policy Statement	191
16 Summary of Fund Benefits	194
17 Glossary of Terms	196



INTRODUCTION

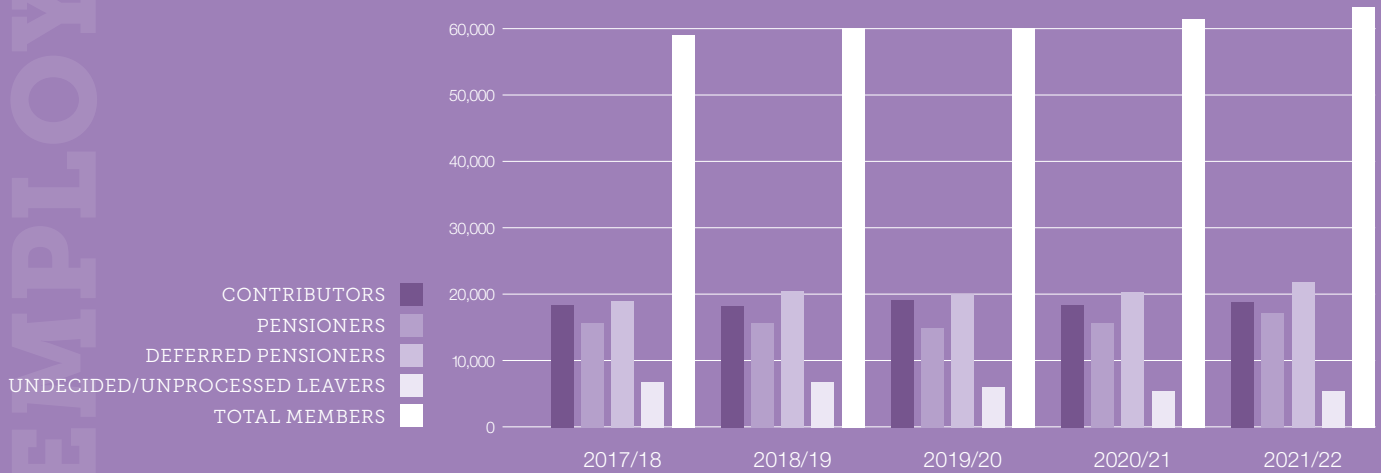
IT IS WITH PLEASURE THAT WE INTRODUCE THIS YEAR'S ANNUAL REPORT OF THE **GLOUCESTERSHIRE PENSION FUND**. IT CONTAINS DETAILS OF THE ADMINISTRATION OF THE FUND, TOGETHER WITH ITS INVESTMENTS AND ACCOUNTS FOR THE YEAR TO 31ST MARCH 2022.

This introductory section provides a summarised version of the key issues set out within the Annual Report, and hence can be read as a standalone report.

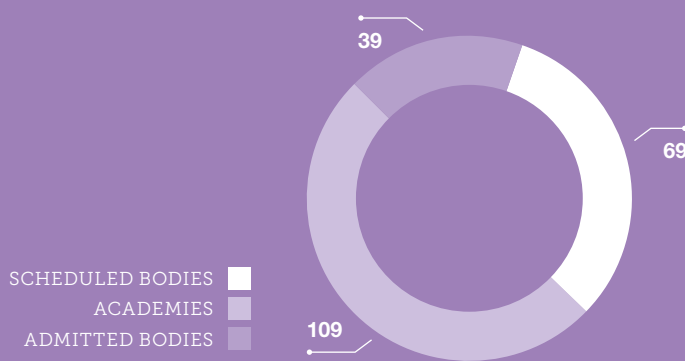
The Fund is managed and administered by Gloucestershire County Council on behalf of Gloucestershire local authorities, other bodies providing

public services and certain admitted bodies, as part of the national Local Government Pension Scheme (LGPS) Regulations. The Fund collects employer and employee pension contributions in relation to active employees of these organisations and meets the cost of pension benefits due to current and former employees.

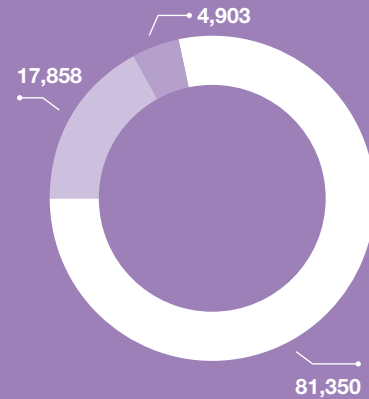
MEMBERSHIP SUMMARY



NUMBER OF EMPLOYERS 2021/22



TOTAL CONTRIBUTIONS 2021/22 £000'S



18,920
CONTRIBUTORS

18,128
PENSIONERS

20,814
DEFERRED

FUND MEMBERSHIP & EMPLOYERS

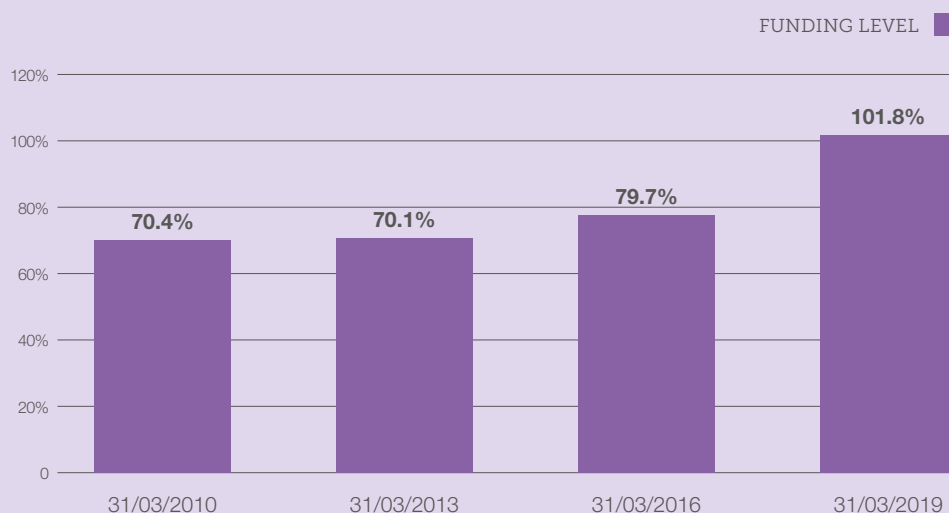
This report is primarily aimed at members and participating employer organisations within the Gloucestershire Pension Fund. In terms of Fund Members, overall membership continues to increase steadily.

Membership at the end of March **2022** stood at approximately **57,900**, split between active contributors (**18,920**), pensioners (**18,128**) and deferred members (**20,814**). There were also

unprocessed leavers (**5,389**) at the end of March **2022**. This equates to a rise of **279** compared with the position at the end of March **2021**.

With regards to participating employers, the Pension Fund has seen the overall numbers increase by **13** during **2021/22** to finish at **217** employers. Contributions received from employers and employees totalled **£104.1m** during the year.

ACTUARIAL ARRANGEMENTS



£1,703
MILLION/2016

79.7%
OF LIABILITIES

£2,379
MILLION/2019

101.8%
OF LIABILITIES

ACTUARIAL ARRANGEMENTS

An actuarial valuation of the Fund is undertaken every three years. This outlines the approach taken to secure Fund solvency while keeping employer contributions stable and also gives details of the actuarial assumptions and methods used to value liabilities at the **2019** triennial valuation. The Fund's assets, as at the **2019** triennial valuation were valued at **£2,379 million**, which were sufficient to meet **101.8%** of the liabilities (i.e. the present value of promised retirement benefits) accrued up to that date.

The funding levels at the last four triennial valuations are shown in the graph. Further details of the rationale and assumptions used to calculate these funding levels can be found within the Annual Report.

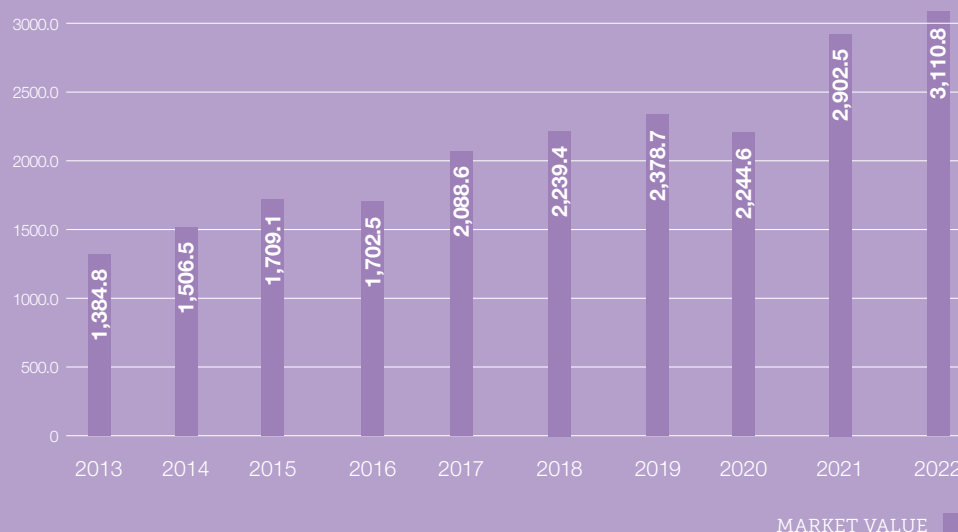
POLICY DOCUMENTS

The latest version of the Fund's policy statements covering Investment Strategy, Funding Strategy, Governance and Communication, as well as a brief summary of scheme benefits are also included within this Annual Report as well as being available on the Fund's website.

31ST MARCH 2022
£3,110.8
 MILLION

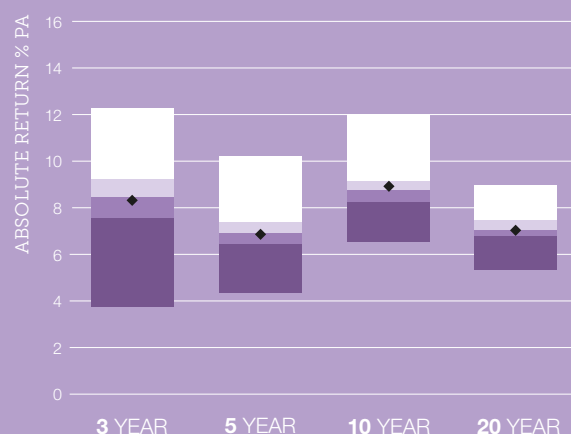
31ST MARCH 2021
£2,902.5
 MILLION

MARKET VALUE OF FUND BY YEAR £M



ANNUALISED RETURNS

	3 YEARS	5 YEARS	10 YEARS	20 YEARS
FUND	8.3%	6.9%	8.9%	7.1%
UNIVERSAL AVERAGE	8.3%	7.1%	8.9%	7.3%



INVESTMENT & FUND PERFORMANCE

During **2021/22** the Fund achieved a 6.9% return on its investments, placing Gloucestershire 39th out of the 62 LGPS Funds measured by PIRC Local Authority Pension Performance Analytics (who monitor the performance of Pension Funds). The long-term performance of the Fund remains positive and the over ten year, annualised performance was **+8.9%**, placing the Fund **26th out of the 61** LGPS Funds measured.

An analysis of the performance of the Fund compared with the other LGPS Funds and its strategic benchmark is shown above. The position of the Gloucestershire Fund is presented as a diamond in each of the relevant bars. The higher the positioning, the higher the Fund scored in comparison to its peers in terms of absolute return over **3, 5, 10 and 20 year periods**.

The value of the Fund's assets as at **31st March 2022** was **£3,110.8 million**. This represented an overall increase of **£208.4 million** compared with the position at **31st March 2021**. The value of the Fund at the end of the last ten financial years is shown in the graph above.

The Fund undertakes its investments in accordance with the Strategic Asset Allocation. This Strategic Asset Allocation was reviewed during **2021/22**, with a new allocation being agreed by the Pension Committee which is set out in the Investment Strategy Statement (ISS). A copy of this policy, along with details of the Fund's investment and performance, is available within this Annual report.

STATEMENT OF ACCOUNTS

The full Statement of Accounts of the Fund for the year ended **31st March 2022** and the auditors report in relation to these accounts can be found on pages **90 to 141**.

SCHEME DETAILS

We remind both existing and future pensioners, that the Local Government Pension Scheme (LGPS) is determined by statutory legislation. This legislation can only be changed by the Government via the Department for Levelling Up, Housing & Communities (DLUHC) and the scheme cannot be changed by the County Council or other scheduled employers of the Gloucestershire Pension Fund.

Following a review by the Public Service Pensions Commission a new LGPS scheme was introduced, commencing from **1st April 2014**. The terms of the LGPS scheme only apply to new pensionable service accrued with effect from **April 2014**. Previously accrued pensionable service and pensions in payment prior to **April 2014** are not affected.

Further information on the main features of the **2014** LGPS scheme can be found within the Annual report.

PENSIONS ADMINISTRATION

The Public Service Pensions Act 2013 and LGPS regulations required LGPS Funds to have a Local Pension Board within its governance structure. Their role, which continued in **2021/22**, is to assist the administering authority in ensuring compliance with LGPS and other pension regulations. More details of the membership, meetings and work of the Gloucestershire Pension Board in relation to **2021/22** can be found on pages **72 to 74**.

WE EXPRESS OUR THANKS TO ALL THOSE INVOLVED WITH THE INVESTMENT, ACCOUNTING AND PENSION ADMINISTRATION ACTIVITIES OF THE GLOUCESTERSHIRE FUND, AND THE DEVELOPMENT OF THE BRUNEL PENSION PARTNERSHIP.

LGPS POOLING

In **July 2015** the Government announced their intention for LGPS Funds to set up investment pooling arrangements. This involved a number of LGPS Funds with assets totalling approximately **£30 billion** jointly investing in the various asset classes, as chosen by each Fund, via an FCA approved organisation. The aim of this approach is to reduce investment manager fees whilst not adversely affecting, or even improving, individual Fund investment performance. During **2016/17** the Government approved and issued new investment regulations for the LGPS Funds to both facilitate and ensure investment pooling took place.

The Gloucestershire Fund is collaborating with nine other LGPS Funds from the South West of England and has established a new FCA regulated investment pooling company called the Brunel Pension Partnership (BPP). This process is ongoing and the ten Funds are continuing to transfer their investments into Brunel as envisaged by Government. As at **31st March 2022, £3,040m** of Gloucestershire investments were under the management of Brunel, this equates to **98%** of the total assets of the Fund at **31st March 2022**. Further details of our pooling progress can be found within the Annual report.

OUR THANKS

We express our thanks to all those involved with the investment, accounting and pension administration activities of the Gloucestershire Fund, and the development of the Brunel Pension Partnership.

In this, we acknowledge the continuing work of the members of the Pension Committee, whose current membership is shown on page **14**, in overseeing the Fund's investment management and administration arrangements as well as the support from the Pension Board, whose membership is shown on page **72**, in assisting the administering authority to comply with the LGPS and other pension regulations.

COUNCILLOR LYNDEN STOWE
Chairman of the Pension Committee

STEVE MAWSON
Deputy Chief Executive & Executive Director of Corporate Resources

MATTHEW TREBILCOCK
Head of Pensions





INDEPENDENT INVESTMENT ADVISOR'S REPORT

01

01

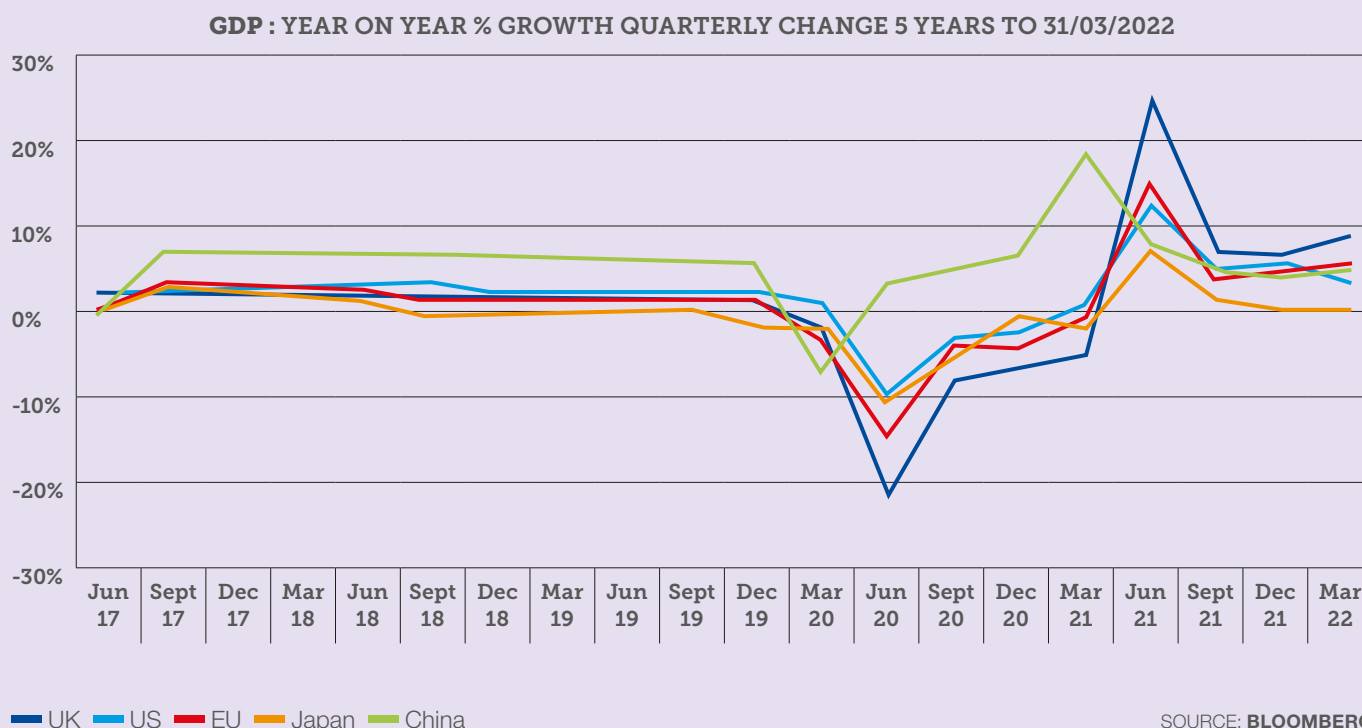
INDEPENDENT INVESTMENT ADVISOR'S REPORT

ECONOMIC BACKGROUND

The last financial year to March 2022 was dominated by a strong economic recovery and rising inflation caused by a sharp rebound in spending as Covid restrictions were reduced and lockdowns relaxed; this was supported by the tail winds of easy fiscal and monetary policy and the excess savings accumulated by many during the pandemic. This growth was accompanied by rising inflation, driven initially by the strong demand for goods hitting disrupted supply chains in many exporting nations, particularly China and, latterly, by rising energy prices. As a result, whilst central banks started the year suggesting the uptick in inflation would be transitory, by the end of the calendar year they were talking openly of increasing interest rates and governments were withdrawing fiscal support (Quantitative Easing). Then on the 24th February 2022 Russia invaded Ukraine, this increased the geopolitical risk for investors and, because Russia and Ukraine are major exporters of a number of important commodities, altered the outlook for growth and particularly inflation throughout the global economy.

As can be seen in chart 1 below, the global economic recovery varied significantly by region as the waves of the Covid pandemic hit continents at differing times. The UK and US, which led the removal of lockdown restrictions, enjoyed the strongest bounce back in growth. Japan saw the weakest recovery, driven by a much lower vaccination rate but also by the lockdown that accompanied the hosting of the 2020 Olympics (held in 2021). Towards the end of the financial year China also experienced weaker growth, again due to a combination of a poor vaccination programme and the government's "zero covid" policy which entailed regional lockdowns as soon as new Covid cases were discovered. Outside of China other emerging economies also struggled, as they faced the headwinds of a rising US dollar and continued trade tensions across the globe from US-China to Relations with Russia and the impact of a hard Brexit.

CHART 1 / GDP GROWTH, QUARTERLY % CHANGE.



The biggest change over the last financial year has been the increase in both reported inflation and short-term inflation expectations. In the summer of last year inflation was widely expected to increase as supply constraints caused by the sporadic re-opening of economies post Covid met increased demand. At the time consensus forecasts expected inflation to peak below 5% in first half of 2022 before slowly declining by the end of the year. However, as can be seen in chart 2 below, actual inflation has not only turned out to be higher but is also now expected to be more persistent rather than transitory, much of this driven by the impact of the Russian invasion of Ukraine coming on top of a rising inflation environment.

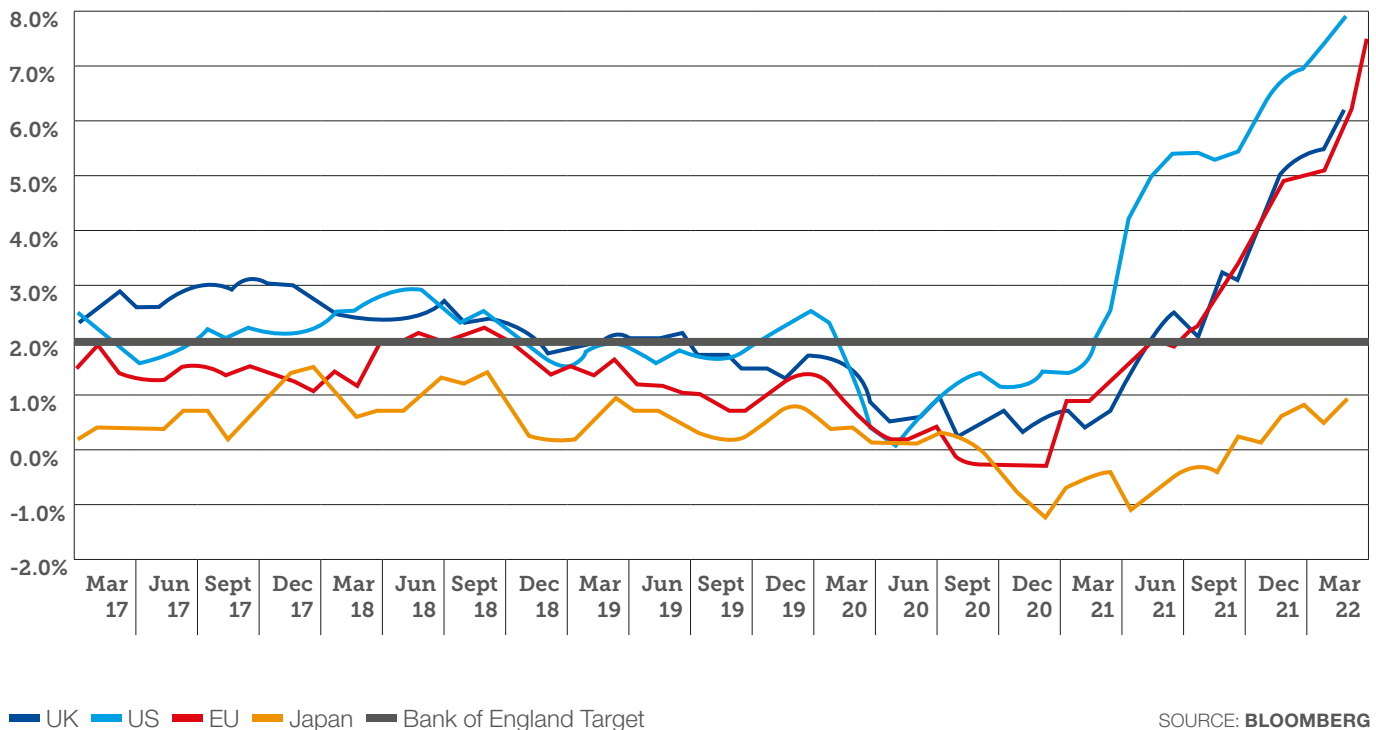
Because inflation is measured as the change in prices from a year earlier the rate will naturally peak at some stage as past price rises drop out of the equation. Inflation is now expected to peak in the US and Eurozone during the summer of 2022 and slightly later in the UK due to the timing of changes to the electricity price cap in October of this year. This assumes no further radical rise in energy prices and a gradual reduction in supply constraints as more of the global economy recovers from Covid.

However, the Russian invasion of Ukraine has destabilised the supply of natural gas, particularly to Europe. It would seem entirely possible that Russia will cut off gas supplies entirely to Europe during this autumn to maximise political pressure on Europe to accept their invasion of the Ukraine and reach a settlement. This has the potential to push gas and other commodity prices yet higher.

In Europe the causes of inflation are mainly around the supply of commodities, particularly natural gas from Russia (due to geographical proximity), in the US inflation has been caused more by the tightness of the labour market with employment at an all-time high. The UK is suffering from both these effects with its gas network connected to Europe and a tightness in the labour market partly caused by Brexit. Inflation in the UK will likely peak higher than elsewhere and take longer to bring under control requiring higher interest rates and potentially a more damaging recession.

CHART 2 / YEAR ON YEAR CHANGE IN CONSUMER PRICE INFLATION.

CPI : ANNUAL RATE OF INFLATION 5 YEARS TO 31/03/2022



SOURCE: BLOOMBERG

CENTRAL BANKS

Even in the summer of 2021 markets expected no change in interest rates across the developed world before 2023, however by the end of 2021 inflation was on the rise. In the fourth quarter, after some prevarication, the Bank of England became the first major central bank to start raising interest rates, followed by the US Federal Bank in February 2022. Since then, the Federal Bank, Bank of England and the European Central Bank have all changed their rhetoric and are now openly stating that getting inflation under control is more important than maintaining economic growth, despite the increased uncertainty caused by the Russian invasion of Ukraine. The exceptions to this are Japan, where the Bank of Japan has re-iterated its easy policy with no change in interest rates or bond yield policy; and China which has eased monetary policy in light of a weakening growth outlook and issues within the property sector.

GLOBAL POLITICS

The most significant geo-political event in the fiscal year was the decision by Russia to invade Ukraine seeking to grab more land in the eastern part of the country, but more importantly to replace the perceived pro-western government by force with a regime compliant with Russia, similar to the government in Belarus. Western governments quickly responded to the invasion with a strong degree of unity, pledging support for Ukraine and imposing escalating sanctions on Russia including freezing the international assets of the Russian Government, Officials and Oligarchs linked to President Putin. This has already had a significant impact on markets and economic sentiment but, longer-term is likely to be very detrimental to all of Europe as trade relationships will take a generation to be repaired. How this event unfolds will influence the path of inflation and economic growth in Europe and globally over the rest of 2022 and beyond. In addition to this, US relations with China are deteriorating with Taiwan being the obvious issue. The breakdown of the geopolitical consensus is leading companies to bring supply chains closer to home which often means higher costs.

MARKET RETURNS

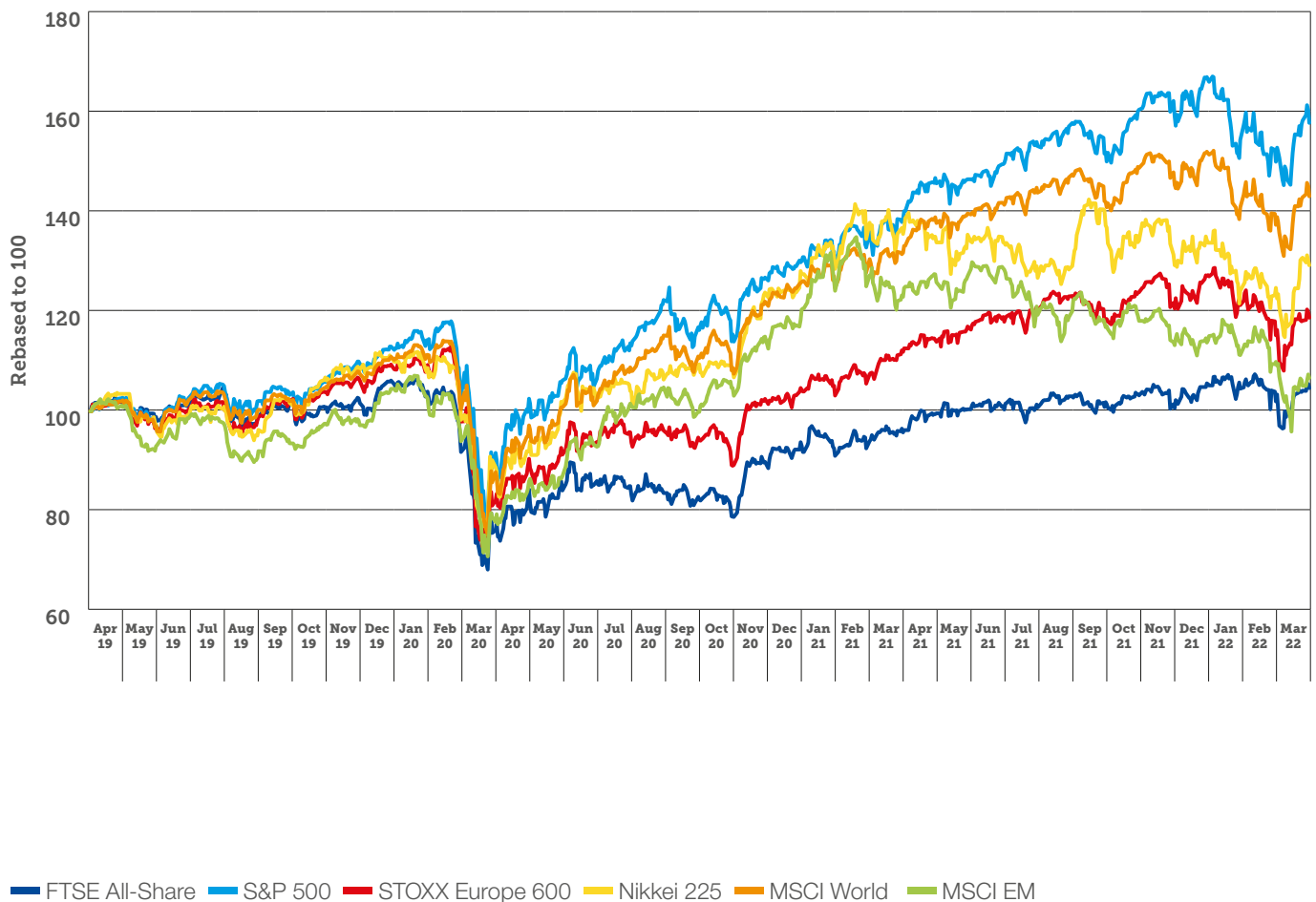
Over the 2021/22 fiscal year Global equities returned 12.8% in sterling terms, the UK equity market did slightly better, up 13.0%. Whilst the return over the year was positive for many equity markets, the final quarter of the financial year, which included the Russian invasion of Ukraine, was negative in all markets bar the UK. This was a reversal of the last few years where the UK equity market has lagged global peers considerably and was driven by the UK markets exposure to commodity producers and its lower valuation against the more technology heavy US market providing some support as global markets fell.

Emerging Markets, had a difficult year, returning around -4%, not least because of Russia being cut off from the world's financial markets following its invasion of Ukraine. Food price inflation, a strengthening US dollar and the resurgence of covid infections in China in Q1. But this result hides a wide range of returns with commodity rich countries like Brazil and the gulf states experiencing strong positive returns whereas commodity importers struggled.

Rising inflation, interest rates and the war caused government bond yields to rise significantly (prices to fall) over the fourth quarter of the financial year once again delivering negative returns over the course of the year. UK investment grade corporate bonds delivered poor returns as yields increased and the credit premium over Government Gilts widened. UK Index-Linked Gilts produced a positive return over the year as they provided a hedge against rising inflation.

UK property markets had a very strong year, returning 19%, as they bounced back from the covid restrictions. Most private market assets including infrastructure; private equity and private debt also delivered steady positive returns. The performance of alternative asset classes like property and private markets underlines the importance of having a diversified asset allocation.

CHART 3 / EQUITY MARKER PERFORMANCE OVER THE LAST 3 YEARS.



FUND RETURNS

Gloucestershire County Council Pension Fund rose to a value of **£3.111bn** as at **31st March 2022**, a rise of **6.9%** over the financial year, mainly driven by the strong performance of equity markets. Over the first 9 months of the financial year, through to December, the Fund rose, outperforming its benchmark over 1, 3, 5 and 10 years and returning **10.0%** per annum over the ten-year period. The final quarter of the 2021/2 financial year was more turbulent with inflation rising and the Russian invasion of Ukraine. The Fund's assets fell by **-3.8%** over the final quarter, underperforming its benchmark such that, over the last **10 years**, the Fund has returned **8.9%** per annum and matched its benchmark over this period. Importantly, this rate of return is above the rate assumed by the actuary which means the Fund's assets have increased by more than the actuary's calculation of the Fund's liabilities (the accrued pension payments) leaving the Fund in a strong position to meet these obligations into the future.

During the year the Pensions Committee reviewed the Funds equity allocation and increased the allocation to the sustainable equity portfolio which targets "positive pursuit" companies - companies providing solutions to environmental sustainability. This portfolio was valued at over **£363m** and accounted for **11.7%** of the total Fund by the end of the financial year. This reflects the Committee's desire to reduce the carbon impact of the portfolio.

The Committee also made further allocations to alternative assets including infrastructure and private debt. These assets provide good diversification from the equity portfolios which make up the majority of the Fund's assets. A large element of the infrastructure investment will be targeting renewable energy. Because these assets are illiquid, it takes time to invest and as such the Fund has cash awaiting investment into these assets.

BRUNEL PENSION PARTNERSHIP – POOLING

The Fund has continued to transfer the management of assets to the Brunel Pensions Partnership. The Fund's assets will remain segregated within Brunel and managed purely in the interest of the members of the Gloucestershire County Council Pension Fund. Brunel now manage over **£35bn** of assets for **10** Local Government Pension Schemes across the South-West of England. This gives them the ability to negotiate better fees with the asset managers and deliver cost savings to the Fund.

During the year the Fund's two fixed interest mandates were transferred to Brunel and the Fund now has approximately **98%** of its assets managed by Brunel. The remaining **2%** is invested in two private debt funds which are currently approaching run-off.

Brunel have a strong commitment to the environment and investing responsibly. Any members particularly interested in this area should visit the Brunel website for further information.

FUND PERFORMANCE

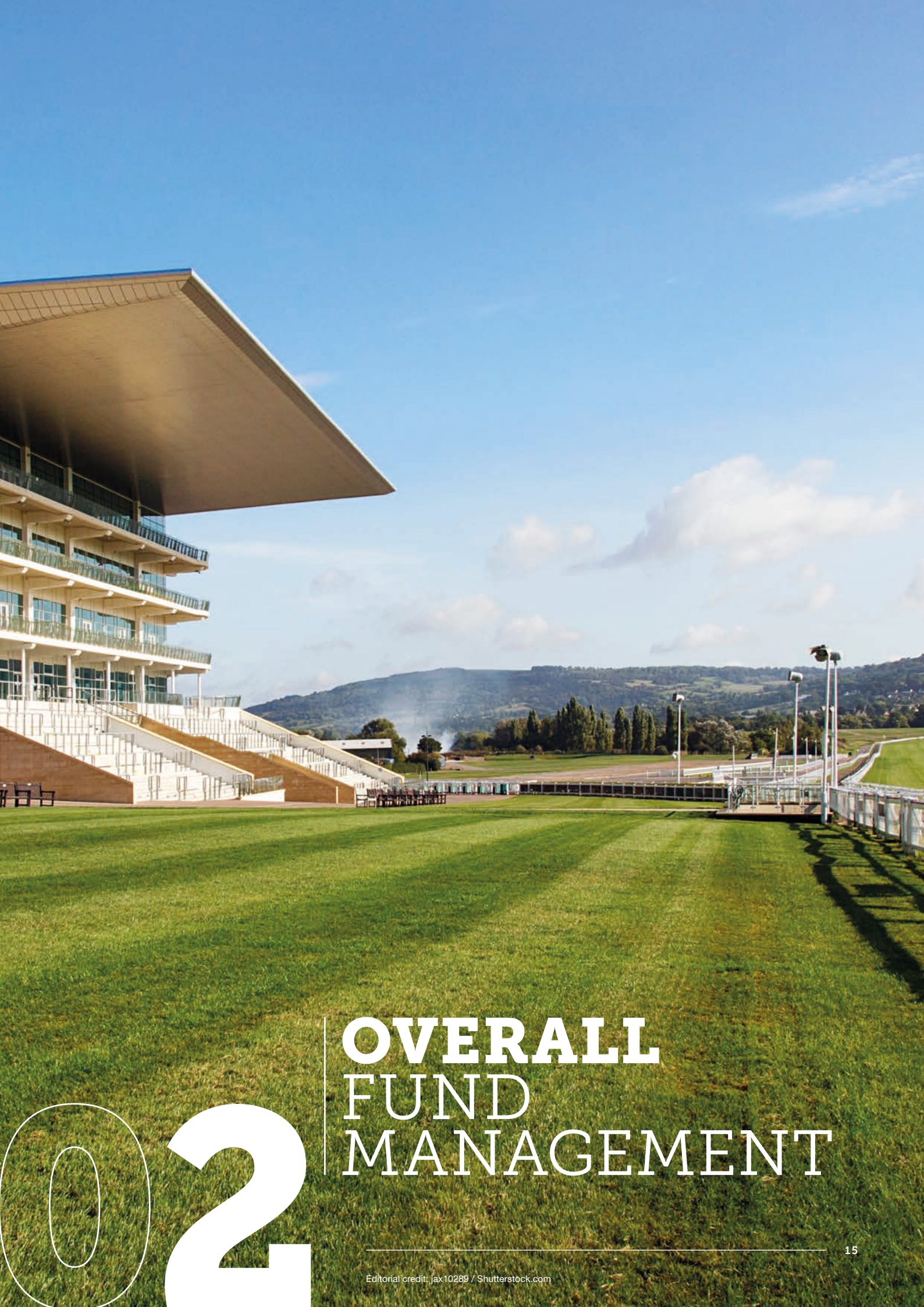
6.9%
OVER 1 YEAR
AND
8.9% PA
OVER 10 YEARS

OUTLOOK

In last year's annual report I raised the prospect of inflation rising over the longer-term and set out some of the factors behind this, but in no way predicted the steepness of the rise we have seen over the last 12 months. The acceleration in the rate of inflation this year has much to do with the Russian invasion of Ukraine and the restriction on gas and other commodity exports from the region. This could get worse and I am concerned that Russia may turn the gas taps off completely this autumn (2022) to try and force Europe to accept their invasion of Ukraine. This would push Europe into a recession as many countries would need to restrict the use of gas within industry.

Economic growth is also slowing in the US as consumers react to higher interest rates caused by rising inflation. In the UK we seem to have the worst of both worlds with our gas prices linked to Europe and a tight labour market pushing inflation through to wage growth. This means that inflation will only leave the system when inflation expectations and hence wage growth has fallen. In the past this has been achieved through higher interest rates causing a recession and dampening employment. As I write **(August 2022)** we are awaiting a new Prime Minister but I am afraid, the situation they will inherit is poor and could deteriorate quickly if they prescribe the wrong medicine. Borrowing levels in the UK are high and the interest cost on this debt is rising as interest rates rise. It is likely that investment returns may struggle to match inflation over the next few years.

John Arthur
August 2022



02

OVERALL FUND MANAGEMENT

02

OVERALL FUND MANAGEMENT

SCHEME MANAGEMENT & ADVISORS

2.1

ADMINISTERING AUTHORITY :
GLOUCESTERSHIRE COUNTY COUNCIL

CURRENT PENSION COMMITTEE

REPRESENTING
GLOUCESTERSHIRE COUNTY COUNCIL



CLLR. L. STOWE
CHAIRMAN



CLLR. D. BROWN



CLLR. C. HAY



CLLR. M. BABBAGE



CLLR. DR. A. MILLER



**CLLR. M. MACKENZIE-
CHARRINGTON**



CLLR. W. THOMAS

REPRESENTING
GLOUCESTERSHIRE
DISTRICT COUNCILS



CLLR. D. GRAY

REPRESENTING
SCHEME
MEMBERS



MR. P CLARK

COUNTY COUNCIL OFFICERS

MR. S. MAWSON
DEPUTY CHIEF EXECUTIVE & EXECUTIVE
DIRECTOR OF CORPORATE RESOURCES
(AND SECTION 151 OFFICER)

MR. P. BLACKER
DIRECTOR OF FINANCE

MR. M. TREBILCOCK
HEAD OF PENSIONS

ASSET POOL & ASSET POOL OPERATOR

BRUNEL PENSION PARTNERSHIP LTD.
WWW.BRUNELPENSIONPARTNERSHIP.ORG
E-MAIL: INFO@BRUNELPP.ORG

INDEPENDENT ADVISOR

MR. J. ARTHUR, MJ HUDSON INVESTMENT
ADVISERS LTD.

FUND ACTUARY

MRS J. WEST, HYMANS ROBERTSON LLP

MR. D. GREEN, HYMANS ROBERTSON LLP

SCHEME ADMINISTRATOR

GLOUCESTERSHIRE COUNTY COUNCIL

INVESTMENT MANAGERS

AS AT 31ST MARCH 2022

- + ARCMONT ASSET MANAGEMENT LTD.
- + BRUNEL PENSION PARTNERSHIP LTD.
- + GOLUB CAPITAL PARTNERS
INTERNATIONAL LP
- + TECHNOLOGY VENTURE PARTNERS LLP (TVP)
- + YORKSHIRE FUND MANAGERS EQUITY
PARTNERS (YFM)

AVC PROVIDER

- + PRUDENTIAL (PART OF M&G PLC.)
- + PHOENIX LIFE LIMITED

2.2

AUDITOR

GRANT THORNTON UK LLP

GLOBAL CUSTODIAN

STATE STREET BANK & TRUST COMPANY

PERFORMANCE MEASUREMENT

+ STATE STREET GLOBAL SERVICES

+ PIRC LIMITED

BANKER

LLOYDS BANK

LEGAL ADVISOR+ GLOUCESTERSHIRE COUNTY COUNCIL
IN-HOUSE LEGAL TEAM

+ OSBORNE CLARKE LLP

POST YEAR-END CHANGES

There have been no post year-end changes to the Pension Committee.

ENQUIRIESFor information/contact details for committee members, fund managers and advisors or for details regarding the Fund's investments and accounting activities, please contact the Pension Investment Team at Shire Hall, Gloucester, phone **(01452) 328946**.For details of Local Government Pension Scheme benefits and administration, please contact the Pension Administration Manager at Shire Hall, Gloucester, phone **(01452) 328866**.**COMPLAINTS**In the event of a complaint members should contact the Pension Administration Manager at Shire Hall, Gloucester, phone **(01452) 328866** in the first instance.**WEBSITE****INVESTMENTS AND ACCOUNTING**<https://www.gloucestershire.gov.uk/pensions/investments>**BENEFITS AND ADMINISTRATION**<https://www.gloucestershire.gov.uk/pensions>**PENSION SCHEMES REGISTRY NUMBER**

PSR 10079170

RISK MANAGEMENT

The Fund recognises that effective risk management is an essential element of good governance. By identifying and managing risks through effective policies and a risk management strategy, the Fund can:

- + demonstrate best practice in governance
- + ensure high quality administration
- + improve financial management
- + minimise the risk and effect of adverse conditions
- + identify and maximise opportunities that might arise
- + minimise threats

The Fund's governance arrangements ensure that risk management is undertaken at the highest levels. The Fund recognises that risk is inherent in many of its activities and makes extensive use of external advisors and industry best practice in assessing and establishing policies to identify and mitigate those risks.

The principal documents relating to risk management and control, which are available on the Fund's website, are:

- + Risk Management Policy
- + Breaches of the Law Policy
- + Communications Policy
- + Conflicts of Interest Policy
- + Funding Strategy Statement
- + Governance Policy & Compliance Statement
- + Investment Strategy Statement
- + Pensions Administration Strategy
- + Training Policy

The Fund maintains a Risk Register which is reviewed and reported to every Pension Committee and Pension Board meeting.

The detailed Risk Register matches high level risks under the three areas of activity; Governance, Funding & Investment; Operational (Administration & Communication). Each of the detailed risks under each activity is then given an impact score and a likelihood score before any controls are applied. These are then combined to give a target risk status which is assigned a Red – Amber – Green (RAG) rating.

RISKS RATED ON A **TRAFFIC LIGHT** SYSTEM AND ASSIGNED TO LEAD OFFICER

The Pension Board is also in place to assist in:

- + Securing compliance with the LGPS regulations and any other legislation relating to the governance and administration of the Fund
- + To secure compliance with requirements imposed in relation to the LGPS by the Pensions Regulator
- + Secure the effective and efficient governance and administration of the LGPS for the Gloucestershire Pension Fund

OTHER **THIRD PARTY RISK**

The receipt and calculation of employer pension contributions is monitored monthly. Employers are required to complete a return which reconciles to the pension payment and verifies the calculation of both employee and employer contributions.

OTHER **INVESTMENT RISK**

The Pension Fund employs an Independent Investment Advisor to assist and advise the Pension Committee. Investment performance is reviewed by committee every quarter. In addition, the Independent Advisor and Fund Officers have regular in-depth meetings with investment managers to review performance and report back to the Pension Committee as appropriate. During 2021/22 performance data was provided by the Brunel Pension Partnership and the custodian to the partnership, as well as by an independent specialist company, PIRC Local Authority Pension Performance Analytics. Performance is measured against both a customised fund benchmark and mandate specific benchmarks.

The Investment Strategy Statement (ISS) contains further details of how the Fund controls risk linked to its investments. There is an additional note on the Nature and Extent of Risks Arising from Financial Instruments within the Notes to the Accounts on pages 91 to 99.

The Internal Audit, Risk and Assurance function carries out audits of the Pension Fund in accordance with their Internal Audit Plan each year. The Internal Audit Plan is approved by the Pensions Committee each year and the outcomes and any recommendations are reported back to Committee at the next available Quarterly Committee meeting, together with any relevant action plans.

A photograph of a forest path. The path is made of dirt and leads into a dense forest. On the left side of the path, there are large, dark rocks covered in vibrant green moss. The trees are tall and their leaves are a mix of green and yellow, suggesting an autumn setting. The lighting is soft and natural, filtering through the canopy.

03

FINANCIAL PERFORMANCE

03 FINANCIAL PERFORMANCE

The Fund Account (page 95) indicates an increase in the net assets of the scheme available to fund benefits during the year of **£208.3m** for **2021/22**; this follows an increase of **£657.9m** in **2020/21**. The summarised figures are shown in the table below.

FINANCIAL SUMMARY

	2017/18 £M	2018/19 £M	2019/20 £M	2020/21 £M	2021/22 £M
CONTRIBUTIONS AND INVESTMENT INCOME *	168.3	145.7	140.7	173.6	129.8
REALISED PROFIT / (LOSS)	55.9	196.4	350.3	196.9	203.5
LESS BENEFITS AND OTHER EXPENSES *	(91.8)	(97.3)	(106.6)	(106.4)	(119.0)
ANNUAL SURPLUS / (SHORTFALL)	132.4	244.8	384.4	264.1	214.3
INCREASE / (DECREASE) IN MARKET VALUE OF INVESTMENTS	18.4	(105.5)	(518.5)	393.8	-6.0
INCREASE / (DECREASE) IN FUND DURING YEAR	150.8	139.3	(134.1)	657.9	208.3
MARKET VALUE OF NET ASSETS AT 31ST MARCH	2,239.4	2,378.7	2,244.6	2,902.5	3,110.8

* Excludes recoverable expenditure

FUND ACCOUNT (INFLOWS) AND OUTFLOWS

The following table shows the income and expenditure of the Pension Fund over the last five years together with an estimate for **2022/23**.

	2017/18 ACTUAL £000	2018/19 ACTUAL £000	2019/20 ACTUAL £000	2020/21 ACTUAL £000	2021/22 ACTUAL £000	2022/23 BUDGET £000
CONTRIBUTIONS EMPLOYERS	-112,820	-93,016	-84,158	-123,689	-82,992	-86,860
CONTRIBUTIONS EMPLOYEES	-17,795	-18,114	-18,962	-20,110	-21,119	-21,980
TRANSFERS IN	-6,733	-6,736	-12,575	-5,883	-6,928	-6,700
BULK TRANSFER VALUES IN	-	-	-	-	-	-
OTHER INCOME	-143	-132	-136	-94	-89	-119
BENEFITS PAYABLE	78,170	83,460	88,290	88,299	92,236	93,200
PAYMENTS TO AND ON ACCOUNT OF LEAVERS	297	372	372	225	333	320
TRANSFERS OUT	5,974	4,992	7,929	5,706	6,867	6,294
BULK TRANSFER VALUES OUT	-	-	-	-	1,069	-
NET (ADDITIONS)/WITHDRAWALS FROM DEALINGS WITH MEMBERS	-53,050	-29,174	-19,240	-55,546	-10,623	-15,845
INVESTMENT MANAGEMENT EXPENSES	5,783	6,492	7,797	10,146	16,306	13,220
ADMINISTRATION EXPENSES	1,217	1,397	1,509	1,556	1,553	1,981
OVERSIGHT & GOVERNANCE EXPENSES	418	553	722	500	671	1,130
INVESTMENT INCOME	-30,849	-27,681	-25,042	-23,931	-18,776	-15,400
PROFIT, LOSS AND CHANGE IN MARKET VALUE	-74,344	-90,864	168,409	-590,652	-197,484	-157,000
NET INCREASE (-) / DECREASE IN THE FUND	-150,825	-139,277	134,155	-657,927	-208,353	-171,914

INCOME

Employers' contributions for 2020/21 included **£38.8m** of pre-payments made by a number of scheduled bodies who chose to pay one-off secondary contributions to the Fund in relation to their 2021/22 and 2022/23 contributions. As a result these bodies paid reduced secondary contribution payments in 2021/22 and will do so in 2022/23 and are reflected in reduced contribution income in 2021/22 and in the forecast for 2022/23.

In 2019/20 there was an increase in the number of high value transfer values. Transfer values in, have subsequently fallen to more normal levels.

Investment income fell by **£5.2m** between 2020/21 and 2021/22. This was primarily due to a fall in income from bonds following the move into pooled funds, where income is retained, but partly offset by an increase in income from the private debt funds as they started to mature and return income.

Investment income for 2022/23 is forecast to reduce further following the transition of the last remaining directly held bonds into pooled funds where the income is retained within the pooled fund and is reflected in the share price instead.

The change in Profit, Loss and Change in Market Value from a **-£590.7m** in 2020/21 to **-£197.5m** in 2021/22 is due to the fall in market values that occurred towards the end of 2021/22 following the start of the war in Ukraine. The previous year, 2020/21, had seen a bounce back in market values following the easing of restrictions due to COVID-19. In 2021/22 the Fund returned performance of **6.9%** (2020/21 26.6%).

EXPENDITURE

Investment management expenses in 2021/22 increased by **£6.2m** in comparison to 2020/21. The increase arose as a result of four key factors, two of the Private Debt funds starting to return profits from which fees were deducted including a performance fee of **£1.2m**, the change in the Strategic Asset Allocation of the Fund and the final transitions to the Investment Pool and resultant transition costs, an increase in the amount invested in private equity and infrastructure which attracts a higher fee structure and an increase in reported transaction costs.

Benefits Payable increased by **£3.9m** during 2021/22 due to an increased number of members retiring and the 2022/23 forecast figure has been increased by **£1m** following current expectations for pensioner growth and pay awards during the period.

Administration expenses were broadly consistent with the previous year whilst Oversight & Governance expenses increased by **£171k** mainly due to the governance review, an increase in actuarial fees as the triennial valuation commenced and an increase in external audit fees to reflect additional work undertaken. The 2021/22 forecast of Administration Expenses and Oversight & Governance Expenses has been increased for additional staffing to facilitate increased resource for the Pension Fund teams and an anticipated increase in the cost of supplies and services.

During 2021/22 a bulk transfer value of **£1,069k** was paid to another local authority pension fund in respect of a group of employees moving between funds.

CASH FLOW

For 2021/22 the inflow of cash to the Fund continued to exceed the outflow. Details of the net cash inflow to the Fund for the past 5 years together with their respective forecasts and a forecast for the following year are shown below:

There are a number of factors that affect the size of the net cash inflow. These factors include changes in the levels of retirements and pensioner numbers, contribution levels, dividend income and transfers into and out of the scheme. During 2021/22 a bulk transfer value of **£1.1m** was paid to another pension fund whilst 2020/21 contained one-off exit credit payments of **£2.1m** received from employers leaving the Pension Fund and **£38.8m** in contribution pre-payments.

	2017/18		2018/19		2019/20		2020/21		2021/22		2022/23
	FORECAST £000	ACTUAL £000	FORECAST £000	ACTUAL £000	FORECAST £000	ACTUAL £000	FORECAST £000	ACTUAL £000	FORECAST £000	ACTUAL £000	FORECAST £000
NET CASH FLOW	50,566	78,433	66,852	49,929	43,846	37,755	37,716	73,705	35,894	20,116	25,948

FINANCIAL PERFORMANCE

OPERATIONAL EXPENSES

The following tables show budgeted and actual figures of the three constituent parts that make up the operating expenses of the Pension Fund.

	2018/19		2019/20		2020/21		2021/22		2022/23
ADMINISTRATIVE COSTS	BUDGET £000	ACTUAL £000	BUDGET £000	ACTUAL £000	BUDGET £000	ACTUAL £000	BUDGET £000	ACTUAL £000	BUDGET £000
STAFF COSTS	832	742	917	766	960	803	1,021	748	1,041
PREMISES	52	74	70	51	70	48	75	40	75
IT	319	287	406	380	400	375	460	395	460
SUPPLIES & SERVICES *	256	228	240	258	260	275	270	309	320
OTHER CENTRAL COSTS	61	66	60	54	60	55	63	61	70
COST OF DEMOCRACY	-	-	-	-	-	-	-	-	-
OTHER *	-	-	-	-	-	-	15	-	15
	1,520	1,397	1,693	1,509	1,750	1,556	1,904	1,553	1,981

* Legal fees are now included within Supplies and Services

	2018/19		2019/20		2020/21		2021/22		2022/23
OVERSIGHT & GOVERNANCE COST	BUDGET £000	ACTUAL £000	BUDGET £000	ACTUAL £000	BUDGET £000	ACTUAL £000	BUDGET £000	ACTUAL £000	BUDGET £000
STAFF COSTS	200	169	210	165	230	159	235	177	240
AUDIT FEES	31	18	19	25	30	23	30	45	50
ACTUARIAL FEES	210	207	300	347	400	173	350	248	400
PENSION COMMITTEE/BOARD	5	2	2	1	10	-	20	6	20
PERFORMANCE MONITORING SERVICE	37	83	19	80	117	79	120	64	120
INVESTMENT CONSULTANCY	22	24	30	24	30	26	130	23	150
OTHER PROFESSIONAL FEES	653	50	980	80	200	40	200	108	150
	1,158	553	1,560	722	1,017	500	1,085	671	1,130

£1.553M
ADMINISTRATIVE COSTS
2021/22

£1.556M
ADMINISTRATIVE COSTS
2020/21

The increase in staffing budgets between 2021/22 and 2022/23 is to facilitate increased resource for the Pension Administration and Pension Investment teams and an anticipated increase in the cost of supplies and services.

Actuarial fees within Oversight & Governance contain actuarial expenses of **£61,000 (2020/21 £88,000)** which arose as a result of employer requests and was therefore recharged back to them. Net actuarial fees for **2021/22** were **£187,000 (2020/21 £86,000)**. Additional actuarial costs were incurred in 2021/22 in relation to the Fund commencing the triennial valuation which is carried out by the Fund actuary.

OPERATIONAL EXPENSES Cont.

	2018/19		2019/20		2020/21		2021/22		2022/23
INVESTMENT MANAGEMENT EXPENSES	BUDGET £000	ACTUAL £000	BUDGET £000	ACTUAL £000	BUDGET £000	ACTUAL £000	BUDGET £000	ACTUAL £000	BUDGET £000
MANAGEMENT FEES *	6,500	4,925	5,800	5,778	5,306	8,312	8,000	10,443	11,500
PERFORMANCE FEES	-	544	-	568	-	-	-	1,325	-
BRUNEL CONTRACT COSTS	-	417	-	953	1,040	1,049	1,065	969	1,120
TRANSACTION COSTS	-	428	-	367	580	696	500	3,495	500
CUSTODY FEES	90	176	90	131	140	89	75	71	75
TAX & LEGAL COSTS	-	2	-	-	-	-	25	3	25
	6,590	6,492	5,890	7,797	7,066	10,146	9,665	16,306	13,220

* Other professional fees within Oversight & Governance increased mainly due to the governance review that was undertaken in 2021/22 and an increase in external audit fees was as a result of additional work undertaken. The external auditors will continue to perform additional work and the budget for 2022/23 has been increased to incorporate that.

Investment management fees have increased as a result of a change in the strategic asset allocation and the final transition to the Investment Pool and resultant transaction and transition costs. In addition, there was an increase in the amount invested in private equity and infrastructure which attract a higher fee structure and two of the Private Debt funds started to return profits from which fees were deducted including a performance fee of £1.2m.

Transaction costs cannot be forecast in advance and hence are not budgeted for.

ANALYSIS OF PENSION CONTRIBUTIONS

The timeliness of employee and employer pension contributions to be paid to the Pension Fund no later than 19 days after the end of the month in which they were deducted from pay is shown below.

EMPLOYEE AND EMPLOYER CONTRIBUTIONS	TOTAL	ON TIME		LATE	
	£000	£000	%	£000	%
2017/18	128,000	127,950	99.95	50	0.05
2018/19	108,000	107,850	99.84	150	0.16
2019/20	100,913	100,671	99.76	242	0.24
2020/21	143,936	143,249	99.52	687	0.48
2021/22	103,199	102,669	99.49	530	0.51

In total **56 (39 2020/21)** monthly payments were received late, of which **47** were received within one month, **4** within two months, **3** within three months and **2** within four months. (**2020/21, 22** received within one month, **5** within two months, **2** within three months and **10** within eleven months).

During **2021/22** the option to levy interest on overdue contributions was not exercised (**2020/21 £0 was charged**).

	2017/18	2018/19	2019/20	2020/21	2021/22
ANALYSIS OF PENSION OVERPAYMENTS	£000	£000	£000	£000	£000
PENSION OVERPAYMENTS B/FWD.	67.3	29.7	33.2	7.1	21.8
PENSION OVERPAYMENTS IN THE CURRENT YEAR	33.0	59.3	20.0	56.0	35.3
OVERPAYMENT RECOVERED	(61.1)	(46.1)	(34.2)	(44.5)	(24.4)
OVERPAYMENTS WRITTEN OFF	(9.5)	(9.7)	(11.9)	3.2	(10.5)
PENSION OVERPAYMENTS C/FWD.	29.7	33.2	7.1	21.8	22.2

Gloucestershire Pension Fund participates in the National Fraud Initiative (NFI) which is a biennial data matching exercise administered by the Cabinet Office.

Pension data was submitted through the web portal in **2020** and data match reports produced matching:-

- + Active pensioners with Department of Works and Pensions (DWP) deceased records, to identify cases where we might be continuing to pay someone who has died;
- + Pensioners with payroll records for public sector bodies to identify cases where pensions should be abated; and
- + Pensioners receiving an enhanced injury pension with individuals receiving relevant state benefits to identify cases where they have failed to declare relevant state benefits that may remove or reduce entitlement to the enhanced pension.

During the **2021** exercise Match reports were reviewed and additional information sought as necessary. The reports identified **20** pensioners who had died where the Pensions Section had not been informed of their death and total overpayments amounted to **£15,158**. As at September **2022** **£9,248** had been recovered. None of the cases identified were suspected of fraud. Since the previous NFI exercise, undertaken in **2018**, the Fund has participated in the "Tell us once" service.

There were no abatement or LGPS injury cases identified as part of the NFI exercise, however the Abatement Policy has currently been suspended since March **2020** after the Government asked the NHS Scheme and LGPS Funds to suspend their policies to encourage recently retired NHS and Social Worker staff to come back to work.



INVESTMENT POLICY & PERFORMANCE REPORT

04

04

INVESTMENT POLICY AND PERFORMANCE REPORT

INVESTMENT POWERS AND DUTIES

The powers and duties concerning the investment of Fund monies are set out in the Local Government Pension Scheme Management and Investment of Funds Regulations 2016 (as amended) which came into force on the 1st November 2016. The 2016 Regulations require the County Council, as Administering Authority for the Gloucestershire Fund, to invest any monies that are not immediately required to pay pensions and other benefits.

The previous Regulations allowed a wide range of investments, but set certain limits; the 2016 Regulations allows the authority to invest, without any restriction as to quantity, in any investment made in accordance with a scheme under section 11(1) of the Trustee Investments Act 1961. However the authority's investment strategy must set out the maximum percentage of the total value of all investments of fund money that it will invest in particular investments or classes of investment. The authority's investment strategy may not permit more than 5% of the total value of all investments of fund money to be invested in entities which are connected with that authority.

The Regulations require the County Council to have a suitably diversified portfolio of investments and must obtain the advice of properly qualified persons on investment matters. In carrying out these duties, the County Council owes a fiduciary duty to the contributors and beneficiaries of the Fund, as well as to the council taxpayers who ultimately 'guarantee' the financing of future liabilities.

INVESTMENT STRATEGY

The Pension Committee is responsible for the Fund's investment policy. During 2021/22 the Committee comprised of seven County Councillors, one District representative and a union nominated representative for staff / deferred / pensioner members. Further details on the Pension Committee regarding meetings held and voting arrangements can be found in the Governance Compliance Statement report on page **75**.

The Committee determines the overall investment strategy for the Fund after receiving advice from its officers, independent advisor and appropriate external investment consultants. The investment strategy developed by the Pension Committee is detailed in the Investment Strategy Statement (ISS) and can be found on pages **182 to 190**.

INVESTMENT MANAGEMENT

The objective of LGPS pension fund investment policy is to minimise the level of the contributions to be paid into the Fund by employer bodies to ensure its solvency. In place at the year-end were four investment managers, Brunel Pension Partnership, Legal & General Investment Management, Golub Capital Partners International and Arcmont Asset Management who each manage portfolios within specific asset categories of the Fund's investments. In addition there was a relatively small amount invested in two private equity/venture capital funds.

Each manager is required to have regard for the Fund's Investment Strategy Statement and the legislative environment in which the Fund operates.

State Street Bank & Trust Company became the Fund's appointed global custodian in November 2017.

THE FUND'S INVESTMENT MANAGERS ARE:

INVESTMENTS MANAGED BY THE BRUNEL PENSION PARTNERSHIP REGIONAL ASSET POOL	MANDATE	BID MARKET VALUE 31ST MARCH 2022 £M
BRUNEL PENSION PARTNERSHIP	Global High Alpha Equities	408.9
	UK Equities	405.1
	Sterling Corporate Bonds	365.3
	Global Sustainable	362.9
	Property	246.1
	Diversifying Returns	233.7
	Multi Asset Credit	200.5
	Emerging Markets Equities	179.1
	Private Equity and Infrastructure	97.4
LEGAL & GENERAL INVESTMENT MANAGEMENT	Passive Equities	443.9

INVESTMENTS MANAGED OUTSIDE OF THE BRUNEL PENSION PARTNERSHIP REGIONAL ASSET POOL	MANDATE	BID MARKET VALUE 31ST MARCH 2022 £M
ARCMONT ASSET MANAGEMENT LLP	UK Private Debt	23.6
GOLUB CAPITAL PARTNERS INTERNATIONAL	Overseas Private Debt	33.2
TECHNOLOGY VENTURE PARTNERS	Private Equity	3.8
YFM GROUP	Private Equity	0.0

£3.0_{BN}
INVESTMENTS
 MANAGED BY BRUNEL

FUND PERFORMANCE

Primarily, State Street Global Services and additionally, PIRC Local Authority Pension Performance Analytics, measure the Fund's investment performance. These companies provide independent performance measuring services for the Fund.

To **31st March 2022** the Fund realised the following returns:

	FUND % P.A.	STRATEGIC BENCHMARK % P.A.
1 YEAR	6.9	8.8
3 YEARS	8.3	8.5
5 YEARS	6.9	7.0
10 YEARS	8.9	9.0

- + Developed equities performed well until the first quarter of 2022 when the Ukraine war and fear of resulting inflation weighed heavily causing markets to fall.
- + Over the twelve months however, developed markets were positive. Emerging markets, battered by a strong US Dollar and the continuing impact of COVID were the worst performing of all asset classes.
- + Bond markets delivered negative results for the year, only inflation linked and private debt making it into positive territory.
- + Strong results were delivered from alternative assets. Private equity once again delivered outstanding returns and Property also continued to perform well.

FUND ACHIEVED

6.9%
PERFORMANCE
DURING 2021/22

AVERAGE LOCAL AUTHORITY FUND ACHIEVED

8.6%
PERFORMANCE
DURING 2021/22

LOCAL AUTHORITY UNIVERSE

For **2021/22**, **62** local authority funds were included directly in the PIRC Local Authority Pension Performance Analytics Universe. The average investment return achieved by Local Authority Pension Funds within the Universe for **2021/22** was **8.6%**, placing Gloucestershire **39th** out of the **62** funds.

The average total fund returns for the average local authority funds are shown below:

AVERAGE RETURNS OVER:	LOCAL AUTHORITY UNIVERSE %
1 YEAR	8.6
3 YEARS	8.3
5 YEARS	7.1
10 YEARS	8.9

COMPARISON OF INVESTMENT PERFORMANCE WITH OTHER LGPS FUNDS

The Fund's investment performance is compared on an annual basis against other local authority pension funds subscribing to PIRC Local Authority Pension Performance based on the Analytics Universe of **62** local authority pension funds. The Fund performance was ranked **39th** out of **62** over one year and **36th** out of **62** over the three year period. Ten year performance placed the Gloucestershire Fund **26th**.

INVESTMENT PERFORMANCE

31st March 2021 investment returns over **1** year, **3** years, **5** years and since inception as derived from the various asset categories in the Gloucestershire Fund compared to the specific performance benchmark used for each asset class:

	SINCE INCEPTION		1 YEAR		3 YEARS		5 YEARS	
	FUND %	B/MARK %	FUND %	B/MARK %	FUND %	B/MARK %	FUND %	B/MARK %
ASSET POOL MANAGED INVESTMENTS								
EQUITIES								
UK ACTIVE *	4.9	6.1	8.5	13.8	3.5	4.8	n/a	n/a
PASSIVE DEVELOPED HEDGED *	11.2	11.3	11.0	11.1	14.2	14.3	n/a	n/a
PASSIVE DEVELOPED PARIS ALIGNED *	3.1	3.2	n/a	n/a	n/a	n/a	n/a	n/a
GLOBAL HIGH ALPHA *	17.3	14.5	8.8	15.9	n/a	n/a	n/a	n/a
EMERGING MARKETS *	2.7	5.0	-11.5	-6.8	n/a	n/a	n/a	n/a
GLOBAL SUSTAINABLE *	11.9	17.3	8.2	12.9	n/a	n/a	n/a	n/a
FIXED INTEREST								
MULTI-ASSET CREDIT *	-1.5	3.6	n/a	n/a	n/a	n/a	n/a	n/a
STERLING CORPORATE BONDS	-6.3	-6.9	n/a	n/a	n/a	n/a	n/a	n/a
PROPERTY								
UK	10.4	12.3	19.8	23.1	n/a	n/a	n/a	n/a
INTERNATIONAL	5.3	8.0	15.6	17.9	n/a	n/a	n/a	n/a
ALTERNATIVES								
PRIVATE MARKETS INFRASTRUCTURE CYCLE 1 *	3.1	2.8	5.9	7.0	6.8	3.1	n/a	n/a
PRIVATE MARKETS INFRASTRUCTURE CYCLE 2 *	-5.5	4.9	-6.6	7.0	n/a	n/a	n/a	n/a
PRIVATE MARKETS PRIVATE EQUITY CYCLE 1 *	23.6	14.7	46.2	12.9	20.1	13.9	n/a	n/a
PRIVATE MARKETS PRIVATE EQUITY CYCLE 2 *	67.1	13.5	24.1	12.9	n/a	n/a	n/a	n/a
PRIVATE MARKETS PRIVATE DEBT CYCLE 2 *	1.2	2.3	n/a	n/a	n/a	n/a	n/a	n/a
DIVERSIFYING RETURNS *	4.3	3.1	7.3	3.2	n/a	n/a	n/a	n/a
NON-ASSET POOL MANAGED INVESTMENTS - FIXED INTEREST								
GLOBAL	5.7	5.6	0.2	-5.1	3.4	1.1	2.7	1.4
ALTERNATIVES								
UK PRIVATE DEBT *	7.5	5.6	8.9	5.2	7.6	5.5	n/a	n/a
OVERSEAS PRIVATE DEBT *	8.8	5.6	19.0	5.2	8.8	5.5	n/a	n/a

* Performance history not available as assets not held for the entire duration of the period.

The **10** year total fund performance returns are shown on page **28**. Performance returns by fund manager are shown below.

Net investment performance by fund manager against benchmarks as at 31st March 2022, annualised for 1, 3 and 5 years and since inception:

ASSET POOL MANAGED INVESTMENTS			SINCE INCEPTION		1 YEAR		3 YEARS		5 YEARS	
	MANDATE	BENCHMARK	PORTFOLIO %	B/MARK %	PORTFOLIO %	B/MARK %	PORTFOLIO %	B/MARK %	PORTFOLIO %	B/MARK %
BRUNEL	UK Active Equity*	FTSE All Share	4.9	6.1	8.5	13.8	3.5	4.8	n/a	n/a
BRUNEL	Global High Alpha Equity*	MSCI World Total Return Gross	17.3	14.5	8.8	15.9	n/a	n/a	n/a	n/a
BRUNEL	Emerging Markets Equity*	MSCI Emerging Markets Total Return Gross	2.7	5.0	-11.5	-6.8	n/a	n/a	n/a	n/a
BRUNEL	Private Markets Infra-structure Cycle 1*	Consumer Price Index	3.1	2.8	5.9	7.0	6.8	3.1	n/a	n/a
BRUNEL	Private Markets Infra-structure Cycle 2*	Consumer Price Index	-5.5	4.9	-6.6	7.0	n/a	n/a	n/a	n/a
BRUNEL	Private Markets Private Equity Cycle 1*	MSCI All Country World Index	23.6	14.7	46.2	12.9	20.1	13.9	n/a	n/a
BRUNEL	Private Markets Private Equity Cycle 2*	MSCI All Country World Index	67.1	13.5	24.1	12.9	n/a	n/a	n/a	n/a
BRUNEL	Private Markets Private Debt Cycle 2*	Sterling Overnight Index Average + 4%	1.2	2.3	n/a	n/a	n/a	n/a	n/a	n/a
BRUNEL	Passive Developed Equity Hedged*	FTSE World Developed Hedged	11.2	11.3	11.0	11.1	14.2	14.3	n/a	n/a
BRUNEL	Passive Developed Equity Paris Aligned	FTSE World Developed Paris Aligned (PAB) Net Index	3.1	3.2	n/a	n/a	n/a	n/a	n/a	n/a
BRUNEL	Diversifying Returns*	Sterling Overnight Index Average	4.3	3.1	7.3	3.2	n/a	n/a	n/a	n/a
BRUNEL	Global Sustainable Equity*	MSCI All Country World GBP Index	11.9	17.3	8.2	12.9	n/a	n/a	n/a	n/a
BRUNEL	International Property	Global Real Estate Fund Index (INREV GREFI)	5.3	8.0	15.6	17.9	n/a	n/a	n/a	n/a
BRUNEL	UK Property*	MSCI/AREF UK Quarterly Property Index Fund – All Property	10.4	12.3	19.8	23.1	n/a	n/a	n/a	n/a
BRUNEL	Multi-Asset Credit	Sterling Overnight Index Average + 4%	-1.5	3.6	n/a	n/a	n/a	n/a	n/a	n/a
BRUNEL	Sterling Corporate bonds	IBOxx Sterling Non-Gilts Overall Total Return Index	-6.3	-6.9	n/a	n/a	n/a	n/a	n/a	n/a
NON-ASSET POOL MANAGED INVESTMENTS										
Western Asset	Global Fixed Interest	ICE BoAML Sterling Non Gilts +1%	5.7	5.6	0.2	-5.1	3.4	1.1	2.7	1.4
Golub Capital Partners	Private Debt*	Sterling Overnight Index Average + 5%	8.6	5.6	19.0	5.2	8.8	5.5	n/a	n/a
Arcmont	Private Debt*	Sterling Overnight Index Average + 5%	7.5	5.6	8.9	5.2	7.6	5.5	n/a	n/a

* Performance history not available as assets were not held for the entire duration of the period.

ASSET ALLOCATION - PLANNED COMPARED TO ACTUAL

	STRATEGIC ASSET ALLOCATION TARGET 2021/22	ACTUAL ASSET ALLOCATION AS AT 31ST MARCH 2021	ACTUAL ASSET ALLOCATION AS AT 31ST MARCH 2022
	%	%	%
UK ACTIVE EQUITIES	12.0	12.9	13.0
GLOBAL HIGH ALPHA	13.5	15.0	13.2
EMERGING MARKETS	6.5	6.1	5.8
SUSTAINABLE	13.0	8.8	11.7
LOW CARBON	0.0	2.3	0.0
SMART BETA	0.0	9.1	0.0
PASSIVE DEVELOPED	0.0	5.8	4.4
PARIS ALIGNED	10.0	0.0	9.9
TOTAL EQUITY	55.0	60.0	58.0
MULTI ASSET CREDIT	7.5	-	6.5
STERLING CORPORATE BONDS	14.5	-	11.8
TOTAL FIXED INTEREST	22.0	20.1	18.3
UK AND GLOBAL PROPERTY	10.0	7.2	9.1
DIVERSIFYING RETURNS	0.0	7.5	7.5
MULTI ASSET GLOBAL ABSOLUTE RETURN	0.0	0.0	0.0
INFRASTRUCTURE	5.0	0.5	1.9
PRIVATE EQUITY	3.0	0.4	1.2
PRIVATE DEBT	5.0	2.2	2.5
VENTURE CAPITAL	0.0	0.2	0.1
CASH	0.0	1.9	1.4
	100.0	100.0	100.0

SIGNIFICANT CHANGES DURING THE YEAR

Following progress with pooling arrangements, the Strategic Asset Allocation allows for a range of allocations to the various Brunel investment portfolios, as agreed by the Committee. The following identifies the various allocation ranges of which management can work within in consultation with the Independent Advisor to the Fund.

BRUNEL PORTFOLIO	NEW AGREED TARGET STRATEGIC ASSET ALLOCATION FROM 1ST NOVEMBER 2021 (%)	AGREED TARGET ASSET ALLOCATION RANGE FROM 1ST NOVEMBER 2021 (+/-) (%)
EQUITIES		
UK ACTIVE EQUITIES	12.0	2.0
GLOBAL HIGH ALPHA EQUITIES	13.5	2.0
EMERGING MARKET EQUITIES	6.5	1.5
SUSTAINABLE EQUITIES	13.0	2.0
PARIS ALIGNED PASSIVE EQUITIES	10.0	2.0
TOTAL EQUITIES	55.0	
FIXED INTEREST		
UK INVESTMENT GRADE	14.5	1.5
MULTI ASSET CREDIT	7.5	1.0
TOTAL FIXED INTEREST	22.0	
ALTERNATIVES		
DIVERSIFIED RETURNS	0.0	10.0
UK PROPERTY	7.5	1.0
INTERNATIONAL PROPERTY	2.5	1.0
PRIVATE DEBT	5.0	1.0
INFRASTRUCTURE	5.0	1.0
PRIVATE EQUITY	3.0	1.0
CASH	0.0	0.5
TOTAL ALTERNATIVES	23.0	
TOTAL	100.0	

As at **31st March 2022** the Fund's assets were invested in a diversified portfolio that consisted primarily of equity and debt securities. The majority of the equities held by the Fund are in international blue chip entities which are listed on stock markets such as the FTSE and MSCI Indices. The equity strategy is to hold a global diverse portfolio of equities with a small allocation to higher risk markets, such as Emerging Markets, to maintain a wide range of diversification and to improve return opportunities.

ANNUAL RESPONSIBLE INVESTMENT UPDATE

Brunel currently manages the majority of the Fund's assets in conjunction with nine other funds in the South-West of England. As such, Brunel own and maintain Responsible Investment (RI) and Climate Change Policies on behalf of their clients and Brunel selects and monitors asset managers on this basis. Brunel publishes a Responsible Investment and Stewardship Outcomes report and this together with further details of the RI and Climate Change Policies can be found on the Brunel website:

<https://www.brunelpensionpartnership.org/responsible-investment/>

During **2021/22**, Brunel continued to develop policies to guide its appointed investment managers with respect to voting, engagement and RI more generally. Brunel's policies are informed by its investment beliefs and its clients' policies and priorities together with regulations and statutory guidance and are aligned with best practice. Brunel's engagement objectives are linked to seven priority themes:

1. **Climate change**
2. **Biodiversity**
3. **Circular economy and supply chain management**
4. **Cyber**
5. **Diversity, equity and inclusion**
6. **Human rights and social issues**
7. **Tax and cost, transparency and fairness**

FEDERATED HERMES

EOS at Federated Hermes is the Brunel Pension Partnership's engagement partner and a leading stewardship provider with a focus on achieving positive change. Their dedicated team of engagement and voting specialists enable pension funds such as Gloucestershire and the wider Brunel pool to achieve their fiduciary responsibilities and be more active owners of companies.

Federated Hermes focuses on greater sustainability in outcomes for society, in the interests of ultimate beneficiaries, through improved long-term returns on investment.

The following sections summarise the work of Brunel, together with their engagement provider, Federated Hermes, across areas including voting and engagement during **2021/22**.

ENGAGEMENT

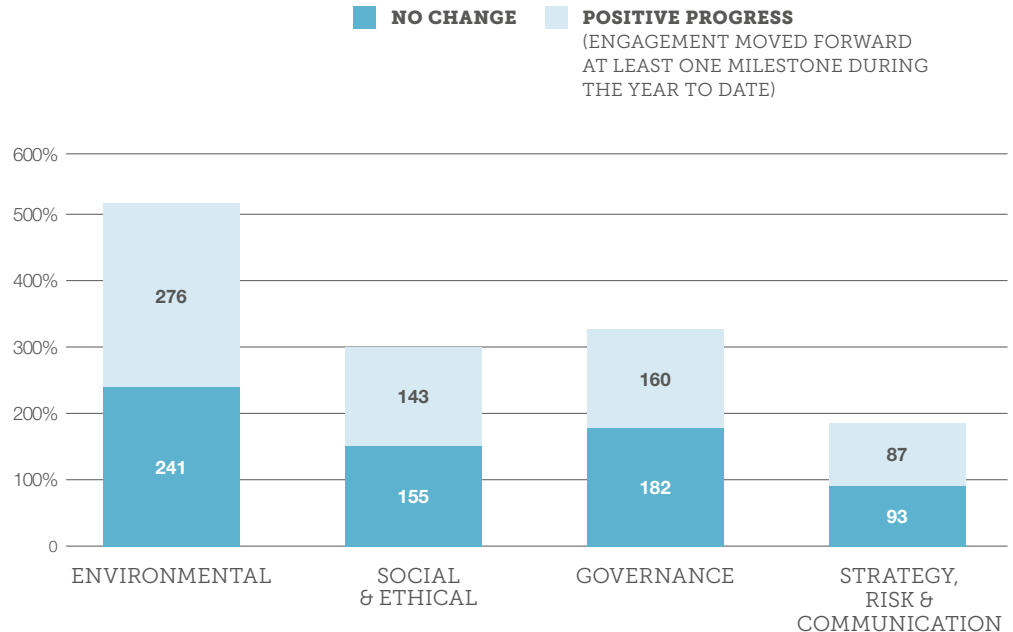
Brunel believes it is essential that they take an active and responsible approach to identifying risks and opportunities within investment portfolios. As such, Brunel set engagement objectives linked to the priority themes highlighted above and provide all of their clients with quarterly and annual updates relating to the work of both Brunel and their appointed asset managers activities.

During **2021/22**, Brunel's proxy voting and engagement provider, Federated Hermes, engaged with 839 Brunel held companies (**881 in 2020/21**) covering 1,337 (**1,050 in 2020/21**) identified objectives and issues (see chart on next page). Progress against one or more milestones was achieved for 50% of objectives during the year (**51% in 2020/21**).

ENGAGEMENT PROGRESS

Engagement during 2021 made significant progress.

EOS undertakes engagement over three-year cycles. During **2021**, EOS engaged with **839** Brunel-held companies on **1,337** milestones. Progress against one or more milestones was achieved for **50%** of engagement objectives set during the year.



Engagement covers active equity portfolios, please note this does not include engagement undertaken directly by Brunel or it's managers.

Source: Brunel Pension Partnership 2022 Responsible Investment and Stewardship Outcomes for the year ending 31st December 2021.

VOTING

Brunel Pension Partnership, on behalf of its clients, have developed a single voting policy for all assets managed by Brunel in the various mandates, articulated in their Stewardship Policy which is available on the company website. The implementation of Brunel's voting policy which is published in their Stewardship Policy is supported by Federated Hermes. Voting decisions are informed by investment consideration, consultation with portfolio managers, clients, other institutional investors and Brunel's engagement with companies. Brunel maintains quarterly voting records which are publicly available on their website.

With respect to Gloucestershire's holdings, during 2021/22 Federated Hermes made voting recommendations at 1,322 meetings (1,044 in 2020/21), which represented 99% of votable meetings. At those meetings Federated Hermes recommended voting against or abstaining on 2,367 resolutions over the year. The vast majority of these voting recommendations were related to board structure and remuneration.



5

SCHEME ADMINISTRATION

05 SCHEME ADMINISTRATION

5.1

ADMINISTRATION ARRANGEMENTS

The Pensions Administration team is responsible for the scheme member and pensioner administration of the Fund. Members of the Pensions Finance team provide support to the Pension Committee including the production of management information and reports. In addition employers are responsible for ensuring that member and employer contributions are deducted at the correct rate and member data is sent to the Pensions Administration team.

To enable assurances to be obtained as to the effective and efficient operation of the Fund's investments, performance is benchmarked on an annual basis against other local authority pension funds subscribing to the PIRC Local Authority Pension Performance Analytics' Universe of 62 local authority pension funds. Internal controls are also in place to support the reliability and integrity of financial information and the Fund is subject to internal and external audit.

Staff contact details can be found on page **17** together with the Fund's web addresses which contain detailed documents and information on the following areas:

- + The Pension Fund's policy statements.
- + The actuary's triennial valuation reports from 2013 to 2019.
- + Annual reports from 2017/18 to the present.
- + Independent Auditor's Consistency Report
- + Business Plan

- + Funding Strategy Statements
- + Investment Strategy Statement
- + Pension Board Report
- + Brunel's Responsible Investment and Stewardship Policies, Climate Change Statement and Voting Guidelines
- + A range of guides for scheme members in "booklet" form covering different topics.
- + Online copies of the various forms members may wish to use in connection with their scheme membership.
- + Updates on latest developments affecting the pension scheme.
- + Information on the Annual Benefit Statements.
- + Administration Staff contact details
- + Employer pages, providing an Employer's Administration Guide and associated forms/documentation together with other relevant information.

The Pension Fund's web pages also contain links to the National LGPS Member website and the Brunel Pension Partnership website, the Fund's pool asset manager who manages the majority of the Fund's investments although responsibility for asset allocation remains with the Pension Committee.

5.2

VALUE FOR MONEY STATEMENT

The Fund strives to provide a quality service to our scheme members and employers, which will include providing value for money. In order to demonstrate the efficiency and effectiveness of the services provided we collect data on key service-related performance indicators and cost data which is used for comparisons over time and comparisons with other Funds where possible.

During 2021/22 as we emerged from the impact of the Covid-19 pandemic we continued to focus on ensuring the payment of members benefits. Whilst some other administration areas remain lower than the performance levels achieved under the pre-April 2014 scheme or in previous years, we are also seeing a return to higher levels of engagement with our members and key stakeholders. The 2021/22 budget allows for the additional recruitment of a number of pension administration officers. The recruitment of these additional team members has been more challenging in the post Covid environment, but once completed and the new members of the team have been appropriately trained, this should result in an improvement of service delivery and performance indicators.

The Local Government Pension Scheme funds account return (SF3) provides a useful dataset that can be analysed by fund membership (size) and administrative cost (investment costs are accounted for separately) the ratio gives a cost per member. From the latest available data the Gloucestershire Pension Fund's (administration and oversight and governance) cost per member was £36.99 (£37.99 for all LGPS England & Wales all sizes), which also compares favourably with, other LGPS funds of similar membership size.

SUMMARY OF ACTIVITY

5.3

KEY TASKS PERFORMANCE INFORMATION

The Pension Fund has a number of local performance targets which are included within the Pension Administration Strategy report, and are detailed in the tables below. These tables show the levels of achievement for the last five years for the key tasks delivered by the Pension Fund.

	2017/18 %	2018/19 %	2019/20 %	2020/21 %	2021/22 %
PENSION CONTRIBUTIONS PAID ON OR BEFORE THE DUE DATE	99.95	99.84	99.76	99.52	99.49
EMPLOYERS PROVIDING THE PENSION FUND WITH A COPY OF THEIR DISCRETIONS POLICY DOCUMENT (212 OUT OF 217)	79.7	81.0	90.2	91.7	97.7

ACTIVITY	TARGET	2017/18	2018/19	2019/20	2020/21	2021/22
ANNUAL BENEFIT STATEMENTS SENT BY STATUTORY DEADLINE	31/08/2018	31/08/2019	31/08/2020	31/08/2021	31/08/2022	
	100%	100%*	100%*	100%*	100%*	100%*
PROVIDE RETIREMENT ESTIMATES WITHIN 15 WORKING DAYS						
TOTAL COMPLETED		571	651	739	534	699
COMPLETED ON TIME		485	587	724	482	523
ACHIEVEMENT	90%	84.9%	90.2%	98.0%	90.3%	74.8%
PAY RETIREMENT GRANTS WITHIN 15 WORKING DAYS						
TOTAL COMPLETED		768	858	983	872	968
COMPLETED ON TIME		575	592	603	701	624
ACHIEVEMENT	90%	74.9%	69%	61.3%	80.4%	64.5%
PAY DEATH GRANTS WITHIN 8 WORKING DAYS						
TOTAL COMPLETED		61	79	76	89	74
COMPLETED ON TIME		45	65	51	62	38
ACHIEVEMENT	90%	73.8%	82%	67.1%	69.7%	51.4%
PAY REFUNDS WITHIN 15 WORKING DAYS						
TOTAL COMPLETED		448	620	649	424	504
COMPLETED ON TIME		429	609	641	395	320
ACHIEVEMENT	90%	95.8%	98.2%	98.8%	93.2%	63.5%
PAY TRANSFER VALUES WITHIN 15 WORKING DAYS						
TOTAL COMPLETED		132	147	194	136	198
COMPLETED ON TIME		122	144	192	132	191
ACHIEVEMENT	90%	92.4%	98.0%	99.0%	97.1%	96.5%

* Where the year-end return has been received from the employer and a definitive match made to the Pensions Administration records.

EMPLOYER CHARGES IN RESPECT OF SERVICE STANDARD BREACHES

5.4

As per Section 2.4 of the Pensions Administration Strategy, the Fund will charge employers additional costs incurred as a result of scheme employer's level of performance. In **2021/22** additional costs of **£5,664** were recharged (£0 2020/21).

COMPLAINTS RECEIVED

TYPE OF COMPLAINT	2017/18	2018/19	2019/20	2020/21	2021/22
SYSTEM ERROR	-	-	-	-	-
STAFF ERROR	-	2	1	1	2
STAFF ATTITUDE	-	-	-	-	-
TOTAL	-	2	1	1	2
TOTAL AS % OF WORKLOAD	0.0%	0.0%	0.0%	0.0%	0.0%

FINANCIAL INDICATORS

UNIT COSTS PER MEMBER	2017/18	2018/19	2019/20	2020/21	2021/22
INVESTMENT MANAGEMENT EXPENSES					
TOTAL COSTS £000	5,783	6,492	7,797	10,146	16,306
TOTAL MEMBERSHIP NUMBERS	59,768	60,134	60,417	61,896	63,251
COST PER MEMBER £	96.75	107.96	129.05	163.92	257.80
ADMINISTRATION EXPENSES					
TOTAL COSTS £000	1,217	1,397	1,509	1,556	1,553
TOTAL MEMBERSHIP NUMBERS	59,768	60,134	60,417	61,896	63,251
COST PER MEMBER £	20.36	23.23	24.98	25.14	24.55
OVERSIGHT AND GOVERNANCE					
TOTAL COSTS £000	418	553	722	500	671
TOTAL MEMBERSHIP NUMBERS	59,768	60,134	60,417	61,896	63,251
COST PER MEMBER £	6.99	9.20	11.95	8.08	10.61
TOTAL COST PER MEMBER £	124.10	140.39	165.98	197.14	292.96

The management fees disclosed above include investment management fees directly incurred by the Fund i.e. including those charged on pooled fund investments which tend to be deducted from the market value of the investments rather than invoiced to the Fund. In addition to these costs, indirect costs are incurred through the bid-offer spread on investments sales and purchases. These are reflected in the cost of investment acquisitions and in the proceeds from the sales of investments.

BENCHMARKING

The Pension Fund submits data (SF3 submission) on an annual basis to the Department for Levelling Up, Housing and Communities (DLUHC). This information provides a benchmark on the administration and fund management of the Local Government Pension Scheme and is also used in compiling the National Accounts and to show the role of pension funds in the economy. The SF3 submission is subjected to a strict validation by DLUHC and any significant variances are investigated.

Please find detailed below the results of the benchmarking obtained from that submission, comparing the average cost per scheme member of the Gloucestershire Fund to the average cost per scheme member of all funds in England and Wales.

The results show that the average cost per scheme member of the Gloucestershire Fund has been consistently lower than the average of all funds in England and Wales.

	2017/18 £	2018/19 £	2019/20 £	2020/21 £	2021/22 £
ADMINISTRATION COSTS PER SCHEME MEMBER					
GLOUCESTERSHIRE COUNTY COUNCIL	27.94	32.92	37.55	34.66	36.99
ALL AUTHORITIES	29.80	32.68	35.70	35.89	37.99
FUND MANAGEMENT COSTS PER SCHEME MEMBER					
GLOUCESTERSHIRE COUNTY COUNCIL	107.80	117.08	139.48	178.67	281.81
ALL AUTHORITIES	175.44	189.59	209.68	238.37	282.37
TOTAL ADMINISTRATION AND FUND MANAGEMENT COSTS PER SCHEME MEMBER					
GLOUCESTERSHIRE COUNTY COUNCIL	135.74	150.00	177.03	213.33	318.80
ALL AUTHORITIES	205.24	222.27	245.38	274.26	320.36

Please also find detailed below benchmarking results, from the SF3 submission, comparing the number of full time equivalent (F.T.E.) staff employed in pension administration and accounting duties at the Gloucestershire Fund to the average number of F.T.E. staff employed in pension administration and accounting duties in all funds in England and Wales.

	2017/18	2018/19	2019/20	2020/21	2021/22
STAFF EMPLOYED IN PENSION ADMINISTRATION AND ACCOUNTING DUTIES					
GLOUCESTERSHIRE COUNTY COUNCIL	22.0	21.0	21.0	20.1	19.6
ALL AUTHORITIES	19.6	20.9	22.0	23.6	25.2

STAFFING INDICATORS

The table below shows the number of staff over the last five years in the Pensions Administration Team working exclusively on local government pension scheme benefits.

	2017/18	2018/19	2019/20	2020/21	2021/22
NUMBER OF FULL TIME EQUIVALENT PENSION FUND STAFF	14.9	14.6	14.9	15.5	14.4
TOTAL FUND MEMBERSHIP	59,768	60,134	60,417	61,896	63,251
NUMBER OF FUND MEMBERS TO ONE MEMBER OF ADMINISTRATION STAFF	4,011	4,119	4,055	3,993	4,392

OTHER INFORMATION

5.5

MEMBERSHIP SUMMARY	2017/18	% DIFF	2018/19	% DIFF	2019/20	% DIFF	2020/20	% DIFF	2021/22
CONTRIBUTORS	18,830	+0.74	18,969	+0.80	19,121	+0.53	19,222	-1.57	18,920
PENSIONERS	15,353	+4.59	16,058	+3.42	16,607	+4.11	17,290	+4.85	18,128
DEFERRED PENSIONERS	19,463	+4.90	20,417	-1.19	20,173	+0.5	20,274	+2.66	20,814
TOTAL	53,646	+3.35	55,444	+0.82	55,901	+1.58	56,786	+1.89	57,862
UNDECIDED/ UNPROCESSED LEAVERS	6,122	-23.39	4,690	-3.71	4,516	+13.15	5,110	+5.46	5,389
TOTAL	59,768	+0.61	60,134	+0.47	60,417	+2.45	61,896	+2.19	63,251

Deferred pensioners are former employees who have not transferred their pension rights and to whom benefits will be paid, from their eligible retirement date.

Undecided leavers are those members who are no longer accruing service and to whom a refund of contributions or transfer out may be due.

Unprocessed leavers are those members which represent cases where we are aware that a member has left, but that case has not yet been processed. These cases (once processed) could end up becoming Undecided Leavers or Deferred's (depending on length of membership) or indeed could end up being aggregated with another record the member may hold, in which case the particular record itself would be deleted.

OTHER INFORMATION

THE FOLLOWING GIVES AN AGE PROFILE OF FUND MEMBERS

GENDER	CATEGORY AGE	ACTIVE	DEFERRED	PENSIONER	WIDOW(ER)/ DEPENDANT
F	under 15	0	0	0	20
M	under 15	0	0	0	15
F	15 to 19	84	1	0	21
M	15 to 19	48	1	0	16
F	20 to 24	543	59	0	10
M	20 to 24	209	28	0	16
F	25 to 29	892	487	0	6
M	25 to 29	315	284	0	1
F	30 to 34	1142	1088	0	4
M	30 to 34	323	570	0	2
F	35 to 39	1602	1527	0	4
M	35 to 39	305	601	0	2
F	40 to 44	1830	1947	2	5
M	40 to 44	354	578	0	3
F	45 to 49	2308	2277	2	3
M	45 to 49	388	528	0	8
F	50 to 54	2735	3208	34	22
M	50 to 54	516	719	11	22
F	55 to 59	2408	3377	521	33
M	55 to 59	582	686	143	62
F	60 to 64	1366	1868	1783	72
M	60 to 64	402	463	578	90
F	65 to 69	338	306	3109	117
M	65 to 69	141	102	1078	110
F	70 to 74	57	71	2621	170
M	70 to 74	32	20	1236	125
F	75 to 79	0	6	1627	240
M	75 to 79	0	11	916	135
F	80 to 84	0	1	867	229
M	80 to 84	0	0	488	108
F	85 to 89	0	0	402	208
M	85 to 89	0	0	261	65
F	90 to 94	0	0	168	118
M	90 to 94	0	0	90	26
F	95 to 99	0	0	39	41
M	95 to 99	0	0	12	0
F	100 to 104	0	0	2	8
M	100 to 104	0	0	1	0
TOTAL	57,862	18,920	20,814	15,991	2,137

ANALYSIS OF NEW PENSIONERS

Please find detailed below a breakdown of new pensioners split into the various types of retirement:

	2017/18	2018/19	2019/20	2020/21	2021/22
NORMAL RETIREMENT	195	205	186	235	365
EARLY RETIREMENT*	544	618	683	637	641
ILL-HEALTH RETIREMENT**	26	32	27	20	14
	765	855	896	892	1,020

*Early retirements are made up of employees who, on being made redundant and over the age of 55, were entitled to their accrued pension rights plus those employees over 55 who elected to receive their pension benefits before their normal retirement age, incurring a reduction in their pension benefits to reflect early payment (there are some exclusions to this rule).

**Ill-health retirements relate to those members of staff, and former members of staff with deferred benefits, deemed permanently incapable of continuing in the employment the member was engaged in due to medical reasons and not immediately capable of undertaking any gainful employment in the future.

EMPLOYER SUMMARY

Please find listed below a summary of the number of employers in the Fund as at 31st March 2022 analysed by scheduled bodies and admitted bodies which are active

(with active members) and ceased (no active members but some outstanding liabilities) during the year.

	ACTIVE	CEASED	TOTAL
SCHEDULED BODIES	177	14	191
ADMITTED BODIES	37	43	80
TOTAL	214	57	271

EMPLOYEE CONTRIBUTIONS

Employee contributions are prescribed by statute and are based on pay bands. The pay bands and rates applicable from April 2021 are detailed below:

Whilst these same rates will apply to the 2022/23 financial year, the pensionable pay banding levels have increased slightly. Employees can opt to pay 50% of the relevant contribution rate to accrue 50% of the normal pension.

PENSIONABLE PAY	EMPLOYEE CONTRIBUTION RATE %
UP TO £14,600	5.5
£14,601 TO £22,900	5.8
£22,901 TO £37,200	6.5
£37,201 TO £47,100	6.8
£47,101 TO £65,900	8.5
£65,901 TO £93,400	9.9
£93,401 TO £110,000	10.5
£110,001 TO £165,000	11.4
MORE THAN £165,001	12.5

EMPLOYER CONTRIBUTIONS

Employer contributions are assessed every three years by the Scheme Actuary. The contributions are required to be sufficient to maintain the long-term solvency of the Fund.

The results of the most recent actuarial valuation of the Fund, as at 31st March 2019, were announced in March 2020 and set the employers' contribution rates payable in each of the three years commencing 1st April 2020. The next actuarial valuation has just commenced and will prescribe the employer rates from 1st April 2023.

The table below summarises the whole fund Primary and Secondary Contribution rates at the 2019 valuation. Primary rates relate to future service liabilities whilst the secondary rate relates to past service deficit payments. The Primary rate is the payroll weighted average of the underlying individual employer primary rates and the Secondary rate is the total of the underlying individual employer secondary rates calculated in accordance with the Regulations and the Chartered Institute of Public Finance & Accountancy (CIPFA) guidance. The whole fund Primary and Secondary contributions calculated at the 2016 valuation of the Fund are shown for comparison.

	LAST VALUATION 31ST MARCH 2016		THIS VALUATION 31ST MARCH 2019	
PRIMARY RATE (% OF PAY)	19.6%		20.9%	
SECONDARY RATE (£)	2017/18	32,487,000	2020/21	30,652,000
	2018/19	36,638,000	2021/22	26,850,000
	2019/20	40,905,000	2022/23	24,353,000

Further information regarding the valuation and the scheme's funding position is included in the Actuarial Report on Fund on pages **62** to **63**.

Details of benefits payable under the LGPS and how they are calculated are contained in a scheme booklet that is issued to new employees. A general guide to the benefits payable is contained on page **195** of this report. In accordance with the Pensions (Increase) Act 1971 pensions payable are increased in relation to the movement in the Consumer Price Index.

PARTICIPATING EMPLOYERS AND CONTRIBUTIONS RECEIVABLE

A list of the Fund's participating and contributing employers is shown below. The Rates & Adjustment Certificate showing each individual employer's contribution rate, as agreed with the Scheme Actuary, for the period 1st April 2020 to 31st March 2023 may be found on pages 65 to 70.

2021/22 CONTRIBUTIONS	EMPLOYER CONTRIBUTIONS	EMPLOYEE CONTRIBUTIONS	TOTAL
ADMINISTERING AUTHORITY			
GLOUCESTERSHIRE COUNTY COUNCIL*	39,736,974	9,703,006	49,439,980
SCHEDULED BODIES			
CHELTENHAM BOROUGH COUNCIL	1,451,660	487,839	1,939,499
COTSWOLD DISTRICT COUNCIL	148,565	56,165	204,730
FOREST OF DEAN DISTRICT COUNCIL	69,663	28,753	98,416
GLOUCESTER CITY COUNCIL	1,224,202	421,131	1,645,333
STROUD DISTRICT COUNCIL	4,030,205	729,784	4,759,989
TEWKESBURY BOROUGH COUNCIL	2,793,334	450,669	3,244,003
COTSWOLDS NATIONAL LANDSCAPE	103,342	36,399	139,741
CHELTENHAM BOROUGH HOMES	1,054,366	390,752	1,445,118
POLICE AND CRIME COMMISSIONER FOR GLOUCESTERSHIRE	6,155,492	1,878,650	8,034,142
LOWER SEVERN DRAINAGE BOARD	154,412	26,701	181,113
PARISH AND TOWN COUNCILS (POOLED)	570,003	155,896	725,899
UNIVERSITY OF GLOUCESTERSHIRE	3,846,031	1,096,762	4,942,793
CIRENCESTER COLLEGE	668,908	151,667	820,575
GLOUCESTERSHIRE COLLEGE	1,113,995	311,211	1,425,206
HARTPURY UNIVERSITY	2,171,954	587,303	2,759,257
ACADEMIES			
ABBEY VIEW CCT	26,625	5,683	32,308
ALL SAINTS	207,285	50,799	258,084
AYLBURTON PRIMARY	19,333	4,012	23,345
BALCARRAS SCHOOL	346,139	78,481	424,620
BATTLEDOWN PRIMARY	150,787	28,542	179,329
BELMONT SCHOOL	271,435	52,011	323,446
BERKELEY PRIMARY	74,454	15,974	90,428
BERKELEY UTC ACADEMY	42,556	10,026	52,582
BIBURY C OF E PRIMARY ACADEMY	15,629	3,173	18,802
BISHOPS CLEEVE PRIMARY	140,685	36,144	176,829
BLOCKLEY PRIMARY ACADEMY	52,526	12,214	64,740
BOURTON ON THE WATER	99,217	23,160	122,377
BREAM C OF E PRIMARY ACADEMY	48,002	10,084	58,086
BROCKWORTH PRIMARY	79,576	18,884	98,460
CAM WOODFIELD JUNIOR ACADEMY	44,224	9,482	53,706

2021/22 CONTRIBUTIONS	EMPLOYER CONTRIBUTIONS	EMPLOYEE CONTRIBUTIONS	TOTAL
CHARLTON KINGS INFANTS SCHOOL	109,815	24,885	134,700
CHARLTON KINGS JUNIOR SCHOOL	96,231	18,630	114,861
CHELTENHAM BOURNSIDE SCHOOL	448,467	92,361	540,828
CHESTERTON PRIMARY ACADEMY	98,095	22,082	120,177
CHIPPING CAMPDEN SCHOOL	332,665	71,907	404,572
CHOSEN HILL SCHOOL	304,057	61,168	365,225
CHRIST CHURCH C OF E	75,002	16,735	91,737
CHURCHDOWN SCHOOL	351,450	64,960	416,410
CHURCHDOWN VILLAGE INFANTS	75,238	17,609	92,847
CIRENCESTER DEER PARK SCHOOL	296,255	70,071	366,326
CIRENCESTER KINGSHILL SCHOOL	224,773	50,969	275,742
CLEARWATER PRIMARY ACADEMY	38,431	7,848	46,279
CLEEVE SCHOOL	273,054	61,256	334,310
COALEY C OF E PRIMARY ACADEMY	17,911	3,734	21,645
COTSWOLD SCHOOL	329,650	82,250	411,900
CRYPT SCHOOL	192,775	48,694	241,469
DENE MAGNA SCHOOL	303,009	58,578	361,587
DENMARK ROAD HIGH SCHOOL	183,701	36,193	219,894
DIOCESE OF GLOUCESTER ACADEMIES TRUST	107,048	29,098	136,146
DRYBROOK PRIMARY	55,523	9,711	65,234
DURSLEY PRIMARY	67,123	13,944	81,067
ENGLISH BICKNOR PRIMARY	1,377	290	1,667
FARMORS ACADEMY	209,140	41,423	250,563
FIELD COURT C OF E INFANT SCHOOL	129,770	32,100	161,870
FIELD COURT C OF E JUNIOR SCHOOL	79,090	16,985	96,075
FIVE ACRES HIGH SCHOOL ACADEMY	278,122	59,820	337,942
FOREST HIGH SCHOOL	71,155	15,501	86,656
FOREST VIEW PRIMARY	140,042	25,785	165,827
GLOUCESTER ACADEMY	305,489	66,301	371,790
GOTHERINGTON PRIMARY SCHOOL	51,867	8,024	59,891
GRANGE PRIMARY ACADEMY	77,232	18,348	95,580
GREAT OLDBURY PRIMARY	16,711	4,040	20,751
GRETTON PRIMARY SCHOOL	25,216	4,869	30,085
HARDWICKE PRIMARY SCHOOL	96,049	18,653	114,702
HARTPURY C OF E PRIMARY ACADEMY	37,870	6,316	44,186
HENLEY BANK HIGH SCHOOL	201,942	41,676	243,618
HIGHNAM C OF E PRIMARY SCHOOL	56,176	12,363	68,539
HOLMLEIGH PARK HIGH SCHOOL	317,432	64,709	382,141
HUNTSGROVE PRIMARY	24,000	5,835	29,835
KATHERINE LADY BERKELEY SCHOOL	374,813	77,405	452,218

2021/22 CONTRIBUTIONS	EMPLOYER CONTRIBUTIONS	EMPLOYEE CONTRIBUTIONS	TOTAL
KEMBLE PRIMARY ACADEMY	26,085	12,045	38,130
LAKEFIELD PRIMARY ACADEMY	75,459	15,024	90,483
LECKHAMPTON HIGH SCHOOL	8,291	1,940	10,231
LONGFORD PARK PRIMARY ACADEMY	58,523	13,548	72,071
LONGNEY C OF E PRIMARY ACADEMY	25,212	5,216	30,428
LYDNEY PRIMARY	80,992	17,458	98,450
MARLING SCHOOL	240,900	53,875	294,775
MILESTONE ACADEMY	816,291	151,082	967,373
MINCHINHAMPTON ACADEMY	80,009	16,748	96,757
MITTON MANOR PRIMARY ACADEMY	40,168	8,397	48,565
MOAT PRIMARY ACADEMY	65,682	16,066	81,748
NEWENT COMMUNITY SCHOOL	236,797	47,987	284,784
NORTH CERNEY C OF E PRIMARY ACADEMY	17,272	3,505	20,777
OFFAS MEAD PRIMARY	27,543	6,342	33,885
PATERNOSTER ACADEMY	164,616	29,562	194,178
PATES SCHOOL	294,764	71,509	366,273
PRIMROSE HILL ACADEMY	63,781	12,802	76,583
REDMARLEY C OF E SCHOOL	25,840	4,694	30,534
RIBSTON HALL SCHOOL	193,101	60,208	253,309
ROBINSWOOD PRIMARY SCHOOL	233,942	58,035	291,977
PHOENIX LEARNING ALLIANCE (FORMERLY THE ROBINSWOOD ACADEMY TRUST - CENTRAL STAFF	37,067	10,507	47,574
ROSARY CATHOLIC PRIMARY SCHOOL	53,885	11,017	64,902
ROWANFIELD INFANT SCHOOL	52,542	12,367	64,909
ROWANFIELD JUNIOR SCHOOL	92,203	22,436	114,639
SAND ACADEMY TRUST	108,502	23,834	132,336
SEVERNBANKS PRIMARY	100,864	19,338	120,202
SEVERN VALE SCHOOL	350,684	67,621	418,305
SEVERN VIEW PRIMARY	4,183	978	5,161
SIDDINGTON C OF E PRIMARY ACADEMY	22,142	4,833	26,975
SIR THOMAS RICH'S SCHOOL	217,601	43,289	260,890
SIR WILLIAM ROMNEY'S SCHOOL	150,968	30,396	181,364
SOUTH GLOS & STROUD ACADEMY TRUST	43,089	11,158	54,247
SPRINGBANK PRIMARY	131,167	31,760	162,927
ST DAVID'S PRIMARY	70,482	16,358	86,840
ST DOMINIC'S CATHOLIC PRIMARY SCHOOL	-7,220	-	-7,220
ST JAMES PRIMARY ACADEMY	95,949	19,277	115,226
ST JOHN'S C OF E PRIMARY	35,963	7,123	43,086
ST LAWRENCE ACADEMY	41,070	8,434	49,504
ST MARY'S CATHOLIC PRIMARY SCHOOL	62,680	14,344	77,024
ST MATTHEW'S C OF E PRIMARY ACADEMY	65,478	13,289	78,767

2021/22 CONTRIBUTIONS	EMPLOYER CONTRIBUTIONS	EMPLOYEE CONTRIBUTIONS	TOTAL
ST PETER'S CATHOLIC HIGH SCHOOL	398,623	82,053	480,676
STAUNTON AND CORSE C OF E SCHOOL	33,400	7,229	40,629
STONE WITH WOODFORD C OF E ACADEMY	26,946	4,833	31,779
STROUD HIGH SCHOOL	222,688	48,329	271,017
TEWKESBURY SCHOOL	336,022	72,751	408,773
THE DEAN ACADEMY	228,880	44,650	273,530
THE RIDGE ACADEMY	97,110	23,934	121,044
THE WILLOW PRIMARY ACADEMY	93,740	17,055	110,795
THOMAS KEBLE SCHOOL	197,737	47,651	245,388
TREDINGTON PRIMARY	24,582	5,224	29,806
TREDWORTH INFANT AND NURSERY ACADEMY	88,643	19,688	108,331
WATERWELL PRIMARY ACADEMY	41,417	10,219	51,636
WHITESHILL PRIMARY ACADEMY	25,519	5,240	30,759
WINCHCOMBE ABBEY	101,145	20,803	121,948
WINCHCOMBE SCHOOL	170,533	32,903	203,436
WYEDEAN SCHOOL	294,135	56,951	351,086
	40,534,058	10,025,392	50,559,450
ADMITTED BODIES			
ADOPTION WEST	136,976	36,152	173,128
ALLIANCE IN PARTNERSHIP (ST. PETERS)	75,594	14,080	89,674
ASPIRE SPORTS AND CULTURAL TRUST	47,122	20,534	67,656
ASPENS (DENMARK ROAD)	3,500	617	4,117
ASPENS CATERING (FARMORS)	7,046	1,327	8,373
ATKINS	15,067	4,825	19,892
BARNARDOS FOD AND STROUD	5,421	1,173	6,594
BARNARDOS GLOUCESTER	-	4,366	4,366
BRANDON TRUST	8,545	2,140	10,685
BRAYBORNE (HOLMLEIGH PARK)	39,554	6,758	46,312
CATERLINK (GLOS. ACADEMY)	3,548	7,860	11,408
CHELtenham TRUST	95,074	24,656	119,730
CIVICA UK LTD	-	38,350	38,350
CIVICA UK LTD - GLOS CITY IT	3,824	1,749	5,573
COTSWOLD ARCHAEOLOGY LTD.	156,135	41,150	197,285
ENTERPRISE (ACCORD OPERATIONS LTD)	-	210	210
GARDNERS LANE & OAKWOOD (CHELT. & TEWKES)	93,008	30,000	123,008
GLOUCESTER CITY HOMES	347,852	88,903	436,755
GLOUCESTER COMMUNITY BUILDING COLLECTIVE	9,503	2,945	12,448
GLOUCESTERSHIRE AIRPORT	37,726	12,709	50,435
GLOUCESTERSHIRE HEALTH & CARE NHS FOUNDATION	60,805	15,446	76,251
GLOUCESTERSHIRE GROUP HOMES	52,010	10,307	62,317

2021/22 CONTRIBUTIONS	EMPLOYER CONTRIBUTIONS	EMPLOYEE CONTRIBUTIONS	TOTAL
THE ORDERS OF ST JOHN CARE TRUST	55,387	11,818	67,205
PLACES FOR PEOPLE	21,608	8,026	29,634
PROSPECTS YOUTH SERVICE	-	114,116	114,116
PUBLICA (COTSWOLD)	972,061	323,871	1,295,932
PUBLICA (FOREST)	546,072	184,379	730,451
PUBLICA (FOREST) REVENUE & BENEFITS	57,972	17,265	75,237
RIDGE CREST CLEANING (FARMORS)	1,680	327	2,007
RINGWAY INFRASTRUCTURE SERVICES	48,803	12,154	60,957
SPORT & LEISURE MANAGEMENT	94,675	25,914	120,589
STROUD COURT COMMUNITY TRUST	84,239	21,375	105,614
STROUD SUBSCRIPTION ROOMS	3,135	866	4,001
TINIES UK (GLOS COLLEGE)	42,064	10,020	52,084
TWO RIVERS HOUSING	189,936	90,753	280,689
UBICO LTD (CHELT BC)	66	94,018	94,084
UBICO LTD (COTS DC)	17,253	5,172	22,425
UBICO LTD (FODDC)	-	5,240	5,240
UBICO LTD (TEWKS BC)	-	33,979	33,979
URBASER	221,211	47,674	268,885
WEALDON LEISURE (FODDC)	56,363	17,041	73,404
ADMITTED BODIES TOTAL	3,610,835	1,390,265	5,001,100
SECTION 75 DEBT (CESSATION OF EMPLOYER)	-9,000	-	-9,000
ILL HEALTH INSURANCE	-880,408	-	-880,408
TOTAL CONTRIBUTIONS	82,992,459	21,118,663	**104,111,122

* including schools.

** includes ill health and early retirement contributions totalling £0.9m.

Some of the employers will include accruals for contributions due but not received as at 31st March 2022.

SUMMARY OF FREEDOM OF INFORMATION REQUESTS RECEIVED DURING 2021/22

SUBJECT	NUMBER OF REQUESTS		
	2019/20	2020/21	2021/22
ALTERNATIVE INVESTMENTS	12	13	10
SUBJECT ACCESS REQUEST	2	1	1
VOTING RECORDS	2	4	3
INVESTMENTS IN FOSSIL FUELS, CLIMATE CHANGE AND TOBACCO	2	3	-
CURRENCY TRANSACTIONS	1	-	-
HOLDINGS IN CAPITAL GROUP	1	-	-
ASSETS HELD	1	2	4

SUMMARY OF FREEDOM OF INFORMATION REQUESTS RECEIVED DURING 2021/22 Cont.

SUBJECT	NUMBER OF REQUESTS		
	2019/20	2020/21	2021/22
SOFTWARE PROVIDERS USED	-	1	2
INVESTMENT MANAGEMENT FEES	-	1	-
INDEPENDENT ADJUDICATOR	-	1	-
BRUNEL PENSION PARTNERSHIP	-	-	1
	21	26	21

The Fund's Internal Disputes Resolution Procedure (I.D.R.P.)

5.6

Although the majority of problems relating to members benefits are normally the result of misunderstandings or incorrect information and can be dealt with informally, the LGPS Regulations provide a formal complaint procedure known as the Internal Dispute Resolution Procedure. This formal process consists of two stages, as detailed below, although many of the complaints are resolved during the first stage.

STAGE 1

In the first instance you should write to the person nominated by the body who made the decision about which you wish to appeal. You must do this within six months of the date of the notification of the decision, or the date of the act or omission about which you are complaining (or such longer period as the nominated person considers reasonable). This is a formal review of the initial decision, act or omission and is an opportunity for the matter to be reconsidered. The nominated person will consider your complaint and notify you of his or her decision.

STAGE 2

If you are dissatisfied with that person's decision, (or their failure to make a decision) you may apply to the Fund's administering authority to have it reconsidered.

The Pensions Section can tell you who your employer's nominated person is and supply you with a more detailed leaflet on the Internal Disputes Resolution Procedure and relevant time limits together with a form to fill in or you can ask your employer.

MONEYHELPER (FORMERLY THE PENSIONS ADVISORY SERVICE - TPAS)

MoneyHelper is available at any time to assist members and beneficiaries of the scheme in connection with any pension query they may have or any difficulty which they cannot resolve with the scheme administrator.

Information can be found on the MoneyHelper website at **www.moneyhelper.org.uk** or they can be contacted on **0800 011 3797**.

PENSIONS OMBUDSMAN

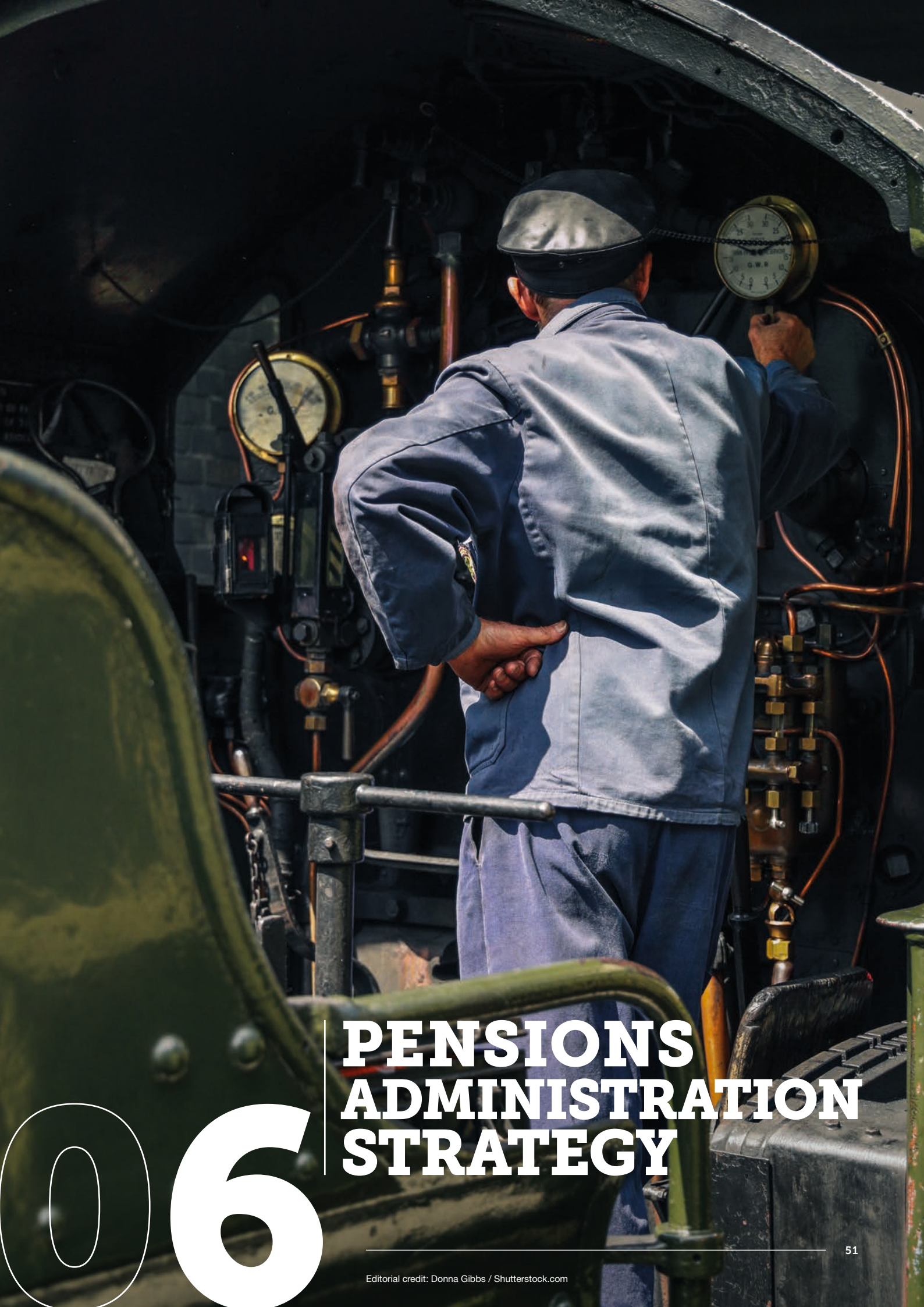
In cases where a complaint or dispute has not been satisfactorily resolved through the Internal Disputes Resolution Procedure, or with the help of MoneyHelper (formerly TPAS), an application can be made to the Pensions Ombudsman within three years of the event that gave rise to the complaint or dispute or, if later, within three years of when the individual first knew about it (or ought to have known about it). There is discretion in certain instances for the time limit to be extended.

The Pensions Ombudsman's website can be found at **www.pensions-ombudsman.org.uk** or they can be contacted on **0800 917 4487**.

More detailed information can be found on the pages of the Pension Section's website by using the following link **<https://www.gloucestershire.gov.uk/pensions>**. Alternatively, you can contact the Pensions Section by telephoning **(01452) 328888**.

Details of scheme member appeals during 2021/2022 are as follows:

There was one Stage 2 IDRPA appeal against the fund during 2021/2022. The independent appointed person did not uphold the member's complaint.



06

PENSIONS ADMINISTRATION STRATEGY

06

PENSIONS ADMINISTRATION STRATEGY

INTRODUCTION & PURPOSE

It is recognised by the Secretary of State that for the administration of the Local Government Pension Scheme (LGPS) to be improved and costs reduced, Employers and Administering Authorities must co-operate closely and provide sufficient resource to ensure that their statutory obligations are met. The purpose of this Administration Strategy is therefore to recognise those responsibilities and to set out the time scales within which tasks should be completed. This will subsequently improve the flow of information between Employers and Gloucestershire Pension Fund (as Administering Authority), ensuring that those obligations are met, and ultimately that costs are kept to a minimum and that scheme members receive accurate and timely payment/notification of their entitlements. The Administering Authority has assigned responsibility for the management and administration of the Gloucestershire Pension Fund to the Pension Committee.

1. THE REGULATIONS

1.1 The Pension Administration Strategy is concerned with ensuring that Gloucestershire Pension Fund runs smoothly for its member's employer organisations and Gloucestershire Pension Fund.

1.2 The Pension Administration Strategy is made in accordance with Regulation 59 of the Local Government Pension Scheme Regulations 2013 which states, amongst other things that:

- (1)** An administering authority may prepare a written statement of the authority's policies in relation to such of the matters mentioned in paragraph (2) as it considers appropriate ('its pension administration strategy') and, where it does so, paragraphs (3) to (7) apply.
- (2)** The matters are:
 - (a)** procedures for liaison and communication with Scheme employers in relation to which it is the administering authority ('its Scheme employers');
 - (b)** the establishment of levels of performance which the administering authority and its Scheme employers are expected to achieve in carrying out their Scheme functions by:
 - (i)** the setting of performance targets
 - (ii)** the making of agreements about levels of performance and associated matters, or
 - (iii)** such other means as the administering authority considers appropriate
 - (c)** procedures which aim to secure that the administering authority and its Scheme employers comply with statutory requirements in respect of those functions and with any agreement about levels of performance;
 - (d)** procedures for improving the communication by the administering authority and its Scheme employers to each other of information relating to those functions;
 - (e)** the circumstances in which the administering authority may consider giving written notice to any of its Scheme employers under regulation 70 (additional costs arising from Scheme employer's level of performance) on account of that employer's unsatisfactory performance in carrying out its Scheme functions when measured against levels of performance established under sub-paragraph (b);
 - (f)** the publication by the administering authority of annual reports dealing with:
 - (i)** the extent to which that authority and its Scheme employers have achieved the levels of performance established under sub-paragraph (b), and
 - (ii)** such other matters arising from its pension administration strategy as it considers appropriate; and

(g) such other matters as appear to the administering authority, after consulting its Scheme employers and such other persons as it considers appropriate, to be suitable for inclusion in that strategy.

1.3 The Pension Administration Strategy is published to Gloucestershire Pension Fund's Scheme employers and to the Secretary of State.

2. THE STRATEGY

2.1 Procedures for liaison and communication with Scheme employers

2.1.1 The employer will nominate a person to act as the 'employer representative' and Gloucestershire Pension Fund 's primary contact. The employer will notify Gloucestershire Pension Fund who that person is and ensure that changes of nominated person are notified to Gloucestershire Pension Fund immediately.

2.1.2 Gloucestershire Pension Fund employs a multi-channel approach to liaison and communication with Scheme employers to ensure that employer needs are constantly and consistently met.

2.1.3 Channels include:

- The 'Gloucestershire Pension Fund Employers Web Site', that gives access to:
 - information about Gloucestershire Pension Fund and the Local Government Pension Scheme
 - administration forms to download, print and use as needed
 - contact information for key Gloucestershire Pension Fund representatives who can inform and liaise with employers on the scheme and its application to individual cases
- Gloucestershire Pension Fund issues information by e-mail to the nominated contact for pensions at each organisation.
- Employer representatives can distribute pension information as appropriate to relevant staff within their organisation with a view to ensuring the smooth operation of the scheme within their organisation. The employer representative should always be mindful of the confidentiality of some correspondence.
- Employer update seminars are held twice yearly (usually during January and June) covering scheme development issues and providing the opportunity for Employers to field any questions/queries.

2.2 LEVELS OF PERFORMANCE

2.2.1 Gloucestershire Pension Fund and Scheme employers must have regard to the current version of the Pension Administration Strategy when carrying out their functions.

LEVELS OF PERFORMANCE FOR SCHEME EMPLOYERS AND THE ADMINISTERING AUTHORITY

2.2.2 The employer must supply notifications (or approved alternatives) to Gloucestershire Pension Fund as follows:

- (i) New starters (FORM: Employer pension starter notification): within 5 weeks of the employee joining.
- (ii) Change in member's details (FORM: LGPS con-change): within 5 weeks of the event.
- (iii) Early leavers (FORM: leaver1): within 5 weeks of the employee leaving.
- (iv) Retirement Notifications (FORM: leaver1) and all other required documents must be received by Gloucestershire Pension Fund on or before 5 working days after the last day of employment.
- (v) Death in active membership (FORM: leaver1): within 5 working days of the death of the member.

2.2.3 Great care must be taken to avoid breaking The Occupational Pension Schemes (Disclosure of Information) Regulations 2013. For example, where a retirement takes place before normal pension age, leaver1 form must be received by Gloucestershire Pension Fund no later than one month after the date of retirement. Where a retirement takes place on or after normal pension age, Gloucestershire Pension Fund must receive leaver1 form no later than 10 working days after the date of retirement. The above timeframes within 2.2.2 are therefore to allow us to ensure compliance with the Disclosure Regulations in relation to all scheme member matters.

2.2.4 Each employer in the fund will provide Gloucestershire Pension Fund with a monthly statement reconciling to the total contributions paid. This statement must be received by the Pension Fund before the payment of the contribution is made. The format of this statement is stipulated by Gloucestershire Pension Fund and contains information as detailed in the LGPS Regulations 2013. It also provides assistance to the employer by validating the calculations. A separate spreadsheet is available for employees utilising the 50/50 scheme and both can be obtained from the 'Gloucestershire Pension Fund Employers Web Site'. The deadline for receipt of these statements is no later than the 10th day of the month following the month in which contributions have been deducted. Where the 10th falls on a weekend or bank holiday, the due date becomes the last working day prior to the 10th.

2.2.5 Employers will provide Gloucestershire Pension Fund with a year-end data return as at 31st March each year in an approved format no later than 31st May of that year. The return must be balanced by the employer against the employee and employer contribution payments made for that financial year.

**Please note that in the year of the Triennial Valuation, this date may need to be brought forward. Any such change will be notified in advance to your nominated person.*

2.2.6 The scheme employer is responsible for ensuring that employee and employer contributions are deducted at the correct rate and on the correct pensionable pay. This includes contributions due on leave of absence with reduced or no pay, maternity leave contributions, contributions relating to the 50/50 option and any other contributions due to the Gloucestershire Pension Fund or requested by the Gloucestershire Pension Fund.

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

2.2.8 Gloucestershire Pension Fund 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 and the Discretionary Payments Regulations. That responsibility rests with the employer.

2.2.9 Any over payment of benefits resulting from inaccurate information supplied by the employer shall be recovered from the employer.

Similarly, where Gloucestershire Pension Fund are required to revise their calculations due to incorrect notification of information by the employer, Gloucestershire Pension Fund reserves the right to pass on the administrative costs of processing that revision.

2.2.10 In the event of Gloucestershire Pension Fund incurring costs or being fined by e.g. The Pensions Regulator, as a result of an employer's action or inaction (e.g. the failure to notify a retirement within the time limits described above), this charge will be passed on to the relevant employer.

2.2.11 Under the Data Protection Act 1998, the employer will protect from improper disclosure any information about a member contained (where applicable) on any item sent from Gloucestershire Pension Fund. It will also only use information supplied or made available by Gloucestershire Pension Fund for the operation of the Local Government Pension Scheme.

LEVELS OF PERFORMANCE FOR GLOUCESTERSHIRE PENSION FUND

2.2.12 Gloucestershire Pension Fund will make available/ issue forms, newsletters, booklets and such other materials as are necessary for the administration of the Scheme.

2.2.13 Gloucestershire Pension Fund will support employers in running the Local Government Pension Scheme by:

- (i) providing information, interpretation and assistance on the scheme and its administration.
- (ii) distributing regular technical information.

2.2.14 Working co-operatively with employers, Gloucestershire Pension Fund aims to:

- (i) in relation to retirements; pay retirement grants within 10 working days of receipt of all the relevant required paperwork
- (ii) in relation to deaths in service; pay the death gratuity within 3 working days of receipt of all the relevant required paperwork
- (iii) provide employer requested estimates within 15 working days of request from employer
- (iv) send Annual Benefit Statements (ABS's) to scheme members in accordance with the specified timeframes within the LGPS Regulations following the relevant end of financial year, (subject to timely receipt of all required notifications under 2.2.2. and a balanced year-end return as stated in 2.2.5)

2.2.15 Gloucestershire Pension Fund will produce benefit illustrations for members each year where the employer has submitted useable and accurate year-end financial data.

2.2.16 Gloucestershire Pension Fund will supply any information to employers necessary to ensure the smooth running of the pension fund.

2.2.17 Gloucestershire Pension Fund will work with employers to ensure that retirement is as smooth a process as possible for the member and employer.

2.2.18 Under the Data Protection Act 1998, Gloucestershire Pension Fund will protect from improper disclosure any information held about a member. Information held will be used by Gloucestershire Pension Fund for the operation of the Local Government Pension Scheme.

2.2.19 Gloucestershire Pension Fund is responsible for exercising the discretionary powers given to it by the regulations. Gloucestershire Pension Fund is also responsible for publishing its policy to its members in respect of the key discretions as required by the regulations.

2.2.20 Gloucestershire Pension Fund aims to provide a service to members that meet the requirements of the Occupational Pension Schemes (Disclosure of Information) Regulations 2013.

2.2.21 The Gloucestershire Pension Fund will contact all scheme employers throughout the financial year, depending on their year end reporting date, to establish requirements for an annual pension liability report produced by the Fund's actuary. These reports are required under the relevant International Accounting Standards (IAS) or Financial Reporting Standards (FRS) for inclusion in the employer's Annual Report & Accounts. For those wishing to commission such a report, the Gloucestershire Pension Fund will provide all the necessary documentation as provided by the Fund's actuary; the cost of obtaining this report will be recharged to the employer. Employers who fail to meet the advised deadlines of this exercise may incur a further actuarial charge due to the nature of the bulk discount fee obtained by the Fund.

2.2.22 Where employers who are admitted bodies to the Fund are required to hold an indemnity bond, the Gloucestershire Pension Fund will request, from the Fund's actuary, revised bond valuations in accordance with the employer's Admission Agreement. Indemnity bonds are normally reviewed annually and the standard renewal date is 1st April. Where an employer is required to obtain a new or revised bond they will be given a minimum of 20 working days notice by the Gloucestershire Pension Fund. The actuary cost of obtaining the bond valuation will be recharged to the employer.

2.3 PAYMENTS BY SCHEME EMPLOYERS TO GLOUCESTERSHIRE PENSION FUND

2.3.1 Scheme employers will make all payments required under the Local Government Pension Scheme, and any related legislation, promptly to Gloucestershire Pension Fund and/or its Additional Voluntary Contribution providers (Prudential / Phoenix Life) as appropriate.

• PAYMENT DATES

Contributions can be paid over at any time but the latest date for cleared funds to be received is the 19th of the month immediately following the month in which deductions were made. For example contributions deducted in April must be received by Gloucestershire Pension Fund by 19th May at the latest. Where the 19th falls on a weekend or Bank Holiday, the due date becomes the last working day prior to the 19th.

Similarly, the employer will pay any Additional Voluntary Contributions to the relevant AVC Provider within the same timeframe.

• LATE PAYMENT

Under the Pensions Act 1995, the Pensions Regulator may be notified if contributions are not received in accordance with the regulators code of practice, as described above.

• MONTHLY CONTRIBUTION

- PAYMENT METHOD

Apart from Additional Voluntary Contributions, all other Contributions should be paid to the Gloucestershire Pension Fund's bank account, by Direct Debit or BACS. The payment should match the in-month return(s) for the employer and a summary document should be sent if the payment covers two returns or more.

• SECONDARY (DEFICIT) CONTRIBUTION

It is expected that secondary (deficit) contribution payments will be included on the monthly return when payment is made with the normal monthly contributions.

• INVOICE - PAYMENT METHOD

Payments of invoices raised by the Pension Fund are due immediately upon receipt and must be made separate to any contribution payment that is due. The payment should be paid to the Gloucestershire Pension Fund's bank account, by BACS quoting invoice details.

• REMITTANCE ADVICES

Employers must submit a remittance advice with each payment to the Gloucestershire Pension Fund (email address: peninv@gloucestershire.gov.uk). Employers who are paying monthly contributions must provide the statement as detailed in paragraph 2.2.4 above.

2.4 ADDITIONAL COSTS INCURRED AS A RESULT OF SCHEME EMPLOYER'S LEVEL OF PERFORMANCE

2.4.1 Gloucestershire Pension Fund will charge the scheme employer an administrative fee, for chasing any overdue/outstanding documentation or overdue payment, of £6 subject to VAT in relation to each item, each time it is chased.

Payments paid into Gloucestershire County Council's bank account rather than the Pension Fund's bank account will be subject to an administration fee of £6 subject to VAT. Any other additional charges imposed by the Bank to transfer these payments will also be passed on to the employer.

In addition, where additional costs have been incurred by Gloucestershire Pension Fund because of the Scheme employer's level of performance in carrying out its functions under the LGPS, the additional costs will be recovered from that Scheme employer. Costs subject to VAT will be based on a time and materials basis.

2.4.2 Gloucestershire Pension Fund will give written notice to the Scheme employer stating -

- (i) the reasons for the additional cost incurred;
- (ii) that the Scheme employer should pay the additional costs attributable to that authority's level of performance;
- (iii) the basis on which the specified amount is calculated; and
- (iv) the relevant provisions of the Pension Administration Strategy under which the additional costs have arisen.
- (v) Additional costs incurred will be collated and invoiced each calendar year.

2.4.3 Any disagreement regarding the amount of additional cost being recovered, which cannot be resolved between the employer and Gloucestershire Pension Fund, will be decided by the Secretary of State who will have regard to -

- (i) the provisions of the Pension Administration Strategy that are relevant to the case; and
- (ii) the extent to which Gloucestershire Pension Fund and the Scheme employer have complied with those provisions in carrying out their functions under these Regulations.

2.5 INTEREST ON LATE PAYMENTS

2.5.1 In accordance with the LGPS Regulations, interest may be charged on any amount overdue from a Scheme employer by more than one month.

2.5.2 Interest will be calculated at one percentage point above base rate on a day to day basis from the due date to the date of payment and compounded with three-monthly rests.

3. REVIEW OF THE PENSION ADMINISTRATION STRATEGY

3.1 The Pension Administration Strategy will be kept under review by the Gloucestershire Pension Fund's Pension Committee.

3.2 The Pension Committee's relationship with Scheme employers including details on communication, governance, skills and knowledge, etc., is contained within the following documents: Communications Policy; Governance Policy; Governance Compliance Statement. All these documents are available on Gloucestershire Pension Fund's website www.gloucestershire.gov.uk/pensionsinvestments.

3.3 Employers may make suggestions to improve the Pension Administration Strategy for consideration by Gloucestershire Pension Fund at any time.

3.4 Gloucestershire Pension Fund will revise the Pension Administration Strategy after consulting with Scheme employers and any other persons considered appropriate following a material change in any policy covered in the strategy. When the Gloucestershire Pension Fund publishes its Strategy or a revised Strategy it will send a copy to each of its Scheme employers and to the Secretary of State.

3.5 Employers are welcome to discuss any aspect of the Pension Administration Strategy with Gloucestershire Pension Fund at any time. Employers are welcome to visit Gloucestershire Pension Fund at any time, subject to notice.

3.6 The Gloucestershire Pension Fund Annual Report will give details of the extent to which the Administering Authority and Employers have achieved the levels of performance as detailed in the Administration Strategy as well as such other matters from the Administration Strategy it considers important.

4. EMPLOYER CONTRIBUTION RATES AND ADMINISTRATION COSTS

4.1 Employers' contribution rates are not fixed. 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.

4.2 Gloucestershire Pension Fund has an actuarial valuation undertaken every three years by the Fund's actuary. The actuary balances the fund's assets and liabilities in respect of each employer, and assesses the appropriate minimum contribution rate for each employer to be applied for the subsequent three years.

4.3 The cost of running Gloucestershire Pension Fund is charged directly to the Fund, and the actuary takes these costs into account in assessing the employers' contribution rates.

4.4 If an employer wishes Gloucestershire Pension Fund to carry out any employer specific work, Gloucestershire Pension Fund reserves the right to make a reasonable charge to cover the administration involved, where appropriate. Gloucestershire Pension Fund would always discuss such matters with the employer before any work commenced.



EXECUTIVE SUMMARY ON THE LAST TRIENNIAL VALUATION

07

07

EXECUTIVE SUMMARY ON THE LAST TRIENNIAL VALUATION

An actuarial valuation of the Fund was carried out as at 31st March 2019. The results are briefly summarised below. A new valuation process commenced in March 2022, the results of which will be implemented from 2023/24.

FUNDING POSITION

The table below summarises the financial position of the Fund at 31st March 2019, and at the previous three valuation dates, in respect of benefits earned by members up to this date.

	31ST MARCH 2010	31ST MARCH 2013	31ST MARCH 2016	31ST MARCH 2019
PAST SERVICE POSITION	£M	£M	£M	£M
PAST SERVICE LIABILITIES	1,498	1,976	2,138	2,338
MARKET VALUE OF ASSETS	1,054	1,385	1,703	2,379
SURPLUS / (DEFICIT)	(444)	(591)	(435)	41
FUNDING LEVEL	70.4%	70.1%	79.7%	101.8%

The main reasons for the change in the funding level over the period were better than anticipated investment returns, the effect of expected changes in membership, an increase in the assumed rate of future investment returns, an increase in the assumed rate of inflation and changes in mortality rates.

CONTRIBUTION RATES

The table below summarises the whole fund Primary and Secondary Contribution rates at the 2019 valuation. The Primary rate is the payroll weighted average of the underlying individual employer primary rates and the Secondary rate is the total of the underlying individual employer secondary rates calculated in accordance with the Regulations and the Chartered Institute of Public Finance & Accountancy (CIPFA) guidance.

The Primary rate includes an allowance of 0.6% of pensionable pay for the Fund's expenses (0.5% at the 2016 valuation). The average employee contribution rate is 6.3% of pensionable pay (6.3% at the 2016 valuation).

The minimum contributions to be paid by each employer from 1st April 2020 to 31st March 2023 are shown in the Rates and Adjustment Certificate on pages **65** to **70**.

PRIMARY EMPLOYER CONTRIBUTION RATE AS A % OF PAY 1ST APRIL 2020 TO 31ST MARCH 2023	SECONDARY RATE £000		
	2020/21	2021/22	2022/23
20.9%	30,652	26,850	24,353

A new valuation process commenced as at 31st March 2022. This will set the minimum contributions to be paid by each employer from 1st April 2023 to 31st March 2026.

A copy of the most recent valuation can be found at <https://www.gloucestershire.gov.uk/pensions/investments>.

RESULT OF INTERIM MONITORING

The Fund continues to set life expectancy assumptions using ClubVita, which is a specialised longevity company providing life expectancy assumptions based on annual monitoring of the Fund's own membership. In addition, employers' ill health and early retirement experience is monitored and extra contributions obtained where necessary. In 2021/22 extra contributions of £0.8m (£1.2m 2020/21) were collected from employers in connection with early retirements and £0.1m (£0.7m 2020/21) was received in connection with ill-health retirements.



08

ACTUARIAL REPORT ON FUND



ACTUARIAL REPORT ON FUND

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

DESCRIPTION OF FUNDING POLICY

The funding policy is set out in the Administering Authority's Funding Strategy Statement (FSS), dated March 2021. In summary, the key funding principles are as follows:

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

The FSS sets out how the Administering Authority seeks to balance the conflicting aims of securing the solvency of the Fund and keeping employer contributions stable. For employers whose covenant was considered by the Administering Authority to be sufficiently strong, contributions have been stabilised to have a sufficiently high likelihood of achieving the funding target over 17 years. Asset-liability modelling has been carried out which demonstrate that if these contribution rates are paid and future contribution changes are constrained as set out in the FSS, there is at least a 70% likelihood that the Fund will achieve the funding target over 17 years.

FUNDING POSITION AS AT THE LAST FORMAL FUNDING VALUATION

The most recent actuarial valuation carried out under Regulation 62 of the Local Government Pension Scheme Regulations 2013 was as at 31st March 2019. This valuation revealed that the Fund's assets, which at 31st March 2019 were valued at £2,379 million, were sufficient to meet 102% of the liabilities (i.e. the present value of promised retirement benefits) accrued up to that date.

Each employer had contribution requirements set at the valuation, with the aim of achieving full funding within a time horizon and probability measure as per the FSS. Individual employers' contributions for the period 1st April 2020 to 31st March 2023 were set in accordance with the Fund's funding policy as set out in its FSS.

PRINCIPAL ACTUARIAL ASSUMPTIONS AND METHOD USED TO VALUE THE LIABILITIES

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

METHOD

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

ASSUMPTIONS

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

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

FINANCIAL ASSUMPTIONS	31ST MARCH 2019
DISCOUNT RATE	4.2%
SALARY INCREASE ASSUMPTION	2.6%
BENEFIT INCREASE ASSUMPTION (CPI)	2.3%

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

	MALES	FEMALES
CURRENT PENSIONERS	21.7 years	23.9 years
FUTURE PENSIONERS*	22.4 years	25.3 years

*Aged 45 at the 2019 Valuation.

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

EXPERIENCE OVER THE PERIOD SINCE 31ST MARCH 2019

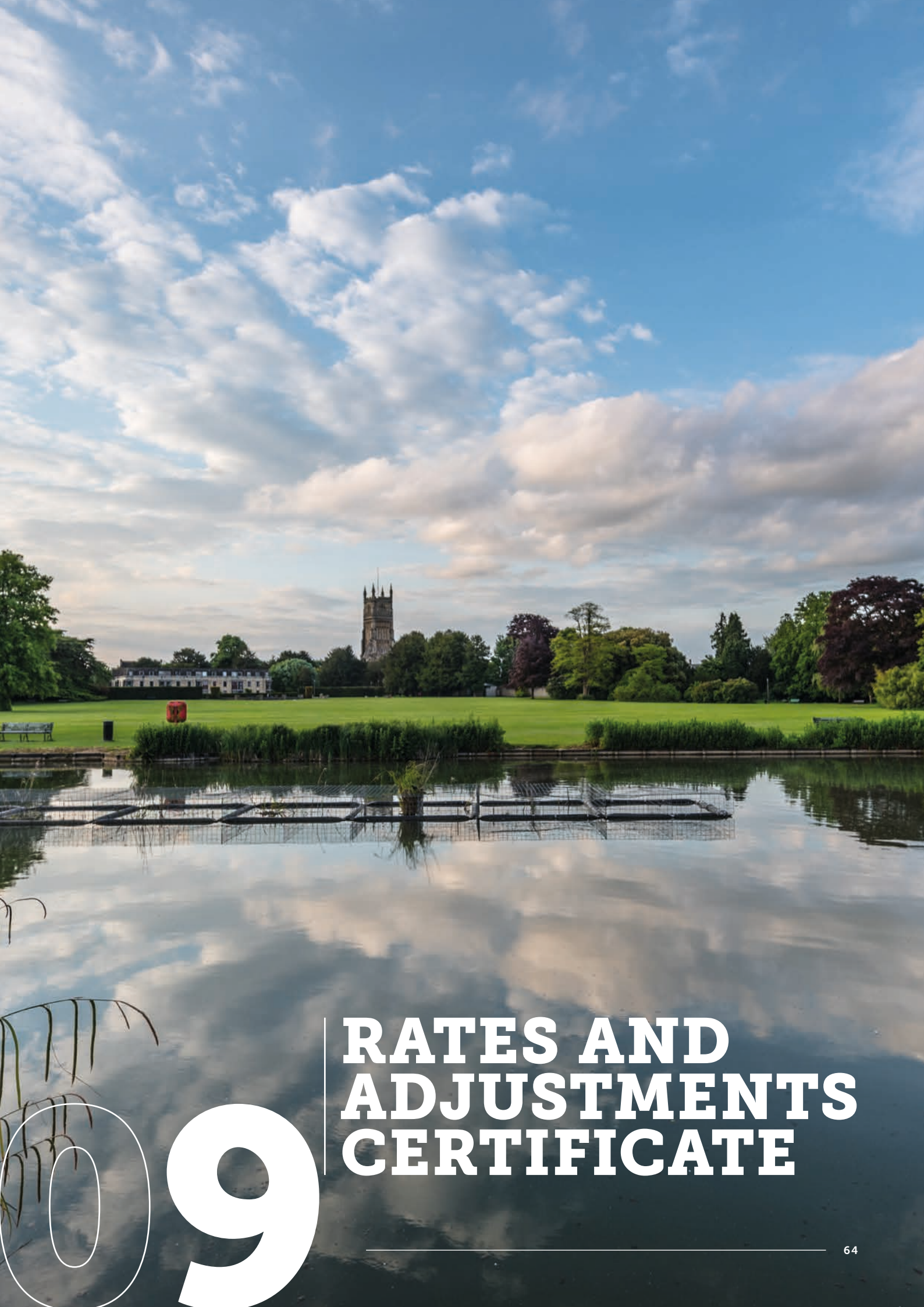
Markets were severely disrupted by COVID 19 in March 2020, but over most of 2020/21 and 2021/22 they recovered strongly. However, due to the war in Ukraine, March 2022 markets were particularly volatile, which affects values as at the accounting date. All other things being equal, the funding level of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

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

Julie West FFA

For and on behalf of Hymans Robertson LLP
27th April 2022

Hymans Robertson LLP
20 Waterloo Street, Glasgow, G2 6DB



09

RATES AND ADJUSTMENTS CERTIFICATE

09

SUMMARY STATEMENT TO THE RATES AND ADJUSTMENTS CERTIFICATE

In accordance with regulation 62(4) of the Regulations, the Actuary has made an assessment of the contributions that should be paid into the Fund by participating employers for the period 1st April 2020 to 31st March 2023 in order to maintain the solvency of the Fund.

The method and assumptions used to calculate the contributions set out in the Rates and Adjustments certificate are detailed in the Fund's Funding Strategy Statement and the Actuary's report on the actuarial valuation.

The required minimum contribution rates are set out below.

EMPLOYER/POOL	MINIMUM CONTRIBUTIONS FOR THE YEAR ENDING TOTAL CONTRIBUTION RATE (%/£)		
	2020/21	2021/22	2022/23
GLOUCESTERSHIRE COUNTY COUNCIL & SCHOOLS POOL			
GLOUCESTERSHIRE COUNTY COUNCIL*	26.8% plus £10,150,000	24.7% plus £150,000	23.7% plus £150,000
GLOUCESTERSHIRE COUNTY COUNCIL SCHOOLS	30.9%	28.9%	27.9%
STABILISED			
GLOUCESTER CITY COUNCIL*	19.4% plus £9,644,000	19.4% plus £0	19.4% plus £0
CHELTENHAM B.C.*	20.0% plus £8,675,000	20.0% plus £0	20.0% plus £0
COTSWOLD D.C.*1	20.2% plus £4,902,000	20.2% plus £0	20.2% plus £0
FOREST OF DEAN D.C.*1	20.3% plus £5,531,000	20.3% plus £0	20.3% plus £0
STROUD D.C.	19.7% plus £2,118,000	19.7% plus £1,840,000	19.7% plus £1,562,000
TEWKESBURY B.C.	19.7% plus £1,661,000	19.7% plus £1,465,000	19.7% plus £1,269,000
POLICE AND CRIME COMMISSIONER FOR GLOUCESTERSHIRE **	19.8% plus £512,000	19.8% plus £343,000	19.8% plus £167,000

EMPLOYER/POOL	MINIMUM CONTRIBUTIONS FOR THE YEAR ENDING TOTAL CONTRIBUTION RATE (%/£)		
	2020/21	2021/22	2022/23
TOWN AND PARISH COUNCILS POOL			
BERKELEY TOWN COUNCIL	23.6%	22.4%	21.1%
BISLEY WITH LYPIATT PARISH COUNCIL	23.6%	22.4%	21.1%
BROCKWORTH PARISH COUNCIL	23.6%	22.4%	21.1%
CAINSCROSS PARISH COUNCIL	23.6%	22.4%	21.1%
CAM PARISH COUNCIL	23.6%	22.4%	21.1%
CHALFORD PARISH COUNCIL	23.6%	22.4%	21.1%
CHARLTON KINGS PARISH COUNCIL	23.6%	22.4%	21.1%
CHURCHDOWN PARISH COUNCIL	23.6%	22.4%	21.1%
CINDERFORD TOWN COUNCIL	23.6%	22.4%	21.1%
CIRENCESTER TOWN COUNCIL	23.6%	22.4%	21.1%
COLEFORD TOWN COUNCIL	23.6%	22.4%	21.1%
DURSLEY TOWN COUNCIL	23.6%	22.4%	21.1%
HINTON PARISH COUNCIL	23.6%	22.4%	21.1%
HUCCLECOTE PARISH COUNCIL	23.6%	22.4%	21.1%
KING'S STANLEY PARISH COUNCIL	23.6%	22.4%	21.1%
LECHLADE TOWN COUNCIL	23.6%	22.4%	21.1%
LEONARD STANLEY PARISH COUNCIL	23.6%	22.4%	21.1%
LYDNEY TOWN COUNCIL	23.6%	22.4%	21.1%
MORETON-IN-MARSH TOWN COUNCIL	23.6%	22.4%	21.1%
NAILSWORTH TOWN COUNCIL	23.6%	22.4%	21.1%
NEWENT TOWN COUNCIL	23.6%	22.4%	21.1%
NORTHLEACH WITH EASTINGTON TOWN COUNCIL	23.6%	22.4%	21.1%
PAINSWICK PARISH COUNCIL	23.6%	22.4%	21.1%
PRESTBURY PARISH COUNCIL	23.6%	22.4%	21.1%
RODBOROUGH PARISH COUNCIL	23.6%	22.4%	21.1%
STONEHOUSE TOWN COUNCIL	23.6%	22.4%	21.1%
STROUD TOWN COUNCIL	23.6%	22.4%	21.1%
TETBURY TOWN COUNCIL	23.6%	22.4%	21.1%
TEWKESBURY TOWN COUNCIL	23.6%	22.4%	21.1%
TIDENHAM PARISH COUNCIL	23.6%	22.4%	21.1%
WOTTON-UNDER-EDGE TOWN COUNCIL	23.6%	22.4%	21.1%

EMPLOYER/POOL	MINIMUM CONTRIBUTIONS FOR THE YEAR ENDING TOTAL CONTRIBUTION RATE (%/£)		
	2020/21	2021/22	2022/23
COLLEGES & UNIVERSITY			
CIRENCESTER TERTIARY COLLEGE	24.8%	24.8%	24.8%
GLOUCESTERSHIRE COLLEGE	19.2% plus £212,000	19.2% plus £213,000	19.2% plus £213,000
HARTPURY UNIVERSITY	22.9% plus £93,000	22.9% plus £95,000	22.9% plus £98,000
UNIVERSITY OF GLOUCESTERSHIRE	22.1% plus £154,000	22.1% plus £158,000	22.1% plus £162,000
SCHEDULED BODIES			
CHELTENHAM BOROUGH HOMES LTD	18.0%	18.0%	18.0%
COTSWOLDS NATIONAL LANDSCAPE (FORMERLY COTSWOLD CONSERVATION BOARD)	19.0%	19.0%	19.0%
LOWER SEVERN INTERNAL DRAINAGE BOARD	26.3% plus £57,000	26.3% plus £57,000	26.3% plus £57,000
ADMITTED BODIES			
ADOPTION WEST	23.8%	23.8%	23.8%
ALLIANCE IN PARTNERSHIP (ST. PETER'S)	30.1%	30.1%	30.1%
APCOA	0%	0%	0%
ASPENS CATERING (FARMORS)	29.2%	29.2%	29.2%
ASPIRE SPORTS AND CULTURAL TRUST	14.9%	14.9%	14.9%
BARNARDOS FOREST OF DEAN AND STROUD	26.8%	26.8%	26.8%
BARNARDOS GLOUCESTER	0%	0%	0%
BRANDON TRUST	25.0%	25.0%	25.0%
BRAYBORNE	31.3%	31.3%	31.3%
CHELTENHAM TRUST	23.7%	23.7%	23.7%
CIVICA (GLOS)	0%	0%	0%
COTSWOLD ARCHAEOLOGICAL TRUST	29.8%	29.8%	29.8%
ENTERPRISE (AOL) LTD	0%	0%	0%
FOREST OF DEAN DC - UBICO	0%	0%	0%
GARDNERS LANE & OAKWOOD	20.2%	20.2%	20.2%
GLOUCESTER CITY HOMES TRUST	24.0%	24.0%	24.0%
GLOUCESTER CITY IT - CIVICA	26.6%	26.6%	26.6%
GLOUCESTER COMMUNITY BUILDING COLLECTIVE	-	19.4%	19.4%
GLOUCESTERSHIRE AIRPORT LTD.	24.0%	24.0%	24.0%
GLOUCESTERSHIRE HEALTH & CARE NHS FOUNDATION	25.5%	25.5%	25.5%
GLOUCESTERSHIRE GROUP HOMES	32.8%	32.8%	32.8%
PLACES FOR PEOPLE	16.3%	16.3%	16.3%
PROSPECTS SERVICES	0.0%	0.0%	0.0%
RIDGE CREST CLEANING (FARMORS)	28.3%	28.3%	28.3%
SPORT LEISURE MANAGEMENT (SLM) LTD	25.3%	25.3%	25.3%
STROUD COURT COMMUNITY TRUST	31.3%	31.3%	31.3%
THE ORDER OF ST. JOHN CARE TRUST	27.9%	27.9%	27.9%

EMPLOYER/POOL	MINIMUM CONTRIBUTIONS FOR THE YEAR ENDING TOTAL CONTRIBUTION RATE (%/£)		
	2020/21	2021/22	2022/23
ADMITTED BODIES			
TINIES UK (GLOS COLLEGE)	22.6%	22.6%	22.6%
TWO RIVERS HOUSING	18.1%	18.1%	18.1%
UBICO - CHELTENHAM WASTE	0.0%	0.0%	0.0%
UBICO - COTSWOLD WASTE	21.1%	21.1%	21.1%
UBICO - TEWKESBURY	0.0%	0.0%	0.0%
URBASER	-	28.6%	28.6%
WEALDEN LEISURE (FOREST OF DEAN DC - LEISURE)	19.9%	19.9%	19.9%
MULTI ACADEMY TRUSTS ***			
ACADEMIES ENTERPRISE TRUST	24.3%	24.3%	24.3%
CORINIUM EDUCATION TRUST	25.2%	25.2%	25.2%
COTSWOLD BEACON ACADEMY TRUST	25.7%	25.7%	25.7%
DIOCESE OF GLOUCESTERSHIRE ACADEMIES TRUST	27.1%	27.1%	27.1%
GLOUCESTERSHIRE LEARNING ALLIANCE	23.8%	23.8%	23.8%
GREENSHAW LEARNING TRUST	29.1%	29.1%	29.1%
PRIMARY QUEST	33.2%	33.2%	33.2%
SAND	30.5%	30.5%	30.5%
SEVERN FEDERATION ACADEMY TRUST	26.5%	26.5%	26.5%
SGS ACADEMY TRUST	25.9%	25.9%	25.9%
PHOENIX LEARNING ALLIANCE (FORMERLY THE ROBINSWOOD ACADEMY TRUST)	23.6%	23.6%	23.6%
THE WHITE HORSE FEDERATION	29.0%	29.0%	29.0%

EMPLOYER/POOL	MINIMUM CONTRIBUTIONS FOR THE YEAR ENDING TOTAL CONTRIBUTION RATE (%/£)		
	2020/21	2021/22	2022/23
ACADEMIES			
ABBEY VIEW – CCT LEARNING	26.5%	27.1%	27.6%
ALL SAINTS ACADEMY	26.3%	24.9%	23.4%
BALCARRAS SCHOOL	27.4%	25.9%	24.4%
BLOCKLEY C OF E PRIMARY SCHOOL	27.9%	27.4%	26.8%
BOURTON ON THE WATER	25.8%	24.5%	23.1%
CHARLTON KINGS INFANT	26.1%	24.7%	23.3%
CHARLTON KINGS JUNIOR	30.6%	29.3%	27.9%
CHELtenham BOURNSIDE	30.5%	29.2%	27.8%
CHIPPING CAMPDEN	28.6%	27.9%	27.2%
CHOSEN HILL SCHOOL	30.6%	29.5%	28.3%
CHRIST CHURCH C OF E PRIMARY (CHELTENHAM)	25.6%	25.1%	24.6%
CHURCHDOWN SECONDARY	33.8%	33.3%	32.8%
CHURCHDOWN VILLAGE INFANTS	24.2%	23.8%	23.3%
CIRENCESTER KINGSHILL	26.3%	25.6%	24.8%
CLEEVE SCHOOL	26.7%	25.8%	24.8%
DENE MAGNA	32.5%	31.8%	31.0%
DENMARK ROAD HIGH SCHOOL	33.5%	32.4%	31.2%
FARMORS	30.1%	30.0%	29.8%
FIELD COURT JUNIOR	28.1%	26.1%	24.1%
FOREST VIEW PRIMARY	31.6%	31.0%	30.3%
GOTHERINGTON	38.0%	36.5%	34.9%
GRETTON PRIMARY	28.1%	28.8%	29.4%
HIGHNAM C OF E	25.8%	25.7%	25.6%
KATHARINE LADY BERKELEYS	31.2%	29.7%	28.1%
MITTON MANOR PRIMARY SCHOOL	28.1%	27.1%	26.1%
NEWENT COMMUNITY SCHOOL ACADEMY	30.2%	29.8%	29.3%
PATE'S GRAMMAR SCHOOL	27.3%	26.7%	26.0%
REDMARLEY C OF E	30.2%	30.2%	30.3%
RIBSTON HALL HIGH SCHOOL	28.3%	26.8%	25.2%
SEVERN VALE	30.8%	31.5%	32.1%
SEVERNBANKS PRIMARY SCHOOL	31.2%	30.2%	29.1%
SIR THOMAS RICH'S	31.3%	29.8%	28.3%
SIR WILLIAM ROMNEY	29.8%	28.9%	27.9%
ST DAVID'S PRIMARY SCHOOL	24.8%	24.3%	23.7%
ST DOMINICS CATHOLIC PRIMARY	32.6%	30.6%	28.6%
ST MARY'S CATHOLIC PRIMARY	25.0%	24.2%	23.4%
ST PETERS HIGH SCHOOL AND SIXTH FORM	30.6%	29.5%	28.3%

EMPLOYER/POOL	MINIMUM CONTRIBUTIONS FOR THE YEAR ENDING TOTAL CONTRIBUTION RATE (%/£)		
	2020/21	2021/22	2022/23
ACADEMIES			
STAUNTON CORSE	27.7%	25.7%	23.7%
STONE WITH WOODFORD C OF E PRIMARY SCHOOL	32.3%	30.8%	29.2%
STROUD HIGH SCHOOL	29.1%	28.4%	27.6%
TEWKESBURY SCHOOL	30.1%	29.2%	28.3%
THE COTSWOLD SCHOOL	27.8%	26.3%	24.8%
THE CRYPT SCHOOL	24.9%	23.9%	22.8%
THE DEAN ACADEMY	32.5%	30.8%	29.0%
THE ROSARY CATHOLIC PRIMARY	29.1%	27.4%	25.7%
THOMAS KEBLE	29.1%	28.1%	27.0%
TREDWORTH INFANT SCHOOL	26.5%	25.6%	24.6%
WINCHCOMBE SECONDARY	31.4%	30.4%	29.4%
WYEDEAN SCHOOL	32.7%	31.8%	30.8%

* The employer Secondary rates have been amended to reflect contribution pre-payments made on 1st April 2020 by the employers to reduce Secondary contributions that were otherwise due in 2021/22 and 2022/23. The Secondary rates for GCC also include an additional £150k p.a. in respect of the former Prospects Services contract.

** The employer Secondary rate in the year 2020/21 has been reduced to reflect up front payment of the whole amount on 1st April 2020.

*** Each academy within the trust will pay the pooled Multi Academy Trust rate shown.

1 The rates for these Councils are inclusive of the Publica contracts.

FURTHER COMMENTS

Contributions expressed as a percentage of pensionable pay should be paid into Gloucestershire County Council Pension Fund ("the Fund") at a frequency in accordance with the requirements of the Regulations.

Further sums should be paid to the Fund to meet the costs of any early retirements and/or augmentations using methods and factors issued by us from time to time or as otherwise agreed.

Payments may be required to be made to the Fund by employers to meet the capital costs of any ill-health retirements that exceed those included within my assumptions. If an employer has an ill-health liability insurance in place with a suitable insurer and provides satisfactory evidence to the Administering Authority, then their certified contribution rate may be reduced by the value of their insurance premium, for the period the insurance is in place.*

The certified contribution rates represent the minimum level of contributions to be paid. Employing authorities may pay further amounts at any time and future periodic contributions may be adjusted on a basis approved by the Fund actuary.

There has been significant volatility in the financial markets since February and March 2020 as a result of the COVID-19 pandemic. This volatility may impact funding balance sheets for those employers planning to exit the Fund during the period covered by this Rates and Adjustments Certificate. In order to effectively manage employer exits from the Fund, the Administering authority reserves the right to revisit the contribution rates for employers that are expected to cease participation in the Fund before 31st March 2023. An employer will be contacted by the Administering Authority in this instance.

* From 1st April 2020 a blanket ill-health insurance policy has been in place covering almost all employers resulting in no amendments to the certified contribution rate.



10

GOVERNANCE

10 GOVERNANCE

THE GLOUCESTERSHIRE LOCAL GOVERNMENT PENSION SCHEME (LGPS) **PENSION BOARD**

10.1

All Public Sector Pension schemes were required under the Public Service Pensions Act 2013 to set up a Pension Board with effect from 2015/16 to assist the administering authorities of their Pension scheme in ensuring compliance with Local Government Pension Scheme (LGPS) and other pension regulations.

The County Council, as administering authority of the Gloucestershire Pension Fund agreed the terms of reference of the Pension Board in February 2015 and amended them during 2019/20. The terms of reference are included within the Fund's Governance Policy document, which can be found on the Fund's website and in the 2021/22 Annual Report.

Under the constitution, the Board shall provide an annual report to the Pension Committee and then to a full meeting of Gloucestershire County Council. The report will include information on the business conducted by the Pension Board with any risks or concerns identified.

The report will also be published on the Pension Fund's website. This report meets that requirement for the 2021/22 financial year, covering the work from the July 2021, October 2021, January 2022 and April 2022 Board meetings.

BOARD MEMBERSHIP AND ATTENDANCE

During the year the Board received the resignation of Paul Jones as a Scheme Employer Representative. Expressions of Interest from Scheme Employers were sought and Colin Williams from the Lower Severn Internal Drainage Board has been appointed to the Board with effect from June 2022.

All meetings were chaired by the Independent non-voting chair, Sean Collins, Head of Pensions from the Oxfordshire Pension Fund.

	MEETING ATTENDANCE			
	28TH JULY 2021	19TH OCTOBER 2021	19TH JANUARY 2022	27TH APRIL 2022
SCHEME EMPLOYER REPRESENTATIVES				
ANNETTE BENSON (UNIVERSITY OF GLOUCESTERSHIRE)	x	x	✓	✓
PAUL JONES (CHELTENHAM BOROUGH COUNCIL) *resigned position August 2021	x			
CLLR STEPHEN HIRST (GLOUCESTERSHIRE COUNTY COUNCIL)	✓	✓	✓	✓
SCHEME MEMBER REPRESENTATIVES				
JOHN ABBOTT	✓	✓	✓	x
MICHAEL HUNT	✓	✓	✓	x
JON TOPPING	✓	✓	✓	x

In addition to attendance at Board Meetings, members of the Pension Board are provided with training opportunities in accordance with the training strategy and training plan. Members of the Pension Board are also sent all agenda papers for the Pension Committee meetings, which they can attend as observers. The minutes of the Pension Board are reported to the next Pension Committee.

All meetings in 2021/22 have taken place virtually.

WORK PROGRAMME

The Board receives the following items in respect of its key responsibilities at every meeting:

- + Operational update on funding levels and investment activities
- + Risk Register
- + Pension Administration Report
- + Business Plan update

The Board received the following additional reports at its meetings:

- + 28th July 2021
 - Governance Review
- + 19th October 2021
 - Annual Report 2020/21 (inc. financial statements)
 - LGPS Benchmarking
 - Fund Conflicts of Interest Policy
 - Pensions Committee Constitution
- + 19th January 2022
 - Revised Investment Strategy Statement
 - Breaches of Law policy
 - Administering Authority Discretions Policy
 - Proposals for Pension Arrangements for Outsourced Services
- + 27th April 2022
 - Public Service Pensions Act Section 13 report
 - 2022 valuation - Actuarial Assumptions
 - Fund Business Plan 2022/23

The Board particularly welcomed the work of an independent Governance Review by AON and the associated work plan that was agreed and resulted in a number of policy reviews, which have been brought back throughout 2021/22.

FUTURE WORK PROGRAMME

The key responsibilities as set out above will continue to be covered by the Board in 2022/23, including the review of the Annual Report and Business Plan.

The Board will continue to monitor the delivery of the agreed workplan as a result of the recommendations provided by the Governance Review.

Another key focus area for the Board in 2022/23 will be the delivery for the 2022 triennial valuation. The Board will be invited to provide comments into the review of the Funding Strategy Statement which will determine the principles to be followed in the valuation.

Finally, the Board will look to support the Committee in delivering the other core projects contained in the Business Plan for 2022/23, which are;

- + the review of the pensions administration system contract
- + the Pensions dashboard (including a data improvement strategy)
- + the McCloud judgement.

BOARD MEMBERS TRAINING 2021/22

ANNETTE BENSON	Brunel Investor Day – Session 1	27 September 2021
ANNETTE BENSON	LGA Fundamentals – Day 1	12 October 2021
ANNETTE BENSON	LGA Fundamentals – Day 2	9 November 2021
ANNETTE BENSON	LGA Fundamentals – Day 3	2 December 2021
ANNETTE BENSON	2022 Funding Strategy Review: an introduction	19 January 2022
ANNETTE BENSON	Club Vita – Longevity training	27 April 2022
JON TOPPING	Actuarial Training	19 October 2021
JON TOPPING	LGA Fundamentals – Day 1	26 October 2021
JON TOPPING	LGA Fundamentals – Day 2	23 November 2021
JON TOPPING	LGA Fundamentals – Day 3	15 December 2021
JON TOPPING	2022 Funding Strategy Review: an introduction	19 January 2022
JOHN ABBOTT	Brunel Investor Day – Session 1	27 September 2021
JOHN ABBOTT	Actuarial Training	19 October 2021
JOHN ABBOTT	LGA Fundamentals – Day 1	26 October 2021
JOHN ABBOTT	LGA Fundamentals – Day 2	23 November 2021
JOHN ABBOTT	LGA Fundamentals – Day 3	15 December 2021
JOHN ABBOTT	2022 Funding Strategy Review: an introduction	19 January 2022
JOHN ABBOTT	Club Vita – Longevity training	27 April 2022
MICHAEL HUNT	Brunel Investor Day – Session 1	27 September 2021
MICHAEL HUNT	Brunel Investor Day – Session 2	6 October 2021
MICHAEL HUNT	Actuarial Training	19 October 2021
MICHAEL HUNT	LGA Fundamentals – Day 1	26 October 2021
MICHAEL HUNT	LGA Fundamentals – Day 2	9 November 2021
MICHAEL HUNT	2022 Funding Strategy Review: an introduction	19 January 2022
CLLR STEPHEN HIRST	Actuarial Training	19 October 2021
CLLR STEPHEN HIRST	LGA Fundamentals – Day 1	26 October 2021
CLLR STEPHEN HIRST	LGA Fundamentals – Day 2	23 November 2021
CLLR STEPHEN HIRST	LGA Fundamentals – Day 3	15 December 2021
CLLR STEPHEN HIRST	2022 Funding Strategy Review: an introduction	19 January 2022
CLLR STEPHEN HIRST	Club Vita – Longevity training	27 April 2022

GOVERNANCE COMPLIANCE

10.2

The Pension Fund's Governance structure and the roles and responsibilities of each element within the structure are contained in the Governance Policy and Compliance Statement on pages **76** to **80** of this report.

Membership of the Pension Committee showing voting rights, attendance at meetings and training received are shown in the matrix below. Training days shown includes attendance at courses, seminars and conferences. This is in addition to training received ahead of Pension Committee meetings provided by officers and advisors which includes fund manager and performance presentations. All members attended a formal full induction day.

	MEETING ATTENDANCE					NO. OF TRAINING SESSIONS RECEIVED DURING 2021/22
	VOTING RIGHTS	18TH JUNE 2021	24TH SEPT 2021	3RD DEC 2021	3RD MAR 2022	
PENSION COMMITTEE MEMBER						
CLLR. L. STOWE (CHAIR)	Yes	✓	✓	✓	✓	8
CLLR. M. BABBAGE *commenced 1st April 2021	Yes	✓	✓	✓	✓	4
CLLR. D BROWN	Yes	✓	✓	✓	✓	9
CLLR. C. HAY	Yes	✓	✓	✓	✓	4
CLLR. M. MACKENZIE-CHARRINGTON *commenced 1st April 2021	Yes	✓	✓	✓	✓	8
CLLR. DR. A. MILLER *commenced 1st April 2021	Yes	X	✓	✓	X	5
CLLR. W. THOMAS *commenced 1st April 2021	Yes	✓	X	✓	✓	3
SCHEME EMPLOYER REPRESENTATIVE						
CLLR. D. GRAY (Gloucestershire County Council and Tewkesbury Borough Council) *commenced 1st April 2020	No	✓	✓	✓	✓	4
SCHEME MEMBER REPRESENTATIVE						
MR. P. CLARK	No	✓	✓	✓	X	6

GOVERNANCE POLICY & COMPLIANCE STATEMENT

10.3

INTRODUCTION AND LEGAL REQUIREMENTS

Gloucestershire County Council is the Administering Authority responsible for managing the Gloucestershire Pension Fund and the administration of the Local Government Pension Scheme (LGPS) on behalf of participating employers and members.

Regulation 55 of the LGPS Regulations 2013 requires Administering Authorities to publish a Governance Policy and Compliance Statement setting out information relating to how the Administering Authority delegates its functions under those regulations and whether it complies with guidance given by the Secretary of State for Levelling Up, Housing, and Communities. It also requires the Administering Authority to keep the statement under review, to make revisions as appropriate and, where such revisions are made, to publish a revised statement.

This document is the Governance Policy and Compliance Statement for the Gloucestershire Pension Fund that has been prepared by the Administering Authority to meet the requirement of the LGPS Regulations.

AIMS AND OBJECTIVES

Gloucestershire County Council recognises the significance of its role as Administering Authority to the Gloucestershire Pension Fund on behalf of its stakeholders, which include:

- + around 60,000 current and former members of the Fund, and their dependants
- + over 200 employers within the Fund which includes scheduled bodies, academies and admitted bodies
- + local taxpayers within Gloucestershire County Council.

In relation to the governance of the Fund, our objectives are as follows:

- + Act in the best interests of the Fund's members and employers
- + Strive to ensure compliance with the appropriate legislation and statutory guidance, and to act in the spirit of other relevant guidelines and best practice guidance
- + Act with integrity and be accountable to our stakeholders for our decisions, ensuring they are robust and well based
- + Have robust governance arrangements in place to facilitate informed decision making, supported by appropriate advice, policies and strategies

GOVERNANCE ARRANGEMENTS AND STRUCTURE

As per the County Council's Constitution, the Pension Committee provides advice on the proper management of the Fund and carries out some of the functions of the Council in respect of its duties as an Administering Authority. The overall operational responsibility for the running of the Fund has been delegated to the Executive Director of Corporate Resources and the Head of Pensions. The Executive Director of Corporate Resources and / or the Head of Pensions will consult with the Chair of the Pension Committee for all decisions with financial implications over £250,000. The Executive Director of Corporate Resources and the Head of Pensions are supported in their roles by:

- + The Director of Finance (Deputy Section 151 officer)
- + The Pensions Investment and Accounting Manager
- + The Pensions Administration Manager
- + The wider pensions team within the Council

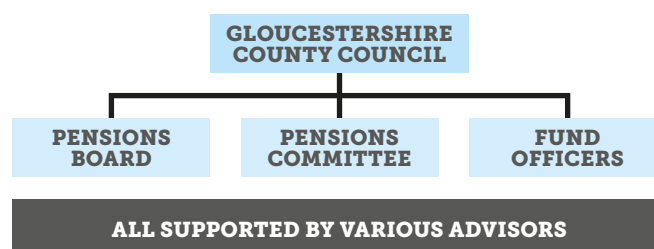
The Pensions Team carries out the day to day running of the Fund including administration, investments and accounting. The Fund participates in the Brunel Pension Partnership (Brunel) who manage some of the Fund's assets on its behalf.

A range of consultants also provide guidance and advice in relation to the management of the Fund.

In line with the Local Government Pension Regulations 2013, a Pensions Board has been established which assists the Administering Authority in ensuring:

- + compliance with the regulations and The Pensions Regulator's requirements and
- + the effective and efficient governance and administration of the Fund

The Constitution of the Council sets out the framework under which the Pension Fund is to be administered. This framework is depicted in the diagram below.



PENSION COMMITTEE

The Council's Constitution outlines that the purpose of the Pension Committee is to give advice on the proper management of the Gloucestershire Pension Fund and carry out the function of the Council as Administering Authority.

Terms of Reference for the Pension Committee

The following are the terms of reference for the Pension Committee as agreed by the Council and included in the Constitution:

1. To ensure the Fund is managed, and that pension payments are made, in compliance with the Local Government Pension Scheme Regulations.
2. To approve and keep under review the Investment Strategy Statement of the Fund, drawing upon appropriate professional advice.
3. To approve and keep under review the Funding Strategy Statement of the Fund, drawing upon appropriate professional advice.
4. To ensure robust risk management arrangements are in place.
5. To ensure the Council operates with due regard and in the spirit of all relevant statutory and non-statutory best practice guidance in relation to its management of the Fund.
6. To agree the Administering Authority responses to consultations by Central Government, professional and other bodies.
7. To appoint and review the performance of all Fund Managers.
8. To appoint and terminate the appointment of the Fund's advisers, including actuaries, investment advisers, governance advisers and specialist lawyers (where required) and periodically to review those arrangements.
9. To consider any other matter relevant to the proper operation and management of the Fund.
10. To approve the Fund's annual business plan and budget and monitoring progress against it.
11. To approve the Fund's Governance Policy Statement and Governance Compliance Statement within the framework as determined by the Council and make recommendations to the Council about any changes to that framework.
12. To approve the Fund's Administration Strategy determining how the Council will administer the Fund including collecting payments due, calculating, and paying benefits, gathering information from, and providing information to scheme members and employers.
13. To approve the Fund's Communications Policy Statement, determining the methods of communications with the various stakeholders including scheme members and employers.
14. To approve the Fund's Conflicts of Interest policy covering the management of actual and perceived conflicts of interest for the Pension Committee, the Local Pension Board, and officers.
15. To agree the Fund's Training Strategy for all Pension Committee and Board members and for all officers of the Fund, including determining the Fund's knowledge and skills framework, identifying training requirements, developing training plans and monitoring compliance with the policy.
16. To report annually to the full Council.
17. To review the County Council's performance as Administering Authority.
18. To decide upon arrangements for managing the Administering Authority's relationship with employers in the fund, e.g., agreeing contribution rates, establishing dispute resolution procedures and ensuring employers have established policies as required by Regulations.
19. Determining, reviewing, and monitoring the Fund's policy in regard to employer admission and cessation arrangements.
20. To decide upon key pension policy and discretions that is the responsibility of the Administering Authority.
21. To consider advice and recommendations from the Pension Board on areas that may improve the governance of the Pension Fund (the remit of the Pension Board is detailed in its Terms of Reference).
22. To consider the Pension Board's proposed business plan for the forthcoming financial year and annual budget request.
23. To undertake such tasks deemed necessary in order to promote the interests of the County Council with respect to investment pooling, which without limitation shall include agreeing and authorising any documentation, contracts, terms of reference, financial expenditure or investment that may be required consequential upon the County Council's participation in the Brunel Pension Partnership.

MEMBERSHIP OF THE PENSION COMMITTEE

The County Council decides the composition of, and makes appointments to, the Pension Committee. Currently the membership of the Pension Committee comprises 7 County Councillors, all of whom have voting rights.

One employer representative without voting rights is co-opted by the Pension Committee following nomination by the Gloucestershire branch of the Local Government Association to represent the interests of District Councils.

One employer representative without voting rights who can demonstrate their capacity to represent other scheme employers, and their knowledge and understanding of the Local Government Pension Scheme, with applications invited from all employers (excluding GCC and the district councils). An interview process that would include the Chair and Vice-Chair of the Pension Committee and the Head of Pensions would be used to fill the position.

One employee representative without voting rights is co-opted by the Pension Committee following nomination by the unions.

Elected councillors already have legal responsibilities for the prudent and effective stewardship of the Fund, and in more general terms have a clear fiduciary duty in the performance of their functions. Employer and Employee representation owe a duty of care to the fund beneficiaries and are required to act in their best interests at all times.

Although the Employer and Employee representatives do not have voting rights, they are treated as equal members of the Committee and have access to all Committee meeting papers, advisers, officers, meetings and training as if they were Council Members and have the opportunity to contribute to the decision-making process.

Substitutions are not permitted on the Pension Committee.

Employer and Employee representatives serve for a 4-year term from their appointment date and can be removed on grounds of non-attendance, breach of code of conduct and non-participation in training. An employer or employee representative may only be removed from office during a term of appointment by the unanimous agreement of all voting members in attendance at the Pension Committee meeting where this is being considered.

Other ways of ensuring interests of key stakeholders are represented in the management of the Fund include:

- + Bi-lateral discussions and similar forums involving employers and other stakeholders
- + An annual meeting for all employers and fund members
- + A triennial meeting between all employers and the actuary to discuss the results of the actuarial valuation

PENSION COMMITTEE MEETINGS

The Pension Committee meets at least four times a year in the ordinary course of business and more frequently if formal decisions on fund management are required. Work for the year will be agreed with the Committee. As per the Training Strategy, all Committee members must complete a training requirement self-assessment form annually, and these are used to determine the training to be provided to Committee members. A log of training undertaken is maintained by the Administering Authority.

Agendas for the meetings are agreed with the Chair and circulated with supporting papers to all members of the Committee, officers of the County Council as appropriate and the Fund's Consultants.

A meeting of the Pension Committee is only quorate when there are three voting members present for the duration of the meeting.

At least five clear working days' notice of any meetings are given by posting details of the meeting on the County Council's website. Copies of the agenda and reports open to the public are made available for inspection at least five clear working days before the meeting. If an item is added to the agenda later, the revised agenda will be open to inspection from the time the item was added to the agenda. The reason for lateness will be specified in the report.

There may on occasions, be items which may be exempt from the agenda, reports and minutes of the meetings when it is likely in view of the nature of the business to be transacted or the nature of the proceedings that confidential information would be disclosed.

Copies of the minutes of the meetings and records of decisions taken are made available for a period of six years after a meeting. Minutes of meetings and records of decisions are available for inspection on the Council's website.

SENIOR OFFICERS

Under the Council's Constitution responsibility for all other functions relating to pensions, not already delegated to the Pension Committee, are delegated to the Executive Director of Corporate Resources (in addition to their role as the Section 151 Officer, whereby they are responsible for ensuring the proper financial administration of the Fund) and the Head of Pensions. As appropriate, the Executive Director of Corporate Resources and the Head of Pensions will delegate aspects of the management of the Pension Fund to other officers of the Council, including;

- + The Director of Finance (Deputy Section 151 officer)
- + The Pensions Investment and Accounting Manager
- + The Pensions Administration Manager
- + The wider pensions team within the Council

as well as appointing suppliers and consultants to assist as necessary.

Other Delegations of Responsibilities

The Pension Committee has also agreed a further scheme of delegation as included in Appendix B. This includes responsibilities relating to how the ongoing implementation of decisions made by them are carried out, as well as how urgent matters that must be considered outside of the Pension Committee cycle are dealt with.

PENSIONS BOARD

Each Administering Authority is required to establish a local Pensions Board to assist them with:

- + securing compliance with the LGPS Regulations and any other legislation relating to the governance and administration of the Scheme, and requirements imposed in relation to the LGPS by the Pensions Regulator
- + ensuring the effective and efficient governance and administration of the Gloucestershire Pension Fund

The Pensions Board is not a local authority committee; as such the elements of the Constitution of Gloucestershire County Council, such as the procedure rules, do not apply to the Pensions Board unless it is expressly referred to in the Board's terms of reference. The Gloucestershire Pension Board was established by Gloucestershire County Council and the full terms of reference of the Board can be found within the Council's Constitution.

The key points are summarised below.

Role of the Pensions Board

The County Council has charged the Pensions Board with providing oversight of the matters that the Pension Committee is responsible for. The Pensions Board, however, is not a decision-making body in relation to the management of the Pension Fund. The Pension Fund's management powers and responsibilities which have been delegated by the Council to the Pension Committee and the Executive Director of Corporate Resources remain solely their responsibilities. However, the remit of the Board includes:

1. Ensuring the Pension Fund's key strategy and policy documents are in place and have been maintained in accordance with the LGPS Regulations.
2. Ensuring the Pension Fund's internal Risk Register is in place and reviewed at least annually.
3. Reviewing the Pension Fund's performance in complying with the requirements of the LGPS Regulations and any other legislation relating to the governance and administration of the LGPS.
4. Reviewing the Pension Fund's performance in complying with the requirements of the Pension Regulator.
5. Providing advice and making recommendations when required, to the Pension Committee, on areas that may improve the governance of the Pension Fund.
6. Formulating and agreeing an annual work plan for the Board.
7. Carrying out any other activities relating to the efficient governance and administration of the Pension Fund, which the Pension Committee may request the Pension Board to undertake.

Membership of the Pension Board

The Pensions Board consists of seven members as follows:

- + three employer representatives
- + three scheme member representatives
- + one independent member (non-voting) to act as the Chair of the Pensions Board. The Chair of the Pension Board cannot be a Gloucestershire County Councillor.

The Chair of the Pension Board must be able to demonstrate their knowledge and understanding of the LGPS and will be appointed by the Scheme Manager (the Administering Authority), taking due regard of the Appointment of Other Member guidance, as set out in the LGPS Guidance in the creation and operation of Local Pension Boards.

One of the employer or member representatives should be a County Councillor appointed annually at a meeting of Full Council.

In order to ensure that effective Board Members are appointed who can demonstrate their capacity to represent other scheme employers or members (as appropriate), a direct appointment process will be followed wherever possible, with member representatives being selected through nominations made by recognised trade unions, and employer representatives being selected through nominations made from established employers within the Fund.

Only members of the Pensions Board who are employer or member representatives will have individual voting rights, but it is expected the Pension Board will as far as possible reach a consensus.

No substitutions are permitted on the Pensions Board.

Pension Board Meetings

The Pensions Board meets at least twice each calendar year and additional meetings may be arranged as required to facilitate its work. This will be determined by the Chair.

A meeting of the Pensions Board is only quorate when there are three Board members present for the duration of the meeting, one of which must be an employer representative and one of which must be a member representative.

Meetings of the Local Pension Board will always be chaired by the appointed Chair of the Board when in attendance. Where the Chair is not in attendance at a meeting, those members present will elect a temporary chairperson for that meeting.

Each member of the Pensions Board is expected to declare, on appointment, annually, and at each meeting, any interests which may lead to conflicts of interest in the subject area or specific agenda of that Pensions Board.

Members of the public may attend Pensions Board meetings and papers will be made public in the same way as described above for the Pension Committee.

POLICY DOCUMENTS

There are a number of key documents which are relevant to the governance and management of the Fund, including various policies and strategies which incorporate the Fund's objectives. Brief details of these are listed below and the full copies of all documents can be obtained on the County Council's website.

Annual Report and Accounts

As part of the financial standing orders, it is the duty of the Section 151 Officer to ensure that record-keeping and accounts are maintained by the Pension Fund. The Pension Fund accounts are produced in accordance with CIPFA's Code of Practice on Local Authority Accounting. The financial statements within the accounts summarise the transactions of the Fund and detail the net assets of the Fund. The statement of accounts is reviewed by the Pension Committee and the Audit and Governance Committee and incorporated in the Statement of Accounts for the Council. The accounts are incorporated into an Annual Report which provides an update on other key matters during the year such as scheme details, financial performance and administration matters. Full copies of the Fund's Annual Report and Accounts are distributed to employers in the Fund and other interested parties and a copy placed on the County Council's website.

Funding Strategy Statement

The Funding Strategy Statement is one of two key parts of the framework which ensures there are sufficient assets in the Fund to pay its liabilities (mainly pension benefits) and sets out how the contribution rates that are required to be paid by the employers participating in the Fund are calculated. The Funding Strategy Statement (FSS) is developed in collaboration with the Fund's actuary and, after consultation with the Fund's employers, it is formally approved by the Pension Committee.

Investment Strategy Statement

The Investment Strategy Statement is the second key part of the framework for ensuring appropriate assets are in the Fund to meet the liabilities. The strategy sets out:

- + the Fund's approach to investment risk including ways in which risks are measured and managed
- + the Fund's approach to pooling of assets (which is done through the Brunel Pension Partnership)
- + how social, environmental or corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments
- + the exercise of voting rights attached to investments.

The Investment Strategy Statement also sets out the target percentage of the total value of all Fund money that should be invested in particular asset classes, including any restrictions on those investments.

Governance Compliance Statement

This sets out our compliance with the Secretary of State's Statutory Guidance on Governance in the LGPS. The Gloucestershire Pension Fund's Governance Compliance Statement is attached as Appendix A and shows where the Fund is compliant or not compliant with the expectations in the statutory guidance and the reasons why the Fund may not be compliant.

Training Strategy

The training strategy provides Pension Committee members, Pensions Board members and senior officers with a clear framework setting out how they acquire and retain the knowledge and skills required to perform their individual roles. The aim of this policy is to ensure that those responsible for the management, delivery and governance and decision making in the Fund have the appropriate levels of knowledge and skills.

As part of this policy, the Fund aims to comply with the requirements of:

- + the CIPFA Code of Practice and Knowledge and Skills Framework
- + the knowledge and skills elements of the Public Service Pensions Act 2013 and the Pensions Regulator's (TPR) Code of Practice for Public Service Schemes / the new TPR Single Code due to be introduced in 2022
- + MiFID II (Markets in Financial Instruments Directive).

Members of the Pension Committee, Pensions Board and officers involved in the management of the Fund receive training following completion of a Training Needs Assessment (TNA) to ensure that they meet the aims of the Knowledge and Skills Policy. Specific TNAs on particular subjects will also be carried out as and when required by the appropriate officer and will be used to inform subsequent training requirements.

Conflicts of Interest Policy

Conflicts of interest have always existed for those with 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 have a variety of other roles and responsibilities, and may also have individual personal, business or other interests which might conflict, or be perceived to conflict, with their role managing or advising an LGPS fund. It is generally accepted that LGPS Administering Authorities have both fiduciary and public law duties to act in the best interest of both the scheme beneficiaries and participating employers.

The Fund's Conflict of Interest Policy details how actual and potential conflicts of interest are identified and managed by those involved in the management and governance of the Fund whether directly or in an advisory capacity. The policy is established to guide Pension Committee members, Pensions Board members, officers and advisers, ensuring that those individuals do not act improperly or create a perception that they may have acted improperly.

Breaches Policy

We recognise that effective risk management is an essential element of good governance in the LGPS. The Risk Policy details the risk management strategy for the Gloucestershire Pension Fund, including:

- + the risk philosophy for the management of the Fund, and in particular attitudes to, and appetite for, risk
- + how risk management is implemented
- + risk management responsibilities
- + the procedures that are adopted in the risk management process

The Fund recognises that it is not possible, or even desirable, to eliminate all risks. Accepting and actively managing risk is therefore a key part of the risk management strategy for Gloucestershire Pension Fund. A key determinant in selecting the action to be taken in relation to any risk will be its potential impact on the Fund's objectives in light of the Fund's risk appetite, particularly in relation to investment matters. Equally important is striking a balance between the cost of risk control actions against the possible effect of the risk occurring.

Communications Policy Statement

This document sets out the communications strategy for the Fund. The aim of the strategy is to ensure that all stakeholders are kept informed of developments in relation to the Fund. This helps to ensure transparency and an effective communication process for all interested parties.

Pension Administration Strategy

The Pension Administration Strategy is key to the administration and efficient running of the Pension Fund. It encompasses administrative procedures and responsibilities for the County Council (as the Administering Authority for the Fund) and employing authorities participating in the Fund. It includes quality and performance standards. It is distributed to employers within the Fund following regular review and consultation. This represents part of the process for ensuring the ongoing efficient management of the Fund and maintenance of accurate data and forms part of the overall governance procedures for the Fund.

Discretions Policies

Under the Local Government Pension Scheme regulations, the Administering Authority has a level of discretion in relation to a number of areas. The approaches to these areas of discretion are outlined in the Administering Authority's Discretions Policy. This policy is reviewed as appropriate and interested parties are notified of any significant changes. Employing Authorities are also required to set out their discretions policies in respect of areas under the Regulations where they have a discretionary power.

KEY RISKS

The main governance risks that Pension Committee members monitor on an ongoing basis include:

- + Recruitment and Retention - insufficient experienced staff to meet Fund objectives
- + Knowledge and Skills - insufficient knowledge and skills amongst those charged with Fund Management
- + Conflicts of Interest - actual conflicts of interest permitted to materialise
- + Internal Fraud - financial loss resulting from actions of employee
- + Data Protection - failure to adequately protect data results in potential financial or personal impact on members
- + Reliance on external systems - the Fund's assets, systems or data are compromised including financial/data loss or systems downtime
- + Business continuity failure
- + External factors including regulatory changes impact the governance of the Fund
- + Incorrect advice/guidance received from third parties.
- + Failure to comply with relevant legislation / best practice / guidance

MONITORING GOVERNANCE OBJECTIVES

OBJECTIVE	MONITORING ARRANGEMENTS
We will aim to act in the best interests of the Fund's members and employers.	<ul style="list-style-type: none"> + Fund specific conflicts of interest policy in place. + Training undertaken on role in managing the Fund on behalf of members/employers as part of induction.
We will strive to ensure compliance with the appropriate legislation and statutory guidance, and to act in the spirit of other relevant guidelines and best practice guidance.	<ul style="list-style-type: none"> + Governance of the Fund is considered by both the External and Internal Auditors. + A log of all breaches of the law is maintained in accordance with the Fund's breaches procedure which is reported on and monitored as outlined in that procedure. + Pensions Board prepares and publishes an annual report which should include comment on compliance matters. + Regular reviews of the Fund's compliance with the Pensions Regulator's Code of Practice.
We will act with integrity and be accountable to our stakeholders for our decisions, ensuring they are robust and well based.	<ul style="list-style-type: none"> + Employers within the Fund are invited to an Annual Employers' Forum. Attendees receive presentations and have the opportunity to ask questions on the governance of the Fund. + Pension Committee includes representatives from scheme members and employers in the Fund. + Pensions Board includes representatives from scheme members and employers in the Fund. + Pension Committee receive advice from officers, and a range of consultants are in place to provide advice across all fund aspects, and members are given sufficient time to consider any recommendations.
We will have robust governance arrangements in place to facilitate informed decision making in a transparent manner, supported by appropriate advice, policies and strategies.	<ul style="list-style-type: none"> + Pension Committee carry out regular effectiveness of governance surveys. + Ongoing monitoring against key objectives at Pension Committee meetings. + Ongoing monitoring of business plan targets at Pension Committee meetings.

APPROVAL, REVIEW AND CONSULTATION

This Governance Policy and Compliance Statement was approved at the Gloucestershire Pension Committee meeting on 23 September 2022 and will be formally reviewed and updated at least every three years or sooner if the governance arrangements or other matters included within either of them merit reconsideration.

APPENDIX A

GOVERNANCE BEST PRACTICE COMPLIANCE STATEMENT

Regulation 55 of the Local Government Pension Scheme Regulations 2013 requires Local Government Pension Scheme (LGPS) Administering Authorities to measure their governance arrangements against the standards set out in the Statutory Guidance issued by the Secretary of State for Communities and Local Government.

The following compliance statement has been approved by the Pension Committee. This sets out where the Fund is compliant with the guidance and where it is not compliant, an explanation is provided for non-compliance.

STRUCTURE	a) The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.	Fully compliant	Council Constitution delegates responsibility for the Pension Fund to the Pension Committee in respect of these matters.
	b) That representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.	Fully compliant	Employer and Scheme member representatives are appointed to the Pension Committee.
	c) That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.	Fully Compliant/not applicable	No secondary committee.
	d) That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel.	Fully Compliant/not applicable	No secondary committee.
REPRESENTATION	a) That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include:- i. employing authorities (including non-scheme employers, e.g., admitted bodies); ii. scheme members (including deferred and pensioner scheme members); iii. where appropriate, independent professional observers; and iv. expert advisors (on an ad-hoc basis).	Fully compliant	(i) Employing authorities are represented by an employer representative. (ii) Scheme members are represented by a scheme member representative. (iii) At this stage the Pension Committee has determined that there is no requirement for an independent professional observer. (iv) Expert advisers – investment consultant participates at all meetings of the Pension Committee and other expert advisors are invited to attend as and when required.
	b) That where lay members sit on a main or secondary committee, they are treated equally in terms of access to papers and meetings, training and are given full opportunity to contribute to the decision making process, with or without voting rights.	Fully Compliant	All members are sent Pension Committee papers ahead of meetings, are invited to training and are able to fully contribute to the decision-making process.

SELECTION AND ROLE OF LAY MEMBERS	a) That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee.	Fully Compliant	See Governance Policy and members made fully aware of this during induction training.
	b) That at the start of any meeting, committee members are invited to declare any financial or pecuniary interest related to specific matters on the agenda.	Fully Compliant	Members of the Pension Committee declare interests at the start of each meeting.
VOTING	a) The policy of individual administering authorities on voting rights is clear and transparent, including the justification for not extending voting rights to each body or group represented on main LGPS committees.	Fully Compliant	See the Council's Constitution and the Fund's Governance Policy.

Further Information

Whilst the co-opted employer and scheme member representatives do not have voting rights, they are encouraged to fully participate in the meetings and decision-making discussions.

TRAINING / FACILITY TIME / EXPENSES	a) That in relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process.	Fully Compliant	See Training Strategy, Governance Policy and Members allowances scheme within the Council's constitution.
	b) That where such a policy exists, it applies equally to all members of committees, advisory panels or any other form of secondary forum.	Fully Compliant	See Training Strategy and Governance Policy.
	c) That the administering authority considers the adoption of annual training plans for committee members and maintains a log of all such training undertaken.	Fully Compliant	See Governance Policy and Training Needs Assessments (TNAs) are regularly completed by all Committee Members.
MEETINGS (FREQUENCY/ QUORUM)	a) That an administering authority's main committee or committees meet at least quarterly.	Fully Compliant	
	b) That an administering authority's secondary committee or panel meet at least twice a year and is synchronised with the dates when the main committee sits.	Fully Compliant/not applicable	No secondary committee.
	c) That an administering authority that does not include lay members in their formal governance arrangements must provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.	Not applicable	See Governance Policy for other ways of engaging stakeholders. Employer and scheme member representatives are on the main Pension Committee.
ACCESS	a) That subject to any rules in the council's constitution, all members of main and secondary committees or panels have equal access to committee papers, documents and advice that falls to be considered at meetings of the main committee.	Fully Compliant	Committee papers are despatched 5 clear working days prior to a Committee meeting.
SCOPE	a) That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.	Fully Compliant	The Pension Committee reviews all aspects of Pension Fund management. The finance and operational arrangements of the Fund are subject to review and audit by both external and internal auditors.
PUBLICITY	a) That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the scheme is governed, can express an interest in wanting to be part of those arrangements.	Fully Compliant	Governance Policy and Compliance Statement published in full in the Pension Fund Annual Report & Accounts and on the County Council's website. The Annual Report is also discussed at the Fund's AGM which is open to all Fund members and employers.

APPENDIX B

DELEGATION OF FUNCTIONS BY PENSIONS COMMITTEE

KEY:

PC – Pensions Committee
EDCR – Executive Director of Corporate Resources (S151 Officer)
DoF – Director of Finance (Deputy S151 Officer)
HoP – Head of Pensions

PIAM – Pensions Investment and Accounting Manager
PAM – Pensions Administration Manager
FA – Fund Actuary
Advisors – Investment, actuarial, governance and/or benefits consultants as appropriate

FUNCTION DELEGATED TO PC	FURTHER DELEGATION TO OFFICER(S)	DELEGATED OFFICER(S)	COMMUNICATION AND MONITORING OF USE OF DELEGATION
To formulate and publish an Investment Strategy Statement and to monitor performance and effectiveness of investment managers.	Implementation of strategic allocation including use of both rebalancing and conditional ranges.	HoP (in consultation with the Funds independent investment advisor).	Monitored at PC as a regular standing agenda item.
To formulate and publish a Funding Strategy Statement in order to manage the Fund's approach to funding its liabilities and to determine all policy matters relating to employer admission and cessations.	Making decisions in line with policy with regards to individual employer admissions and cessations, i.e. to determine the amount of any cessation surplus or deficit. Agreeing (in conjunction with the FA) the terms and payment of bulk transfers into and out of the Fund where there is a bulk transfer of staff.	HoP (in consultation with the FA).	Monitored at PC as a regular standing agenda item.
To agree the Administering Authority responses to consultations on LGPS matters and other matters where they may impact on the Fund or its stakeholders.	Agreeing the Administering Authority responses where the consultation timescale does not provide sufficient time for a draft response to be approved by PC.	HoP (or PAM or PIAM) and in consultation with relevant advisors, subject to agreement with Chair of PC.	PC advised of consultation via e-mail (if not already raised previously at PC) to provide opportunity for other views to be fed in. Copy of consultation response provided at following PC for noting.
To set the overall strategic objectives for the Pension Fund and ensure these are reflected in the annual business plan, delivered on budget and to review the Administering Authority's performance.	Regular day to day operational delivery of objectives.	HoP (in conjunction with PAM and / or PIAM).	Regularly monitored at PC with further monitoring by EDCR and DoF via Administering Authority's Corporate Service Plan.
To approve / agree the Pension Fund's policy and strategy documents on a regular cycle.	Changes to policy and strategy documents - authority to make minor amendments or required regulatory changes (i.e., where no impact on strategy and having no significant financial implications). Changes to Administering Authority discretionary policies necessitated by changes to regulations - authority to amend the policies to reflect the requirements of such new regulations, subject to those decisions having no significant financial implications. Note that the discretionary policy itself contains a number of specific delegated responsibilities to various Fund officers.	HoP (in conjunction with PAM and / or PIAM after taking appropriate advice from advisers).	Copy of policies to be provided to PC members at next available PC meeting following changes being made.
To determine arrangements for managing the Fund's relationships with its employers.	Ensuring employers have established policies as required by Regulations. (for example Employing Authority Discretions policy and a nominated person to consider Internal Dispute Resolution Procedure) cases.	HoP and/or PAM and PIAM (having regard to advisers).	Ongoing reporting to PC for noting, where applicable.

FUNCTION DELEGATED TO PC	FURTHER DELEGATION TO OFFICER(S)	DELEGATED OFFICER(S)	COMMUNICATION AND MONITORING OF USE OF DELEGATION
To determine the Fund's risk management strategy and arrangements.	Ensuring the processes outlined in the Fund's risk management strategy are carried out and that risks are recorded and monitored on the risk register on an ongoing basis.	HoP and/or PAM and PIAM (having regards to advisers).	Ongoing reporting to PC for noting.
To select, appoint and dismiss the Fund's advisers, including actuary, benefits consultants, governance consultants, investment consultants and global custodian.	Ongoing monitoring of suppliers.	HoP.	Ongoing reporting to PC for noting.
	Selection, appointment, and termination of suppliers following approval by PC.	HoP (having regard to ongoing advice of legal and procurement advisers) and subject to ratification by PC.	Notified to PC via ratification process.
The Committee may delegate a limited range of its functions to one or more officers of the Authority. The Pension Committee will be responsible for outlining expectations in relation to reporting progress of delegated functions back to the Pension Committee.	Other urgent matters as they arise.	HoP or PAM / PIAM / DoF, subject to agreement with Chair of PC.	PC advised of need for delegation via e-mail as soon as the delegation is necessary. Result of delegation to be reported for noting to following PC.
	Other non-urgent matters as they arise.	HoP or PAM / PIAM, subject to agreement to Chair of PC.	PC advised of need for delegation via e-mail as soon as the delegation is necessary. Result of delegation to be reported for noting to following PC.



FUND ACCOUNT AND NET ASSETS STATEMENT



11

FUND ACCOUNT AND NET ASSETS STATEMENT

STATEMENT OF ACCOUNTS 2021/22

STATEMENT OF RESPONSIBILITIES AND FOREWORD TO ACCOUNTS

The audited accounts and notes following on pages **95** to **141**, summarise the transactions and net assets of the Fund.

AUTHORITY'S RESPONSIBILITIES

The Authority 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 (the Chief Financial Officer).
- + To manage its affairs to secure economic, efficient and effective use of resources and safeguard its assets.
- + To approve the statement of accounts.

THE CHIEF FINANCIAL OFFICER'S RESPONSIBILITIES

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

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

- + Selected suitable accounting policies and then applied them consistently.
- + Made judgements and estimates that were reasonable and prudent.
- + Complied with the Code of Practice on Local Authority Accounting.
- + Kept proper accounting records which were up to date.
- + Taken reasonable steps for the prevention and detection of fraud and other irregularities.

Steve Mawson
Deputy Chief Executive & Executive Director of
Corporate Resources (and Section 151 Officer)

28 February 2023

INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF GLOUCESTERSHIRE COUNTY COUNCIL ON THE PENSION FUND FINANCIAL STATEMENTS OF GLOUCESTERSHIRE PENSION FUND

Opinion

We have audited the financial statements of Gloucestershire Pension Fund (the 'Pension Fund') administered by Gloucestershire County Council (the 'Authority') for the year ended 31 March 2022 which comprise the Fund Account, the Net Assets Statement, and notes to the pension fund financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22.

In our opinion, the financial statements:

- + give a true and fair view of the financial transactions of the Pension Fund during the year ended 31 March 2022 and of the amount and disposition at that date of the fund's assets and liabilities,
- + have been properly prepared in accordance with the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22; and
- + have been prepared in accordance with the requirements of the Local Audit and Accountability Act 2014.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law, as required by the Code of Audit Practice (2020) ("the Code of Audit Practice") approved by the Comptroller and Auditor General. Our responsibilities under those standards are further described in the 'Auditor's responsibilities for the audit of the financial statements' section of our report. We are independent of the Authority in accordance with the ethical requirements that are relevant to our audit of the Pension Fund's financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

We are responsible for concluding on the appropriateness of the Deputy Chief Executive and Executive Director of Corporate Resources' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or

conditions that may cast significant doubt on the Pension Fund's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify the auditor's opinion. Our conclusions are based on the audit evidence obtained up to the date of our report. However, future events or conditions may cause the Pension Fund to cease to continue as a going concern.

In our evaluation of the Deputy Chief Executive and Executive Director of Corporate Resources' conclusions, and in accordance with the expectation set out within the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22 that the Pension Fund's financial statements shall be prepared on a going concern basis, we considered the inherent risks associated with the continuation of services provided by the Pension Fund. In doing so we had regard to the guidance provided in Practice Note 10 Audit of financial statements and regularity of public sector bodies in the United Kingdom (Revised 2020) on the application of ISA (UK) 570 Going Concern to public sector entities. We assessed the reasonableness of the basis of preparation used by the Authority in the Pension Fund financial statements and the disclosures in the Pension Fund financial statements over the going concern period.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Pension Fund's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

In auditing the financial statements, we have concluded that the Deputy Chief Executive and Executive Director of Corporate Resources' use of the going concern basis of accounting in the preparation of the Pension Fund financial statements is appropriate. The responsibilities of the Deputy Chief Executive and Executive Director of Corporate Resources with respect to going concern are described in the 'Responsibilities of the Authority, the Deputy Chief Executive and Executive Director of Corporate Resources and Those Charged with Governance for the financial statements' section of this report.

Other information

The Deputy Chief Executive and Executive Director of Corporate Resources is responsible for the other information. The other information comprises the information included in the Statement of Accounts, other than the Pension Fund's financial statements, our auditor's report thereon, and our auditor's report on the Authority's financial statements. Our opinion on the Pension Fund's financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the Pension Fund's financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the Pension Fund's financial statements or our knowledge of the Pension Fund obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the Pension Fund financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of the other information, we are required to report that fact.

We have nothing to report in this regard.

Opinion on other matter required by the Code of Audit Practice (2020) published by the National Audit Office on behalf of the Comptroller and Auditor General (the Code of Audit Practice)

In our opinion, based on the work undertaken in the course of the audit of the Pension Fund's financial statements and our knowledge of the Pension Fund, the other information published together with the Pension Fund's financial statements in the Statement of Accounts, for the financial year for which the financial statements are prepared is consistent with the Pension Fund financial statements.

Matters on which we are required to report by exception

Under the Code of Audit Practice, we are required to report to you if:

- + we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- + we make a written recommendation to the Authority under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- + we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or;
- + we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or

- + we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014, in the course of, or at the conclusion of the audit.

We have nothing to report in respect of the above matters in relation to the Pension Fund.

Responsibilities of the Authority, the Deputy Chief Executive and Executive Director of Corporate Resources and Those Charged with Governance for the financial statements

As explained more fully in the Statement of Responsibilities, the Authority 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 Deputy Chief Executive and Executive Director of Corporate Resources. The Deputy Chief Executive and Executive Director of Corporate Resources is responsible for the preparation of the Statement of Accounts, which includes the Pension Fund's financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22, for being satisfied that they give a true and fair view, and for such internal control as the Deputy Chief Executive and Executive Director of Corporate Resources determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the Pension Fund's financial statements, the Deputy Chief Executive and Executive Director of Corporate Resources is responsible for assessing the Pension Fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless there is an intention by government that the services provided by the Pension Fund will no longer be provided.

The Audit and Governance Committee is Those Charged with Governance for the Pension Fund. Those charged with governance are responsible for overseeing the Authority's financial reporting process.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the Pension Fund's financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Explanation as to what extent the audit was considered capable of detecting irregularities, including fraud.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. Owing to the inherent limitations of an audit, there is an unavoidable risk that material misstatements in the financial statements may not be detected, even though the audit is properly planned and performed in accordance with the ISAs (UK).

The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below:

- + We obtained an understanding of the legal and regulatory frameworks that are applicable to the Pension Fund and determined that the most significant, which are directly relevant to specific assertions in the financial statements, are those related to the reporting frameworks (international accounting standards as interpreted and adapted by the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22, The Local Audit and Accountability Act 2014, the Accounts and Audit Regulations 2015, the Public Service Pensions Act 2013, The Local government Pension Scheme Regulations 2013 and the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016.
- + We enquired of senior officers and the Audit and Governance Committee, concerning the Authority's policies and procedures relating to:
 - the identification, evaluation and compliance with laws and regulations;
 - the detection and response to the risks of fraud; and
 - the establishment of internal controls to mitigate risks related to fraud or non-compliance with laws and regulations.
- + We enquired of senior officers, internal audit and the Audit and Governance Committee, whether they were aware of any instances of non-compliance with laws and regulations or whether they had any knowledge of actual, suspected or alleged fraud.
- + We assessed the susceptibility of the Pension Fund's financial statements to material misstatement, including how fraud might occur, by evaluating officers' incentives and opportunities for manipulation of the financial statements. This included the evaluation of the risk of management override of controls. We determined that the principal risks were in relation to:
 - management override of controls in relation to journals, management estimations and transactions outside the course of normal business; and
 - the significant accounting estimates in the financial statements, including those related to the valuation of level 2 and level 3 investments and the valuation of defined benefit net pension fund liabilities.

Our audit procedures involved:

- Evaluation of the design effectiveness of management controls over journals;
- Analysis of the journals listing and determining the criteria for selecting high risk unusual journals;
- Identification and testing of unusual journals made during the year and during the accounts production stage for appropriateness and corroboration;
- Gaining an understanding of the accounting estimates and critical judgements applied by management and considered their reasonableness; and
- Evaluating the rationale for any changes in accounting policies, estimates, or significant unusual transactions.
- + These audit procedures were designed to provide reasonable assurance that the financial statements were free from fraud or error. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error and detecting irregularities that result from fraud is inherently more difficult than detecting those that result from error, as fraud may involve collusion, deliberate concealment, forgery or intentional misrepresentations. Also, the further removed non-compliance with laws and regulations is from events and transactions reflected in the financial statements, the less likely we would become aware of it.
- + The team communications in respect of potential non-compliance with relevant laws and regulations, including the potential for fraud in revenue and expenditure recognition.

- + Our assessment of the appropriateness of the collective competence and capabilities of the engagement team included consideration of the engagement team's:
 - understanding of, and practical experience with audit engagements of a similar nature and complexity through appropriate training and participation
 - knowledge of the local government pensions sector
 - understanding of the legal and regulatory requirements specific to the Pension Fund including:
 - the provisions of the applicable legislation
 - guidance issued by CIPFA, LASAAC and SOLACE
 - the applicable statutory provisions.
- + In assessing the potential risks of material misstatement, we obtained an understanding of:
 - the Pension Fund's operations, including the nature of its income and expenditure and its services and of its objectives and strategies to understand the classes of transactions, account balances, expected financial statement disclosures and business risks that may result in risks of material misstatement.
 - the Authority's control environment, including the policies and procedures implemented by the Authority to ensure compliance with the requirements of the financial reporting framework.

Use of our report

This report is made solely to the members of the Authority, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 and as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. Our audit work has been undertaken so that we might state to the Authority's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Authority and the Authority's members as a body, for our audit work, for this report, or for the opinions we have formed.

Alex Walling

**Key Audit Partner for and on behalf of
Grant Thornton UK LLP, Local Auditor
Bristol**

1 March 2023

FUND ACCOUNT FOR THE YEAR ENDED 31ST MARCH 2022

2020/21 £000	CONTRIBUTIONS	2021/22 £000	NOTE
-123,689	employer contributions	-82,992	N18
-20,110	member contributions	-21,119	N18
-143,799	TOTAL	-104,111	N7
	TRANSFERS IN FROM OTHER PENSION FUNDS		
-5,883	individual transfers from other schemes or funds	-6,928	
-	group transfers from other schemes or funds	-	
-5,883	TOTAL	-6,928	
	OTHER INCOME		
-94	recoveries for services provided	-89	N20
-94	TOTAL	-89	
	BENEFITS		
75,033	pensions	77,261	N30
11,358	commutation of pensions and lump sum retirement benefits	13,328	
1,908	lump sum death benefits	1,647	
88,299	TOTAL	92,236	N7
	PAYMENTS TO AND ON ACCOUNT OF LEAVERS		
227	refunds to members leaving scheme or fund	335	
-2	payments for members joining state scheme or fund	-2	
5,706	individual transfers to other schemes or funds	6,867	
-	group transfers to other schemes or funds	1,069	N28
5,931	TOTAL	8,269	
-55,546	NET (ADDITIONS) / WITHDRAWALS FROM DEALINGS WITH MEMBERS	-10,623	
12,202	MANAGEMENT EXPENSES	18,530	N20
-43,344	NET (ADDITIONS) / WITHDRAWALS INCLUDING FUND MANAGEMENT EXPENSES	7,907	
	RETURNS ON INVESTMENTS		
-23,888	Investment income	-18,776	N13
-43	Taxes on income	-	N3 & N13
-590,652	Profit(-) and losses on disposal of investments and changes in market value of investments	-197,484	N4
-614,583	NET RETURNS ON INVESTMENTS	-216,260	
-657,927	NET INCREASE (-) / DECREASE IN THE NET ASSETS AVAILABLE FOR BENEFITS DURING THE YEAR	-208,353	
2,244,563	OPENING NET ASSETS OF THE SCHEME	2,902,490	
2,902,490	CLOSING NET ASSETS OF THE SCHEME	3,110,843	

NET ASSETS STATEMENT AS AT 31ST MARCH 2022

2020/21 £000	INVESTMENT ASSETS	2021/22 £000	NOTE
360,751	Bonds	-	
2,257,529	Pooled investment vehicles	2,773,831	N10
202,134	Pooled property investments	246,138	
1,106	Derivative contracts	-	N2 & N15
4,856	Other investments - Venture Capital/Private Equity	3,853	
15,816	Cash held on behalf of the investment managers	75,988	N25
5,800	Other investment balances	1,129	
2,847,992	TOTAL	3,100,939	N12
LONG TERM INVESTMENT ASSETS			
112	Brunel Pension Partnership Ltd.	71	
112	TOTAL	71	
INVESTMENT LIABILITIES			
-813	Derivative contracts	-	N2 & N15
-	Other investment balances	-	
-813	TOTAL	-	N12
2,847,291	TOTAL NET INVESTMENTS	3,101,010	
LONG TERM ASSETS			
308	Contributions due from employers	181	
308	TOTAL	181	N12 & N22
CURRENT ASSETS			
4,974	Contributions due from employers	5,256	
277	Other current assets	1,382	
275	Payments in advance	5	
50,668	Cash balances	4,495	N2, N21 & N25
56,194	TOTAL	11,138	N12 & N22
CURRENT LIABILITIES			
-7	Unpaid benefits	-13	
-1,296	Other current liabilities	-1,473	
-1,303	TOTAL	-1,486	N12 & N23
2,902,490	NET ASSETS OF THE SCHEME AVAILABLE TO FUND BENEFITS AT THE REPORTING PERIOD END	3,110,843	N4, N5, N12 & N16

The Fund's financial statements do not take account of liabilities to pay pensions and other benefits after the period end but rather summarise the transactions and net assets of the scheme.

The actuarial present value of promised retirement benefits is disclosed at Note 24. The notes on the following pages form part of these Financial Statements.

STATEMENT OF ACCOUNTS 2021/22

NOTES TO PENSION FUND ACCOUNTS 2021/22

N1. INTRODUCTION

The County Council is the administering body for the Gloucestershire Pension Fund which is a contributory defined benefit scheme. This is not only for County Council employees but also for District Councils within the County and other local bodies providing public services. A full list of all employing bodies who are members of the Fund are shown in the Pension Fund's Annual Report alongside the detailed accounts of the Gloucestershire Pension Fund.

The Fund is governed by the Public Service Pensions Act 2013 and 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 (as amended).

The Fund exists to provide pensions and certain other benefits to former employees. The Pension Fund is not a Gloucestershire County Council fund and is subject to its own audit; therefore balances are not included in the Gloucestershire County Council Consolidated Balance Sheet. The Fund is administered by the Pension Committee, which is a committee of Gloucestershire County Council. The Pension Board was set up with effect from the 1st April 2015 to assist the Pensions Committee in securing compliance with the relevant laws and Regulations and to help the Pension Committee ensure the effective and efficient governance and administration of the Fund.

MEMBERSHIP BREAKDOWN

Membership of the Local Government Pension Scheme is voluntary and employees are free to choose whether to join the scheme, remain in the scheme or make their own personal arrangements outside the scheme.

Organisations participating in the Pension Fund include the following:

- Scheduled bodies, which are automatically entitled to be members of the Fund.
- Admitted bodies, which participate in the Fund under the terms of an admission agreement between the Fund and the employer. Admitted bodies include voluntary, charitable and similar not-for-profit organisations, or private contractors undertaking a local authority function following outsourcing to the private sector.

Fire fighters, police and teachers have their own separate nationally administered schemes.

Membership details are set out below:

	31ST MARCH 2021	31ST MARCH 2022
NUMBER OF EMPLOYERS	204	217
NUMBER OF EMPLOYEES IN THE SCHEME		
COUNTY COUNCIL	10,074	9,762
OTHER EMPLOYERS	9,148	9,158
	19,222	18,920
NUMBER OF PENSIONERS		
COUNTY COUNCIL	10,176	10,630
OTHER EMPLOYERS	7,114	7,498
	17,290	18,128
DEFERRED PENSIONERS		
COUNTY COUNCIL	11,744	11,939
OTHER EMPLOYERS	8,530	8,875
	20,274	20,814
TOTAL NUMBER OF MEMBERS IN PENSION SCHEME	56,786	57,862

In addition, to the membership numbers above, there were 5,389 (5,110 2020/21) undecided or unprocessed leavers. Undecided leavers are those members who are no longer accruing service and to whom a refund of contributions or transfer out may be due. Unprocessed leavers are those members which represent cases where we are aware that a member has left, but that case has not yet been processed.

FUNDING

Benefits are funded by contributions and investment earnings. Contributions are made by active members of the Fund in accordance with the Local Government Pension Scheme Regulations 2013 and range from 5.5% to 12.5% of pensionable pay for the financial year ending 31st March 2022. Employers' contributions are set based on triennial actuarial funding valuations. The last such valuation was at 31st March 2019. When setting contribution rates the Actuary takes into account the funding target, the time horizon over which the funding target is to be achieved and the strength of the employer covenant; further information can be found within the Fund's Funding Strategy Statement. During 2021/22 employer contribution rates ranged from 0% to 36.5% of pensionable pay.

BENEFITS

Prior to 1st April 2014, pension benefits under the LGPS were based on final pensionable pay and length of pensionable service. From 1st April 2014, the scheme 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 uprated annually in line with the Consumer Prices Index.

A range of other benefits are also provided including early retirement, disability pensions and death benefits, as explained on the LGPS website - see www.lgpsmember.org.

N2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

BASIS OF PREPARATION

The Statement of Accounts summarises the Fund's transactions for the 2021/22 financial year and its position at year end as at 31st March 2022. The accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 which is based upon International Financial Reporting Standards (IFRS), as amended for the UK public sector. The accounts summarise the transactions of the Fund and reports on the net assets available to pay pension benefits. The accounts do not take account of obligations to pay pensions and benefits which fall due after the end of the financial year. The actuarial value of promised retirement benefits, valued on an International Accounting Standard (IAS19) basis, is disclosed at Note 24 of these accounts. The accounts are prepared on a going concern basis.

CRITICAL JUDGEMENTS IN APPLYING ACCOUNTING POLICIES

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

The critical judgement is made by senior management of the Pension Fund, with advice from the Actuary, of the assumptions to be used in the Valuation but because they are assumptions, they could be a source of estimation uncertainty and are also covered in the following section. The Pension Fund Liability is subject to significant variances based on changes to the underlying assumptions and these have been summarised in Note 24.

These actuarial revaluations are used to set future contribution rates and underpin the Fund's most significant investment management policies.

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

The preparation of financial statements requires management to make judgements, estimates and assumptions that affect the amounts reported for assets and liabilities at the year-end-date and the amounts reported for the revenues and expenses during the year. Estimates and assumptions are made taking into account historical experience, current trends and other relevant factors. However, the nature of estimation means that the actual outcomes could differ from the assumptions and estimates. Income and expenditure have been accounted for on an accruals basis.

The items within the Financial Statements as at 31st March 2022, for which there is a significant risk of material adjustment in the forthcoming year, are highlighted below:

ITEM	UNCERTAINTIES	EFFECT IF ACTUAL RESULTS DIFFER FROM ASSUMPTIONS
Actuarial present value of promised retirement benefits (Note 24)	Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, salary increases, changes in retirement ages, mortality rates and returns on fund assets. A firm of consulting actuaries is engaged to provide the Fund with expert advice about the assumptions to be applied.	<p>The effects on the net pension liability of changes in the individual assumptions can be measured as follows:</p> <ul style="list-style-type: none"> - A 0.1% decrease in the discount rate would increase the liability by £79m - A 0.1% increase in the pension increase rate would increase the liability by £72m - A 0.1% increase in the salary increase rate would increase the liability by £7m - A 1 year increase in member life expectancy would increase the liability by £160m
Private Equity, Infrastructure and Private Debt (Note 26)	Private equity, Infrastructure and Private Debt are valued at fair value in accordance with International Private Equity and Venture Capital Valuation guidelines. Investments are not publicly listed and as such there is a degree of estimation involved in the valuation.	<p>Those investments where at least one input that could have a significant effect on the valuation is not based on observable market data is classed at level 3 in the Fair Value Hierarchy.</p> <p>Private Equity, Infrastructure and Private Debt investments classed as level 3 total £178.274m. The Fund has determined that the valuation methods used are likely to be accurate to within the ranges set out in the Sensitivity of Assets valued at Level 3 table within Note 26. This table also sets out the consequent potential impact on the closing value of investments held at 31st March 2022.</p>
Private Equity, Infrastructure and Private Debt	Due to the normal delay in receiving quarterly valuation statements for some of the underlying funds, investments in Private Equity, Infrastructure and Private Debt funds totalling £151.5m have a valuation date earlier than 31st March 2022 and may be different when the 31st March prices are known. The percentages used in the next column highlight the volatility that might occur.	<p>The total value of Private Equity, Infrastructure and Private Debt investments in the financial statements as at 31st March 2022 was £174.421m.</p> <p>A change in market price of those holdings with a valuation date prior to the 31st March 2022 would equate to a potential movement of</p> <ul style="list-style-type: none"> - Private Equity & Infrastructure £30.4m, 31.2% - Private Debt £4.9m, 9.0% <p>There is a risk that these investments may be under or overstated in the accounts, see Note 26.</p>

ITEM	UNCERTAINTIES	EFFECT IF ACTUAL RESULTS DIFFER FROM ASSUMPTIONS
Pooled Property Funds (Note 26)	Pooled Property Funds are valued in accordance with Royal Institution of Chartered Surveyor's standards and fair value processes driven by International Private Equity and Venture Capital Valuation guidelines. Some Property Pooled Funds are not publicly listed or have redemption restrictions and as such there is a degree of estimation involved in the valuation.	<p>Those investments where at least one input that could have a significant effect on the valuation is not based on observable market data is classed at level 3 in the Fair Value Hierarchy.</p> <p>Pooled Property Funds classed as level 3 total £24.456m. The Fund has determined that the valuation methods used are likely to be accurate to within the ranges set out in the Sensitivity of Assets valued at Level 3 table within Note 26. This table also sets out the consequent potential impact on the closing value of investments held at 31st March 2022.</p>
Pooled Property Funds	<p>Investments are not publicly listed and as such there is a degree of estimation involved in the valuation. Managers either apply open market values or a fair value process, open market values are in accordance with RICS valuation standards and fair value processes are driven by International Private Equity and Venture Capital Valuation guidelines.</p> <p>Due to the normal delay in receiving quarterly valuation statements for the underlying funds, investments in Pooled Property Funds totalling £66.9m have a valuation date earlier than 31st March 2022.</p>	<p>The total value of Pooled Property Funds in the financial statements as at 31st March 2022 was £246.138m.</p> <p>A change in market price of those holdings with a valuation date prior to the 31st March 2022 would equate to a potential movement of £10.0m, 15.0%.</p> <p>There is a risk that these investments may be under or overstated in the accounts, see Note 26.</p>

REVENUE AND EXPENSE RECOGNITION

CONTRIBUTION INCOME

Contributions have been accounted for on an accruals basis where amounts due have been determined in time for inclusion in the accounts. Additional employer's contributions in respect of ill-health and early retirements are accounted for in the year the event arose. Employer deficit contribution lump sum payments are accounted for in the year the payment is made. Any amount due in year but unpaid will be classed as a current financial asset. Amounts not due until future years are classed as long-term financial assets.

BENEFITS PAYABLE AND REFUNDS OF CONTRIBUTIONS

Benefits payable and refunds of contributions have been brought into the accounts on the basis of all valid claims approved during the year.

TRANSFERS TO AND FROM OTHER SCHEMES

Individual transfer values are accounted for when they are paid or received. Bulk transfer value calculations are made towards the end of the bulk transfer process and based on payment being made on a specific day. Bulk transfer values are accrued when the value has been determined.

MANAGEMENT EXPENSES

Pension Fund expenses have been accounted for in accordance with the CIPFA guidance *Accounting for Local Government Pension Scheme Management Costs*. A more detailed breakdown of management expenses can be found in Note 20.

A) INVESTMENT MANAGEMENT EXPENSES

Investment Management Expenses comprise of expenses which are incurred in relation to the management of pension fund assets. Broadly, these are based on the market value of the investments in the investment manager's portfolio and therefore increase or reduce as the value of these investments change. Where an investment manager's fee has not been received by the reporting period end date, an estimate based upon the market value of the mandate at the end of the reporting period has been used. Where fees are netted off investment market values by investment managers, these expenses are grossed up to increase the change in value of investments.

Federated Hermes deducts its fees from a combination of assets held and income distributions and is included within Investment Management Expenses. Technology Venture Partners (TVP) and Yorkshire Fund Managers Ltd. (YFM) deduct their fees from the value of the assets under their management. Fees for TVP and YFM have not been included as they are the legal responsibility of the managers and not the Fund. Management costs for Arcmont are deducted from distributions. Brunel's investment managers and Golub deduct their fees from the value of the pooled funds under their management. The investment manager for Brunel's passive global equity pooled funds encashes units to cover their fees and all these fees have also been included within Investment Management Expenses.

B) ACQUISITION AND TRANSACTION COSTS OF INVESTMENTS

Acquisition costs of investments (e.g. stamp duty) and transaction costs are included within Investment Management Expenses with a corresponding offset against Profit on Disposal of Investments. In addition to the transaction costs disclosed, indirect costs are incurred through the bid/offer spread on investments within pooled investment vehicles. A more detailed breakdown of management expenses, including transaction costs, can be found in Note 20.

C) ADMINISTRATION EXPENSES

All administrative expenses are accounted for on an accrual basis. All staff costs associated with administration is charged to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund. Further information on administrative expenses can be found in Note 20.

D) OVERSIGHT & GOVERNANCE EXPENSES

All Oversight and Governance expenses are accounted for on an accrual basis. All staff costs associated with Oversight and Governance is charged to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund. The cost of investment advice from external consultants is included in Oversight & Governance. Further information on Oversight and Governance expenses can be found in Note 20.

INVESTMENT INCOME

Dividends are accounted for when the holding is declared ex-dividend. Any amount not received by the end of the reporting period is recognised as a current financial asset. Investment income arising from the underlying investments of Pooled Investment Vehicles is reinvested within the Pooled Investment Vehicle and reflected in the unit price.

CASH AND CASH EQUIVALENTS

Cash comprises cash in hand (bank) and demand deposits (money market funds) which also includes amounts held by the Fund's custodian on behalf of its investment managers.

Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash and are subject to minimal risk of changes in value.

Cash balances held in accordance with the County Councils' Treasury Management Strategy and those held with the Fund's custodian, State Street Bank & Trust Company, on behalf of investment managers, are in instant access accounts.

THE ACTUARIAL PRESENT VALUE OF PROMISED RETIREMENT BENEFITS

The actuarial present value of promised retirement benefits is assessed on a triennial basis by the scheme actuary in accordance with the requirements of IAS 19 Post-Employment Benefits and relevant actuarial standards.

As permitted under the Code, the Fund has included a note disclosing the actuarial present value of promised retirement benefits by way of a note to the Net Asset Statement in Note 24.

CONTINGENT ASSETS AND CONTINGENT LIABILITIES

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

A contingent liability arises where an event has taken place prior to the year-end giving rise to a possible financial obligation whose existence will only be confirmed or otherwise by the occurrence of future events. Contingent liabilities can also arise in circumstances where a provision would be made, except that it is not possible at the balance sheet date to measure the value of the financial obligation reliably.

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

VALUATION OF ASSETS

The SORP requires securities to be valued on a Fair Value Basis therefore assets and liabilities, where there is an active and readily available market price, are valued at the bid price. Where assets do not actively trade through established exchange mechanisms, a price is obtained from the manager of the investment asset through their quarterly reports. Further details of their approach to establishing fair value can be found within Note 26, Basis of Valuation table. Any amounts due or payable in respect of trades entered into but not yet completed at 31st March each year, accrued dividend income, Fund debtors and creditors and cash and cash instruments are accounted for as financial instruments held at amortised cost. Investments held in foreign currencies are shown at market value translated into sterling at the exchange rates prevailing as at 31st March 2022. Purchases and sales during the year which require settlement in a foreign currency are converted from/to sterling at the exchange rate prevailing on the trade date. Pooled investment vehicles are valued at closing bid price if both bid and offer prices are published; or if single priced, at the closing single price. In the case of pooled investment vehicles that are accumulation funds, change in market value also includes income which is re-invested in the fund, net of applicable withholding tax. The Pooled Property Investments are independently valued either in accordance with the Royal Institute of Chartered Surveyors valuation standards or by a fair value process driven by International Private Equity and Venture Capital Valuation guidelines. Private Equity and Infrastructure funds are valued using the latest financial statements published by the respective fund managers and in accordance with the International Private Equity and Venture Capital Guidelines. The valuation standards followed by the managers are in accordance with the industry guidelines and the constituent management agreements. Such investments may not always be valued on year end valuation as information may not be available, and therefore will be valued based on the latest valuation provided by the managers adjusted for movements to the year end.

A detailed breakdown of investments can be found under Note 12.

Financial assets are included in the financial statements on a fair value basis at the reporting date. A financial asset is recognised in the Net Assets Statement on the date the Fund becomes party to the contractual acquisition of the asset. From this date any gains or losses arising from the changes in the fair value of the asset 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 IFRS 13 (see Note 26). For the purposes of disclosing levels of fair value hierarchy, the Fund has adopted the classification guidelines recommended in Practical Guidance on Investment Disclosures (PRAG/ Investment Association).

Gloucestershire Pension Fund together with nine other shareholders each hold a 10% share in Brunel Pension Partnership Ltd (company number 10429110). As such, no fund is deemed to have a significant influence and this long term investment is accounted for at fair value. The asset was initially measured at cost and is subsequently revalued for any impairment.

The accounts for the year ended 31st March 2022 use the valuations for the Fund's assets based on the figures provided by the Fund's custodian, State Street.

DERIVATIVES

Derivative contracts are valued at fair value and are determined using exchange prices at the reporting date. The fair value is the unrealised profit or loss at the current bid or offer market quoted price of the contract. Derivative contract assets, those with a positive value, are valued at bid price and derivative contract liabilities, those with a negative value, are valued at the offer price. The amounts included in change in market value are the realised gains and losses on closed futures contracts and the unrealised gains and losses on open futures contracts. The fair value of the forward currency contracts are based on market forward exchange rates at the year end date.

N3. TAXATION

The Fund is a registered public service scheme under Section 1(1) of Schedule 36 of the Finance Act 2004 and is exempt from UK capital gains tax on the proceeds of investments sold and UK income tax on interest received. Corporation Tax is deducted from UK equity dividends; tax deducted from property unit trusts can be reclaimed. Withholding tax is payable on income from overseas investments. This tax is recovered wherever local tax laws permit.

N4. INVESTMENT MOVEMENTS SUMMARY

2021/22 ASSET CLASS	MARKET VALUE AT 31ST MARCH 2021	PURCHASES DURING THE YEAR AT COST & DERIVATIVE PAYMENTS	SALES PROCEEDS DURING THE YEAR & DERIVATIVE RECEIPTS	CHANGE IN MARKET VALUE DURING THE YEAR	MARKET VALUE AT 31ST MARCH 2022
	£000	£000	£000	£000	£000
BONDS	360,751	775,844	-1,143,493	6,898	-
EQUITIES	-	-	-	-	-
POOLED INVESTMENTS	2,257,529	1,298,998	-934,775	152,079	2,773,831
POOLED PROPERTY FUNDS	202,134	53,600	-48,439	38,843	246,138
PRIVATE EQUITY / VENTURE CAPITAL	4,856	-	-1,516	513	3,853
	2,825,270	2,128,442	-2,128,223	198,333	3,023,822
DERIVATIVE CONTRACTS					
FUTURES	-206	387	-383	202	-
FORWARD CURRENCY CONTRACTS	499	-	-	-499	-
	293	387	-383	-297	-
LONG TERM INVESTMENT ASSETS					
BRUNEL PENSION PARTNERSHIP LTD.	112	-	-	-41	71
NET INVESTMENT ASSETS	2,825,675	2,128,829	-2,128,606	197,995	3,023,893

In addition to the investments there was £86,950k (£76,815k 2020/21) in cash, cash equivalents and accruals. Cash movements, currency adjustments and other end of year settlements totalled -£511k (£359k 2020/21). As a result the total profit (-) and losses on disposal of investments and changes in market value of investments was -£197.5m (-£590.6m 2020/21).

2020/21 ASSET CLASS	MARKET VALUE AT 31ST MARCH 2020	PURCHASES DURING THE YEAR AT COST & DERIVATIVE PAYMENTS	SALES PROCEEDS DURING THE YEAR & DERIVATIVE RECEIPTS	CHANGE IN MARKET VALUE DURING THE YEAR	MARKET VALUE AT 31ST MARCH 2021
	£000	£000	£000	£000	£000
BONDS	331,206	63,441	-52,290	18,394	360,751
EQUITIES	-	-	-	-	-
POOLED INVESTMENTS	1,673,162	507,876	-496,390	572,881	2,257,529
POOLED PROPERTY FUNDS	200,277	8,032	-2,509	-3,666	202,134
PRIVATE EQUITY / VENTURE CAPITAL	4,491	-	-57	422	4,856
	2,209,136	579,349	-551,246	588,031	2,825,270
DERIVATIVE CONTRACTS					
FUTURES	415	777	-1,857	459	-206
FORWARD CURRENCY CONTRACTS	-1,619	-	-	2,118	499
	-1,204	777	-1,857	2,577	293
LONG TERM INVESTMENT ASSETS					
BRUNEL PENSION PARTNERSHIP LTD.	427	-	-	-315	112
NET INVESTMENT ASSETS	2,208,359	580,126	-553,103	590,293	2,825,675

In addition to the investments there was £76,815k (£36,204k 2019/20) in cash, cash equivalents and accruals. Cash movements, currency adjustments and other end of year settlements totalled £359k (-£550k 2019/20). As a result, the total profit (-) and losses on disposal of investments and changes in market value of investments was -£590.6m (£168.4m 2019/20).

The change in market value of investments comprises all increases and decreases in the market value of investments held at any time during the year, including profits and losses realised on sales of investments during the year.

The closing market value of the derivatives in the previous tables represents fair value as at the year end date. In the case of derivative contracts, which are traded on exchanges, this value is determined using exchange prices at the reporting date. Forward foreign exchange contracts are over the counter contracts and are valued by determining the gain or loss that would arise from closing out the contract at the reporting date and entering into an equal and opposite contract as at that date. The profit or loss arising is included within the cash and accruals figure.

All derivative contracts settled during the period are reported within the table as purchases and sales.

N5. MANAGEMENT OF FUND ASSETS

The market value of investments managed by each external manager at the end of the financial year was:

	2020/21 £000	%	2021/22 £000	%
INVESTMENTS MANAGED BY THE BRUNEL REGIONAL ASSET POOL				
LEGAL & GENERAL INVESTMENT MANAGEMENT	498,512	17.2	443,916	14.3
BRUNEL GLOBAL HIGH ALPHA FUND	436,140	15.0	408,878	13.1
BRUNEL ACS UK EQUITY FUND	373,224	12.9	405,123	13.0
BRUNEL STERLING CORPORATE BONDS PORTFOLIO	-	-	365,269	11.7
BRUNEL GLOBAL SUSTAINABLE FUND	254,269	8.8	362,852	11.7
BRUNEL PROPERTY FUND	208,809	7.2	246,138	7.9
BRUNEL DIVERSIFYING RETURNS FUND	217,761	7.5	233,716	7.5
BRUNEL MULTI ASSET CREDIT PORTFOLIO	-	-	200,543	6.4
BRUNEL EMERGING EQUITY FUND	176,328	6.1	179,114	5.8
BRUNEL PRIVATE EQUITY AND INFRASTRUCTURE PORTFOLIO	29,709	1.0	97,394	3.1
CASH, CASH INSTRUMENTS AND ACCRUALS WITH BRUNEL	-	-	76,181	2.5
BRUNEL PRIVATE DEBT FUND	-	-	20,921	0.7
BRUNEL PENSION PARTNERSHIP LTD. (SHAREHOLDING)	112	0.0	71	0.0
	2,194,864	75.7	3,040,116	97.7
INVESTMENTS MANAGED OUTSIDE OF THE BRUNEL REGIONAL ASSET POOL				
WESTERN ASSET MANAGEMENT COMPANY LTD.	582,266	20.1	-	-
ARCMONT ASSET MANAGEMENT LTD.	33,360	1.1	23,602	0.8
GOLUB CAPITAL PARTNERS INTERNATIONAL	31,710	1.1	33,228	1.1
TECHNOLOGY VENTURE PARTNERS	3,817	0.1	3,842	0.1
YORKSHIRE FUND MANAGERS LTD.	1,039	0.0	11	0.0
	652,192	22.4	60,683	2.0
TOTAL - EXTERNAL MANAGERS	2,847,056	98.1	3,100,799	99.7
IN-HOUSE CASH AND ACCRUALS	55,199	1.9	9,833	0.3
CASH INSTRUMENTS WITH CUSTODIAN	235	0.0	211	0.0
	2,902,490	100.0	3,110,843	100.0

Where the value of an investment exceeds 5% of the total value of net assets, details have been disclosed in Note 16.

N6. ACTUARIAL POSITION OF THE FUND

In line with the Local Government Pension Scheme Regulations, actuarial valuations of the Fund are required to be undertaken every three years for the purpose of setting employer contribution rates for the forthcoming triennial period. The latest valuation took place as at 31st March 2019 and established the minimum contribution payments for the three years until 31st March 2023. Work on the 2022 valuation has commenced with results being issued towards the end of 2022.

The key elements of the actuarial valuation are:

- + to ensure the long-term solvency of the Fund, i.e. that sufficient funds are available to meet all pension liabilities as they fall due for payment
- + to ensure that employer contribution rates are as stable as possible
- + to minimise the long-term cost of the scheme by recognising the link between assets and liabilities and adopting an investment strategy that balances risk and return
- + to reflect the different characteristics of employing bodies in determining contribution rates where it is reasonable to do so
- + to use reasonable measures to reduce the risk to other employers and ultimately to the council tax payer from an employer defaulting on its pension obligations.

The aim is to achieve 100% solvency over a period not exceeding 17 years depending on the type of employer and to provide stability in employer contribution rates by spreading any increases in rates over a period of time. Solvency is achieved when the funds held, plus future expected investment returns and future contributions, are sufficient to meet expected future pension benefits payable.

The market value of the Fund's assets at the March 2019 triennial valuation date was £2,379m (£1,703m March 2016) and represented 102% (79.7% March 2016) of the Fund's accrued liabilities.

The table below summarises the whole fund Primary and Secondary Contribution rates at the 2019 valuation. The 2016 valuation results of the Fund are shown for comparison.

	LAST VALUATION 31ST MARCH 2016		THIS VALUATION 31ST MARCH 2019	
PRIMARY RATE (% OF PAY)	19.6%		20.9%	
SECONDARY RATE (£)	2017/18	32,487,000	2020/21	30,652,000
	2018/19	36,638,000	2021/22	26,850,000
	2019/20	40,905,000	2022/23	24,353,000

+ Individual employers' rates will vary depending on the demographic and actuarial factors particular to each employer. Full details of the contribution rates payable can be found in the 2019 actuarial valuation report and the Funding Strategy Statement on the Fund's website. The Actuary has made an assessment of the contributions that should be paid into the Fund by participating employers for the period 1st April 2020 to 31st March 2023 in order to maintain the solvency of the Fund.

+ The contribution rate has been calculated using the projected evolution of each employers' assets and benefit payments and the main actuarial assumptions used are as follows:

FUNDING BASIS		
	2016	2019
RATE OF RETURN ON INVESTMENTS (DISCOUNT RATE)	4.0% PA	4.2% PA
RATE OF GENERAL PAY INCREASES	2.4% PA	2.6% PA
RATE OF INCREASE TO PENSIONS IN PAYMENT (IN EXCESS OF GUARANTEED MINIMUM PENSION)	2.1% PA	2.3% PA

+ The estimate of the pension fund liability is subject to significant variations, based on changes to the underlying assumptions used - please see table above.

+ The full actuarial valuation reports for 2013, 2016 and 2019 are published on the Pension pages of the County Council's website.

See Note 24 for details of the Actuarial Present Value of Promised Retirement Benefits.

N7. ANALYSIS OF CONTRIBUTIONS RECEIVABLE AND BENEFITS PAYABLE

	2020/21		2021/22	
	CONTRIBUTIONS RECEIVABLE £000	BENEFITS PAYABLE £000	CONTRIBUTIONS RECEIVABLE £000	BENEFITS PAYABLE £000
GLOUCESTERSHIRE COUNTY COUNCIL [ADMINISTERING AUTHORITY]	**60,830	47,185	49,440	47,761
SCHEDULED BODIES (177 21/22) (167 20/21)* [BODIES ADMITTED BY RIGHT]	**76,371	35,530	49,768	37,377
ADMITTED BODIES (39 21/22) (36 20/21)* [BODIES ADMITTED BY AGREEMENT]	***6,598	5,584	4,903	7,098
	143,799	88,299	104,111	92,236

Scheduled bodies now include 109 (102 20/21) schools who have converted to academy status.

* These numbers relate to active employers with active members.

** During 2020/21 Gloucestershire County Council and four scheduled bodies made the decision to pay lump sum deficit contributions of £38.8m to the Fund to benefit from earning greater investment returns in the short term resulting in reduced contribution payments owing in future years.

*** Contributions Receivable for Admitted Bodies for 2020/21 contained deficit payments of £2.1m in relation to employers who left the scheme.

N8. INVESTMENT STRATEGY STATEMENT

The Fund's Investment Strategy Statement (ISS) as required by the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 can be found on the Fund's website [https:// www.gloucestershire.gov.uk/pensions/investments](https://www.gloucestershire.gov.uk/pensions/investments). It includes a statement on the Fund's approach to pooling its investment assets as required under the Regulations.

N9. RELATED PARTY TRANSACTIONS

Gloucestershire County Council, as Administering Authority for the Fund, incurred the following costs in relation to the administration of the Fund and was subsequently reimbursed by the Fund for these expenses. The Council is also the single largest employer of members of the Pension Fund. All monies owing to and due from the Fund were paid or accrued for in the year.

ADMINISTRATIVE EXPENSES

2020/21 £000	2021/22 £000
2,144	2,299

Part of the Pension Fund's cash holdings are invested on the money markets by the Treasury Management team of Gloucestershire County Council, see Notes 2, 21 and 25.

Of the County Council's key management personnel, some of the Deputy Chief Executive & Executive Director of Corporate Resources and the Director of Finance remuneration costs were charged to the Fund to reflect time spent supporting the Fund. These consisted of salary, fees and allowances of £12,781 (£28,528 2020/21), employers' pension contributions of £2,594 (£8,815 2020/21) and employer's national insurance contributions of £1,617. The decrease on the year reflects the reduction in time spent by the Director of Finance following the appointment of the new Head of Pensions.

The Deputy Chief Executive & Executive Director and Director are members of the Fund as contributing Gloucestershire County Council employees. This does not impact on their role as Finance Director and S151 officer, which is clearly defined.

The Pensions Committee is the decision making body for the Fund and Gloucestershire County Council nominates 7 voting committee members. Councillor Gray is also a County Councillor but is the District Council's representative on the Pension Committee.

Each member of the Pension Committee is required to declare their interests at each meeting.

Mr. P. Clark, the Scheme Member Representative, is a non-voting member of the Pension Committee. Mr. Clark is a contributing member of the Pension Fund and this does not impact on his Pension Committee role.

Three members of the Pension Committee were also District Council members as at 31st March 2022 and these are detailed below:

MEMBER	DISTRICT COUNCIL
CLLR. M. BABBAGE	CHELTENHAM BOROUGH COUNCIL
CLLR. D. BROWN	GLOUCESTER CITY COUNCIL
CLLR. D. GRAY	TEWKESBURY BOROUGH COUNCIL

Cllr L. Stowe represents the Gloucestershire Pension Fund on the Brunel Oversight Board and is corporate shareholder representative for Gloucestershire County Council for UBICO Limited which is an employer in the Fund.

The Pension Board was created on the 1st April 2015. Four members of the Board are members of the Fund as contributing employees. This does not impact on their roles as members of the Pension Board given the nature of the Board's functions.

Transactions between employers and the Fund are disclosed in Note 7.

BRUNEL PENSION PARTNERSHIP LTD. (COMPANY NUMBER 10429110)

Brunel was formed on the 14th October 2016 and oversees the investment of pension fund assets for Avon, Buckinghamshire, Cornwall, Devon, Dorset, Environment Agency, Gloucestershire, Oxfordshire, Somerset and Wiltshire Funds.

Each of the ten local authorities, including Gloucestershire County Council own 10% of Brunel. As part of Gloucestershire's investment in Brunel the Fund provided regulatory capital. This is subject to regular review by the regulator which could result in additional calls for capital.

Pension Fund transactions with Brunel are as follows:

	2020/21 £000	2021/22 £000
INCOME	-	46
EXPENDITURE	909	1,014
DEBTORS	-	-
PAYMENTS IN ADVANCE	271	-

In addition to his role as Pension Committee member, Cllr. L. Stowe represents the Fund on the Brunel Oversight Board.

In 2020/21 the Pension Fund, together with the other nine Funds in Brunel, entered into a Pension Cost Recharge Agreement whereby each Fund agreed to reimburse Brunel with its share of regular ongoing pension related cashflows

via its Annual Operating Charge. As part of this arrangement the Fund also agreed to pay or receive its share of any exit payment or credit should Brunel cease to be a member of the Local Government Pension Scheme. At the end of September 2021 the Fund's share of the possible charge was £768k.

N9a. KEY MANAGEMENT PERSONNEL

The key management personnel of the Fund are the Section 151 Officer and the Head of Pensions. A proportion of the Section 151 Officer's costs have been charged to the Fund to reflect time spent supporting the Fund and those costs are included with those of the Head of Pensions in the table below.

The Head of Pensions position, formerly a 0.5 full time equivalent, was vacant between June and October 2020 before the new Head of Pensions commenced in November 2020 as one full time equivalent. Therefore in relation to the Head of Pensions post the 2020/21 figure in the below table contains two months at 0.5 of a full time equivalent and 5 months at one full time equivalent. The costs for 2021/22 includes one full time equivalent for the whole year.

	2020/21 £000	2021/22 £000
SHORT-TERM BENEFITS	51	92
POST-EMPLOYMENT BENEFITS	3	-
OTHER LONG-TERM BENEFITS	-	24
TERMINATION BENEFITS	-	-
SHARE-BASED PAYMENTS	-	-
	54	116

N10. CONTINGENT LIABILITIES AND CONTRACTUAL COMMITMENTS

INVESTMENT COMMITMENTS

The Fund has investment commitments with three managers where the investment manager has not yet drawn down all monies due. These commitments relate to investments in private debt, private equity and infrastructure and are requested as and when the respective investment manager identifies an investment opportunity. The amounts requested can therefore be irregular in both size and timing.

In March 2022 the Fund increased its commitment to Brunel's infrastructure mandate by £20m, private equity mandate by £16m and private debt mandate by £38m. Brunel anticipates that commitments in Cycle 1 and Cycle 2 will be fully drawn down by 2026 and Cycle 3 by 2027.

Of the Golub Capital Partners commitment, 87.5% has been drawn down. Golub do not anticipate any further draw downs but reserve the right to still do so. The commitment draw down period will end on the 1st July 2023 and Golub will return monies as investments mature.

In relation to the Fund's private debt fund managed by Arcmont, 76% of the Fund's total commitment has been drawn down and the private debt fund will start returning monies as investments mature rather than draw down the entire commitment.

The following table shows the Fund's total commitment and the remaining liability, following drawdowns, at the year end.

	TOTAL COMMITMENT £000	OUTSTANDING LIABILITY 2020/21 £000	OUTSTANDING LIABILITY 2021/22 £000
ARCMONT ASSET MANAGEMENT LTD. (PRIVATE DEBT)	50,000	14,992	12,018
GOLUB CAPITAL PARTNERS INTERNATIONAL (PRIVATE DEBT)	40,000	5,798	5,038
BRUNEL PENSION PARTNERSHIP LTD. (PRIVATE EQUITY) CYCLE 1	43,000	31,638	23,596
BRUNEL PENSION PARTNERSHIP LTD. (PRIVATE EQUITY) CYCLE 2	70,000	69,563	58,139
BRUNEL PENSION PARTNERSHIP LTD. (PRIVATE EQUITY) CYCLE 3	16,000	-	16,000
BRUNEL PENSION PARTNERSHIP LTD. (INFRASTRUCTURE) CYCLE 1	43,000	30,664	17,503
BRUNEL PENSION PARTNERSHIP LTD. (INFRASTRUCTURE) CYCLE 2	130,000	122,865	95,276
BRUNEL PENSION PARTNERSHIP LTD. (INFRASTRUCTURE) CYCLE 3	20,000	-	20,000
BRUNEL PENSION PARTNERSHIP LTD. (PRIVATE DEBT) CYCLE 2	120,000	120,000	99,104
BRUNEL PENSION PARTNERSHIP LTD. (PRIVATE DEBT) CYCLE 3	38,000	-	38,000
	570,000	395,520	384,674

PENSION BONDS

During 2021/22, eleven (eleven 2020/21) admitted body employers in the Pension Fund held insurance bonds to guard against the possibility of being unable to meet their pension obligations. These bonds are drawn in favour of the Pension Fund and payment will only be triggered in the event of employer default. No such defaults have occurred in 2021/22 (2020/21 nil).

CONTINGENT LIABILITY

In 2020/21 the Pension Fund, together with the nine other Funds in Brunel, entered into a Pension Cost Recharge Agreement whereby each Fund agreed to reimburse Brunel with its share of regular ongoing pension related cashflows via its Annual Operating Charge. As part of this arrangement the Fund also agreed to pay or receive its share of any exit payment or credit should Brunel cease to be a member of the Local Government Pension Scheme. At the end of September 2021 the Fund's share of the possible charge was £768k (2020/21 £657k).

N11. STOCK LENDING

The Pension Funds' custodian is authorised to release directly held stock to third parties under a stock lending arrangement, however during the early part of 2021/22 all of the Fund's assets were transferred into pooled funds and the stock lending programme ceased. Stock lending commission of £1k (2020/21 £3k) was received by the Fund for the part-year.

Brunel also operates a stock lending programme in relation to the underlying assets in two of the Fund's pooled funds. At 31st March 2022 the market value of shares out on loan was £22.2m (2020/21 £17.1m) and the value of collateral held £24.3m (2020/21 £18.5m) equal to 109.3% (2020/21 108.2%) of stock out on loan. Income of £68k (2020/21 £40k) was reinvested into the pooled funds.

These investments continue to be recognised in the Fund's financial statements. During the period the stock is on loan, the voting rights of the loaned stocks pass to the borrower.

N12. FINANCIAL ASSET ANALYSIS

INVESTMENT ASSETS	2020/21 £000	2021/22 £000	NOTE
BONDS			
PUBLIC SECTOR	45,381	-	
CORPORATE	315,370	-	
	360,751	-	
POOLED INVESTMENT VEHICLES			
EQUITIES	1,738,473	1,799,883	
BONDS	208,677	565,811	
DIVERSIFIED GROWTH	217,761	233,716	
PRIVATE EQUITY	11,407	37,290	
INFRASTRUCTURE	16,141	60,104	
PRIVATE DEBT	65,070	77,027	
	2,257,529	2,773,831	N10
OTHER INVESTMENTS			
POOLED PROPERTY INVESTMENTS	202,134	246,138	
VENTURE CAPITAL/PRIVATE EQUITY	4,856	3,853	
	206,990	249,991	
DERIVATIVE CONTRACTS			
FUTURES	583	-	
FORWARD FOREIGN EXCHANGE CONTRACTS	523	-	
	1,106	-	N15

INVESTMENT ASSETS	2020/21 £000	2021/22 £000	NOTE
CASH (MANAGERS)			
CASH INSTRUMENTS	13,239	35,969	
CASH DEPOSITS	2,577	40,019	
	15,816	75,988	
OTHER INVESTMENT BALANCES			
DEBTORS			
OUTSTANDING SETTLEMENT OF INVESTMENT SALES	1	51	
ACCRUED DIVIDEND INCOME AND TAX RECLAIMS DUE ON DIVIDEND INCOME	5,799	1,078	
	5,800	1,129	
LONG TERM FINANCIAL ASSETS			
BRUNEL PENSION PARTNERSHIP LTD.	112	71	
TOTAL INVESTMENT ASSETS	2,848,104	3,101,010	
INVESTMENT LIABILITIES	2020/21 £000	2021/22 £000	NOTE
DERIVATIVE CONTRACTS			
FUTURES	-789	-	
FORWARD FOREIGN EXCHANGE CONTRACTS	-24	-	
TOTAL INVESTMENT LIABILITIES	-813	-	N15
LONG TERM ASSETS			
CONTRIBUTIONS DUE FROM EMPLOYERS	308	181	
	308	181	N22
CURRENT ASSETS			
CONTRIBUTIONS DUE FROM EMPLOYERS	4,974	5,256	
OTHER CURRENT ASSETS (DEBTORS)	277	1,382	
PAYMENTS IN ADVANCE	275	5	
CASH BALANCES	50,668	4,495	N21
	56,194	11,138	N22
CURRENT LIABILITIES			
UNPAID BENEFITS	-7	-13	
OTHER LIABILITIES (CREDITORS)	-1,296	-1,473	
	-1,303	-1,486	N23
TOTAL	2,902,490	3,110,843	

N13. INVESTMENT INCOME

Investment income arises from the following investment categories:

	2020/21 £000	2021/22 £000
BONDS	11,751	3,440
POOLED INVESTMENT VEHICLES	3,608	7,355
POOLED PROPERTY INVESTMENTS	8,325	7,672
INTEREST ON CASH DEPOSITS	140	107
PRIVATE EQUITY	7	-
OTHER INCOME FROM STOCKLENDING, UNDERWRITING AND CLASS ACTIONS	57	202
	23,888	18,776
WITHHOLDING TAX	43	-
	23,931	18,776

N14. SEPARATELY INVESTED ADDITIONAL VOLUNTARY CONTRIBUTIONS (AVC'S)

Gloucestershire Pension Fund provides additional voluntary contribution (AVC) schemes for its members with The Prudential Assurance Company Limited and Phoenix Life Limited. The AVC's are invested separately in funds managed by them. These are in the form of with-profits, unit-linked and deposit accounts and secure additional benefits on a money purchase basis for those members electing to pay additional voluntary contributions. Members participating in this arrangement receive an annual statement confirming amounts held to their account and movements in the year. These amounts are not included in the Pension Fund Accounts in accordance with Regulation 4 (1) (b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 (as amended).

VALUE OF SEPARATELY INVESTED ADDITIONAL VOLUNTARY CONTRIBUTIONS	31ST MARCH 2021 £000	31ST MARCH 2022 £000
The Prudential Assurance Company Limited	6,922	6,587
Phoenix Life Limited	19	19
	6,941	6,606

Contributions paid by members in the Prudential scheme during 2021/22 totalled £597,142 (2020/21 £610,385).

N15. DERIVATIVES

In May 2021 the directly invested fixed income manager, who was employing the use of derivatives to reduce currency risk and duration risk, the risk associated with the sensitivity of a bond's price to a one percent change in interest rates, was terminated and all derivative positions closed. Pooled funds investing in Sterling Corporate Bonds and Multi-asset Credit were purchased in their place. Managers of these pooled funds are allowed the modest use of derivatives primarily for currency and interest rate hedging purposes. Due to the nature of pooled funds where units are purchased in the fund itself rather than the underlying assets, details of derivative contracts are at fund level and not disclosed.

A derivative is a generic term for financial instruments used in the management of portfolios and is a financial contract between two parties, the value of which is determined by the underlying asset. Derivatives include futures, forwards, swaps and options.

The table below reflects the outstanding contracts at 31st March 2021 which were subsequently closed in early 2021/22.

DERIVATIVE CONTRACT ANALYSIS

INVESTMENT ASSETS	CONTRACT TYPE*	2020/21 ECONOMIC EXPOSURE £000	2021/22 ECONOMIC EXPOSURE £000	EXPIRATION	2020/21 MARKET VALUE £000	2021/22 MARKET VALUE £000
FUTURES						
US 10YR NOTE FUTURE	ET	-16,608	-	Less than 3 months	478	-
US ULTRA BOND FUTURE	ET	-1,839	-	Less than 3 months	105	-
OVERSEAS FUTURES		-18,447	-		583	-
TOTAL FUTURES		-18,447	-		583	-
FORWARD FOREIGN EXCHANGE CONTRACTS	OTC	36,753	-	Less than 6 months	523	-
TOTAL DERIVATIVE ASSETS		18,306	-		1,106	-

INVESTMENT LIABILITIES	CONTRACT TYPE*	2020/21 ECONOMIC EXPOSURE £000	2021/22 ECONOMIC EXPOSURE £000	EXPIRATION	2020/21 MARKET VALUE £000	2021/22 MARKET VALUE £000
FUTURES						
UK - FIXED INTEREST						
UK LONG GILT FUTURE	ET	4,976	-	Less than 3 months	-52	-
UK FUTURES		4,976	-		-52	-
OVERSEAS - FIXED INTEREST						
GERMAN EURO-BUND FUTURE	ET	-7,733	-	Less than 3 months	-24	-
US 5YR NOTE FUTURE	ET	47,671	-	Less than 3 months	-654	-
US TREASURY LONG BOND FUTURE	ET	1,120	-	Less than 3 months	-59	-
OVERSEAS FUTURES		41,058	-		-737	-
TOTAL FUTURES		46,034	-		-789	-
FORWARD FOREIGN EXCHANGE CONTRACTS	OTC	5,804	-	Less than 6 months	-24	-
TOTAL DERIVATIVE LIABILITIES		51,838	-		-813	-
NET FUTURES					293	-

* Contract types ET (exchange traded) OTC (over the counter).

OPEN FORWARD CURRENCY CONTRACTS

	ASSET VALUE £000	LIABILITY VALUE £000
OPEN FORWARD CURRENCY CONTRACTS AT 31ST MARCH 2022	-	-
NET FORWARD CURRENCY CONTRACTS AT 31ST MARCH 2022		-
PRIOR YEAR COMPARATIVE		
OPEN FORWARD CURRENCY CONTRACTS AT 31ST MARCH 2021	523	-24
NET FORWARD CURRENCY CONTRACTS AT 31ST MARCH 2021		499

N16. INVESTMENTS EXCEEDING 5% OF TOTAL NET ASSETS

At 31st March 2022 the Pension Fund held seven (2020/21, eight) investments that each exceeded 5% of the total value of the net assets of the scheme. These seven investments totalled £2,262,698k out of a total market value for the Fund of £3,110,843k. These are detailed as follows:

INVESTMENTS EXCEEDING 5% OF TOTAL NET ASSETS	2020/21 £000	%	2021/22 £000	%
BRUNEL GLOBAL HIGH ALPHA EQUITY FUND	436,140	15.0	408,878	13.1
BRUNEL UK EQUITY FUND	373,224	12.9	405,122	13.0
ROYAL LONDON POOLED PENSION COMPANY - BRUNEL STERLING CORPORATE BOND FUND	-	-	365,269	11.7
BRUNEL GLOBAL SUSTAINABLE FUND	254,269	8.8	362,852	11.7
LEGAL & GENERAL FTSE PARIS ALIGNED DEVELOPED EQUITIES INDEX FUND	-	-	307,747	9.9
BRUNEL DIVERSIFYING RETURNS FUND	217,761	7.5	233,716	7.5
BRUNEL EMERGING MARKETS EQUITY FUND	176,328	6.1	179,114	5.8
LEGAL & GENERAL DEVELOPED WORLD EQUITY HEDGED CURRENCY INDEX FUND	167,613	5.8	*	*
LEGAL & GENERAL SSCIBETA MULTI FACTOR DEVELOPED EQUITY INDEX FUND	263,530	9.1	-	-
LEGG MASON GLOBAL FUNDS - WA GMS	201,044	6.9	-	-
	2,089,909	72.1	2,262,698	72.7

* The Fund continues to hold the Legal & General Developed World Equity Fund, however it's value has dropped below 5% of Total Net Assets standing at £136,169,000 (4.4 %).

The Brunel Funds are Unit Trusts.

The Legg Mason Global Fund is an O.E.I.C. investing in overseas fixed interest.

The Legal & General Funds are passively managed Unitised Insurance Policies.

The Royal London Pooled Pension Company Fund is an Unitised Insurance Policy investing in sterling corporate bonds.

N17. AGENCY SERVICES

The Pension Fund pays discretionary pension awards to former employees on behalf of some Pension Fund employers. The amounts paid are not included within the Fund Account but are provided as a service and fully reclaimed from the employer bodies. The sums are disclosed below.

	2020/21 £000	2021/22 £000
DISCRETIONARY PAYMENTS	1,109	1,091

N18. CONTRIBUTIONS BREAKDOWN

FROM EMPLOYERS	2020/21 £000	2021/22 £000
NORMAL CONTRIBUTIONS	62,440	67,026
AUGMENTATION CONTRIBUTIONS	-	-
DEFICIT RECOVERY CONTRIBUTIONS	57,267	15,063
SECTION 75 DEBT (CESSATION OF EMPLOYER)	2,066	-9
OTHER	1,916	912
	123,689	82,992
FROM MEMBERS		
NORMAL CONTRIBUTIONS	19,937	20,923
ADDITIONAL VOLUNTARY CONTRIBUTIONS	173	196
	20,110	21,119

The Fund's actuary undertakes a funding valuation every three years for the purpose of setting employer contribution rates for the forthcoming triennial period. The primary contribution rate, the rate which all employers in the Fund will pay was set at 20.9%, in addition most employers will also pay a secondary contribution rate depending on their own particular circumstances. Full details of the contribution rates payable can be found in the 2019 Actuarial Valuation Report and the Pension Fund's Annual Report.

The employers' monthly contributions are expressed as a percentage of pensionable pay. Deficit recovery payments are either based on a percentage of pensionable pay or paid as a lump sum. Both monthly contributions and deficit funding payments have been identified above. The deficit recovery contributions relate to past service benefit accrual and are payable over an agreed recovery period, not exceeding 17 years.

During 2020/21 Gloucestershire County Council and four scheduled bodies made the decision to pay lump sum deficit contributions of £38.8m to the Fund to benefit from earning greater investment returns in the short term resulting in reduced contribution payments owing in future years.

In addition Gloucestershire County Council also paid a higher percentage contribution rate in 2020/21 equivalent to £2.8m to benefit from earning greater investment returns.

Employers who leave the scheme may need to pay outstanding deficit payments and this is included under Section 75 debt.

A revision to the Regulations in May 2018 and a further, more recent revision permits, at the discretion of the Pension Fund, the payment of an exit credit to an employer. Exit credit payments are also included within Section 75 debt.

Other contributions are those contributions paid by an employer to compensate the Pension Fund for early retirement or the recovery of ill health retirement costs.

These payments follow the principles outlined in the Funding Strategy Statement. Early retirement costs are usually paid in one lump sum or were historically paid over several years dependent on the status of the employer. When a payment is spread there is an extra cost to reflect the delay in total payment. There are currently no early retirement costs being spread. At 31st March 2022, £34k (2020/21 £0) was due to the Pension Fund for early retirements and has been accrued.

The majority of employers are covered by an ill health insurance policy and claims are made as they arise. Excess ill health retirement costs, not covered by the insurance policy, are invoiced for where necessary. At 31st March 2022, £50k (2020/21 £454k) was due to the Pension fund for ill health retirement costs and has been accrued.

It had been agreed previously that an employer who left the Fund in 2008/09 could spread the payment of their deficit over a number of years. The total amount was credited to the Pension Fund and an accrual made for the outstanding amount. The accrual is rolled forward each year and adjusted for deficit payments made.

N19. CUSTODY OF INVESTMENTS

The accounts for the year ended 31st March 2022 use the valuations for the Fund's assets provided by our custodian, State Street Bank & Trust Company. This reflects the position of the custodian who is ultimately the master book of record. Custodian records are regularly reconciled with the Fund Managers' records. Using the custodian's valuations ensures that the various portfolios are priced consistently, so that the same stocks, in different portfolios, are valued on the same basis. Investments held in custody by State Street Bank & Trust Company on behalf of the Pension Fund, are ring-fenced from the assets of the Bank and segregated within its books as belonging to Gloucestershire County Council's Pension Fund.

N20. MANAGEMENT EXPENSES

Pension Fund expenses have been accounted for in accordance with the CIPFA guidance *Accounting for Local Government Pension Scheme Management Costs*.

MANAGEMENT EXPENSES	2020/21 £000	2021/22 £000
INVESTMENT MANAGEMENT EXPENSES *	10,146	16,306
ADMINISTRATION EXPENSES	1,556	1,553
OVERSIGHT & GOVERNANCE	500	671
	12,202	18,530

* Please see a more detailed breakdown of the investment management expenses below.

INVESTMENT MANAGEMENT EXPENSES 2021/22	MANAGEMENT FEES £000	PERFORMANCE FEES £000	TRANSACTION COSTS £000	TOTAL £000
BONDS	74	-	-	74
POOLED INVESTMENT VEHICLES	9,331	1,160	3,243	13,734
POOLED PROPERTY INVESTMENTS	1,038	165	245	1,448
DERIVATIVE CONTRACTS	-	-	7	7
BRUNEL PENSION PARTNERSHIP LTD.	969	-	-	969
	11,412	1,325	3,495	16,232
CUSTODY FEES				71
TAX AND LEGAL COSTS				3
				16,306

INVESTMENT MANAGEMENT EXPENSES 2020/21	MANAGEMENT FEES £000	PERFORMANCE FEES £000	TRANSACTION COSTS £000	TOTAL £000
BONDS	573	-	-	573
POOLED INVESTMENT VEHICLES	6,699	-	554	7,253
POOLED PROPERTY INVESTMENTS	1,040	-	-	1,040
DERIVATIVE CONTRACTS	-	-	142	142
BRUNEL PENSION PARTNERSHIP LTD.	1,049	-	-	1,049
	9,361	-	696	10,057
CUSTODY FEES				89
				10,146

Investment management expenses are generally set on a fixed fee basis, calculated using the market value of each portfolio. The cost of investment management expenses varies with the value of assets under management.

The increase on investment management expenses during the period of £6.2 million arose as a result of four key factors:

- + Two of the Private Debt funds starting to return profits from which fees were deducted which also included a performance fee of £1.2m.
- + The change in the Strategic Asset Allocation of the Fund and the final transitions to the Investment Pool and resultant transition costs.
- + An increase in the amount invested in private equity and infrastructure which attract a higher fee structure.
- + An increase in reported transaction costs.

CHANGE IN STRATEGIC ASSET ALLOCATION

In accordance with the agreed strategic asset allocation, the existing fixed interest holdings were sold and the proceeds invested in a Sterling Corporate Bond Fund and Multi Asset Credit Fund managed by Brunel. This move resulted in transition costs of £1,231k (transition costs £492k in 2020/21) and £132k in investment management costs. In addition the Fund sold its Low Carbon and Smart Beta pooled funds and invested in a Paris Aligned pooled fund to increase investments in climate solutions in line with the Paris goals, this resulted in transaction costs of £273k. These changes, which were supported by the Independent Investment advisor to the Fund, are designed to improve investment returns, and increase diversification and reduce investment risks to the Fund.

TRANSACTION AND TRANSITION COSTS

When an asset is purchased or sold a cost is incurred for broker commission and stamp duty, when appropriate, based on a small percentage of the value of assets being transacted. When an asset is directly held these costs are easily identified, when a pooled fund is held these indirect costs are less transparent as details of the underlying investments and transactions are not generally disclosed.

For the first time the Fund has included indirect transaction costs within the accounts to show a complete reflection of the costs. These costs have been identified from cost transparency templates provided by the investment managers as part of the LGPS Scheme Advisory Board Code of Transparency and Compliance initiative and accounts for the majority of the increase in transaction costs of £3,495k including transition costs of £1,231k compared to £696k (of which transition costs were £492k) in 2020/21.

As recommended by CIPFA transactions costs have been added to Investment Management Expenses with a corresponding offset against Profit on Disposal of Investments.

ADMINISTRATION EXPENSES AND OVERSIGHT & GOVERNANCE EXPENSES

Administration Expenses remained broadly even with a reduction in staff costs offset by an increase in IT and legal costs. Whilst the increase in Oversight & Governance was mainly due to increased actuarial fees in readiness for the triennial valuation and professional fees incurred in improving the Fund's corporate governance structure.

Within Oversight and Governance costs there were actuarial expenses of £61,330 (£87,680 2020/21) generated by specific employer requirements, these were recharged back to the employer. The corresponding income is included within Recoveries for Services Provided in the Fund Account.

In addition to the recharged actuarial expenses, recoveries for services provided includes £27,977 (£5,959 20/21) for pension and fee reimbursements.

AUDIT FEES

Audit fees of £45,206 (£22,575 in 2020/21) were incurred in relation to Grant Thornton UK LLP, the auditors appointed by Public Sector Audit Appointments Ltd. for external audit services.

N21. CASH

From the 1st April 2010 the Pension Fund has had its own bank account. At 31st March 2022 cash of £4.5m (£50.7m in 2020/21) was invested through the County Council's short-term investment procedures. During the year the average investment balance was £27.76m (£55.4m 2020/21) earning interest of £7k (£54.5k 2020/21).

N22. CURRENT & LONG TERM ASSETS

CURRENT ASSETS	2020/21 £000	2021/22 £000
CONTRIBUTIONS DUE - EMPLOYEES	925	1,100
CONTRIBUTIONS DUE - EMPLOYERS	4,049	4,156
SUNDRY DEBTORS	277	1,382
PAYMENT IN ADVANCE	275	5
	5,526	6,643
CASH BALANCES	50,668	4,495
	56,194	11,138

LONG TERM ASSETS	2020/21 £000	2021/22 £000
Long term debtors	308	181

It had been agreed that an employer who left the Fund could spread the payment of their deficit over a number of years. The total amount was credited to the Pension Fund and an accrual made for the outstanding amount. The accrual is rolled forward each year and adjusted for deficit payments made. A payment of £127,200 is due to the Pension Fund within the next twelve months and is included in Current Assets - Sundry Debtors.

N23. CURRENT LIABILITIES

	2020/21 £000	2021/22 £000
Benefits payable	-7	-13
Sundry creditors	-1,296	-1,473
	-1,303	-1,486

N24. ACTUARIAL PRESENT VALUE OF PROMISED RETIREMENT BENEFITS

In addition to the triennial funding valuation (See Note 6), the Fund's Actuary also undertakes a valuation of the Pension Fund liabilities on an IAS19 basis every year. The promised retirement benefits at 31st March 2022 have been projected using a roll forward approximation from the latest formal funding valuation as at 31st March 2019. The approximation involved in the roll forward model means that the split of benefits between the three classes of member may not be reliable.

However the Actuary is satisfied that the total figure is a reasonable estimate of the actuarial present value of benefit promises.

PRESENT VALUE OF PROMISED RETIREMENT BENEFITS	31ST MARCH 2021 £M	31ST MARCH 2022 £M
ACTIVE MEMBERS	1,881	1,900
DEFERRED MEMBERS	990	922
PENSIONERS	1,277	1,184
TOTAL	4,148	4,006

It should be noted that the above figures are appropriate only for the preparation of the Fund's accounts. They should not be used for any other purpose (i.e. comparing against liability measures on a funding basis or a cessation basis).

ASSUMPTIONS

The assumptions used are those adopted for the Administering Authority's IAS19 report and are different as at 31st March 2022 and 31st March 2021. It is estimated that the impact of the change in financial assumptions to 31st March 2022 is to decrease the actuarial present value by £309m (20/21 increase of £837m). It is estimated that the impact of the change in demographic assumptions is to decrease the actuarial present value by £20m (20/21 increase by £49m).

SIGNIFICANT ACTUARIAL ASSUMPTIONS USED

FINANCIAL ASSUMPTIONS	YEAR ENDED 31ST MARCH 2021 %PA	YEAR ENDED 31ST MARCH 2022 %PA
PENSION INCREASE RATE (CPI)	2.85	3.20
SALARY INCREASE RATE	3.15	3.50
DISCOUNT RATE	2.00	2.70

DEMOGRAPHIC ASSUMPTIONS

Life expectancy is based on the Fund's VitaCurves with improvements in line with the CMI 2021 model, with a 0% weighting of 2021 (and 2020) data, standard smoothing (Sk7), initial adjustment of 0.25% and a long term rate of improvement of 1.50% p.a. Based on these assumptions, the average future life expectancies at age 65 are summarised below.

LONGEVITY ASSUMPTIONS AS AT 31ST MARCH 2022	MALES	FEMALES
	YEARS	
CURRENT PENSIONERS	21.7	24.1
FUTURE PENSIONERS **	22.6	25.8

LONGEVITY ASSUMPTIONS AS AT 31ST MARCH 2021	MALES	FEMALES
	YEARS	
CURRENT PENSIONERS	21.9	24.3
FUTURE PENSIONERS **	22.9	26.0

** Future pensioners are assumed to be aged 45 at the latest formal valuation as at 31st March 2019.

Please note that the longevity assumptions have changed since the previous IAS26 disclosure for the Fund.

SENSITIVITY ANALYSIS

CIPFA guidance requires the disclosure of the sensitivity of the results to the methods and assumptions used. The sensitivities regarding the principal assumptions used to measure the obligations are set out below:

CHANGE IN ASSUMPTION AT 31ST MARCH 2022	APPROXIMATE INCREASE TO PROMISED RETIREMENT BENEFITS %	APPROXIMATE MONETARY AMOUNT £M
0.1% P.A. DECREASE IN THE DISCOUNT RATE	2	79
0.1% P.A. INCREASE IN THE SALARY INCREASE RATE	0	7
0.1% P.A. INCREASE IN THE PENSION INCREASE RATE (CPI)	2	72
1 YEAR INCREASE IN MEMBER LIFE EXPECTANCY	4	160

CHANGE IN ASSUMPTION AT 31ST MARCH 2021*	APPROXIMATE INCREASE TO PROMISED RETIREMENT BENEFITS %	APPROXIMATE MONETARY AMOUNT £M
0.5% P.A. DECREASE IN THE DISCOUNT RATE	10	424
0.5% P.A. INCREASE IN THE SALARY INCREASE RATE	1	37
0.5% P.A. INCREASE IN THE PENSION INCREASE RATE (CPI)	9	379
1 YEAR INCREASE IN MEMBER LIFE EXPECTANCY	3-5	n/a

* The percentage movements used in the Sensitivity Analysis for 31st March 2022 have changed from 0.5% to 0.1% so a direct comparison is not possible.

N25. NATURE AND EXTENT OF RISKS ARISING FROM FINANCIAL INSTRUMENTS

The Gloucestershire Pension Fund's ("The Fund") objective is to generate positive investment returns for a given level of risk. Therefore the Fund holds financial instruments such as collective investment schemes (or pooled funds), cash and cash equivalents and debtors and creditors (which arise as a result of its operations). The value of all these financial instruments in the financial statements approximates to their fair value.

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 on 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's investments are managed on behalf of the Fund via Brunel and its appointed Investment Managers. In addition the Fund also has a small number of directly appointed pooled funds. Each Investment Manager is required to invest the assets managed by them in accordance with the terms of their investment guidelines or pooled fund prospectus. The Gloucestershire Pension Fund Committee ("Committee") has determined that the investment management structure is appropriate and is in accordance with its investment strategy. The Committee regularly monitors each investment mandate and considers and takes advice on the nature of the investments made and associated risks.

The Fund's investments are held by State Street Bank & Trust Company, who act as custodian on behalf of the Fund.

Because the Fund adopts a long term investment strategy, the high level risks described below will not alter significantly during the year unless there are significant strategic or tactical changes in the portfolio.

MARKET RISK

Market risk represents the risk that the fair value of a financial instrument will fluctuate because of changes in market prices, interest rates or currencies. The Fund is exposed through its investments in equities, bonds and investment funds, to all these market risks. The aim of the investment strategy is to manage and control market risk within acceptable parameters, while optimising the return from the investment portfolio.

In general, excessive volatility in market risk is managed through the diversification of the portfolio in terms of geographical, industry sectors, individual securities, investment mandate guidelines and Investment Managers. The risk arising from exposure to specific markets is limited by the strategic asset allocation, which is regularly monitored by the Committee as well as appropriate monitoring of market conditions and benchmark analysis.

OTHER PRICE RISK

Other price risk represents the risk that the value of a financial instrument will fluctuate as a result of changes in market prices, caused by factors other than interest rate or foreign currency movements, whether those changes are caused by factors specific to the individual instrument, its issuer or factors affecting all such instruments in the market.

Market price risk arises from uncertainty about the future value of the financial instruments that the Fund holds. 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. Possible losses from shares sold short are unlimited. The Investment Managers mitigate this price risk through diversification in line with their own investment strategies and mandate guidelines.

OTHER PRICE RISK - SENSITIVITY ANALYSIS

The sensitivity of the Fund's investments to changes in market prices has been analysed using the volatility of return experienced by each investment portfolio during the year to 31st March 2022. The volatility data is broadly consistent with a one-standard deviation movement in the value of the assets. The analysis assumes that all other variables remain constant.

Movements in market prices would have increased or decreased the assets, as held by the Fund's custodian, at 31st March 2022 by the amounts shown below:

AS AT 31ST MARCH 2022	VALUE £000	VOLATILITY OF RETURN %	VALUE ON INCREASE £000	VALUE ON DECREASE £000
UK BONDS	365,269	8.10	394,856	335,682
OVERSEAS BONDS	200,543	8.10	216,787	184,299
UK EQUITIES	405,122	19.90	485,742	324,503
MULTI NATIONAL EQUITIES	1,628,477	18.50	1,929,745	1,327,208
UK PROPERTY	220,656	15.00	253,754	187,557
OVERSEAS PROPERTY	25,483	15.00	29,306	21,660
VENTURE CAPITAL/PRIVATE EQUITY / INFRASTRUCTURE	101,247	31.20	132,836	69,658
PRIVATE DEBT	77,027	9.00	83,959	70,095
	3,023,824		3,526,985	2,520,662
TOTAL GLOUCESTERSHIRE FUND	3,023,824	13.00%	3,416,921	2,630,727

Cash equivalents of £5,296k have been included in UK Bonds and £1,021k in Overseas Bonds. Both of these asset classes are invested in pooled funds. The above table does not include investment manager cash, cash instruments and debtors or the Brunel Pension Partnership shareholding, long term and current assets and current liabilities of £87,019k as these are not subject to price risk.

AS AT 31ST MARCH 2021	VALUE £000	VOLATILITY OF RETURN %	VALUE ON INCREASE £000	VALUE ON DECREASE £000
UK BONDS	333,654	8.00	360,346	306,962
OVERSEAS BONDS	235,774	8.00	254,636	216,912
UK EQUITIES	373,224	16.70	435,552	310,896
MULTI NATIONAL EQUITIES	1,583,011	16.60	1,845,791	1,320,231
UK PROPERTY	188,361	14.20	215,108	161,614
OVERSEAS PROPERTY	13,773	14.20	15,729	11,817
VENTURE CAPITAL/PRIVATE EQUITY / INFRASTRUCTURE	32,404	28.50	41,639	23,169
PRIVATE DEBT	65,070	4.60	68,063	62,077
	2,825,271		3,236,864	2,413,678
TOTAL GLOUCESTERSHIRE FUND	2,825,271	10.50%	3,121,924	2,528,618

The above table does not include investment manager cash, cash instruments and debtors or the Brunel Pension Partnership shareholding, derivative contracts, long term and current assets and current liabilities of £77,219k as these are not subject to price risk.

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 risk, which represents the risk that the fair value or future cash flows of a financial instrument will fluctuate due to changes in market interest rates. This risk will affect the value of both fixed interest and index linked securities. The amount of income receivable from cash balances will also be affected by fluctuations in interest rates.

The Funds exposure to interest rate movements, as a result of its investments in fixed interest pooled funds, as at the 31st March 2022 is set out below along with the interest rate sensitivity analysis data. Information supplied for 2020/21 relates to the Fund's directly held bond investments.

INTEREST RATE RISK SENSITIVITY ANALYSIS

The Council recognises that interest rates can vary and can affect both income to the Fund and the value of the net assets available to pay benefits. In the UK, the benchmark 10-year gilt yield rose from 0.97% to 1.61% in the March 2022 quarter,

a rise of 64bps. There was a respite in the upwards trend following the Russian invasion of Ukraine, but concern about inflation and more hawkish central bank rhetoric meant that the fall in yields proved to be temporary. The same pattern was visible in the US and Germany, where yields rose throughout the period but temporarily dipped around the onset of war in Ukraine: the benchmark treasury yield rose from 1.51% to 2.34% in the March 2022 quarter, while the 10-year bund yield rose from -0.14% to 0.55%. Given the high degree of uncertainty over the future economic situation, the Fund's bond manager has advised that it is entirely possible that yields could fluctuate anywhere within this historic range in the next year, or in extreme circumstances outside these boundaries.

Changes in interest rates do not impact on the value of cash and cash equivalents but they will affect the interest income received on those balances.

The analysis that follows assumes that all other variables, in particular, exchange rates, remain constant and shows the effect in the year on the values of a +/- 100bps (1%) change in interest rates on a time-weighted basis.

ASSETS EXPOSED TO INTEREST RATE RISK	CARRYING AMOUNT AS AT 31ST MARCH 2022 £000	CHANGE IN THE YEAR IN THE NET ASSETS AVAILABLE TO PAY BENEFITS	
		+100BPS (1% INCREASE) £000	-100BPS (1% DECREASE) £000
CASH HELD DIRECTLY BY THE FUND	4,495	-	-
CASH AND CASH EQUIVALENTS HELD ON BEHALF OF THE FUND	75,988	-	-
BOND PORTFOLIO - FIXED INTEREST SECURITIES	565,812	-32,423	32,423
	646,295	-32,423	32,423

In the above table, cash equivalents of £6,317k are included in the Bond Portfolio - Fixed Interest Securities, which are held in pooled funds.

ASSETS EXPOSED TO INTEREST RATE RISK	CARRYING AMOUNT AS AT 31ST MARCH 2021 £000	CHANGE IN THE YEAR IN THE NET ASSETS AVAILABLE TO PAY BENEFITS	
		+100BPS (1% INCREASE) £000	-100BPS (1% DECREASE) £000
CASH HELD DIRECTLY BY THE FUND	50,668	-	-
CASH AND CASH EQUIVALENTS HELD ON BEHALF OF THE FUND	15,816	-	-
BOND PORTFOLIO - FIXED INTEREST SECURITIES	551,606	-32,568	32,568
	618,090	-32,568	32,568

FOREIGN CURRENCY RISK

Foreign 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 both monetary and non-monetary investments denominated in a currency other than Sterling. For a Sterling based investor, when Sterling weakens, the Sterling value of foreign currency denominated investments rises. As Sterling strengthens, the Sterling value of foreign currency denominated investment falls. The Fund's allocation to passive global developed world equities is held in a currency hedged share class, thereby providing the Fund with a certain level of currency exposure protection.

CURRENCY RISK SENSITIVITY ANALYSIS

Following analysis of historical data, by the Fund's performance measurement service, the likely volatility associated with foreign exchange rate movements is considered to be 7% (as measured by one standard deviation).

This analysis assumes that all other variables, in particular interest rates, remain constant.

A 7% strengthening/weakening of the Pound against the various countries in which the Fund holds investments would increase/decrease the net assets available to pay benefits as follows:

2021/22 CURRENCY EXPOSURE - ASSET TYPE	ASSET VALUE AS AT 31ST MARCH 2022	CHANGE TO NET ASSETS AVAILABLE TO PAY BENEFITS	
	£000	£000 +7%	£000 -7%
UK EQUITIES*	1,470	1,573	1,367
GLOBAL EQUITIES	1,194,914	1,278,558	1,111,270
GLOBAL BONDS	34,221	36,616	31,826
OVERSEAS PRIVATE DEBT	33,235	35,561	30,909
OVERSEAS PROPERTY	25,483	27,267	23,699
VENTURE CAPITAL /PRIVATE EQUITY/ INFRASTRUCTURE	43,284	46,314	40,254
DIVERSIFIED GROWTH	16,754	17,927	15,581
CASH/CASH EQUIVALENTS	5,868	6,279	5,457
	1,355,229	1,450,095	1,260,363

* Amount of overseas currency within the Brunel UK Equity Pooled Fund.

2020/21 CURRENCY EXPOSURE - ASSET TYPE	ASSET VALUE AS AT 31ST MARCH 2021	CHANGE TO NET ASSETS AVAILABLE TO PAY BENEFITS	
	£000	£000 +6.9%	£000 -6.9%
UK EQUITIES	-	-	-
GLOBAL EQUITIES	1,140,344	1,219,028	1,061,660
EMERGING MARKET EQUITIES	-	-	-
OVERSEAS PRIVATE DEBT	32,611	34,861	30,361
VENTURE CAPITAL /PRIVATE EQUITY/ INFRASTRUCTURE	-	-	-
DIVERSIFIED GROWTH	10,651	11,386	9,916
CASH/CASH EQUIVALENTS	739	790	688
	1,184,345	1,266,065	1,102,625

CREDIT RISK

Credit risk represents the risk that the counterparty to a transaction or financial instrument will fail to discharge an obligation and cause the Fund to incur a financial loss. This is often referred to as counterparty risk.

In essence the Fund's entire investment portfolio is exposed to some form of credit risk, with the exception of the derivatives positions, where the risk equates to the net market value of a positive derivative position. However, the careful selection and monitoring of counterparties including brokers, custodian and investment managers minimises any credit risk that may occur through the failure to settle transactions in a timely manner. The Fund's contractual exposure to credit risk is represented by the net payment or receipt that remains outstanding, and the cost of replacing the derivative position in the event of a counterparty default. The residual risk is minimal due to the various insurance policies held by the exchanges to cover defaulting counterparties.

Bankruptcy or insolvency of the custodian may affect the Fund's access to its assets. However, all assets held by the custodian are ring-fenced as "client assets" and therefore cannot be claimed by creditors of the custodian. Brunel, on behalf of the Fund, manages the risk by monitoring the credit quality and financial position of the custodian.

Credit risk on over the counter derivative contracts is minimised as counterparties are recognised financial intermediaries with acceptable credit ratings determined by a recognised rating agency.

The Fund's bond pooled funds have significant credit risk through their underlying investments. This risk is managed through diversification across sovereign and corporate entities, credit quality and maturity of bonds. The market prices of bonds incorporate an assessment of credit quality in their valuation which reflects the probability of default (the yield of a bond will include a premium that will compensate for the risk of default).

The Fund believes it has managed its exposure to credit risk within an acceptable level and its default experience over the last five financial years is not significantly out of line with the industry.

Another source of credit risk is the cash balances held to meet operational requirements or by the managers at their discretion. Internally held cash is managed on the Fund's behalf by the Council's Treasury Management Team in line with the Fund's Treasury Management Policy which sets out the permitted counterparties and limits. The Fund invests surplus cash held with the custodian in diversified money market funds.

Through its securities lending activities, the Fund is exposed to the counterparty risk of the collateral provided by borrowers against the securities lent. This risk is managed by restricting the collateral permitted.

Foreign exchange contracts are subject to credit risk in relation to the counterparties of the contracts which are primarily banks. The maximum credit exposure on foreign currency contracts is any net profit on forward contracts, should the counterparty fail to meet its obligations to the Fund when it falls due.

The credit risk within the bond pooled funds can be analysed using standard industry credit ratings and the analysis as at 31st March 2022 is set out below. Information supplied for 2020/21 relates to the Fund's directly held bond investments and has been categorised slightly differently.

CREDIT ANALYSIS 31ST MARCH 2022	AAA £000	AA+ TO AA- £000	A+ TO A- £000	BBB+ TO BBB- £000	BB+ TO BB- £000	B+ TO B- £000	CCC+ TO C- £000	UNRATED £000
UK CORPORATE BONDS	19,511	20,231	79,446	203,133	15,047	9,359	-	13,247
GLOBAL BONDS	2,451	159	3,607	18,472	36,048	90,031	40,831	7,672
	21,962	20,390	83,053	221,605	51,095	99,390	40,831	20,919
% OF FIXED INTEREST POOLED FUNDS	3.9	3.6	14.9	39.6	9.1	17.8	7.3	3.7

Cash equivalents held in the Bond Portfolio pooled funds of £6,317k have not been included in the credit analysis table above but are included in the market value of the Bond Portfolio pooled funds in Note 12.

CREDIT ANALYSIS 31ST MARCH 2021	AAA £000	AA £000	A £000	BBB £000	BB £000	B £000	UNRATED £000
UK GILTS	-	35,621	-	-	-	-	-
OVERSEAS GOVT BONDS	9,224	-	-	-	-	-	-
CORPORATE BONDS	-	15,468	149,081	110,538	7,130	4,109	1,160
ASSET BACKED	1,098	5,483	4,966	19,044	2,296	-	-
EMERGING MARKETS	-	-	3,796	824	1,023	30	-
MORTGAGE BACKED SECURITIES	-	1,908	-	-	-	-	-
CASH/CASH EQUIVALENTS/ CURRENCY FORWARDS/ DERIVATIVES	2	1	-	-	-	-	8,527
	10,324	58,481	157,843	130,406	10,449	4,139	9,687
% OF FIXED INTEREST PORTFOLIO	2.7	15.3	41.4	34.2	2.7	1.1	2.6

TREASURY MANAGEMENT YEAR END CASH BALANCES

The management of Pension Fund cash balances not held by the Custodian is delegated to Gloucestershire County Council's Treasury Management team to manage in accordance with their Treasury Management Strategy, which reflects the CIPFA Code of Practice on Treasury Management in Public Services. Pension Fund cash is invested separately from Gloucestershire County Council monies.

The Fund's cash holding under its treasury management arrangements at 31st March 2022 is shown below:

ACCOUNT NAME	BALANCES AS AT 31ST MARCH 2021		BALANCES AS AT 31ST MARCH 2022	
	RATING*	£000	RATING*	£000
ABERDEEN STANDARD LIQUIDITY FUND	AAAm	10,000	AAAm	2,636
FEDERATED SHORT TERM STERLING PRIME FUND	AAAm	10,000	AAAm	1,274
GOLDMAN SACHS	AAAm	9,483	AAAm	-
HSBC INSTANT ACCESS	A-1	21,210	A-1	-
LLOYDS INSTANT ACCESS		-	A-1	545
HSBC CURRENT ACCOUNT	A-1	-25	A-1	20
LLOYDS CURRENT ACCOUNT		-	A-1	20
		50,668		4,495

* Ratings quoted are all Standard and Poors as at 31st March 2022 and 2021.

Credit risk may also occur if an employing body not supported by central government does not pay contributions promptly, or defaults on its obligations. The Pension Fund has not experienced any actual defaults in recent years and in the past the Fund has obtained a guarantee before admitting new employers so that all pension obligations are covered in the event of that employer facing financial difficulties. More recently the Fund has also admitted certain employers on a pass-through basis where the risks inherent in participating in the LGPS are shared between the new employer and the letting employer who is supported by central government. Contributions due as at 31st March 2022 was £5,256k (2020/21 £4,974k) and as at 26th May 2022 £50k remained outstanding.

LIQUIDITY RISK

Liquidity risk represents the risk that the Fund will not be able to meet its financial obligations as they fall due. The Council therefore takes steps to ensure that the Pension Fund has adequate cash resources to meet its commitments.

A substantial portion of the Fund's investments consist of readily realisable securities, in particular equities and fixed income investments, even though they are held in pooled funds. However, the main liability of the Fund are the benefits payable, which fall due over a long period and the investment strategy reflects the long term nature of these liabilities.

Therefore the Fund is able to manage the liquidity risk that arises from its investments in less liquid asset classes such as property which are subject to longer redemption periods and cannot be considered as liquid as the other investments. The Fund maintains a cash balance to meet working requirements and has immediate access to its cash holdings.

REFINANCING RISK

Refinancing risk relates to the Fund being required to replenish a significant proportion of its financial instruments at a time of unfavourable interest rates. Refinancing risk within the Pooled Bond Funds is mitigated through credit and liquidity analysis of all investments and diversification by issuer and maturity. The Brunel property portfolio managed on behalf of the Pension Fund is not leveraged or subject to refinancing risk. However, the underlying investments within this portfolio are leveraged and so may be subject to refinancing risk. This risk is mitigated by covenants written into the Fund documentation. There are no other financial instruments that have refinancing risk as part of its treasury management and investment strategies.

N26. FAIR VALUE HIERARCHY

BASIS OF VALUATION

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.

DESCRIPTION OF ASSET	VALUATION HIERARCHY	VALUE AT 31ST MARCH 2022 £000	BASIS OF VALUATION	OBSERVABLE AND UNOBSERVABLE INPUTS	KEY SENSITIVITIES AFFECTING THE VALUATIONS PROVIDED
DERIVATIVE CONTRACTS - FUTURES	Level 1	-	Published exchange prices at the year end.	Not required.	Not required.
CASH DEPOSITS	Level 1	44,514	Cash held in foreign currencies are shown at market value translated into Sterling at the exchange rates prevailing as at 31st March 2022.	Not required.	Not required.
INVESTMENT INCOME & TAX RECLAIMS DUE	Level 1	1,078	Investment income is accounted for when a holding is declared ex-dividend and tax relaims accounted for when tax is deducted from investment income. Income and tax relaims due in foreign currencies are shown at market value translated into Sterling at the exchange rates prevailing at 31st March 2022.	Not required.	Not required.
AMOUNTS RECEIVABLE FOR INVESTMENT SALES	Level 1	51	Amounts receivable due in foreign currencies are shown at market value translated into Sterling at the exchange rates prevailing at 31st March 2022.	Not required.	Not required.
BONDS	Level 2	-	Fixed interest securities are valued at a market value based on current yields.	Source of pricing, valuation methodology documentation.	Not required.
DERIVATIVE CONTRACTS - FORWARD FOREIGN EXCHANGE DERIVATIVES	Level 2	-	Market forward exchange rates at the year-end.	Exchange rate risks.	Not required.

DESCRIPTION OF ASSET	VALUATION HIERARCHY	VALUE AT 31ST MARCH 2022 £000	BASIS OF VALUATION	OBSERVABLE AND UNOBSERVABLE INPUTS	KEY SENSITIVITIES AFFECTING THE VALUATIONS PROVIDED
POOLED INVESTMENT VEHICLES	Level 2	2,599,410	Closing bid price where bid and offer prices are published. Closing single price where single price published.	NAV based pricing set on a forward pricing basis and prices published frequently.	Not required.
POOLED PROPERTY INVESTMENTS	Level 2	221,682	Closing bid price where bid and offer prices are published. Closing single price where single price published.	NAV based pricing set on a forward pricing basis. Ease of redemption.	Not required.
CASH INSTRUMENTS HELD ON BEHALF OF THE INVESTMENT MANAGERS	Level 2	35,969	Net Asset Value.	Interest rates.	Not required.
PRIVATE EQUITY	Level 3	41,143	Fair value basis applied in accordance with International Financial Reporting Standards and International Private Equity Valuation guidelines.	EBITDA multiple, Revenue multiple, Discount for lack of marketability, Control premium.	Valuations could be affected by material events occurring between the date of the financial statements provided and the Pension Fund's own reporting date, by changes to expected cash flows, and by any differences between audited and unaudited accounts.

DESCRIPTION OF ASSET	VALUATION HIERARCHY	VALUE AT 31ST MARCH 2022 £000	BASIS OF VALUATION	OBSERVABLE AND UNOBSERVABLE INPUTS	KEY SENSITIVITIES AFFECTING THE VALUATIONS PROVIDED
PRIVATE DEBT	Level 3	77,027	The fair value of funds managed by Arcmont and Golub is determined by the enterprise value of a portfolio company, the nature and realisable value of any collateral, its ability to make payments and its earnings, discounted cash flows, market environment and changes in the interest rate environment. For the Private Debt fund managed by Brunel, a fair value basis is applied in accordance with International Financial Reporting Standards and International Private Equity Valuation guidelines.	Initial recognition cost, Principal repayments, effective interest method, impairment reductions.	Valuations could be affected by material events occurring between the date of the financial statements provided and the Pension Fund's own reporting date, by changes to expected cash flows, and by any differences between audited and unaudited accounts.
INFRASTRUCTURE	Level 3	60,104	Fair value basis applied in accordance with International Financial Reporting Standards and International Private Equity Valuation guidelines.	Future free cash flows from underlying investments. Cost of capital of underlying investments.	Valuations could be affected by material events occurring after the preparation of the independent reports, and by changes to expected cash flows.

FAIR VALUE HIERARCHY

The Fund is required to classify its investments using a fair value hierarchy that reflects the subjectivity of the inputs used in making an assessment of fair value. Fair value is the value at which the investments could be realised within a reasonable timeframe. This hierarchy is not a measure of investment risk but a reflection of the ability to value the investments at fair value. Asset and liability valuations have been classified into three levels, according to the quality and reliability of information used to determine fair values. Transfers between levels are recognised in the year in which they occur. The fair value hierarchy has the following levels:

- + Level 1 – Unadjusted quoted prices in an active market for identical assets or liabilities that the reporting entity has the ability to access at the measurement date. Products classified as Level 1 comprise quoted equities, quoted fixed interest securities and quoted index linked securities.
- + Level 2 – Inputs other than quoted market prices under Level 1, for example, when an instrument is traded in a market that is not considered to be active, or where valuation techniques are used to determine fair value.
- + Level 3 – At least one input that could have a significant effect on the instrument's valuation is not based on observable market data.

The following table provides an analysis of the financial assets and liabilities of the Pension Fund grouped into levels 1 to 3, based on the level at which the fair value is observable.

VALUES AT 31ST MARCH 2022	QUOTED MARKET PRICE	USING OBSERVABLE INPUTS	WITH SIGNIFICANT UNOBSERVABLE INPUTS	TOTAL
	LEVEL 1	LEVEL 2	LEVEL 3	
	£000	£000	£000	£000
FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT AND LOSS				
BONDS	-	-	-	-
POOLED INVESTMENT VEHICLES	-	2,599,410	-	2,599,410
POOLED PROPERTY INVESTMENTS	-	221,682	24,456	246,138
PRIVATE EQUITY	-	-	41,143	41,143
INFRASTRUCTURE	-	-	60,104	60,104
PRIVATE DEBT	-	-	77,027	77,027
DERIVATIVE CONTRACTS	-	-	-	-
CASH INSTRUMENTS HELD ON BEHALF OF THE INVESTMENT MANAGERS	-	35,969	-	35,969
CASH DEPOSITS	44,514	-	-	44,514
INVESTMENT INCOME AND TAX RECLAIMS DUE	1,078	-	-	1,078
AMOUNTS RECEIVABLE FOR INVESTMENT SALES	51	-	-	51
	45,643	2,857,061	202,730	3,105,434
NON-FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT AND LOSS	-	-	-	-
FINANCIAL LIABILITIES AT FAIR VALUE THROUGH PROFIT AND LOSS	-	-	-	-
AMOUNTS PAYABLE FOR INVESTMENT PURCHASES	-	-	-	-
NET INVESTMENT ASSETS	45,643	2,857,061	202,730	3,105,434
BRUNEL PENSION PARTNERSHIP LTD.				71
DEBTORS / CREDITORS *				5,338
TOTAL NET INVESTMENT ASSETS	45,643	2,857,061	202,730	3,110,843

VALUES AT 31ST MARCH 2021	QUOTED MARKET PRICE	USING OBSERVABLE INPUTS	WITH SIGNIFICANT UNOBSERVABLE INPUTS	TOTAL
	LEVEL 1	LEVEL 2	LEVEL 3	
	£000	£000	£000	£000
FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT AND LOSS	583	2,592,456	246,053	2,839,092
NON-FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT AND LOSS	-	-	-	-
FINANCIAL LIABILITIES AT FAIR VALUE THROUGH PROFIT AND LOSS	-789	-	-	-789
INVESTMENT MANAGER CASH AND ACCRUALS				8,876
NET INVESTMENT ASSETS	-206	2,592,456	246,053	2,847,179
BRUNEL PENSION PARTNERSHIP LTD.				112
INVESTMENT DEBTORS/CREDITORS *				55,199
TOTAL NET INVESTMENT ASSETS	-206	2,592,456	246,053	2,902,490

* Debtors and creditors have been added to this table to reflect the total net assets of the Fund.

TRANSFERS BETWEEN LEVELS 1 AND 2

There has been no movement between levels 1 & 2.

SENSITIVITY OF ASSETS VALUED AT LEVEL 3

Having consulted with independent advisors, who model 5,000 possible outcomes of future behaviour of each economic variable and asset return, the Fund has determined that the valuation methods described above are likely to be accurate to within the following ranges, and has set out below the consequent potential impact on the closing value of investments held at 31st March 2022.

2021/22	ASSESSED VALUATION RANGE (+/-)	VALUE AT 31ST MARCH 2022 £000	VALUE ON INCREASE £000	VALUE ON DECREASE £000
UK POOLED PROPERTY INVESTMENTS	15.0%	14,425	16,589	12,261
OVERSEAS POOLED PROPERTY INVESTMENTS	15.0%	10,031	11,535	8,526
PRIVATE EQUITY/INFRASTRUCTURE	31.2%	101,247	132,836	69,658
UK BONDS	8.1%	-	-	-
UK PRIVATE DEBT	9.0%	43,799	47,740	39,857
OVERSEAS PRIVATE DEBT	9.0%	33,228	36,219	30,237
TOTAL		202,730	244,919	160,539

2020/21	ASSESSED VALUATION RANGE (+/-)	VALUE AT 31ST MARCH 2021 £000	VALUE ON INCREASE £000	VALUE ON DECREASE £000
UK POOLED PROPERTY INVESTMENTS	14.2%	145,184	165,800	124,568
OVERSEAS POOLED PROPERTY INVESTMENTS	14.2%	-	-	-
PRIVATE EQUITY/INFRASTRUCTURE	28.5%	32,404	41,639	23,169
UK BONDS	8.0%	3,395	3,667	3,123
UK PRIVATE DEBT	4.6%	33,360	34,895	31,825
OVERSEAS PRIVATE DEBT	4.6%	31,710	33,169	30,251
TOTAL		246,053	279,170	212,936

All movements in the assessed valuation range of the above investments derive from changes in the underlying profitability of component companies, the range of the potential movement quoted is caused by how this profitability is measured and the economic circumstances in which the component company operates.

RECONCILIATION OF FAIR VALUE MEASUREMENTS WITHIN LEVEL 3

2021/22	UK POOLED PROPERTY INVESTMENTS £000	OVERSEAS POOLED PROPERTY INVESTMENTS £000	PRIVATE EQUITY / INFRASTRUCTURE £000	OVERSEAS PRIVATE DEBT £000	UK PRIVATE DEBT £000	UK BONDS £000	TOTAL £000
MARKET VALUE 31ST MARCH 2021	145,184	-	32,404	31,710	33,360	3,395	246,053
TRANSFERS INTO LEVEL 3*	7,509	-	-	-	-	-	7,509
TRANSFERS OUT OF LEVEL 3*	-137,838	-	-	-	-	-	-137,838
PURCHASES DURING THE YEAR AND DERIVATIVE PAYMENTS	1,863	9,339	62,177	-	23,787	1,931	99,097
SALES DURING THE YEAR AND DERIVATIVE RECEIPTS	-3,183	-	-3,516	-	14,496	-5,824	1,973
UNREALISED GAINS/ (LOSSES)	670	691	10,257	-2,468	-28,071	-	-18,921
REALISED GAINS/ (LOSSES)	220	1	-75	3,986	227	498	4,857
MARKET VALUE 31ST MARCH 2022	14,425	10,031	101,247	33,228	43,799	-	202,730

2020/21	UK POOLED PROPERTY INVESTMENTS £000	OVERSEAS POOLED PROPERTY INVESTMENTS £000	PRIVATE EQUITY / INFRASTRUCTURE £000	OVERSEAS PRIVATE DEBT £000	UK PRIVATE DEBT £000	UK BONDS £000	TOTAL £000
MARKET VALUE 31ST MARCH 2020	170,116	-	17,111	33,363	30,752	17,699	269,041
TRANSFERS INTO LEVEL 3**	2,963	-	-	-	-	-	2,963
TRANSFERS OUT OF LEVEL 3**	-24,064	-	-	-	-	-14,369	-38,433
PURCHASES DURING THE YEAR AND DERIVATIVE PAYMENTS	25	-	23,501	-	2,540	-	26,066
SALES DURING THE YEAR AND DERIVATIVE RECEIPTS	-	-	-8,644	-	-93	-52	-8,789
UNREALISED GAINS/ (LOSSES)	-3,856	-	450	-1,653	161	121	-4,777
REALISED GAINS/ (LOSSES)	-	-	-14	-	-	-4	-18
MARKET VALUE 31ST MARCH 2021	145,184	-	32,404	31,710	33,360	3,395	246,053

When assigning holdings to a level in the fair value hierarchy, consideration is given to the Fund's ability to exit the holding. For holdings not traded on a recognised exchange but where a published price exists and investors are entitled to redeem their holding without restriction, holdings are assigned to level 2. Where there are restrictions on redemption, holdings are assigned to level 3.

* On the 1st April 2021, £137.8m of UK Pooled Property Investments were transferred from level 3 to level 2 due to the restrictions on redemption easing. Similarly £7.5m of UK Pooled Property Investments were transferred from level 2 to level 3 due to restrictions on redemption.

** Following further information received, on the 1st April 2020 £24.1m of Pooled Property Investment was transferred from level 3 to level 2 and £3m Pooled Property Investment was transferred from level 2 to level 3.

In the quarter ending March 2021, £14.4m of UK Corporate Bonds were transferred from level 3 to level 2 due to there being more observed trading activity to corroborate the fair values given.

N27. FINANCIAL INSTRUMENT DISCLOSURE

2021/22 FINANCIAL ASSETS	FAIR VALUE THROUGH PROFIT AND LOSS £000	ASSETS AT AMORTISED COST £000	LIABILITIES AT AMORTISED COST £000
BONDS	-	-	-
POOLED INVESTMENT VEHICLES	2,773,831	-	-
POOLED PROPERTY INVESTMENTS	246,138	-	-
VENTURE CAPITAL/PRIVATE EQUITY	3,853	-	-
BRUNEL PENSION PARTNERSHIP LTD.	71	-	-
DERIVATIVE CONTRACTS	-	-	-
CASH	75,988	4,495	-
OTHER INVESTMENT BALANCES	-	1,129	-
DEBTORS	-	1,387	-
	3,099,881	7,011	-
FINANCIAL LIABILITIES			
DERIVATIVE CONTRACTS	-	-	-
OTHER INVESTMENT BALANCES	-	-	-
CREDITORS	-	-	-1,473
BORROWINGS	-	-	-
	-	-	-1,473
	3,099,881	7,011	-1,473

2020/21 FINANCIAL ASSETS	FAIR VALUE THROUGH PROFIT AND LOSS £000	ASSETS AT AMORTISED COST £000	LIABILITIES AT AMORTISED COST £000
BONDS	360,751	-	-
POOLED INVESTMENT VEHICLES	2,257,529	-	-
POOLED PROPERTY INVESTMENTS	202,134	-	-
VENTURE CAPITAL/PRIVATE EQUITY	4,856	-	-
BRUNEL PENSION PARTNERSHIP LTD.	112	-	-
DERIVATIVE CONTRACTS	1,106	-	-
CASH	-	66,484	-
OTHER INVESTMENT BALANCES	-	5,800	-
DEBTORS	-	552	-
	2,826,488	72,836	-
FINANCIAL LIABILITIES			
DERIVATIVE CONTRACTS	-813	-	-
OTHER INVESTMENT BALANCES	-	-	-
CREDITORS	-	-	-1,296
BORROWINGS	-	-	-
	-813	-	-1,296
	2,825,675	72,836	-1,296

N27a. NET GAINS AND LOSSES ON FINANCIAL INSTRUMENTS

FINANCIAL ASSETS	2020/21 £000	2021/22 £000
FAIR VALUE THROUGH PROFIT AND LOSS	590,652	197,484
AMORTISED COST - REALISED GAINS ON DE-RECOGNITION OF ASSETS	-	-
AMORTISED COST - UNREALISED GAINS	-	-
FINANCIAL LIABILITIES		
FAIR VALUE THROUGH PROFIT AND LOSS	-	-
AMORTISED COST - REALISED LOSSES ON DE-RECOGNITION OF ASSETS	-	-
AMORTISED COST - UNREALISED LOSSES	-	-
	590,652	197,484

All realised gains and losses arise from the sale or disposal of financial assets which have been derecognised in the financial statements.

The Fund has not entered into any financial guarantees that are required to be accounted for as financial instruments.

N28. BULK TRANSFERS IN & OUT OF THE PENSION FUND

TRANSFERS TO OR FROM OTHER PENSION FUNDS

During 2021/22 a bulk transfer value of £1,069k was paid to another local authority pension fund in respect of a group of employees moving between funds (£0 2020/21).

N29. ACCOUNTING STANDARDS THAT HAVE BEEN ISSUED BUT HAVE NOT YET BEEN ADOPTED

The Code requires consideration of the impact of standards that have been issued but not yet adopted. This is to enable users to evaluate the risk of these new standards on the Pension Fund's current financial position.

Amendments to IFRS1 (First-time adoption), IAS37 (Onerous contracts), IFRS16 (Leases), IAS41 (Agriculture) and IAS16 (Property, plant and Equipment) have been issued. These will not have an impact on the Pension Fund and are therefore considered to be immaterial.

N30. TAXATION WHERE LIFETIME OR ANNUAL ALLOWANCES ARE EXCEEDED

Where a member's benefit entitlement exceeds the United Kingdom Inland Revenue tax limits (Lifetime Allowance or the Annual Allowance), the member is liable for taxation. This tax can be paid by the member or has to be paid by the Pension Fund on behalf of the member in exchange for a reduction in benefit entitlement. The Pension Fund has paid £63k on behalf of members during 2021/22 (£67k 2020/21). Any lifetime or annual allowance tax paid on behalf of members is recovered from their future pension payments. No accruals are made for the recovery of this tax element on the grounds of materiality and the very long term nature of its recovery.

N31. EVENTS AFTER THE REPORTING DATE

Following the turmoil in markets towards the latter part of 2022 there is a potential for a reduction in the Pension Fund's future income and investment returns and an increase in expenditure in the form of additional costs.

It is not possible to reliably estimate the duration and severity of these consequences and their impact on the financial position and performance of the Pension Fund. As investments are valued at fair value and any profits and losses only realised upon sale it has been determined that the turmoil in markets should be treated as a non-adjusting event and the financial position for the year ended 31st March 2022 has not been adjusted.



12

| ASSET POOLS

12 ASSET POOLS

INVESTMENT POOLING BRUNEL PENSION PARTNERSHIP

In 2015 the Department of Communities and Local Government (as it then was) issued LGPS: Investment Reform Criteria and Guidance which set out how the government expected funds to establish asset pooling arrangements. The objective was to deliver:

- + Benefits of scale
- + Strong governance and decision making
- + Reduced costs and excellent value for money, and
- + An improved capacity and capability to invest in infrastructure

This has led to the creation of eight asset pools which have significantly changed the previous approach to investing, although it should be stressed that the responsibility for determining asset allocations and the investment strategy remains with individual pension funds.

As a result of the investment pooling agenda, the Gloucestershire Fund joined with nine other LGPS administering authorities to set up the Brunel Pension Partnership. Gloucestershire County Council approved the business case for Brunel in December 2016, based on estimated potential fee savings of £550 million over a 20 year period across the ten funds, of which Gloucestershire's share was estimated to be £10.8 million. This estimated fee saving is much lower than for the majority of Funds in Brunel, due to the fact that the investment management fees being paid by the Gloucestershire Fund were generally lower than those paid by the other Funds in Brunel.

The project will see initial net costs in the early years primarily due to transition costs but will break even in the future as fee savings are delivered. With regard to the Gloucestershire Fund the original business case forecasts that the Fund would break even by 2029.

GOVERNANCE ARRANGEMENTS OF THE POOL

The governance arrangement in place between the pool and the ten funds involves two types of representation:

1. Oversight Board made up of one representative from each Pensions Committee and two member-representative observers.
2. Client Group made up of senior officers from each of the ten funds

Further details of the role and involvement of administering authorities in the governance arrangements of the pool can be found within Brunel's annual report for the year ended 30th September 2021; a copy of which can be found at the following address:

[Brunel-Pension-Partnership-Annual-Report-Financial-Statements-2020-21.pdf \(brunelpensionpartnership.org\)](#)

POOL SET UP COSTS AND SAVINGS

The expected costs and savings for the Gloucestershire Pension Fund, as per the original business case approved in December 2016, and then submitted to Government, are set out in the following table:

GLOUCESTERSHIRE PENSION FUND EXPECTED COSTS AND SAVINGS FROM POOLING (AS PER BUSINESS CASE SUBMISSIONS)

	2016/17 £000	2017/18 £000	2018/19 £000	2019/20 £000	2020/21 £000	2021/22 £000
SET UP COSTS	117	1,034	-	-	-	-
ONGOING BRUNEL COSTS	-	-	413	535	552	570
CLIENT SAVINGS	-	-	(64)	(66)	(68)	(70)
TRANSITION COSTS	-	-	1,327	2,652	13	-
FEE SAVINGS	-	-	(171)	(557)	(898)	(965)
NET COSTS (REALISED SAVINGS)	117	1,034	1,505	2,564	(401)	(465)

	2022/23 £000	2023/24 £000	2024/25 £000	2025/26 £000	2026/36 £000	TOTAL £000
SET UP COSTS	-	-	-	-	-	1,151
ONGOING BRUNEL COSTS	588	607	627	647	7,742	12,281
CLIENT SAVINGS	(72)	(74)	(76)	(78)	(924)	(1,492)
TRANSITION COSTS	-	-	-	-	-	3,992
FEE SAVINGS	(1,037)	(1,111)	(1,191)	(1,274)	(19,514)	(26,718)
NET COSTS (REALISED SAVINGS)	(521)	(578)	(640)	(705)	(12,696)	(10,786)

Following approval of the business case, Brunel was established in July 2017, as a company wholly owned by the Administering Authorities (in equal shares) that participate in the pool. The company is authorised by the Financial Conduct Authority (FCA). It is responsible for implementing the detailed Strategic Asset Allocations of the participating funds by investing Funds' assets within defined outcome focused investment portfolios. In particular, it researches and selects the external managers or pooled funds needed to meet the investment objective of each portfolio.

Now that Brunel is operational, the financial performance of the pool will be monitored to ensure that Brunel is delivering on the key objectives of investment pooling. This includes reporting of the costs associated with the appointment and management of the pool company including set up costs, investment management expenses and the oversight and monitoring of Brunel by the client funds. The set up and transition costs incurred to date are set out in the following table:

BRUNEL PARTNERSHIP SET UP COSTS

GLoucestershire 2021/22	DIRECT £000	INDIRECT £000	TOTAL 2021/22 £000	CUMULATIVE £000
SET UP COSTS				
RECRUITMENT	-	-	-	18
LEGAL	-	-	-	133
CONSULTING, ADVISORY & PROCUREMENT	-	-	-	82
OTHER SUPPORT COSTS E.G.IT, ACCOMMODATION	-	-	-	0
SHARE PURCHASE / SUBSCRIPTION COSTS	-	-	-	840
OTHER WORKING CAPITAL PROVIDED E.G. LOANS	-	-	-	-
STAFF COSTS	-	-	-	-
TOTAL SET UP COSTS	-	-	-	1,073
TRANSITION COSTS				
TRANSITION FEE	-	204	204	376
TAX	-	-	-	894
OTHER TRANSITION COSTS	-	1,250	1,250	6,025
TOTAL TRANSITION COSTS	-	1,454	1,454	7,295

The Gloucestershire Fund transitioned its first assets to Brunel in July 2018, with investments being made to the following portfolios between 2018/19 and 2020/21:

- + Global Developed Passive Equities
- + Smart Beta Passive Equities
- + Low Carbon Passive Equities
- + Active UK Equities
- + Active Emerging Market Equities
- + Active High Alpha Equities
- + Private Markets: Infrastructure
- + Private Markets: Private Equity
- + Diversifying Returns
- + Global Sustainable Equities

During 2021/22 the last two transitions took place, with allocations being made to the following portfolios:

- + Multi Asset Credit
- + Sterling Corporate Bonds

At 31st March 2022, 98% of the Fund's investments had transitioned to Brunel; the remaining 2% are held in directly managed pooled funds and will be retained by the Fund until they mature.

The investment fee savings achieved by the Gloucestershire Fund in relation to all of these portfolios are set out in the table below:

INVESTMENT FEE SAVINGS FROM POOLING

PORTFOLIO	VALUE IN ORIGINAL BUSINESS CASE (31ST MARCH 2016)	VALUE AT 31ST MARCH 2022	PRICE VARIANCE 2021/22	QUANTITY VARIANCE 2021/22	TOTAL SAVING/ (COST) 2021/22	PRICE VARIANCE CUMULATIVE TO DATE	QUANTITY VARIANCE CUMULATIVE TO DATE	TOTAL SAVING/ (COST) CUMULATIVE TO DATE
	£000	£000	£	£	£	£	£	£
WORLD DEVELOPED EQUITY PASSIVE	301,562	136,169	21,644	-77,917	-56,273	208,769	-58,301	150,468
SMART BETA PASSIVE EQUITIES	0	0	71,716	-169,512	-97,796	294,698	-653,227	-358,529
LOW CARBON PASSIVE EQUITIES	0	0	8,544	-19,936	-11,392	31,251	-72,920	-41,669
ACTIVE UK EQUITIES	318,696	405,122	599,671	-302,705	296,966	1,844,019	-576,202	1,267,817
ACTIVE EMERGING MARKETS EQUITIES	0	179,114	323,442	-1,154,370	-830,928	614,964	-2,575,386	-1,960,422
ACTIVE HIGH ALPHA EQUITIES	0	408,878	1,474,036	-2,960,401	-1,486,365	3,313,998	-7,173,163	-3,859,165
DIVERSIFYING RETURNS	75,700	233,716	1,086,253	-1,094,838	-8,585	1,445,353	-1,282,705	162,648
ACTIVE GLOBAL SUSTAINABLE EQUITIES	0	362,852	936,937	-1,904,945	-968,008	1,099,234	-2,246,297	-1,147,063
PARIS ALIGNED DEVELOPED EQUITIES	0	307,747	18,971	-26,559	-7,588	18,971	-26,559	-7,588
STIRLING CORPORATE BONDS	0	365,269	142,703	-334,888	-192,185	142,703	-334,888	-192,185
MULTI ASSET CREDIT	0	200,543	-71,549	-212,590	-284,139	-71,549	-212,590	-284,139
PRIVATE MARKETS INFRASTRUCTURE CYCLE 1	0	26,046	128,429	-370,660	-242,231	266,318	-847,068	-580,750
PRIVATE MARKETS INFRASTRUCTURE CYCLE 2	0	34,058	463,265	-1,120,600	-657,335	724,570	-1,508,192	-783,622
PRIVATE MARKETS PRIVATE EQUITY CYCLE 1	0	23,558	128	-412,413	-412,285	-2,721	-1,064,139	-1,066,860
PRIVATE MARKETS PRIVATE EQUITY CYCLE 2	0	13,731	347,081	-671,370	-324,289	362,436	-791,331	-428,895
UK PROPERTY	0	220,656	780,323	-214,628	565,695	1,437,580	-398,938	1,038,642
OVERSEAS PROPERTY	0	25,483	58,811	-58,811	-	58,811	-58,811	-
PRIVATE DEBT CYCLE 2	0	20,921	764,352	-950,400	-186,048	822,861	-1,008,909	-186,048
TOTAL		2,963,863	7,154,757	-12,057,543	-4,902,786	12,612,266	-20,889,626	-8,277,360

This analysis shows the fee savings achieved for the Gloucestershire Fund in relation to the assets that have transitioned to the Brunel portfolios. Savings figures for 2021/22 and cumulative to date figures covering 2018/19 to 2021/22 are provided.

The price variance savings are the fee savings achieved by the Gloucestershire Fund, based on the value of investments in each portfolio. These savings are calculated based on the fee percentages being paid by the Gloucestershire Fund prior to pooling, compared with the fee percentages achieved by Brunel. Where fee reductions were granted by one of the Investment Managers due to pooling, slightly in advance of the formulation of the business case, the benefits of these fee reductions are included within the table.

Where the Gloucestershire Fund was not invested in some of the mandates at 31st March 2016, the fee savings were estimated by comparing the fees payable under Brunel, with the average of fees paid, pre Brunel, by other Funds joining the Brunel Pension Partnership, who were invested in these mandates at 31st March 2016.

The calculated fee savings for all of the Funds within the partnership also take account of any performance fees that were in place with investment managers prior to pooling, regardless of the fact as to whether the performance achieved under these mandates was sufficient to require the payment of these performance fees. This is the position regarding the UK Equities mandate relating to the Gloucestershire Fund, where a performance fee was in place prior to pooling. Because of the actual performance achieved by this manager the performance fee was not paid, hence the saving shown in relation to this mandate is a potential cost avoidance saving, rather than a cash saving, which will be achieved under the Brunel mandate if it delivers against the performance target, because a performance fee is no longer payable under the Brunel mandate.

The fee savings achieved (the price variance) feed into the analysis of costs and savings set out in the table below. The budget figures are those that were included in the original business case.

The quantity variance is purely a technical variance which CIPFA requires Funds to publish. It is calculated by looking at the Assets under Management (AUM) at 31st March 2016 for each portfolio, less the AUM at the end of 2021/22, multiplied by the old fee rate.

However, because the Gloucestershire Fund, like the majority of other Funds, did not have asset allocations in many of the portfolio's that the Fund now invests in under the new pooling arrangements, the quantity variances are significantly inflated since the mode of calculation compares a zero value in 2016 with the AUM figure at the end of 2021/22.

EXPECTED COSTS COMPARED TO ACTUAL COSTS / SAVINGS TO DATE

	2018-19				2019-20			
	BUDGET		ACTUAL		BUDGET		ACTUAL	
	IN YEAR £000	CUMULATIVE TO DATE £000	IN YEAR £000	CUMULATIVE TO DATE £000	IN YEAR £000	CUMULATIVE TO DATE £000	IN YEAR £000	CUMULATIVE TO DATE £000
SET UP COSTS	-	1,151	-	1,073	-	1,151	-	1,073
ONGOING BRUNEL COSTS *	413	413	660	660	535	948	1,059	1,719
CLIENT SAVINGS	-64	-64	-	-	-66	-129	-	-
TRANSITION COSTS	1,327	1,327	2,183	2,183	2,652	3,979	2,475	4,658
FEE SAVINGS	-171	-171	-294	-294	-557	-728	-1,305	-1,600
NET COSTS (REALISED SAVINGS)	1,505	2,656	2,549	3,622	2,564	5,221	2,229	5,850

	2020-21				2021-22			
	BUDGET		ACTUAL		BUDGET		ACTUAL	
	IN YEAR £000	CUMULATIVE TO DATE £000	IN YEAR £000	CUMULATIVE TO DATE £000	IN YEAR £000	CUMULATIVE TO DATE £000	IN YEAR £000	CUMULATIVE TO DATE £000
SET UP COSTS	-	1,151	-	1,073	-	1,151	-	1,073
ONGOING BRUNEL COSTS *	552	1,500	1,097	2,816	570	2,070	1,106	3,922
CLIENT SAVINGS	-68	-197	-	-	-70	-267	-	-
TRANSITION COSTS	13	3,992	1,183	5,841	-	3,992	1,454	7,295
FEE SAVINGS	-898	-1,626	-3,858	-5,458	-965	-2,591	-7,155	-12,613
NET COSTS (REALISED SAVINGS)	-401	4,820	-1,578	4,272	-465	4,355	-4,595	-323

* Ongoing Brunel costs relate to invoices received by the Fund from Brunel and allocated to the year that the invoice relates to. Brunel costs as shown under Investment Management Expenses in Notes to the Accounts, Note 20, have been adjusted so that custody and performance measurement costs contained within those invoices have been allocated as per CIPFA guidance and any invoices not accrued in the relevant year have been included in the year of payment.

The most significant variances from the original business case can be summarised as follows:

ONGOING BRUNEL COSTS

CUMULATIVE BUDGET TO DATE	£2.070m
CUMULATIVE ACTUAL TO DATE	£3.922m

It was accepted that the estimated budget for ongoing Brunel costs, set out in the original business case, was understated, and was insufficient to facilitate the effective delivery of investment services required by the ten Funds within the partnership. A detailed examination of the budget was undertaken in 2018/19, which resulted in an agreed budget increase for 2019/20 to ensure the partnership would effectively deliver the transition plan, investment services required and ongoing savings.

TRANSITION COSTS

CUMULATIVE BUDGET TO DATE	£3.992m
CUMULATIVE ACTUAL TO DATE	£7.295m

The actual transition costs remain higher than the budgeted level. As part of the original business case this was the costing that was materially difficult to predict. The budget included in the original business case could not be based on specific asset holdings, and hence used estimated assets under management based on original client intentions. Each transition is being overseen by Funds and an independent transition advisor to ensure that each transition is being undertaken as effectively as possible.

FEE SAVINGS

CUMULATIVE BUDGET TO DATE	£2.591m
CUMULATIVE ACTUAL TO DATE	£12.613m

Fee savings (including cost avoidance) are significantly higher than the budgeted figure. This is mainly due to higher than anticipated investment returns over the period, which has resulted in increases assets under management on which the fees are payable. With the lower levels of fees achieved by Brunel this culminates into a greater saving based on the increased asset values.

COST TRANSPARENCY - ONGOING INVESTMENT MANAGEMENT COSTS 21-22

The following information has been prepared to enable comparison of the ongoing investment management costs between asset pooled and non pooled investments.

	ASSET POOL				NON-ASSET POOL				FUND TOTAL	
	DIRECT £000	INDIRECT £000	TOTAL £000	BPS	DIRECT £000	INDIRECT £000	TOTAL £000	BPS	£000	BPS
MANAGEMENT FEES										
AD VALOREM	8,299	2,291	10,590	35.42	2,144	-	2,144	43.54	12,734	34.52
PERFORMANCE	165	-	165	0.54	1,160	-	1,160	17.89	1,325	3.59
RESEARCH	-	-	-	-	-	-	-	-	-	-
PRIIPS COMPLIANCE	-	-	-	-	-	-	-	-	-	-
TOTAL MANAGEMENT FEES	8,464	2,291	10,755	35.96	3,304	-	3,304	61.43	14,059	38.11
ASSET POOL SHARED COSTS										
	969	-	969	3.19	-	-	-	n/a	969	2.63
TRANSACTION COSTS										
COMMISSIONS	455	-	455	1.50	1	-	1	0.09	456	1.24
ACQUISITION/ISSUE COSTS	2,340	3,390	5,730	18.87	6	-	6	0.59	5,736	15.55
DISPOSAL COSTS	256	-	256	0.84	-	-	-	-	256	0.69
REGISTRATION/FILING FEES	-	-	-	-	-	-	-	-	-	-
TAXES AND STAMP DUTY	437	-	437	1.44	-	-	-	-	437	1.19
TOTAL TRANSACTION COSTS	3,488	3,390	6,878	22.65	7	-	7	0.68	6,885	18.67
CUSTODY	-	-	-	-	-	-	-	-	71	0.19
TAX & LEGAL COSTS	-	-	-	-	-	-	-	-	3	0.01
OTHER (PROPERTY EXPS)	-	1,651	1,651	5.43	-	-	-	-	1,651	4.48
TOTAL	12,921	7,332	20,523	67.23	3,311	-	3,311	62.11	23,638	64.09

Direct / Indirect Costs

Direct investment management fees and transaction costs included in Note 20 - Management Expenses in the Fund Account and Net Assets Statement section represent those charges invoiced to the Fund, deducted from income or deducted from the market value of pooled fund units.

However there has been a general recognition that there are significant further costs that in the past have been hidden. These indirect costs, such as pooled fund administration and governance costs and implicit and indirect transaction costs, as detailed in the table, do not meet the criteria for inclusion in the accounts but have been included to show a complete reflection of the costs. These have been identified from cost transparency templates provided by the investment managers as part of the LGPS Scheme Advisory Board Code of Transparency and Compliance initiative. Three managers did not provide information on indirect costs.

Asset Pool Shared Costs

Asset Pool Shared Costs represents the amounts recharged by Brunel for management and ongoing running costs.

Transaction Costs

Transaction costs represent costs incurred in the purchase or disposal of an asset.

Custody

Custody is provided by State Street for the entire Fund and has been included at Fund level in the table above to aid reconciliation to Note 20 - Management Expenses in the Fund Account and Net Assets Statement section.

BPS

The basis point (bps) calculation is based on fees and costs as a percentage of the closing market value of assets. Where a portfolio was only held for part of the year, fees and costs have been pro-rated to represent a full year. The market value of assets transferred during the year to the Brunel Pool was then added back to the market value of the Non-Asset Pool for the purposes of the calculation to enable comparison of the bps.



13

FUNDING STRATEGY STATEMENT

IMPLEMENTATION AND APPLICATION OF THE FUNDING STRATEGY STATEMENT

The Funding Strategy Statement (FSS) focuses on how employer liabilities are measured, the pace at which these liabilities are funded, and how employers or pools of employers pay for their own liabilities. The FSS is in essence a summary of the Fund's approach to funding its liabilities. The FSS was reviewed as part of the Triennial Fund Valuation process and employers consulted prior to the current FSS being finalised. The full version of the FSS can be found on pages **152** to **180**.

A key challenge for the Administering Authority is to balance the need for stable affordable employer contributions with the requirement to take a prudent, longer-term view of funding and ensure the solvency of the Fund. With this in mind, there are a number of methods which the Administering Authority may permit in order to improve the stability of employer contributions. These include, where circumstances permit, capping of employer contribution rate changes within a pre-determined range ("stabilisation"), the use of extended deficit recovery periods, the phasing in of contribution rises or reductions, the pooling of contributions amongst employers with similar characteristics and the use of some form of security or guarantee to justify a lower contribution rate than would otherwise be the case. Section 3.3 of the FSS on page **158** gives a summary of how the main funding policies differ for different types of employer.

New eligible admitted bodies, those employers who do not have an automatic right to join the Pension Fund, are only admitted into the Fund if they have a guarantor to cover any pension obligations which are not met. They may also be required to have an indemnity bond or security in place to cover any potential risks and these are reviewed annually. Admitted bodies do not have the same freedoms as scheduled bodies in how they fund their liabilities and these are set out again in Section 3.3 of the FSS on page **157**.

13

FUNDING STRATEGY STATEMENT

THE FUNDING STRATEGY STATEMENT SHOWN BELOW IS THE CURRENT VERSION OF THIS STATEMENT.

1. INTRODUCTION

1.1 What is this document?

This is the Funding Strategy Statement (FSS) of the Gloucestershire County Council Pension Fund ("the Fund"), which is administered by Gloucestershire County Council, ("the Administering Authority").

It has been prepared by the Administering Authority in collaboration with the Fund's actuary, Hymans Robertson LLP, and after consultation with the Fund's employers and investment adviser. It is effective from 6th March 2021.

1.2 What is the Gloucestershire County Council Pension Fund?

The Fund is part of the national Local Government Pension Scheme (LGPS). The LGPS was set up by the UK Government to provide retirement and death benefits for local government employees, and those employed in similar or related bodies, across the whole of the UK. The Administering Authority runs the Gloucestershire County Council Pension Fund, in effect the LGPS for the Gloucestershire area, to make sure it:

- + receives the proper amount of contributions from employees and employers, and any transfer payments;
- + invests the contributions appropriately, with the aim that the Fund's assets grow over time with investment income and capital growth; and
- + uses the assets to pay Fund benefits to the members (as and when they retire, for the rest of their lives), and to their dependants (as and when members die), as defined in the LGPS Regulations. Assets are also used to pay transfer values and administration costs.

The roles and responsibilities of the key parties involved in the management of the Fund are summarised in **Appendix B**.

1.3 Why does the Fund need a Funding Strategy Statement?

Employees' benefits are guaranteed by the LGPS Regulations, and do not change with market values or employer contributions. Investment returns will help pay for some of the benefits, but probably not all, and certainly with no guarantee. Employees' contributions are fixed in those Regulations also, at a level which covers only part of the cost of the benefits.

Therefore, employers need to pay the balance of the cost of delivering the benefits to members and their dependants.

The FSS focuses on how employer liabilities are measured, the pace at which these liabilities are funded, and how employers or pools of employers pay for their own liabilities. This statement sets out how the Administering Authority has balanced the conflicting aims of:

- + affordability of employer contributions,
- + transparency of processes,
- + stability of employers' contributions, and
- + prudence in the funding basis.

There are also regulatory requirements for an FSS, as given in **Appendix A**.

The FSS is a summary of the Fund's approach to funding its liabilities, and this includes reference to the Fund's other policies; it is not an exhaustive statement of policy on all issues. The FSS forms part of a framework which includes:

- + the LGPS Regulations;
- + the Rates and Adjustments Certificate (confirming employer contribution rates for the next three years) which can be found in an appendix to the formal valuation report;
- + actuarial factors for valuing individual transfers, early retirement costs and the costs of buying added service; and
- + the Fund's Investment Strategy Statement (see **Section 4**).

1.4 How does the Fund and this FSS affect me?

This depends on who you are:

- + a member of the Fund, i.e. a current or former employee, or a dependant: the Fund needs to be sure it is collecting and holding enough money so that your benefits are always paid in full;
- + an employer in the Fund (or which is considering joining the Fund): you will want to know how your contributions are calculated from time to time, that these are fair by comparison to other employers in the Fund, in what circumstances you might need to pay more and what happens if you cease to be an employer in the Fund. Note that the FSS applies to all employers participating in the Fund;
- + an Elected Member whose council participates in the Fund: you will want to be sure that the council balances the need to hold prudent reserves for members' retirement and death benefits, with the other competing demands for council money;
- + a Council Tax payer: your council seeks to strike the balance above, and also to minimise cross-subsidies between different generations of taxpayers.

1.5 What does the FSS aim to do?

The FSS sets out the objectives of the Fund's funding strategy, such as:

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

1.6 How do I find my way around this document?

In Section 2 there is a brief introduction to some of the main principles behind funding, i.e. deciding how much an employer should contribute to the Fund from time to time.

In Section 3 we outline how the Fund calculates the contributions payable by different employers in different situations.

In Section 4 we show how the funding strategy is linked with the Fund's investment strategy.

In the Appendices we cover various issues in more detail if you are interested:

- A. the regulatory background, including how and when the FSS is reviewed,
- B. who is responsible for what,
- C. what issues the Fund needs to monitor, and how it manages its risks,
- D. some more details about the actuarial calculations required,
- E. the assumptions which the Fund actuary currently makes about the future,
- F. a glossary explaining the technical terms occasionally used here.

If you have any other queries please contact the Pensions team in the first instance at peninv@gloucestershire.gov.uk or on **01452 328949**.

2. BASIC FUNDING ISSUES

(More detailed and extensive descriptions are given in Appendix D).

2.1 How does the actuary calculate the required contribution rate?

In essence this is a three-step process:

- + Calculate the funding target for that employer, i.e. the estimated amount of assets it should hold in order to be able to pay all its members' benefits. See Appendix E for more details of what assumptions we make to determine that funding target;
- + Determine the time horizon over which the employer should aim to achieve that funding target. See the table in 3.3 and Note (c) for more details;
- + Calculate the employer contribution rate such that it has at least a given likelihood of achieving that funding target over that time horizon, allowing for various possible economic outcomes over that time horizon. See 2.3 below, and the table in 3.3 Note (e) for more details.

2.2 What is each employer's contribution rate?

This is described in more detail in Appendix D. Employer contributions are normally made up of two elements:

- a) the estimated cost of benefits being built up each year, after deducting the members' own contributions and including an allowance for administration expenses. This is referred to as the "Primary rate", and is expressed as a percentage of members' pensionable pay; plus
- b) an adjustment for the difference between the Primary rate above, and the actual contribution the employer needs to pay, referred to as the "Secondary rate". In broad terms, payment of the Secondary rate is in respect of benefits already accrued at the valuation date. The Secondary rate may be expressed as a percentage of pay and/or a monetary amount in each year.

The rates for all employers are shown in the Fund's Rates and Adjustments Certificate, which forms part of the formal Actuarial Valuation Report. Employers' contributions are expressed as minima, with employers able to pay contributions at a higher rate. Account of any higher rate will be taken by the Fund actuary at subsequent valuations, i.e. will be reflected as a credit when next calculating the employer's contributions.

2.3 What different types of employer participate in the Fund?

Historically the LGPS was intended for local authority employees only. However over the years, with the diversification and changes to delivery of local services, many more types and numbers of employers now participate. There are currently more employers in the Fund than ever before, a significant part of this being due to new academies.

In essence, participation in the LGPS is open to public sector employers providing some form of service to the local community. Whilst the majority of members will be local authority employees (and ex-employees), the majority of participating employers are those providing services in place of (or alongside) local authority services: academy schools, contractors, housing associations, charities, etc.

The LGPS Regulations define various types of employer as follows:

Scheduled bodies - councils, and other specified employers such as academies and further education establishments. These must provide access to the LGPS in respect of their employees who are not eligible to join another public sector scheme (such as the Teachers Scheme). These employers are so-called because they are specified in a schedule to the LGPS Regulations.

It is now possible for Local Education Authority schools to convert to academy status, and for other forms of school (such as Free Schools) to be established under the academies legislation. All such **academies (or Multi Academy Trusts)**, as employers of non-teaching staff, become separate new employers in the Fund. As academies are defined in the LGPS Regulations as "Scheduled Bodies", the Administering Authority has no discretion over whether to admit them to the Fund, and the academy has no discretion whether to continue to allow its non-teaching staff to join the Fund. There has also been guidance issued by the MHCLG regarding the terms of academies' membership in LGPS Funds.

Designating employers - employers such as town and parish councils are able to participate in the LGPS via resolution (and the Fund cannot refuse them entry where the resolution is passed). These employers can designate which of their employees are eligible to join the scheme.

Other employers are able to participate in the Fund via an admission agreement, and are referred to as 'admission bodies'. These employers are generally those with a "community of interest" with another scheme employer – **community admission bodies** ("CAB") or those providing a service on behalf of a scheme employer – **transferee admission bodies** ("TAB"). CABs will include housing associations and charities, TABs will generally be contractors. The Fund is able to set its criteria for participation by these employers and can refuse entry if the requirements as set out in the Fund's admissions policy are not met. (NB the terminology CAB and TAB has been dropped from recent LGPS Regulations, which instead combine both under the single term 'admission bodies'; however, we have retained the old terminology here as we consider it to be helpful in setting funding strategies for these different employers).

2.4 How does the calculated contribution rate vary for different employers?

All three steps above are considered when setting contributions (more details are given in **Section 3** and **Appendix D**).

1. The **funding target** is based on a set of assumptions about the future, (e.g. investment returns, inflation, pensioners' life expectancies). If an employer is approaching the end of its participation in the Fund then its funding target may be set on a more prudent basis, so that its liabilities are less likely to be spread among other employers after its cessation;
2. The **time horizon** required is the period over which the funding target is achieved. Employers may be given a lower time horizon if they have a less permanent anticipated membership, or do not have tax-raising powers to increase contributions if investment returns under-perform; and
3. The **likelihood of achieving** the funding target over that time horizon will be dependent on the Fund's view of the strength of employer covenant and its funding profile. Where an employer is considered to be weaker then the required likelihood will be set higher, which in turn will increase the required contributions (and vice versa).

For some employers it may be agreed to pool contributions, see 3.4.

Any costs of non ill-health early retirements must be paid by the employer, see **3.6**.

Costs of ill-health early retirements are covered in **3.7** and **3.8**.

2.5 How is a funding level calculated?

An employer's "funding level" is defined as the ratio of:

- + the market value of the employer's share of assets (see Appendix D, section D5, for further details of how this is calculated), to
- + the value placed by the actuary on the benefits built up to date for the employer's employees and ex-employees (the "liabilities"). The Fund actuary agrees with the Administering Authority the assumptions to be used in calculating this value.

It is important to note that the funding level and deficit/surplus are only measurements at a particular point in time, on a particular set of assumptions about the future. Whilst we recognise that various parties will take an interest in these measures, for most employers the key issue is how likely it is that their contributions will be sufficient to pay for their members' benefits (when added to their existing asset share and anticipated investment returns).

In short, funding levels and deficits are short term, high level risk measures, whereas contribution-setting is a longer term issue.

In short, funding levels and deficits are short term, high level risk measures, whereas contribution-setting is a longer term issue.

2.6 How does the Fund recognise that contribution levels can affect council and employer service provision, and council tax?

The Administering Authority and the Fund actuary are acutely aware that, all other things being equal, a higher contribution required to be paid to the Fund will mean less cash available for the employer to spend on the provision of services. For instance:

- + Higher Pension Fund contributions may result in reduced council spending, which in turn could affect the resources available for council services, and/or greater pressure on council tax levels;
- + Contributions which Academies pay to the Fund will therefore not be available to pay for providing education; and
- + Other employers will provide various services to the local community, perhaps through housing associations, charitable work, or contracting council services. If they are required to pay more in pension contributions to the LGPS then this may affect their ability to provide the local services at a reasonable cost.

Whilst all this is true, it should also be borne in mind that:

- + The Fund provides invaluable financial security to local families, whether to those who formerly worked in the service of the local community who have now retired, or to their families after their death;
- + The Fund must have the assets available to meet these retirement and death benefits, which in turn means that the various employers must each pay their own way. Lower contributions today will mean higher contributions tomorrow: deferring payments does not alter the employer's ultimate obligation to the Fund in respect of its current and former employees;
- + Each employer will generally only pay for its own employees and ex-employees (and their dependants), not for those of other employers in the Fund;
- + The Fund strives to maintain reasonably stable employer contribution rates where appropriate and possible. However, a recent shift in regulatory focus means that solvency within each generation is considered by the Government to be a higher priority than stability of contribution rates;
- + The Fund wishes to avoid the situation where an employer falls so far behind in managing its funding shortfall that its deficit becomes unmanageable in practice: such a situation may lead to employer insolvency and the resulting deficit falling on the other Fund employers. In that situation, those employers' services would in turn suffer as a result;
- + Council contributions to the Fund should be at a suitable level, to protect the interests of different generations of council tax payers. For instance, underpayment of contributions for some years will need to be balanced by overpayment in other years; the council will wish to minimise the extent to which council tax payers in one period are in effect benefitting at the expense of those paying in a different period.

- ✦ Council contributions to the Fund should be at a suitable level, to protect the interests of different generations of council tax payers. For instance, underpayment of contributions for some years will need to be balanced by overpayment in other years; the council will wish to minimise the extent to which council tax payers in one period are in effect benefiting at the expense of those paying in a different period.

Overall, therefore, there is clearly a balance to be struck between the Fund's need for maintaining prudent funding levels, and the employers' need to allocate their resources appropriately. The Fund achieves this through various techniques which affect contribution increases to various degrees (see 3.1). In deciding which of these techniques to apply to any given employer, the Administering Authority takes a view on the financial standing of the employer, i.e. its ability to meet its funding commitments and the relevant time horizon.

The Administering Authority will consider a risk assessment of that employer using a knowledge base which is regularly monitored and kept up-to-date. This database will include such information as the type of employer, its membership profile and funding position, any guarantors or security provision, material changes anticipated, etc.

For instance, where the Administering Authority has reasonable confidence that an employer will be able to meet its funding commitments, then the Fund will permit options such as stabilisation (see 3.3 Note (b)), a longer time horizon relative to other employers, and/or a lower likelihood of achieving their funding target. Such options will temporarily produce lower contribution levels than would otherwise have applied. This is permitted in the expectation that the employer will still be able to meet its obligations for many years to come.

On the other hand, where there is doubt that an employer will be able to meet its funding commitments or withstand a significant change in its commitments, then a higher funding target, and/or a shorter time horizon relative to other employers, and/or a higher likelihood of achieving the target may be required.

The Fund actively seeks employer input, including to its funding arrangements, through various means: see **Appendix A**.

2.7 What approach has the Fund taken to dealing with uncertainty arising from the McCloud court case and its potential impact on the LGPS benefit structure?

The LGPS benefit structure from 1 April 2014 is currently under review following the Government's loss of the right to appeal the McCloud and other similar court cases. The courts have ruled that the 'transitional protections' awarded to some members of public service pension schemes when the schemes were reformed (on 1 April 2014 in the case of the LGPS) were unlawful on the grounds of age discrimination. At the time of writing, the Ministry of Housing, Communities and Local Government (MHCLG) has not provided any details of changes as a result of the case. However it is expected that

benefits changes will be required and they will likely increase the value of liabilities. At present, the scale and nature of any increase in liabilities are unknown, which limits the ability of the Fund to make an accurate allowance.

The LGPS Scheme Advisory Board (SAB) issued advice to LGPS funds in May 2019. As there was no finalised outcome of the McCloud case by 31 August 2019, the Fund Actuary has acted in line with SAB's advice and valued all member benefits in line with the current LGPS Regulations.

The Fund, in line with the advice in the SAB's note, has considered how to allow for this risk in the setting of employer contribution rates. As the benefit structure changes that will arise from the McCloud judgement are uncertain, the Fund has elected to reflect the increase in risk through the likelihood of success parameters which are used in the assessment of employer contribution rates at the 2019 valuation.

Once the outcome of the McCloud case is known, the Fund may revisit the contribution rates set to ensure they remain appropriate.

The Fund has also considered the McCloud judgement in its approach to cessation valuations. Please see note (j) to table 3.3 for further information.

2.8 What approach has the Fund taken to dealing with uncertainty arising from the Goodwin court case and its potential impact on the LGPS benefit structure?

The Goodwin tribunal was raised in the Teachers' scheme. It claimed members, or their survivors, were discriminated against due to their sexual orientation. The claim was because the Teachers' scheme provides a survivor's pension which is less favourable for a widower or surviving male partner, than for a widow or surviving female partner of a female scheme member. On 30 June 2020, the Tribunal found in favour of the claimant and agreed there was discrimination. This finding and remedy is expected to apply across all public service pension schemes, including the LGPS, however this is not certain and the details are not yet known.

The impact, if any, of the Goodwin case on Fund liabilities is expected to be small and will largely be an administrative issue. In the absence of a resolution or any guidance to this case, no allowance has been made for this within the 2019 formal valuation.

2.9 When will the next actuarial valuation be?

On 8 May 2019 MHCLG issued a consultation seeking views on (among other things) proposals to amend the LGPS valuation cycle in England and Wales from a three year (triennial) valuation cycle to a four year (quadrennial) valuation cycle.

The Fund intends to carry out its next actuarial valuation in 2022 (3 years after the 2019 valuation date) in line with MHCLG's desired approach in the consultation. The Fund has therefore instructed the Fund Actuary to certify contribution rates for employers for the period 1 April 2020 to 31 March 2023 as part of the 2019 valuation of the Fund.

3. CALCULATING CONTRIBUTIONS FOR INDIVIDUAL EMPLOYERS

3.1 General comments

A key challenge for the Administering Authority is to balance the need for stable, affordable employer contributions with the requirement to take a prudent, longer-term view of funding and ensure the solvency of the Fund. With this in mind, the Fund's three-step process identifies the key issues:

1. What is a suitably (but not overly) prudent funding target?
2. How long should the employer be permitted to reach that target? This should be realistic but not so long that the funding target is in danger of never actually being achieved.
3. What likelihood is required to reach that funding target?
This will always be less than 100% as we cannot be certain of the future. Higher likelihood "bars" can be used for employers where the Fund wishes to reduce the risk that the employer ceases leaving a deficit to be picked up by other employers.

These and associated issues are covered in this Section.

The Administering Authority recognises that there may occasionally be particular circumstances affecting individual employers that are not easily managed within the rules and policies set out in the Funding Strategy Statement. Therefore the Administering Authority reserves the right to direct the actuary to adopt alternative funding approaches on a case by case basis for specific employers.

3.2 The effect of paying lower contributions

In limited circumstances the Administering Authority may permit employers to pay contributions at a lower level than is assessed for the employer using the three step process above. At their absolute discretion the Administering Authority may:

- + extend the time horizon for targeting full funding;
- + adjust the required likelihood of meeting the funding target;
- + permit an employer to participate in the Fund's stabilisation mechanisms;
- + permit extended phasing in of contribution rises or reductions;
- + pool contributions amongst employers with similar characteristics; and/or
- + accept some form of security or guarantee in lieu of a higher contribution rate than would otherwise be the case.

Employers which are permitted to use one or more of the above methods will often be paying, for a time, contributions less than required to meet their funding target, over the appropriate time horizon with the required likelihood of success. Such employers should appreciate that:

- + their true long term liability (i.e. the actual eventual cost of benefits payable to their employees and ex-employees) is not affected by the pace of paying contributions;
- + lower contributions in the short term will result in a lower level of future investment returns on the employer's asset share. Thus, deferring a certain amount of contribution may lead to higher contributions in the long-term; and
- + it may take longer to reach their funding target, all other things being equal.

Overleaf (3.3) is a summary of how the main funding policies differ for different types of employer, followed by more detailed notes where necessary.

Section 3.4 onwards deals with various other funding issues which apply to all employers.

3.3 The different approaches used for different employers

TYPE OF EMPLOYER	SCHEDULED BODIES			COMMUNITY ADMISSION BODIES AND DESIGNATING EMPLOYERS		TRANSFEREE ADMISSION BODIES*
SUB-TYPE	LOCAL AUTHORITIES, POLICE, FIRE	COLLEGES & UNIVERSITIES	ACADEMIES	OPEN TO NEW ENTRANTS	CLOSED TO NEW ENTRANTS	(ALL)
FUNDING TARGET BASIS USED	Ongoing participation basis, assumes long-term Fund participation (see Appendix E)			Ongoing participation basis, but may move to “low-risk exit basis” - see Note (a)		Contractor exit basis, assumes fixed contract term in the Fund (see Appendix E)
PRIMARY RATE APPROACH	(see Appendix D – D.2)					
STABILISED CONTRIBUTION RATE?	Yes - see Note (b)	No	No	No	No	No
MAXIMUM TIME HORIZON – NOTE (C)	17 years	17 years	17 years	17 years	Future working lifetime	As per the letting employer
SECONDARY RATE – NOTE (D)	Monetary amount	Monetary amount	% of payroll	Monetary amount	Monetary amount	% of payroll or monetary amount
TREATMENT OF SURPLUS	Covered by stabilisation arrangement	Contributions kept at Primary rate	Contributions kept at Primary rate	Preferred approach: contributions kept at Primary rate. Reductions may be permitted by the Administering Authority		Where the calculated secondary rate is negative, contributions are the maximum of the current rate in payment and the sum of the primary and the secondary rates. Where the calculated secondary rate is positive, contributions are set to be the primary rate.
LIKELIHOOD OF ACHIEVING TARGET – NOTE (E)	70%	70% or 75% depending on evidence of financial strength	75%	80% for Community Admission Bodies, 70% for Designating Employers	50% where the low-risk exit basis is used	66%
PHASING OF CONTRIBUTION CHANGES	Covered by stabilisation arrangement	3 years	3 years for increases and decreases, subject to a maximum increase / decrease of 2% p.a.	3 years	3 years	None
REVIEW OF RATES – NOTE (F)	Review of rates will be carried out in line with the Regulations and as set out in Note (f)					Particularly reviewed in last 3 years of contract
NEW EMPLOYER	n/a	n/a	Note (g)	Note (h)		Notes (h) & (i)
CESSATION OF PARTICIPATION: EXIT DEBT/CREDIT PAYABLE	Cessation is assumed not to be generally possible, as Scheduled Bodies are legally obliged to participate in the LGPS. In the rare event of cessation occurring (machinery of Government changes for example), the cessation calculation principles applied would be as per Note (j).			Can be ceased subject to terms of admission agreement. Exit debt/credit will be calculated on a basis appropriate to the circumstances of cessation – see Note (j).		Participation is assumed to expire at the end of the contract. Cessation debt/ credit calculated on the contractor exit basis, unless the admission agreement is terminated early by the contractor in which case the low risk exit basis would apply. Letting employer will be liable for future deficits and contributions arising. See Note (j) for further details

* Where the Administering Authority recognises a fixed contribution rate agreement between a letting authority and a contractor, the certified employer contribution rate will be derived in line with the methodology specified in the risk sharing agreement. Additionally, in these cases, upon cessation the contractor's assets and liabilities will transfer back to the letting employer with no crystallisation of any deficit or surplus. Further detail on fixed contribution rate agreements is set out in note (i).

NOTE (A) (GILTS EXIT BASIS FOR CABS AND DESIGNATING EMPLOYERS CLOSED TO NEW ENTRANTS)

In the circumstances where:

- + the employer is a Designating Employer, or an Admission Body but not a Transferee Admission Body, and
- + the employer has no guarantor, and
- + the admission agreement is likely to terminate, or the employer is likely to lose its last active member, within a timeframe considered appropriate by the Administering Authority to prompt a change in funding,

the Administering Authority may set a higher funding target (e.g. based on the return from long-term gilt yields) by the time the agreement terminates or the last active member leaves, in order to protect other employers in the Fund. This policy will increase regular contributions and reduce, but not entirely eliminate, the possibility of a final deficit payment being required from the employer when a cessation valuation is carried out.

The Administering Authority also reserves the right to adopt the above approach in respect of those Designating Employers and Admission Bodies with no guarantor, where the strength of covenant is considered to be weak but there is no immediate expectation that the admission agreement will cease or the Designating Employer alters its designation.

NOTE (B) (Stabilisation)

Stabilisation is a mechanism where employer contribution rate variations from year to year are kept within a pre-determined range, thus allowing those employers' rates to be relatively stable. In the interests of stability and affordability of employer contributions, the Administering Authority, on the advice of the Fund Actuary, believes that stabilising contributions can still be viewed as a prudent longer-term approach. However, employers whose contribution rates have been "stabilised" (and may therefore be paying less than their theoretical contribution rate) should be aware of the risks of this approach and should consider making additional payments to the Fund if possible.

This stabilisation mechanism allows short term investment market volatility to be managed so as not to cause volatility in employer contribution rates, on the basis that a long term view can be taken on net cash inflow, investment returns and strength of employer covenant.

The current stabilisation mechanism applies if:

- + the employer satisfies the eligibility criteria set by the Administering Authority (see below) and;

- + there are no material events which cause the employer to become ineligible, e.g. significant reductions in active membership (due to outsourcing or redundancies), or changes in the nature of the employer (perhaps due to Government restructuring), or changes in the security of the employer.

On the basis of extensive modelling carried out for the 2019 valuation exercise (see Section 4), the following employers will be permitted to stabilise contribution increases and decreases subject to previously agreed limits:

- + Gloucestershire County Council and Schools
- + Cotswold District Council
- + Forest of Dean District Council
- + Gloucester City Council
- + Stroud District Council
- + Tewkesbury Borough Council
- + Gloucestershire Police
- + Cheltenham Borough Council

The stabilisation criteria and limits will be reviewed at the next formal valuation. However, the Administering Authority reserves the right to review the stabilisation criteria and limits at any time before then, on the basis of membership and/or employer changes as described above.

NOTE (C) (Maximum time horizon)

The maximum time horizon starts at the commencement of the revised contribution rate (1 April 2020 for the 2019 valuation). The Administering Authority would normally expect the same period to be used at successive triennial valuations, but would reserve the right to propose alternative time horizons, for example where there were no new entrants.

NOTE (D) (Secondary rate)

For employers where stabilisation is not being applied, the Secondary contribution rate for each employer covering the period until the next formal valuation will often be set as a monetary amount. However, where a percentage of salaries approach is used, the Administering Authority reserves the right to amend these rates between formal valuations and/or to require these payments in monetary terms instead, for instance where:

- + the employer is relatively mature, i.e. has a large Secondary contribution rate (e.g. above 15% of payroll), or
- + there has been a significant reduction in payroll due to outsourcing or redundancy exercises, or
- + the employer has closed the Fund to new entrants.

NOTE (E) (Likelihood of achieving funding target)

Each employer has its funding target calculated, and a relevant time horizon over which to reach that target. Contributions are set such that, combined with the employer's current asset share and anticipated market movements over the time horizon, the funding target is achieved with a given minimum likelihood. A higher required likelihood bar will give rise to higher required contributions, and vice versa.

The way in which contributions are set using these three steps, and relevant economic projections, is described in further detail in **Appendix D**.

Different likelihoods are set for different employers depending on their nature and circumstances: in broad terms, a higher likelihood will apply due to one or more of the following:

- + the Fund believes the employer poses a greater funding risk than other employers,
- + the employer does not have tax-raising powers;
- + the employer does not have a guarantor or other sufficient security backing its funding position; and/or
- + the employer is likely to cease participation in the Fund in the short or medium term.

NOTE (F) (Regular Reviews)

Under the Regulations the Fund may amend contribution rates between valuations for "significant change" to the liabilities or covenant of an employer: this may result in a material increase or decrease in contributions, depending on the circumstances. The Fund would consider the following circumstances as a potential trigger for review:

- + in the opinion of an Administering Authority there are circumstances which make it likely that an employer (including an admission body) will become an exiting employer sooner than anticipated at the last valuation;
- + an employer is approaching exit from the scheme within the next two years and before completion of the next valuation;
- + an employer agrees to pay increased contributions to meet the cost of an award of additional pension, under Regulation 31(3) of the Regulations;
- + there are changes to the benefit structure set out in the LGPS Regulations including the outcomes of the McCloud case and cost sharing mechanisms (if permitted in Regulation at that time) which have not been allowed for at the last valuation;

- + it appears likely to the Administering Authority that the amount of the liabilities arising or likely to arise for an employer or employers has changed significantly since the last valuation;
- + it appears likely to the Administering Authority that there has been a significant change in the ability of an employer or employers to meet their obligations (i.e. a material change in employer covenant);
- + it appears to the Administering Authority that the membership of the employer has changed materially such as bulk transfers, significant reductions to payroll or large-scale restructuring; or
- + where an employer has failed to pay contributions or has not arranged appropriate security as required by the Administering Authority.

The Administering Authority will also consider a request from any employer to review contributions where the employer has undertaken to meet the costs of that review and sets out the reasoning for the review (which would be expected to fall into one of the above categories, such as a belief that their covenant has changed materially or they are going through a significant restructuring impacting their membership).

Except in circumstances such as an employer nearing cessation, the Administering Authority will not consider market volatility or changes to asset values as a basis for a change in contributions outside a formal valuation.

The Rates & Adjustments Certificate will be updated as necessary, following such a review.

The Administering Authority will also consider guidance in such matters from the Scheme Advisory Board as issued from time to time.

NOTE (G) (New Academy conversions)

At the time of writing, the Fund's policies on academies' funding issues are as follows:

- i. The new academy will be regarded as a separate employer in its own right and will not be pooled with other employers in the Fund. The only exception is where the academy is part of a Multi Academy Trust (MAT) in which case the academy's figures will be calculated as below but can be combined with, for the purpose of setting contribution rates, with those of the other academies in the MAT;
- ii. The new academy's past service liabilities on conversion will be calculated based on its active Fund members on the day before conversion. For the avoidance of doubt, these liabilities will include all past service of those members, but will exclude the liabilities relating to any ex-employees of the school who have deferred or pensioner status;
- iii. The new academy will be allocated an initial asset share from the ceding council's assets in the Fund. This asset share will be calculated using the estimated funding position of the ceding council at the date of academy conversion. The share will be based on the active members' funding level, having first allocated assets in the council's share to fully fund deferred and pensioner members. The assets allocated to the academy will be limited if necessary so that its initial funding level is subject to a maximum of 100%. The asset allocation will be based on market conditions and the academy's active Fund membership on the day prior to conversion;
- iv. The new academy's calculated contribution rate will be based on the time horizon and likelihood of achieving funding target outlined for Academies in the table in Section 3.3 above;
- v. It is possible for an academy to leave one MAT and join another. If this occurs, all active, deferred and pensioner members of the academy transfer to the new MAT.

The Fund's policies on academies are subject to change in the light of any amendments to MHCLG and/or DfE guidance (or removal of the formal guarantee currently provided to academies by the DfE). Any changes will be notified to academies, and will be reflected in a subsequent version of this FSS. In particular, policies (iii) and (iv) above will be reconsidered at each valuation.

NOTE (H) (New Admission Bodies)

With effect from 1 October 2012, the LGPS 2012 Miscellaneous Regulations introduced mandatory new requirements for all Admission Bodies brought into the Fund from that date. Under these Regulations, all new Admission Bodies will be required to provide some form of security, such as a guarantee from the letting employer, an indemnity or a bond. The security is required to cover some or all of the following:

- + the strain cost of any redundancy early retirements resulting from the premature termination of the contract;
- + allowance for the risk of asset underperformance;
- + allowance for the risk of a greater than expected rise in liabilities;
- + allowance for the possible non-payment of employer and member contributions to the Fund; and/or
- + the current deficit.

Transferee Admission Bodies: For all TABs, the security must be to the satisfaction of the Administering Authority as well as the letting employer, and will be reassessed on an annual basis. See also Note (i) on next page.

Community Admission Bodies: The Administering Authority will only consider requests from CABs (or other similar bodies, such as section 75 NHS partnerships) to join the Fund if they are sponsored by a Scheduled Body with tax raising powers, guaranteeing their liabilities and also providing a form of security as above.

The above approaches reduce the risk, to other employers in the Fund, of potentially having to pick up any shortfall in respect of Admission Bodies ceasing with an unpaid deficit.

NOTE (I) (New Transferee Admission Bodies)

A new TAB usually joins the Fund as a result of the letting/outsourcing of some services from an existing employer (normally a Scheduled Body such as a council or academy) to another organisation (a “contractor”). This involves the TUPE transfer of some staff from the letting employer to the contractor. Consequently, for the duration of the contract, the contractor is a new participating employer in the Fund so that the transferring employees maintain their eligibility for LGPS membership. At the end of the contract the employees revert to the letting employer or to a replacement contractor.

Ordinarily, the TAB would be set up in the Fund as a new employer with responsibility for all the accrued benefits of the transferring employees; in this case, the contractor would usually be assigned an initial asset allocation equal to the past service liability value of the employees’ Fund benefits. The quid pro quo is that the contractor is then expected to ensure that its share of the Fund is also fully funded at the end of the contract: see Note (j).

Employers which “outsource” have flexibility in the way that they can deal with the pension risk potentially taken on by the contractor. In particular, there are three different routes that such employers may wish to adopt. Clearly as the risk ultimately resides with the employer letting the contract, it is for them to agree the appropriate route with the contractor:

i) Pooling

Under this option the contractor is pooled with the letting employer. In this case, the contractor pays the same rate as the letting employer, which may be under a stabilisation approach.

ii) Letting employer retains pre-contract risks

Under this option the letting employer would retain responsibility for assets and liabilities in respect of service accrued prior to the contract commencement date. The contractor would be responsible for the future liabilities that accrue in respect of transferred staff. The contractor’s contribution rate could vary from one valuation to the next. It would be liable for any deficit (or entitled to any surplus) at the end of the contract term in respect of assets and liabilities attributable to service accrued during the contract term. Please note, the level of exit credit (if any) payable on cessation would be determined by the Administering Authority in accordance with the Regulations, this FSS and the Fund’s exit credit policy.

iii) Fixed contribution rate agreed

Under this option the contractor pays a fixed contribution rate throughout its participation in the Fund and on cessation does not pay any deficit or receive an exit credit. In other words, the pension risks “pass through” to the letting employer.

The Administering Authority is willing to administer any of the above options as long as the approach is documented in the Admission Agreement as well as the transfer agreement. Alternatively, letting employers and Transferee Admission Bodies may operate any of the above options by entering into a separate Side Agreement. The Administering Authority would not necessarily be a party to this side agreement, but may treat the Admission Agreement as if it incorporates the side agreement terms where this is permitted by legislation or alternatively agreed by all parties.

Any risk sharing agreement should ensure that some element of risk transfers to the contractor where it relates to their decisions and it is unfair to burden the letting employer with that risk. For example the contractor should typically be responsible for pension costs that arise from:

- + above average pay increases, including the effect in respect of service prior to contract commencement even if the letting employer takes on responsibility for the latter under (ii) above; and
- + redundancy and early retirement decisions.

NOTE (J) (Admission Bodies Exiting the Fund)

Notwithstanding the provisions of the Admission Agreement, the Administering Authority may consider any of the following as triggers for the cessation of an admission agreement with any type of body:

- + Last active member ceasing participation in the Fund (NB recent LGPS Regulation changes mean that the Administering Authority has the discretion to defer taking action for up to three years, so that if the employer acquires one or more active Fund members during that period then cessation is not triggered. The current Fund policy is that this is left as a discretion and may or may not be applied in any given case);
- + The insolvency, winding up or liquidation of the Admission Body;
- + Any breach by the Admission Body of any of its obligations under the Agreement that they have failed to remedy to the satisfaction of the Fund;
- + A failure by the Admission Body to pay any sums due to the Fund within the period required by the Fund; or
- + The failure by the Admission Body to renew or adjust the level of the bond or indemnity, or to confirm an appropriate alternative guarantor, as required by the Fund.
- + On termination of a deferred debt agreement.

On cessation, in the absence of a deferred debt arrangement, the Administering Authority will instruct the Fund actuary to carry out a cessation valuation to determine whether there is any deficit or surplus.

Payment of cessation debt

Where there is a deficit, payment of this amount in full would normally be sought from the Admission Body. The Fund's normal policy is that this cessation debt is paid in a single lump sum within 30 days of the employer being notified.

However, in line with the Regulations and when in the best interests of all parties, the Fund may agree for this payment to be spread over an agreed period, however, such agreement would only be permitted at the Fund's discretion, where payment of the debt in a single immediate lump sum could be shown to be materially detrimental to the employer's normal operations. In cases where payment is spread, the Fund reserves the right to require that the ceasing employer provides some form of security (such as a charge over assets, bond indemnity or guarantee) relating to the unpaid amount of debt at any given time.

Consideration of surplus / exit credit

Where there is a surplus, the Administering Authority will determine the amount of exit credit to be paid in accordance with the Regulations. In making this determination, the Administering Authority will consider:

- (i) the extent of any surplus,
- (ii) the proportion of surplus arising as a result of the employer's contributions,
- (iii) any representations (such as risk sharing agreements or guarantees) made by the exiting employer and any employer providing a guarantee (or some other form of employer assistance/support) and
- (iv) any other factors the Administering Authority deem relevant.

The Fund have a separate 'Exit Credit Policy' document which sets out the general guidelines that the Fund will consider when determining the amount of an exit credit payable to an exiting employer in line with Regulation 64, depending on employer's participation conditions. Please note that these are guidelines only and the Fund will also consider any other factors that are relevant on a case-by-case basis. These considerations may result in a determination that would be different if the guidelines were rigorously adhered to. In all cases, the Fund will not be bound by the guidelines, and will make its decision on a discretionary basis.

Allowance for McCloud on cessation

As discussed in Section 2.7, the LGPS benefit structure from 1 April 2014 is currently under review following the Government's loss of the right to appeal the McCloud and other similar court cases. The Fund has considered how it will reflect the current uncertainty regarding the outcome of this judgement in its approach to cessation valuations. For cessation valuations that are carried out before any changes to the LGPS benefit structure (from 1 April 2014) are confirmed, the Fund's policy is that the actuary will apply a 1% loading to the ceasing employer's post 2014 benefit accrual value, as an estimate of the possible impact of resulting benefit changes.

Allowance for expenses on cessation

The Fund Actuary charges a fee for carrying out an employer's cessation valuation which the Fund will recharge to the employer. For the purposes of the cessation valuation, this fee will be treated as an expense incurred by the employer and will be deducted from the employer's cessation surplus or added to the employer's cessation deficit, as appropriate. This process improves administrative efficiency as it reduces the number of transactions required to be made between the employer and the Fund following an employer's cessation.

Actuarial basis on cessation

For non-Transferee Admission Bodies whose participation is voluntarily ended either by themselves or the Fund, or where a cessation event has been triggered, the Administering Authority must look to protect the interests of other ongoing employers. The actuary will therefore adopt an approach which, to the extent reasonably practicable, protects the other employers from the likelihood of any material loss emerging in future:

- (b) Where a guarantor does not exist then, in order to protect other employers in the Fund, the cessation liabilities and final surplus/deficit will normally be calculated using a "gilt exit basis", which is more prudent than the ongoing participation basis. This has no allowance for potential future investment outperformance above gilt yields, and has added allowance for future improvements in life expectancy. This could give rise to significant cessation debts being required.
- (c) Where there is a guarantor for future deficits and contributions, the details of the guarantee will be considered prior to the cessation valuation being carried out. In some cases the guarantor is simply guarantor of last resort and therefore the cessation valuation will be carried out consistently with the approach taken had there been no guarantor in place. Alternatively, where the guarantor is not simply guarantor of last resort, the cessation may be calculated using the ongoing participation basis or contractor exit basis as described in Appendix E;

(d) Again, depending on the nature of the guarantee, it may be possible to simply transfer the former Admission Body's liabilities and assets to the guarantor, without needing to crystallise any deficit or surplus. This approach may be adopted where the employer cannot pay the contributions due, and this is within the terms of the guarantee.

Under (a) and (b), any shortfall would usually be levied on the departing Admission Body as a single lump sum payment. If this is not possible then the Fund may spread the payment subject to there being some security in place for the employer such as a bond indemnity or guarantee.

In the event that the Fund is not able to recover the required payment in full, then the unpaid amounts fall to be shared amongst all of the other employers in the Fund. This may require an immediate revision to the Rates and Adjustments Certificate affecting other employers in the Fund, or instead be reflected in the contribution rates set at the next formal valuation following the cessation date.

Deferred Debt Agreement ("DDA") alternative to immediate cessation

As an alternative, where the ceasing Admission Body is continuing in business the Administering Authority may enter into a written agreement with the Admission Body to defer their obligations to make an exit payment and continue to make secondary contributions (a 'Deferred Debt Agreement' as described in Regulation 64 (7A)). The Admission Body must meet all active employer requirements and pay the secondary rate of contributions as determined by the Fund Actuary until the termination of the deferred debt agreement.

The Administering Authority will consider deferred debt agreements in the following circumstances:

- + The Admission Body requests the Fund consider a deferred debt agreement;
- + The Admission Body is expected to have a deficit if a cessation valuation was carried out;
- + The Admission Body is expected to be a going concern; and
- + The covenant of the Admission Body is considered sufficient by the Administering Authority.

The Administering Authority will normally require:

- + Security be put in place covering the Admission Body's deficit on their cessation basis;
- + Regular monitoring of the contribution requirements and security requirements;
- + All costs of the arrangement are met by the Admission Body, such as the cost of advice to the Fund, ongoing monitoring of the arrangement, and correspondence on any ongoing contribution and security requirements.

A deferred debt agreement will normally terminate on the first date on which one of the following events occurs:

- + the Admission Body enrolls new active Fund members;
- + the period specified, or as varied, under the deferred debt agreement elapses;
- + the take-over, amalgamation, insolvency, winding up or liquidation of the Admission Body;
- + the Administering Authority serves a notice on the Admission Body that the Administering Authority is reasonably satisfied that the Admission Body's ability to meet the contributions payable under the deferred debt arrangement has weakened materially or is likely to weaken materially in the next 12 months;
- + the Fund actuary assesses that the Admission Body has paid sufficient secondary contributions to cover all (or almost all) of the exit payment due if the employer becomes an exiting employer on the calculation date (i.e. Admission Body is now largely fully funded on their cessation basis);
- + the Fund actuary assesses that the Admission Body's value of liabilities has fallen below an agreed de minimis level, if the employer becomes an exiting employer on the calculation date; or
- + The Admission Body requests early termination of the agreement and settles the exit payment in full as calculated by the Fund actuary on the calculation date (i.e. the Admission Body pays their outstanding cessation debt on their cessation basis).

On the termination of a deferred debt agreement, the Admission Body will become an exiting employer and a cessation valuation will be completed in line with this FSS.

3.4 Pooled contributions

From time to time, with the advice of the Actuary, the Administering Authority may set up pools for employers with similar or complementary characteristics. This will always be in line with its broader funding strategy. Currently the pools in place within the Fund are as follows:

- + Town and Parish Councils (as a way of sharing experience and smoothing out the effects of costly but relatively rare events such as deaths in service).
- + LEA schools are generally pooled with their funding Council. However there may be exceptions for specialist or independent schools.
- + Admission Bodies may be pooled with the letting employer or other associated Local Authorities, provided all parties (particularly the letting employer(s) or Local Authorities) agree.

The intention of the pool is to minimise contribution rate volatility which would otherwise occur when members join, leave, take early retirement, receive pay rises markedly different from expectations, etc. Such events can cause large changes in contribution rates for very small employers in particular, unless these are smoothed out for instance by pooling across a number of employers.

On the other hand it should be noted that the employers in the pool will still have their own individual funding positions tracked by the Actuary, so that some employers will be much better funded, and others much more poorly funded, than the pool average. This therefore means that if any given employer was funding on a stand-alone basis, as opposed to being in the pool, then its contribution rate could be much higher or lower than the pool contribution rate.

On exit from a pool, Town and Parish Councils, and LEA schools converting to academies, will normally be attributed assets on a pro-rata basis measuring the pool's funding position at that time. This differs from the alternative approach (in effect applied to TABs ceasing their contract) which would be to assess the individual employer's calculated asset share. The reason for this difference in approach is the long history of Town and Parish Councils and LEA schools paying pooled rates regardless of their own calculated asset share, and also to ensure that any orphan liabilities are accounted for.

Those employers which have been pooled are identified in the Rates and Adjustments Certificate.

Employers who are permitted to enter (or remain in) a pool at the 2019 valuation will not normally be advised of their individual contribution rate unless agreed by the Administering Authority.

Community Admission Bodies that are deemed by the Administering Authority to have closed to new entrants are not usually permitted to participate in a pool.

3.5 Additional flexibility in return for added security

The Administering Authority may permit greater flexibility to the employer's contributions if the employer provides added security to the satisfaction of the Administering Authority.

Such flexibility includes a reduced rate of contribution, an extended time horizon, or permission to join a pool with another body (e.g. the Local Authority).

Such security may include, but is not limited to, a suitable bond, a legally-binding guarantee from an appropriate third party, or security over an employer asset of sufficient value.

The degree of flexibility given may take into account factors such as:

- + the extent of the employer's deficit;
- + the amount and quality of the security offered;
- + the employer's financial security and business plan; and
- + whether the admission agreement is likely to be open or closed to new entrants.

3.6 Non ill health early retirement costs

It is assumed that members' benefits are payable from the earliest age that the employee could retire without incurring a reduction to their benefit (and without requiring their employer's consent to retire). (NB the relevant age may be different for different periods of service, following the benefit changes from April 2008 and April 2014). Employers are required to pay additional contributions ('strain') wherever an employee retires before attaining this age. The actuary's funding basis makes no allowance for premature retirement except on grounds of ill-health.

Employers must make these additional contributions as a one off payment to the fund immediately on awarding the early retirement. The exception to this rule are statutory bodies with tax raising powers, where, depending on the circumstances, the Administering Authority may at its absolute discretion agree to spread the payment over a period not exceeding 3 years. If this is agreed, interest will be charged, using factors provided by the actuary. In any event the spread period cannot exceed the period to the member's normal retirement date if this is shorter than 3 years.

3.7 Ill health early retirement costs

If a member retires early due to ill-health, an additional funding strain will usually arise, which can be very large. Such strain costs are the responsibility of the member's employer to pay, and are required to be paid to the Fund immediately or, in the case of tax raising bodies, over a three year period if requested by the employer.

The Administering Authority has arranged for an external insurance policy to cover ill health early retirement strains (see 3.8 below for further details). Each employer's contributions to the Fund includes its share of that year's insurance premium. When an active member retires on ill health early retirement, the claim amount received from the insurer will be credited to the respective employer's asset share in the Fund.

The Fund will monitor the strain arising from Tier 1 and Tier 2 ill-health retirements. Any additional costs arising from Tier 3 ill-health retirements will be reflected in the employer contribution rate following the next formal valuation.

3.8 Ill health risk management

The Fund recognises ill health early retirement costs can have a significant impact on an employer's funding and contribution rate, which could ultimately jeopardise their continued operation.

To mitigate this risk, the Fund has agreed to implement new procedures with effect from 1 April 2020, under which all Academy Schools, Town and Parish Councils, Admitted Bodies with closed Admission Agreements and Admitted Bodies without a guarantor will be required to be automatically covered by an ill health pension strain insurance policy organised by the Fund. This cost of this cover will be paid from the employer contributions.

All other employers will also automatically be covered by the ill health policy organised by the Fund unless they choose to opt out of such cover by making a risk based decision in accordance with the detailed procedures issued to all employers.

Where an employer formally opts out of the cover their employer contributions will remain unchanged, but will include a risk based ill health allowance. The standard approach of monitoring ill-health strain costs will apply for these employers where they will be asked to pay for any ill-health strains in excess of their allowance.

3.9 Employers with no remaining active members

In general an employer ceasing in the Fund, due to the departure of the last active member, will pay a cessation debt or receive an exit credit on an appropriate basis (see 3.3, Note (j)) and consequently have no further obligation to the Fund. Thereafter it is expected that one of two situations will eventually arise:

- a) The employer's asset share runs out before all its ex-employees' benefits have been paid. In this situation the other Fund employers will be required to contribute to pay all remaining benefits: this will be done by the Fund actuary apportioning the remaining liabilities on a pro-rata basis at successive formal valuations;
- b) The last ex-employee or dependant dies before the employer's asset share has been fully utilised. In this situation the remaining assets would be apportioned pro-rata by the Fund's actuary to the other Fund employers.
- c) In exceptional circumstances the Fund may permit an employer with no remaining active members and a cessation deficit to continue contributing to the Fund. This would require the provision of a suitable security or guarantee, as well as a written ongoing commitment to fund the remainder of the employer's obligations over an appropriate period. The Fund would reserve the right to invoke the cessation requirements in the future, however. The Administering Authority may need to seek legal advice in such cases, as the employer would have no contributing members.

3.10 Policies on bulk transfers

Each case will be treated on its own merits, but in general:

- + The Fund will not pay bulk transfers greater than the lesser of (a) the asset share of the transferring employer in the Fund, and (b) the value of the past service liabilities of the transferring members;
- + The Fund will not grant added benefits to members bringing in entitlements from another Fund unless the asset transfer is sufficient to meet the added liabilities; and
- + The Fund may permit shortfalls to arise on bulk transfers if the Fund employer has suitable strength of covenant and commits to meeting that shortfall in an appropriate period. This may require the employer's Fund contributions to increase between valuations.

3.11 Excess salary awards

The Fund Actuary makes assumptions regarding future pay growth applying to the pre-1 April 2014 accrual of benefit of current active members. Should actual pay rises exceed this assumption then the employer's liabilities will increase, and this increase could be very marked as pay growth immediately affects all benefits accrued before April 2014.

4. FUNDING STRATEGY AND LINKS TO INVESTMENT STRATEGY

4.1 What is the Fund's investment strategy?

The Fund has built up assets over the years, and continues to receive contribution and other income. All of this must be invested in a suitable manner, which is the investment strategy.

Investment strategy is set by the Administering Authority, after consultation with the employers and after taking investment advice. The precise mix, manager make up and target returns are set out in the Investment Strategy Statement which is available to members and employers.

The investment strategy is set for the long-term, but is reviewed from time to time. Normally a full review is carried out as part of each actuarial valuation, and is kept under review annually between actuarial valuations to ensure that it remains appropriate to the Fund's liability profile.

The same investment strategy is currently followed for all employers.

4.2 What is the link between funding strategy and investment strategy?

The Fund must be able to meet all benefit payments as and when they fall due. These payments will be met by contributions (resulting from the funding strategy) or asset returns and income (resulting from the investment strategy). To the extent that investment returns or income fall short, then higher cash contributions are required from employers, and vice versa

Therefore, the funding and investment strategies are inextricably linked.

4.3 How does the funding strategy reflect the Fund's investment strategy?

In the opinion of the Fund actuary, the current funding policy is consistent with the current investment strategy of the Fund. The actuary's assumptions for future investment returns (described further in Appendix E) are based on the current benchmark investment strategy of the Fund. The future investment return assumptions underlying each of the fund's three funding bases include a margin for prudence, and are therefore also considered to be consistent with the requirement to take a "prudent longer-term view" of the funding of liabilities as required by the UK Government (see Appendix A1).

In the short term – such as the assessments at formal valuations – there is the scope for considerable volatility in asset values. However, the actuary takes a long term view when assessing employer contribution rates and the contribution rate setting methodology takes into account this potential variability.

The Fund does not hold a contingency reserve to protect it against the volatility of equity investments.

4.4 Does the Fund monitor its overall funding position?

The Administering Authority monitors the relative funding position, i.e. changes in the relationship between asset values and the liabilities value, annually. It reports this to the regular Pensions Committee meetings, and also to employers via e-mail, Employers Forums and its Annual General Meeting.

5. STATUTORY REPORTING AND COMPARISON TO OTHER LGPS FUNDS

5.1 Purpose

Under Section 13(4)(c) of the Public Service Pensions Act 2013 ("Section 13"), the Government Actuary's Department must, following each triennial actuarial valuation, report to MHCLG on each of the LGPS Funds in England & Wales. This report will cover whether, for each Fund, the rate of employer contributions are set at an appropriate level to ensure both the solvency and the long term cost efficiency of the Fund.

This additional MHCLG oversight may have an impact on the strategy for setting contribution rates at future valuations.

5.2 Solvency

For the purposes of Section 13, the rate of employer contributions shall be deemed to have been set at an appropriate level to ensure solvency if:

- (a) the rate of employer contributions is set to target a funding level for the Fund of 100%, over an appropriate time period and using appropriate actuarial assumptions (where appropriateness is considered in both absolute and relative terms in comparison with other funds); and either
- (b) employers collectively have the financial capacity to increase employer contributions, and/or the Fund is able to realise contingent assets should future circumstances require, in order to continue to target a funding level of 100%; or
- (c) there is an appropriate plan in place should there be, or if there is expected in future to be, a material reduction in the capacity of fund employers to increase contributions as might be needed.

5.3 Long Term Cost Efficiency

The rate of employer contributions shall be deemed to have been set at an appropriate level to ensure long term cost efficiency if:

- i. the rate of employer contributions is sufficient to make provision for the cost of current benefit accrual,
- ii. with an appropriate adjustment to that rate for any surplus or deficit in the Fund.

In assessing whether the above condition is met, MHCLG may have regard to various absolute and relative considerations. A relative consideration is primarily concerned with comparing LGPS pension funds with other LGPS pension funds. An absolute consideration is primarily concerned with comparing Funds with a given objective benchmark.

Relative considerations include:

- 1. the implied deficit recovery period; and
- 2. the investment return required to achieve full funding after 20 years.

Absolute considerations include:

- 1. the extent to which the contributions payable are sufficient to cover the cost of current benefit accrual and the interest cost on any deficit;
- 2. how the required investment return under "relative considerations" above compares to the estimated future return being targeted by the Fund's current investment strategy;
- 3. the extent to which contributions actually paid have been in line with the expected contributions based on the extant rates and adjustment certificate; and
- 4. the extent to which any new deficit recovery plan can be directly reconciled with, and can be demonstrated to be a continuation of, any previous deficit recovery plan, after allowing for actual Fund experience.

MHCLG may assess and compare these metrics on a suitable standardised market-related basis, for example where the local funds' actuarial bases do not make comparisons straightforward.

APPENDIX A - Regulatory framework

WHY DOES THE FUND NEED AN FSS?

The Ministry of Housing, Communities and Local Government (MHCLG) has stated that 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 going forward;
- to support the regulatory framework to maintain **as nearly constant employer contribution rates as possible**; and
- to take a **prudent longer-term view** of funding those liabilities.”

These objectives are desirable individually, but may be mutually conflicting.

The requirement to maintain and publish a FSS is contained in LGPS Regulations which are updated from time to time. In publishing the FSS the Administering Authority has to have regard to any guidance published by Chartered Institute of Public Finance and Accountancy (CIPFA) (most recently in 2016) and to its Statement of Investment Principles / Investment Strategy Statement.

This is the framework within which the Fund’s actuary carries out triennial valuations to set employers’ contributions and provides recommendations to the Administering Authority when other funding decisions are required, such as when employers join or leave the Fund. The FSS applies to all employers participating in the Fund.

A2 Does the Administering Authority consult anyone on the FSS?

Yes. This is required by LGPS Regulations. It is covered in more detail by the most recent CIPFA guidance, which states that the FSS must first be subject to “consultation with such persons as the authority considers appropriate”, and should include “a meaningful dialogue at officer and elected member level with council tax raising authorities and with corresponding representatives of other participating employers”.

In practice, for the Fund, the consultation process for this FSS was as follows:

- a) A draft version of the FSS was issued to all participating employers in February 2021 for comment;
- b) Comments were requested within 16 days;
- c) Following the end of the consultation period the FSS was submitted to, and agreed by the Pension Committee at its March 2021 meeting, updated where required, and then published, in March 2021.

A3 How is the FSS published?

The FSS is made available through the following routes:

- + Published on the website, at www.gloucestershire.gov.uk/extra/pensions/investments
- + A copy sent by email to each participating employer in the Fund;
- + A copy sent to employee/pensioner representatives;
- + A full copy linked from the annual report and accounts of the Fund;
- + Copies sent to independent advisers;
- + Copies made available on request.

A4 How often is the FSS reviewed?

move to every four years in future – see Section 2.8). This version is expected to remain unaltered until it is consulted upon as part of the formal process for the next valuation.

It is possible that (usually slight) amendments may be needed within the three year period. These would be needed to reflect any regulatory changes, or alterations to the way the Fund operates (e.g. to accommodate a new class of employer). Any such amendments would be consulted upon as appropriate:

- + trivial amendments would be simply notified at the next round of employer communications,
- + amendments affecting only one class of employer would be consulted with those employers,
- + other more significant amendments would be subject to full consultation.

In any event, changes to the FSS would need agreement by the Pensions Committee and would be included in the relevant Committee Meeting minutes.

A5 How does the FSS fit into other Fund documents?

The FSS is a summary of the Fund’s approach to funding liabilities. It is not an exhaustive statement of policy on all issues, for example there are a number of separate statements published by the Fund including the Investment Strategy Statement, Governance Strategy and Communications Strategy. In addition, the Fund publishes an Annual Report and Accounts with up to date information on the Fund.

These documents can be found on the web at www.gloucestershire.gov.uk/extra/pensions/investments

APPENDIX B - Responsibilities of key parties

The efficient and effective operation of the Fund needs various parties to each play their part.

B1 The Administering Authority should:-

1. operate the Fund as per the LGPS Regulations;
2. effectively manage any potential conflicts of interest arising from its dual role as Administering Authority and a Fund employer;
3. collect employer and employee contributions, and investment income and other amounts due to the Fund;
4. ensure that cash is available to meet benefit payments as and when they fall due;
5. pay from the Fund the relevant benefits and entitlements that are due;
6. invest surplus monies (i.e. contributions and other income which are not immediately needed to pay benefits) in accordance with the Fund's Investment Strategy Statement (ISS) and LGPS Regulations;
7. communicate appropriately with employers so that they fully understand their obligations to the Fund;
8. take appropriate measures to safeguard the Fund against the consequences of employer default;
9. manage the valuation process in consultation with the Fund's actuary;
10. provide data and information as required by the Government Actuary's Department to carry out their statutory obligations (see Section 5);
11. prepare and maintain a FSS and a ISS, after consultation;
12. notify the Fund's actuary of material changes which could affect funding (this is covered in a separate agreement with the actuary); and
13. monitor all aspects of the fund's performance and funding and amend the FSS and ISS as necessary and appropriate.

B2 The Individual Employer should:-

1. deduct contributions from employees' pay correctly;
2. pay all contributions, including their own as determined by the actuary, promptly by the due date;
3. have a policy and exercise discretions within the regulatory framework;
4. make additional contributions in accordance with agreed arrangements in respect of, for example, augmentation of scheme benefits, early retirement strain; and
5. notify the Administering Authority promptly of all changes to its circumstances, prospects or membership, which could affect future funding.

B3 The Fund Actuary should:-

1. prepare valuations, including the setting of employers' contribution rates. This will involve agreeing assumptions with the Administering Authority, having regard to the FSS and LGPS Regulations, and targeting each employer's solvency appropriately;
2. provide data and information as required by the Government Actuary's Department to carry out their statutory obligations (see Section 5);
3. provide advice relating to new employers in the Fund, including the level and type of bonds or other forms of security (and the monitoring of these);
4. prepare advice and calculations in connection with bulk transfers and individual benefit-related matters;
5. assist the Administering Authority in considering possible changes to employer contributions between formal valuations, where circumstances suggest this may be necessary;
6. advise on the termination of employers' participation in the Fund; and
7. fully reflect actuarial professional guidance and requirements in the advice given to the Administering Authority.

B4 Other parties:-

1. investment advisers (either internal or external) should ensure the Fund's ISS remains appropriate, and consistent with this FSS;
2. investment managers, custodians and bankers should all play their part in the effective investment (and dis-investment) of Fund assets, in line with the ISS;
3. auditors should comply with their auditing standards, ensure Fund compliance with all requirements, monitor and advise on fraud detection, and sign off annual reports and financial statements as required;
4. governance advisers may be appointed to advise the Administering Authority on efficient processes and working methods in managing the Fund;
5. legal advisers (either internal or external) should ensure the Fund's operation and management remains fully compliant with all regulations and broader local government requirements, including the Administering Authority's own procedures;
6. MHCLG (assisted by the Government Actuary's Department) and the Scheme Advisory Board, should work with LGPS Funds to meet Section 13 requirements.

APPENDIX C - Key risks and controls

TYPES OF RISK

The Administering Authority has an active risk management programme in place. The measures that it has in place to control key risks are summarised below under the following headings:

- + financial;
- + demographic;
- + regulatory; and
- + governance.

C2 Financial risks

RISK	SUMMARY OF CONTROL MECHANISMS
FUND ASSETS FAIL TO DELIVER RETURNS IN LINE WITH THE ANTICIPATED RETURNS UNDERPINNING THE VALUATION OF LIABILITIES AND CONTRIBUTION RATES OVER THE LONG-TERM.	<p>Only anticipate long-term returns on a relatively prudent basis to reduce risk of under-performing.</p> <p>Assets invested on the basis of specialist advice, in a suitably diversified manner across asset classes, geographies, managers, etc.</p> <p>Analyse progress at three yearly valuations for all employers.</p> <p>Inter-valuation roll-forward of liabilities between valuations at whole Fund level.</p>
INAPPROPRIATE LONG-TERM INVESTMENT STRATEGY.	<p>Overall investment strategy options considered as an integral part of the funding strategy. Used asset liability modelling to measure 4 key outcomes.</p> <p>Chosen option considered to provide the best balance.</p>
ACTIVE INVESTMENT MANAGER UNDER-PERFORMANCE RELATIVE TO BENCHMARK.	<p>Quarterly investment monitoring analyses market performance and active managers relative to their index benchmark.</p>
PAY AND PRICE INFLATION SIGNIFICANTLY MORE THAN ANTICIPATED.	<p>The focus of the actuarial valuation process is on real returns on assets, net of price and pay increases.</p> <p>Inter-valuation monitoring, as above, gives early warning.</p> <p>Some investment in bonds also helps to mitigate this risk.</p> <p>Employers pay for their own salary awards and should be mindful of the geared effect on pension liabilities of any bias in pensionable pay rises towards longer-serving employees.</p>
EFFECT OF POSSIBLE INCREASE IN EMPLOYER'S CONTRIBUTION RATE ON SERVICE DELIVERY AND ADMISSION/SCHEDULED BODIES	<p>An explicit stabilisation mechanism has been agreed as part of the funding strategy. Other measures are also in place to limit sudden increases in contributions.</p>
ORPHANED EMPLOYERS GIVE RISE TO ADDED COSTS FOR THE FUND	<p>The Fund seeks a cessation debt (or security/guarantor) to minimise the risk of this happening in the future.</p> <p>If it occurs, the Actuary calculates the added cost spread pro-rata among all employers – (see 3.9).</p>
EFFECT OF POSSIBLE ASSET UNDERPERFORMANCE AS A RESULT OF CLIMATE CHANGE	<p>The Fund is working closely with the Brunel Pension Partnership to ensure that climate change risks are actively considered.</p>

C3 Demographic risks

RISK	SUMMARY OF CONTROL MECHANISMS
PENSIONERS LIVING LONGER, THUS INCREASING COST TO FUND.	<p>Set mortality assumptions with some allowance for future increases in life expectancy.</p> <p>The Fund Actuary has direct access to the experience of over 50 LGPS funds which allows early identification of changes in life expectancy that might in turn affect the assumptions underpinning the valuation.</p>
MATURING FUND – I.E. PROPORTION OF ACTIVELY CONTRIBUTING EMPLOYEES DECLINES RELATIVE TO RETIRED EMPLOYEES.	<p>Continue to monitor at each valuation, consider seeking monetary amounts rather than % of pay and consider alternative investment strategies.</p>
DETERIORATING PATTERNS OF EARLY RETIREMENTS	<p>Employers are charged the extra cost of non ill-health retirements following each individual decision.</p> <p>All high risk employers are covered by an ill health insurance policy organised by the Fund. All other employers are also covered by this policy unless they formally opt out of these arrangements following the procedures set out in section 3.8 above.</p>
REDUCTIONS IN PAYROLL CAUSING INSUFFICIENT DEFICIT RECOVERY PAYMENTS	<p>In many cases this may not be sufficient cause for concern, and will in effect be caught at the next formal valuation. However, there are protections where there is concern, as follows:</p> <p>Employers in the stabilisation mechanism may be brought out of that mechanism to permit appropriate contribution increases (see Note (b) to 3.3).</p> <p>For other employers, review of contributions is permitted in general between valuations (see Note (f) to 3.3) and may require a move in deficit contributions from a percentage of payroll to fixed monetary amounts.</p>

C4 Regulatory risks

RISK	SUMMARY OF CONTROL MECHANISMS
CHANGES TO NATIONAL PENSION REQUIREMENTS AND/OR HMRC RULES E.G. CHANGES ARISING FROM PUBLIC SECTOR PENSIONS REFORM.	<p>The Administering Authority considers all consultation papers issued by the Government and comments where appropriate.</p> <p>The Administering Authority is monitoring the progress on the McCloud court case and will consider an interim valuation or other appropriate action once more information is known.</p> <p>The government's long term preferred solution to GMP indexation and equalisation - conversion of GMPs to scheme benefits - was built into the 2019 valuation.</p>
TIME, COST AND/OR REPUTATIONAL RISKS ASSOCIATED WITH ANY MHCLG INTERVENTION TRIGGERED BY THE SECTION 13 ANALYSIS (SEE SECTION 5).	<p>Take advice from Fund Actuary on position of Fund as at prior valuation, and consideration of proposed valuation approach relative to anticipated Section 13 analysis.</p>
CHANGES BY GOVERNMENT TO PARTICULAR EMPLOYER PARTICIPATION IN LGPS FUNDS, LEADING TO IMPACTS ON FUNDING AND/OR INVESTMENT STRATEGIES.	<p>The Administering Authority considers all consultation papers issued by the Government and comments where appropriate.</p> <p>Take advice from Fund Actuary on impact of changes on the Fund and amend strategy as appropriate.</p>

C5 Governance risks

RISK	SUMMARY OF CONTROL MECHANISMS
ADMINISTERING AUTHORITY UNAWARE OF STRUCTURAL CHANGES IN AN EMPLOYER'S MEMBERSHIP (E.G. LARGE FALL IN EMPLOYEE MEMBERS, LARGE NUMBER OF RETIREMENTS) OR NOT ADVISED OF AN EMPLOYER CLOSING TO NEW ENTRANTS.	<p>The Administering Authority has a close relationship with employing bodies and communicates required standards e.g. for submission of data.</p> <p>The Actuary may revise the rates and Adjustments certificate to increase an employer's contributions between triennial valuations</p> <p>Deficit contributions may be expressed as monetary amounts.</p>
ACTUARIAL OR INVESTMENT ADVICE IS NOT SOUGHT, OR IS NOT HEEDDED, OR PROVES TO BE INSUFFICIENT IN SOME WAY	<p>The Administering Authority maintains close contact with its specialist advisers.</p> <p>Advice is delivered via formal meetings involving Elected Members, and recorded appropriately.</p> <p>Actuarial advice is subject to professional requirements such as peer review.</p>
ADMINISTERING AUTHORITY FAILING TO COMMISSION THE FUND ACTUARY TO CARRY OUT A TERMINATION VALUATION FOR A DEPARTING ADMISSION BODY.	<p>The Administering Authority requires employers with Best Value contractors to inform it of forthcoming changes.</p> <p>Community Admission Bodies' memberships are monitored and, if active membership decreases, steps will be taken.</p>
AN EMPLOYER CEASING TO EXIST WITH INSUFFICIENT FUNDING OR ADEQUACY OF A BOND.	<p>The Administering Authority believes that it would normally be too late to address the position if it was left to the time of departure.</p> <p>The risk is mitigated by:</p> <ul style="list-style-type: none"> Seeking a funding guarantee from another scheme employer, or external body, where-ever possible (see Notes (h) and (j) to 3.3). Alerting the prospective employer to its obligations and encouraging it to take independent actuarial advice. Vetting prospective employers before admission. Where permitted under the regulations requiring a bond to protect the Fund from various risks. Requiring new Community Admission Bodies to have a guarantor. Reviewing bond or guarantor arrangements at regular intervals (see Note (f) to 3.3). Reviewing contributions well ahead of cessation if thought appropriate (see Note (a) to 3.3).
AN EMPLOYER CEASING TO EXIST RESULTING IN AN EXIT CREDIT BEING PAYABLE	<p>The Administering Authority regularly monitors admission bodies coming up to cessation</p> <p>The Administering Authority invests in liquid assets to ensure that exit credits can be paid when required.</p>

APPENDIX D - The calculation of Employer contributions

In Section 2 there was a broad description of the way in which contribution rates are calculated. This Appendix considers these calculations in much more detail.

As discussed in Section 2, the actuary calculates the required contribution rate for each employer using a three-step process:

- + Calculate the funding target for that employer, i.e. the estimated amount of assets it should hold in order to be able to pay all its members' benefits. See Appendix E for more details of what assumptions we make to determine that funding target;
- + Determine the time horizon over which the employer should aim to achieve that funding target. See the table in 3.3 and Note (c) for more details;
- + Calculate the employer contribution rate such that it has at least a given likelihood of achieving that funding target over that time horizon, allowing for various possible economic outcomes over that time horizon. See the table in 3.3 Note (e) for more details.

The calculations involve actuarial assumptions about future experience, and these are described in detail in Appendix E.

D1 What is the difference between calculations across the whole Fund and calculations for an individual employer?

Employer contributions are normally made up of two elements:

- a) the estimated cost of ongoing benefits being accrued, referred to as the "Primary contribution rate" (see D2); plus
- b) an adjustment for the difference between the Primary rate above, and the actual contribution the employer needs to pay, referred to as the "Secondary contribution rate" (see D3).

The contribution rate for each employer is measured as above, appropriate for each employer's assets, liabilities and membership. The whole Fund position, including that used in reporting to MHCLG (see section 5), is calculated in effect as the sum of all the individual employer rates. MHCLG currently only regulates at whole Fund level, without monitoring individual employer positions.

D2 How is the Primary contribution rate calculated?

The Primary element of the employer contribution rate is calculated with the aim that these contributions will meet benefit payments in respect of members' future service in the Fund. This is based upon the cost (in excess of members' contributions) of the benefits which employee members earn from their service each year.

The Primary rate is calculated separately for all the employers, although employers within a pool will pay the contribution rate applicable to the pool as a whole. The Primary rate is calculated such that it is projected to:

1. meet the required funding target for all future years' accrual of benefits*, excluding any accrued assets,
2. within the determined time horizon (see note 3.3 Note (c) for further details),
3. with a sufficiently high likelihood, as set by the Fund's strategy for the category of employer (see 3.3 Note (e) for further details).

* The projection is for the current active membership where the employer no longer admits new entrants, or additionally allows for new entrants where this is appropriate.

The projections are carried out using an economic modeller (the "Economic Scenario Service") developed by the Fund's actuary Hymans Robertson: this allows for a wide range of outcomes as regards key factors such as asset returns (based on the Fund's investment strategy), inflation, and bond yields. Further information about this model is included in Appendix E. The measured contributions are calculated such that the proportion of outcomes meeting the employer's funding target (at the end of the time horizon) is equal to the required likelihood.

The approach includes expenses of administration to the extent that they are borne by the Fund, and includes allowances for benefits payable on death in service and on ill health retirement.

D3 How is the Secondary contribution rate calculated?

The Fund aims for the employer to have assets sufficient to meet 100% of its accrued liabilities at the end of its funding time horizon based on the employer's funding target assumptions (see Appendix E).

The Secondary rate is calculated as the balance over and above the Primary rate, such that the total contribution rate is projected to:

1. meet the required funding target relating to combined past and future service benefit accrual, including accrued asset share (see D5)
2. at the end of the determined time horizon (see 3.3 Note (c) for further details)
3. with a sufficiently high likelihood, as set by the Fund's strategy for the category of employer (see 3.3 Note (e) for further details).

The projections are carried out using an economic modeller (the "Economic Scenario Service") developed by the Fund Actuary Hymans Robertson: this allows for a wide range of outcomes as regards key factors such as asset returns (based on the Fund's investment strategy), inflation, and bond yields. Further information about this model is included in Appendix E. The measured contributions are calculated such that the proportion of outcomes meeting the employer's funding target (at the end of the time horizon) is equal to the required likelihood.

D4 What affects a given employer's valuation results?

The results of these calculations for a given individual employer will be affected by:

1. past contributions relative to the cost of accruals of benefits;
2. different liability profiles of employers (e.g. mix of members by age, gender, service vs. salary);
3. the effect of any differences in the funding target, i.e. the valuation basis used to value the employer's liabilities at the end of the time horizon;
4. any different time horizons;
5. the difference between actual and assumed rises in pensionable pay;
6. the difference between actual and assumed increases to pensions in payment and deferred pensions;
7. the difference between actual and assumed retirements on grounds of ill-health from active status;
8. the difference between actual and assumed amounts of pension ceasing on death;
9. the additional costs of any non ill-health retirements relative to any extra payments made; and/or
10. differences in the required likelihood of achieving the funding target.

D5 How is each employer's asset share calculated?

The Administering Authority does not operate separate bank accounts or investment mandates for each employer.

Therefore it cannot account for each employer's assets separately. Instead, the Fund Actuary must apportion the assets of the whole Fund between the individual employers.

There are broadly two ways to do this:

- 1) A technique known as "analysis of surplus" in which the Fund actuary estimates the surplus/deficit of an employer at the current valuation date by analysing movements in the surplus/deficit from the previous actuarial valuation date. The estimated surplus/deficit is compared to the employer's liability value to calculate the employer's asset value. The actuary will quantify the impact of investment, membership and other experience to analyse the movement in the surplus/deficit. This technique makes a number of simplifying assumptions due to the unavailability of certain items of information. This leads to a balancing, or miscellaneous, item in the analysis of surplus, which is split between employers in proportion to their asset shares.
- 2) A 'cashflow approach' in which an employer's assets are tracked over time allowing for cashflows paid in (contributions, transfers in etc.), cashflows paid out (benefit payments, transfers out etc.) and investment returns on the employer's assets.

Until 31 March 2016 the Administering Authority used the 'analysis of surplus' approach to apportion the Fund's assets between individual employers.

Since then, the Fund has adopted a cashflow approach for tracking individual employer assets.

The Fund Actuary uses the Hymans Robertson's proprietary "HEAT" system to track employer assets on a monthly basis. Starting with each employer's assets from the previous month end, cashflows paid in/out and investment returns achieved on the Fund's assets over the course of the month are added to calculate an asset value at the month end.

The Fund is satisfied that this new approach provides the most accurate asset allocations between employers that is reasonably possible at present.

D6 How does the Fund adjust employer asset shares when an individual member moves from one employer in the Fund to another?

Under the cashflow approach for tracking employer asset shares, the Fund has allowed for any individual members transferring from one employer in the Fund to another, via the transfer of a sum from the ceding employer's asset share to the receiving employer's asset share. This sum is equal to the member's Cash Equivalent Transfer Value (CETV) as advised by the Fund's administrators.

APPENDIX E - Actuarial assumptions

E1 What are the actuarial assumptions used to calculate employer contribution rates?

These are expectations of future experience used to place a value on future benefit payments (“the liabilities”) and future asset values. Assumptions are made about the amount of benefit payable to members (the financial assumptions) and the likelihood or timing of payments (the demographic assumptions). For example, financial assumptions include investment returns, salary growth and pension increases; demographic assumptions include life expectancy, probabilities of ill-health early retirement, and proportions of member deaths giving rise to dependants’ benefits.

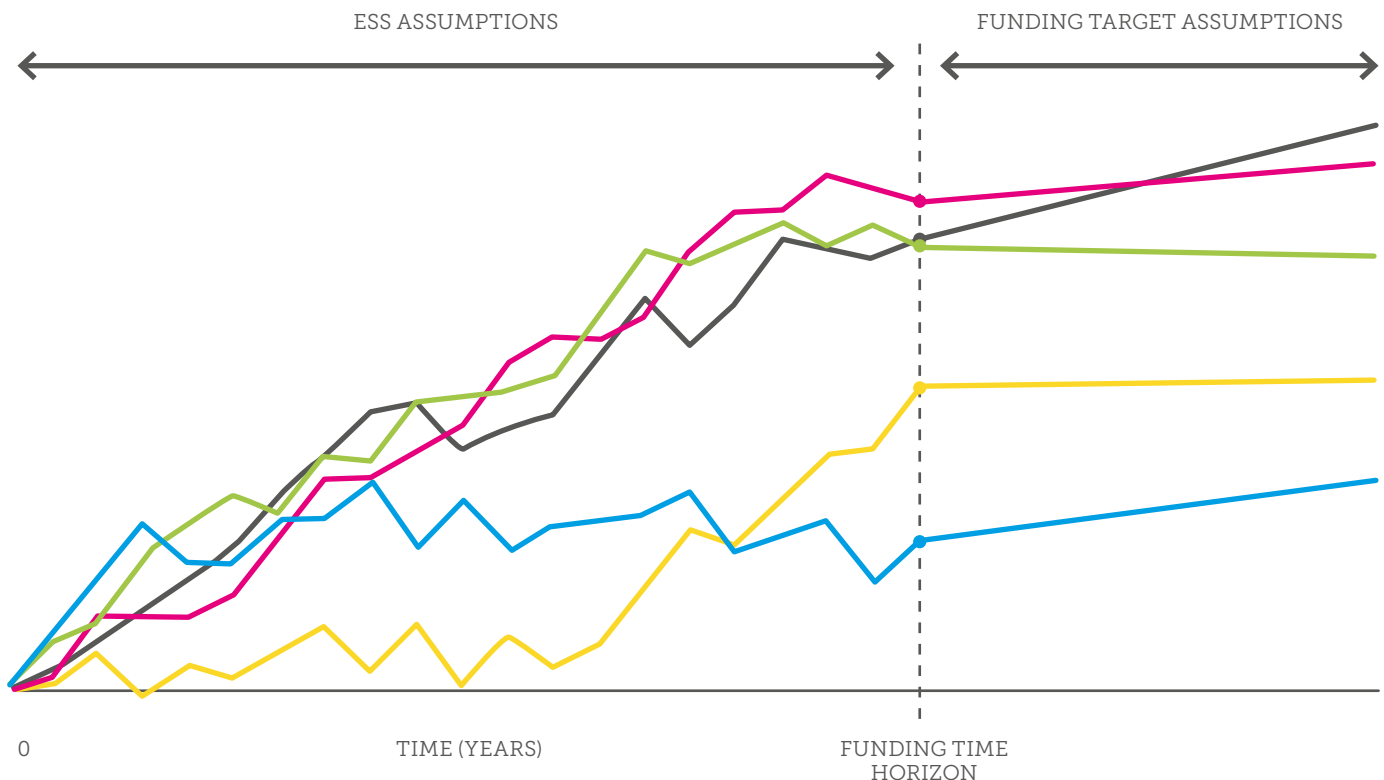
Changes in assumptions will affect the funding target and required contribution rate. However, different assumptions will not of course affect the actual benefits payable by the Fund in future.

The actuary’s approach to calculating employer contribution rates involves the projection of each employer’s future benefit payments, contributions and investment returns into the future under 5,000 possible economic scenarios. Future inflation (and therefore benefit payments) and investment returns for each asset class (and therefore employer asset values) are variables in the projections.

By projecting the evolution of an employer’s assets and benefit payments 5,000 times, a contribution rate can be set that results in a sufficient number of these future projections (determined by the employer’s required likelihood) being successful at the end of the employer’s time horizon. In this context, a successful contribution rate is one which results in the employer having met its funding target at the end of the time horizon.

Setting employer contribution rates therefore requires two types of assumptions to be made about the future:

1. Assumptions to project the employer’s assets, benefits and cashflows to the end of the funding time horizon. For this purpose the actuary uses Hymans Robertson’s proprietary stochastic economic model - the Economic Scenario Service (“ESS”).
2. Assumptions to assess whether, for a given projection, the funding target is satisfied at the end of the time horizon. For this purpose, the Fund has three different funding bases.



Details on the ESS assumptions and funding target assumptions are included below (in E2 and E3 respectively).

E2 What assumptions are used in the ESS?

The actuary uses Hymans Robertson's ESS model to project a range of possible outcomes for the future behaviour of asset returns and economic variables. With this type of modelling, there is no single figure for an assumption about future inflation or investment returns. Instead, there is a range of what future inflation or returns will be which leads to likelihoods of the assumption being higher or lower than a certain value.

The ESS is a complex model to reflect the interactions and correlations between different asset classes and wider economic variables. The table below shows the calibration of the model as at 31 March 2019. All returns are shown net of fees and are the annualised total returns over 5, 10 and 20 years, except for the yields which refer to the simulated yields at that time horizon.

ANNUALISED TOTAL RETURNS

		ANNUALISED TOTAL RETURNS									
		CASH	INDEX LINKED GILTS (MEDIUM)	FIXED INTEREST GILTS (MEDIUM)	UK EQUITY	OVERSEAS EQUITY	PROPERTY	A RATED CORPORATE BONDS (MEDIUM)	RPI INFLATION EXPECTATION	17 YEAR REAL GOVT BOND YIELD	17 YEAR GOVT BOND YIELD
5 YEARS	16th %'ile	-0.4 %	-2.3%	-2.9%	-4.1%	-4.1%	-3.5%	-2.7%	1.9%	-2.5%	0.8%
	50th %'ile	0.7%	0.5%	0.3%	4.0%	4.1%	2.4%	0.8%	3.3%	1.7%	2.1%
	84th %'ile	2.0%	3.3%	3.4%	12.7%	12.5%	8.8%	4.0%	4.9%	-0.8%	3.6%
10 YEARS	16th %'ile	-0.2%	-1.8 %	-1.3 %	-1.5%	-1.4 %	-1.5%	-0.9%	1.9%	-2.0%	1.2%
	50th %'ile	1.3%	0.0%	0.2%	4.6%	4.7%	3.1%	0.8%	3.3%	-0.8%	2.8%
	84th %'ile	2.9%	1.9%	1.7%	10.9%	10.8%	7.8%	2.5%	4.9%	-0.4%	4.8%
20 YEARS	16th %'ile	0.7%	-1.1%	0.1%	1.2%	1.3%	0.6%	0.7%	2.0%	-0.7%	2.2%
	50th %'ile	2.4%	0.3%	1.0%	5.7%	5.8%	4.3%	1.9%	3.2%	0.8%	4.0%
	84th %'ile	4.5%	2.0%	2.0%	10.3%	10.4%	8.1%	3.0%	4.7%	2.2%	6.3%
Volatility (Disp)(1 yr)		1%	7%	10%	17%	17%	14%	11%	1%		

E3 What assumptions are used in the funding target?

At the end of an employer's funding time horizon, an assessment will be made – for each of the 5,000 projections – of how the assets held compare to the value of assets required to meet the future benefit payments (the funding target). Valuing the cost of future benefits requires the actuary to make assumptions about the following financial factors:

- + Benefit increases and CARE revaluation
- + Salary growth
- + Investment returns (the “discount rate”)

Each of the 5,000 projections represents a different prevailing economic environment at the end of the funding time horizon and so a single, fixed value for each assumption is unlikely to be appropriate for every projection.

For example, a high assumed future investment return (discount rate) would not be prudent in projections with a weak outlook for economic growth. Therefore, instead of using a fixed value for each assumption, the actuary references economic indicators to ensure the assumptions remain appropriate for the prevailing economic environment in each projection. The economic indicators the actuary uses are: future inflation expectations and the prevailing risk free rate of return (the yield on long term UK government bonds is used as a proxy for this rate).

The Fund has three funding bases which will apply to different employers depending on their type. Each funding basis has a different assumption for future investment returns when determining the employer's funding target.

FUNDING BASIS	ONGOING PARTICIPATION BASIS	CONTRACTOR EXIT BASIS	LOW RISK EXIT BASIS
EMPLOYER TYPE	All employers except Transferee Admission Bodies and closed Community Admission Bodies	Transferee Admission Bodies	Community Admission Bodies that are closed to new entrants
INVESTMENT RETURN ASSUMPTION UNDERLYING THE EMPLOYER'S FUNDING TARGET (AT THE END OF ITS TIME HORIZON)	Long term government bond yields plus an asset outperformance assumption (AOA) of 1.8% p.a.	Long term government bond yields plus an AOA equal to the AOA used to allocate assets to the employer on joining the Fund	Long term government bond yields with no allowance for outperformance on the Fund's assets

E4 What other assumptions apply?

The following assumptions are those of the most significance used in both the projection of the assets, benefits and cashflows and in the funding target.

a) Salary growth

After discussion with Fund officers, the salary increase assumption at the 2019 valuation has been set to be a blended rate combined of:

1. 2% p.a. until 31 March 2022 followed by
2. 0.5% above the consumer prices index (CPI) p.a. thereafter.

This gives a single "blended" assumption of CPI plus 0.3%. This is equivalent to the assumption adopted at the previous valuation leading to no change in the funding target.

b) Pension increases

Since 2011 the consumer prices index (CPI), rather than RPI, has been the basis for increases to public sector pensions in deferment and in payment. Note that the basis of such increases is set by the Government, and is not under the control of the Fund or any employers.

At this valuation, we have continued to assume that CPI is 1.0% per annum lower than RPI. (Note that the reduction is applied in a geometric, not arithmetic, basis).

c) Life expectancy

The demographic assumptions are intended to be best estimates of future experience in the Fund based on past experience of LGPS funds which participate in Club Vita, the longevity analytics service used by the Fund, and endorsed by the actuary.

The longevity assumptions that have been adopted at this valuation are a bespoke set of "VitaCurves", produced by the Club Vita's detailed analysis, which are specifically tailored to fit the membership profile of the Fund. These curves are based on the data provided by the Fund for the purposes of this valuation.

Allowance has been made in the ongoing valuation basis for future improvements in line with the 2018 version of the Continuous Mortality Investigation model published by the Actuarial Profession and a 1.25% per annum minimum underpin to future reductions in mortality rates. This updated allowance for future improvements will generally result in lower life expectancy assumptions and hence a reduced funding target (all other things being equal).

The approach taken is considered reasonable in light of the long term nature of the Fund and the assumed level of security underpinning members' benefits.

d) General

The same financial assumptions are adopted for most employers (on the ongoing participation basis identified above), in deriving the funding target underpinning the Primary and Secondary rates: as described in (3.3), these calculated figures are translated in different ways into employer contributions, depending on the employer's circumstances.

The demographic assumptions, in particular the life expectancy assumption, in effect vary by type of member and so reflect the different membership profiles of employers.

APPENDIX F - Glossary

Funding basis

The combined set of assumptions made by the actuary, regarding the future, to calculate the value of the funding target at the end of the employer's time horizon. The main assumptions will relate to the level of future investment returns, salary growth, pension increases and longevity. More prudent assumptions will give a higher funding target, whereas more optimistic assumptions will give a lower funding target.

Administering Authority

The council with statutory responsibility for running the Fund, in effect the Fund's "trustees".

Admission Bodies

Employers where there is an Admission Agreement setting out the employer's obligations. These can be Community Admission Bodies or Transferee Admission Bodies. For more details (see 2.3).

Covenant

The assessed financial strength of the employer. A strong covenant indicates a greater ability (and willingness) to pay for pension obligations in the long run. A weaker covenant means that it appears that the employer may have difficulties meeting its pension obligations in full over the longer term.

Designating Employer

Employers such as town and parish councils that are able to participate in the LGPS via resolution. These employers can designate which of their employees are eligible to join the Fund.

Employer

An individual participating body in the Fund, which employs (or used to employ) **members** of the Fund. Normally the assets and **funding target** values for each employer are individually tracked, together with its **Primary rate** at each **valuation**.

Gilt

A UK Government bond, ie a promise by the Government to pay interest and capital as per the terms of that particular gilt, in return for an initial payment of capital by the purchaser. Gilts can be "fixed interest", where the interest payments are level throughout the gilt's term, or "index-linked" where the interest payments vary each year in line with a specified index (usually RPI). Gilts can be bought as assets by the Fund, but are also used in funding as an objective measure of a risk-free rate of return.

Guarantee / guarantor

A formal promise by a third party (the guarantor) that it will meet any pension obligations not met by a specified employer. The presence of a guarantor will mean, for instance, that the Fund can consider the employer's covenant to be as strong as its guarantor's.

Letting employer

An employer which outsources or transfers a part of its services and workforce to another employer (usually a contractor). The contractor will pay towards the LGPS benefits accrued by the transferring members, but ultimately the obligation to pay for these benefits will revert to the letting employer. A letting employer will usually be a local authority, but can sometimes be another type of employer such as an Academy.

LGPS

The Local Government Pension Scheme, a public sector pension arrangement put in place via Government Regulations, for workers in local government. These Regulations also dictate eligibility (particularly for Scheduled Bodies), members' contribution rates, benefit calculations and certain governance requirements. The LGPS is divided into 100 Funds which map the UK. Each LGPS Fund is autonomous to the extent not dictated by Regulations, e.g. regarding investment strategy, employer contributions and choice of advisers.

Maturity

A general term to describe a Fund (or an employer's position within a Fund) where the members are closer to retirement (or more of them already retired) and the investment time horizon is shorter. This has implications for investment strategy and, consequently, funding strategy.

Members

The individuals who have built up (and may still be building up) entitlement in the Fund. They are divided into actives (current employee members), deferreds (ex-employees who have not yet retired) and pensioners (ex-employees who have now retired, and dependants of deceased ex-employees).

Primary contribution rate

The employer contribution rate required to pay for ongoing accrual of active members' benefits (including an allowance for administrative expenses). See Appendix D for further details.

Profile

The profile of an employer's membership or liability reflects various measurements of that employer's **members**, ie current and former employees. This includes: the proportions which are active, deferred or pensioner; the average ages of each category; the varying salary or pension levels; the lengths of service of active members vs their salary levels, etc. A membership (or liability) profile might be measured for its **maturity** also.

Rates and Adjustments Certificate

A formal document required by the LGPS Regulations, which must be updated at the conclusion of the formal **valuation**. This is completed by the actuary and confirms the contributions to be paid by each employer (or pool of employers) in the Fund for the period until the next valuation is completed.

Scheduled Bodies

Types of employer explicitly defined in the LGPS Regulations, whose employees must be offered membership of their local LGPS Fund. These include Councils, colleges, universities, academies, police and fire authorities etc, other than employees who have entitlement to a different public sector pension scheme (e.g. teachers, police and fire officers, university lecturers).

Secondary contribution rate

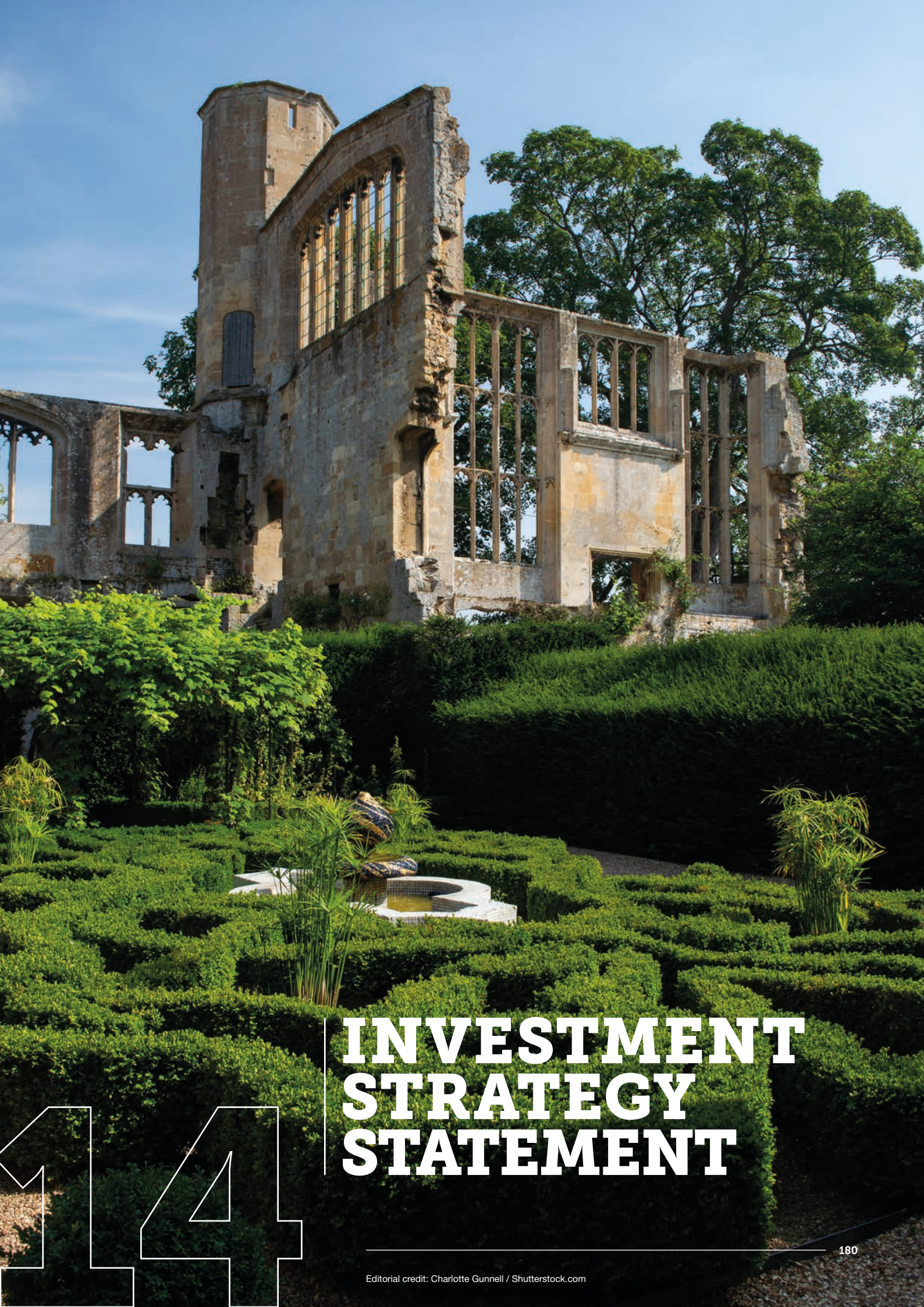
The difference between the employer's actual and Primary contribution rates. See Appendix D for further details.

Stabilisation

Any method used to smooth out changes in employer contributions from one year to the next. This is very broadly required by the LGPS Regulations, but in practice is particularly employed for large stable employers in the Fund.

Valuation

A risk management exercise to review the **Primary and Secondary contribution rates**, and other statutory information for a Fund, and usually individual employers too.



14

INVESTMENT STRATEGY STATEMENT

INVESTMENT STRATEGY STATEMENT

INTRODUCTION AND BACKGROUND

This is the Investment Strategy Statement ("ISS") of the Gloucestershire Pension Fund ("the Fund"), which is administered by Gloucestershire County Council, ("the Administering Authority"). The Council has a duty to ensure that the Fund assets, not immediately required to pay pension benefits, are suitably invested and to take proper advice in the execution of this function. It has delegated this responsibility to the Funds Pensions Committee ("the Committee").

The ISS is made in accordance with Regulation 7 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 ("the Regulations") and guidance issued from time to time by the Secretary of State. The ISS has been prepared by the Committee having taken advice from the actuary to the Fund, Hymans Robertson LLP and the Fund's Independent Investment Advisor.

This ISS, which was approved by the Committee, is subject to periodic review at least every three years and without delay after any significant change in investment policy. In addition, an appendix is included which sets out the Committee's Investment Beliefs. This is in line with the recommendations in the Stewardship Code 2020 produced by the Financial Reporting Council (FRC). It is the intention that these beliefs act as broad guidance for the Committee's actions going forward.

The ISS should be read in conjunction with the Fund's Funding Strategy Statement (dated March 2021).

THE SUITABILITY OF PARTICULAR INVESTMENTS AND TYPES OF INVESTMENTS

The primary objective of the Fund is to provide pension and lump sum benefits for members on their retirement and/or benefits on death for their dependants, on a defined benefits basis. The funding position of the Fund will be reviewed at each triennial actuarial valuation, or more frequently as required.

The Committee aims to fund the Fund in such a manner that, in normal market conditions, all accrued benefits are fully covered by the value of the Fund's assets and that an appropriate level of contributions is agreed by the employers to meet the cost of future benefits accruing.

The Committee has translated its objectives into a suitable strategic asset allocation benchmark for the Fund. This benchmark is consistent with the Committee's views on the appropriate balance between generating a satisfactory long-term return on investments whilst taking account of market volatility and risk and the nature and cash flow requirements of the Fund's liabilities.

It is intended that the Fund's investment strategy and strategic asset allocation will be reviewed at least every three years following an actuarial revaluation of the Fund.

The Committee carried out a strategic asset allocation review and an asset liability modelling exercise in conjunction with the 2019 actuarial valuation of the Fund. A number of different contribution and investment strategies were modelled and the future evolution of the Fund considered under a wide range of different scenarios. The Committee considered the chances of achieving their long-term funding target – maintaining a fully funded position into the future. They also considered the level of downside risk in the various strategies by identifying the low funding levels which might emerge in the event of poor outcomes.

This approach helps to ensure that the investment strategy takes due account of the maturity profile of the Fund (in terms of the relative proportions of liabilities in respect of pensioners, deferred and active members), together with the level of disclosed surplus or deficit (relative to the funding bases used).

In addition, the Committee monitors the investment strategy on an ongoing basis, focusing on factors including, but not limited to:

- + Suitability, given the Fund's level of funding and liability profile
- The level of expected risk
- The outlook for asset returns over the long term

The Committee also monitors the Fund's actual allocation on a regular basis to ensure it does not notably deviate from the agreed target allocation ranges. The allocations will be rebalanced back to within this target allocation range as necessary to control investment risk.

INVESTMENT OF MONEY IN A WIDE VARIETY OF INVESTMENTS ASSET CLASSES

The Fund may invest in quoted and unquoted securities of UK and overseas markets including equities; fixed interest and index linked bonds; cash; property; and loans, either directly or through pooled funds. The Fund may also make use of contracts for differences and other derivatives either directly or in pooled funds, investing in these products for the purpose of efficient portfolio management or to hedge specific risks.

The Committee reviews the nature of Fund investments on a regular basis, with particular reference to suitability and diversification. The Committee seeks and considers advice from a suitably qualified person in undertaking such a review, this being the appointed Independent Advisor to the Gloucestershire Pension Fund. If, at any time, investment in a security or product not previously known to the Committee is proposed, appropriate advice is sought and considered to ensure its suitability and diversification benefit.

The conclusions of the asset allocation review conducted in 2020 were that the Fund could afford to take a modestly lower level of investment risk and still achieve the required rate of return as forecast by the actuary. As a result, the overall target allocation to equities has been reduced. The target allocation to fixed interest (bonds) has also been reduced due to the low level of current bond yields and the low level of forecast investment returns. There have been increases in the target allocations to, international property; infrastructure; private equity and private debt. These asset classes have similar long-term return forecasts to equities but should provide greater diversification and hence lower the investment risk within the Fund. Due to the illiquid nature of some of the assets the Fund will be investing in, this move will take a number of years to complete.

The new target investment strategy is set out below.

Allocation by investment category

INVESTMENT CATEGORY	TARGET STRATEGIC ASSET ALLOCATION	TARGET STRATEGIC ASSET ALLOCATION RANGE (+/-)
EQUITIES	55.0%	3.0%
ALTERNATIVES	23.0%	2.0%
FIXED INTEREST	22.0%	2.0%
TOTAL	100.0%	

As at February 2020, the forecast return on the target portfolio over the long-term was 4.8% p.a. with an expected annual volatility of the funding level of 9.1%. This volatility includes an assumed diversification benefit. Further details on the Fund's risks, including the approach to mitigating risks, is provided in the following section.

RESTRICTIONS ON INVESTMENT

In line with the Regulations, the authority's investment strategy does not permit more than 5% of the total value of all investments of fund money to be invested in entities which are connected with that authority within the meaning of section 212 of the Local Government and Public Involvement in Health Act 2007.

The Committee's approach to setting its investment strategy and assessing the suitability of different types of investment takes account of the various risks involved and a rebalancing policy is applied to maintain the asset split close to the agreed asset allocation target. Therefore, it is not felt necessary to set additional restrictions on investments.

Once the Committee has set the strategic asset allocation for the Fund, after seeking appropriate investment advice, it sets benchmarks for each asset class which reflect the risk and return profile which the Fund is looking to access so that, in aggregate, they are consistent with the overall asset allocation for the Fund.

The Fund's investment managers will hold a mix of investments which reflects their views relative to their respective benchmarks. Within each major market and asset class, the managers will maintain diversified portfolios through direct investment or pooled vehicles. Passive management (where the portfolio directly reflects the composition of the benchmark), is used where the Committee do not believe an active manager is able to add value in this asset class or where there is a desire to dampen the investment risk in that asset class.

The individual managers and their benchmarks are as follows:

ASSET CLASS	BENCHMARK	TARGET STRATEGIC ASSET ALLOCATION	TARGET ASSET ALLOCATION RANGE (+/-)
EQUITIES		55.0%	3.0%
UK ACTIVE EQUITIES	FTSE All Share (excluding investment trusts)	12.0%	2.0%
GLOBAL HIGH ALPHA	MSCI World	13.5%	2.0%
EMERGING MARKET	MSCI Emerging Markets	6.5%	1.5%
SUSTAINABLE	MSCI All Country World (ACWI)	13.0%	2.0%
PARIS ALIGNED PASSIVE EQUITIES	FTSE Developed World PAB	10.0%	2.0%
FIXED INTEREST	-	-	22.0%
UK INVESTMENT GRADE	Iboxx Sterling Non-Gilt All Maturities Bond Index	14.5%	1.5%
MULTI ASSET CREDIT	GBP SONIA	7.5%	1.0%
ALTERNATIVES	-	-	23.0%
DIVERSIFIED RETURNS	GBP SONIA	0.0%	10.0%
UK PROPERTY	MSCI/AREF UK Quarterly Property Fund Index	7.5%	1.0%
INTERNATIONAL PROPERTY	Global Real Estate Fund Index	2.5%	1.0%
INFRASTRUCTURE	Consumer Prices Index (CPI)	5.0%	1.0%
PRIVATE EQUITY	MSCI ACWI	3.0%	1.0%
PRIVATE DEBT	GBP SONIA	5.0%	1.0%
CASH	-	0.0%	0.5%
TOTAL		100.0%	

The intention is to continue to move towards the Target Strategic Benchmark in stages as market conditions allow and commitments to the Alternative Asset Classes are drawn.

A high allocation to Diversified Returns will be made to hold a proportion of the cash awaiting drawdown into the alternative asset classes, hence the wide of 10% range for this asset class.

The approach to risk, including the ways in which risks are to be measured and managed.

The Gloucestershire Pension Fund Committee is aware that the Fund has a need to take investment risk to help it achieve its funding objectives. It has an active risk management programme in place that aims to help it identify the risks being taken and has put in place processes to manage, measure, monitor and (where possible) mitigate the risks being taken. The principal risks affecting the Fund are set out below, as is the Fund's approach to managing these risks and the contingency plans that are in place:

FUNDING RISKS

- + Financial mismatch – The risk that Fund assets fail to grow in line with the developing cost of meeting its liabilities.
- + Changing demographics – The risk that longevity improves and other demographic factors change, increasing the cost of Fund benefits.
- + Systemic risk – The possibility of an interlinked and simultaneous failure of several asset classes, and/or investment managers, possibly compounded by financial 'contagion', resulting in an increase in the cost of meeting the Fund's liabilities.

The Committee measures and manages financial mismatch in two ways. As indicated above, the Committee has set a strategic asset allocation benchmark for the Fund after considering the most recent actuarial data from the 2019 actuarial review. This data will be updated in 2022. The Committee assesses risk relative to the strategic benchmark by monitoring the Fund's asset allocation and investment returns relative to the benchmark. The Committee also assesses risk relative to liabilities by monitoring the delivery of benchmark returns relative to liabilities.

The Committee monitors Demographic changes by using detailed mortality analysis provided by the Funds actuaries during each triennial actuarial review.

The Committee seeks to mitigate systemic risk through a diversified portfolio of assets and by employing a number of asset managers. It is not possible to make specific provision for all possible eventualities that may arise under this heading.

INVESTMENT RISKS

- + Concentration – The risk that a significant allocation to any single asset category and its underperformance relative to expectation would result in difficulties in achieving funding objectives.
- + Illiquidity – The risk that the Fund cannot meet its immediate liabilities because it has insufficient liquid assets.
- + Currency risk – The risk that the currency of the Fund's assets underperforms relative to Sterling (i.e. the currency of the liabilities).
- + Environmental, social and governance ("ESG") – The risk that ESG related factors reduce the Fund's ability to generate the long-term returns.
- + Manager underperformance – The failure by the fund managers to achieve the rate of investment return assumed in setting their mandates.

The Committee measure and manage asset risks as follows.

The Fund's strategic asset allocation benchmark includes a diversified range of asset classes. The Committee has put in place rebalancing arrangements to ensure the Fund's "actual allocation" does not deviate substantially from this target. The Fund invests in a range of investment mandates each of which has a defined objective, performance benchmark and manager process which, taken in aggregate, help reduce the Fund's asset concentration risk.

The Fund monitors its cashflow requirements and any necessary generation of income from its assets to meet current and future pension payments. The cash flow forecasts are formally updated as part of the triennial actuarial review. The Fund invests in a range of assets, both liquid (quoted equities and bonds) and less liquid (infrastructure, Private Debt etc). The Committee monitors its need for liquidity and aims to hold cash to cover 6 months of forecast drawdowns of its commitments into the alternative asset classes and the use of the Diversified Returns allocation will manage the Funds medium to long-term cash requirements for these commitments.

The Fund invests in a range of overseas markets which provides an exposure to a diversified range of currencies; the Committee also assess the Fund's currency risk during their risk analysis. A proportion of the currency risk relating to the Fund's overseas equity investments is hedged back to Sterling either through investment in currency hedged fund units within the Fund's Global Equity mandates, or via a strategic currency hedge solution. At the strategic level, the intention is to hedge back to Sterling 100% of fixed interest assets and approximately 50% of Equity assets via the major currencies where this is cost efficient. The actual level of currency hedging will be kept under review by the Committee and its advisers on an ongoing basis.

Details of the Fund's approach to managing ESG risks is set out later in this Investment Strategy Statement.

The Committee believes in working with asset managers over the long-term which allows the asset manager to invest over the long-term, and the Committee monitors them on this basis. The diversification by manager and long-term nature of the investment process adopted by the asset managers reduces the probability of a single asset manager underperforming to the extent that it affects the Funds ability to meet its liabilities in a significant way. Under the advent of pooling the selection and monitoring of asset managers is undertaken by the Brunel Pension Partnership (Brunel) who are resourced to complete this function. Nonetheless the Committee will continue to hold both Brunel and the underlying managers to account as necessary.

A separate schedule of risks that the Fund monitors is set out in the Fund's Funding Strategy Statement.

The approach to pooling investments, including the use of collective investment vehicles and shared services.

The Gloucestershire Pension Fund is working with nine other administering authorities to pool investment assets through the Brunel Pension Partnership Ltd (Brunel). Brunel is wholly owned by the Administering Authorities of these ten member Funds and is authorised by the Financial Conduct Authority (FCA) to act as the operator of an unregulated Collective Investment Scheme.

The pool has been created in order to achieve greater economies of scale within asset management, increase resources focused on the selection and monitoring of asset managers, provide thought leadership in Responsible Investment and EGS areas, imbedding these into the selection of asset managers and investments, and deliver cost savings to the Fund. The Fund's intention is to invest its assets through the Brunel pool as and when suitable investment solutions become available. An indicative timetable for investing through the Pool was set out in the July 2016 submission to Government.

The key criteria for assessment of Pool solutions will be as follows:

1. That the Pool enables access to an appropriate solution that meets the objectives and benchmark criteria set by the Fund.
2. That there is financial benefit to the Fund in investing in the solution offered by the Pool.

At the end of 2020 all of the Fund's listed equity exposures are being managed by Brunel, as well as the property exposure. The fixed interest allocations will transition in 2021 and all future alternative asset allocations are now being committed to the Brunel portfolios. At the time of preparing this statement, the Fund has the following legacy assets under its management:

- + Two small closed end fixed life venture capital funds. These funds will mature over the next few years and repay their proceeds to the Fund.
- + Two Private Debt funds, both of which are closed ended. These funds will mature over the next few years and repay their proceeds to the Fund.

The Gloucestershire fund is a client of Brunel and as a client has the right to expect certain standards and quality of service. A detailed service agreement has been signed which sets out the duties and responsibilities of Brunel, and the rights of the Gloucestershire Fund as a client. It includes a duty of care on Brunel to act in its clients' interests. Each client has an appointed Shareholder and an Oversight Board and Client Group have been established by Brunel. They are comprised of representatives from each of the Administering Authorities including Gloucestershire.

These have been set up by them according to an agreed constitution and terms of reference. Acting for the Administering Authorities, they will, together with the nominated Shareholders, have responsibility for ensuring that Brunel delivers the services required to achieve investment pooling. The proposed arrangements for asset pooling for the Brunel pool have been formulated to meet the requirements of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 and Government guidance. The Committee is aware that the Ministry for Housing, Communities and Local Government is currently engaged in a further consultation regarding the mechanisms for pooling and the Fund will take any updated recommendations and advice into account when issued. Gloucestershire County Council has approved the full business case for the Brunel Pension Partnership.

How social, environmental or corporate governance considerations are considered in the selection, non-selection, retention and realisation of investments.

The Committee consider the Fund's approach to responsible investment in two key areas:

- + Responsible investment, including climate change – considering the financial impact of environmental, social and governance (ESG) factors on its investments.
- + Stewardship and governance – acting as responsible and active investors/owners, through considered voting of shares, and encouraging its investment managers to engage with investee company management as part of the investment process.

Responsible investment, including Climate Change.

As a Pension Fund, with pension obligations stretching out many years into the future, the Fund, by its nature, is a long-term investor. The authority recognises that investing responsibly over the long-term must include the consideration of not just financial data but also of the impact of the Fund's investments in terms of the environment, effects on broader society and corporate governance (ESG issues). The Fund, through Brunel, has appointed asset managers who invest for the long term and explicitly consider ESG issues as an integral part of their research effort when investing the Fund's assets.

The Fund also expects to vote, where practical, on all Annual and Extraordinary general meetings held by companies in which it is invested, via the Brunel Pension Partnership. The Fund will not seek to exclude investments that are not barred by UK law in the belief that engagement is preferable to divestment. Whilst there is obvious risk in investing in companies with material ESG issues, there can be long-term financial gain where such companies are actively attempting to manage and improve these risks, and as such the Fund adopts a policy of risk monitoring and engagement in order to positively influence company behaviour and enhance future returns to investors, and believes this is more compatible with its fiduciary responsibility and more supportive of its long term investment goals.

If a company fails to engage on these issues with the Brunel Pension Partnership and with the Fund's asset managers, or if the BPP and/or asset managers have reason to believe a company is not being honest and open about its intended actions in this area, divestment on a stock by stock basis remains an option.

The Fund will work with like-minded investors within the BPP to promote best practice in the long-term stewardship of investments.

Brunel's Investment Principles clearly articulate the commitment of each Fund in the Partnership and its operator (Brunel Company), to be responsible investors and as such recognise that social, environment and corporate governance considerations are a key part of the processes in the selection, non-selection, retention and realisation of managers and underlying assets. One of the principal benefits, outlined in the Brunel business case, achieved through scale and resources arising from pooling, is this improved implementation of responsible investment and stewardship. Every portfolio, in every asset class, under the Brunel, explicitly includes responsible investment and includes an assessment of how social, environment and corporate governance considerations may present financial risks to the delivery of the portfolio objectives. The approach undertaken will vary in order to be the most effective in mitigating risks and enhancing investor value in relation to each portfolio and its objectives. More information is available on the Brunel Pension Partnership website.

CLIMATE CHANGE

THE BRUNEL PENSION PARTNERSHIP'S 2020-2022 CLIMATE CHANGE POLICY OBJECTIVES

The Gloucestershire Pension Committee fully encourages and supports the BPP's 2020-2022 policy objectives on climate change which are set out in their Climate Change Policy. These are laid out below.

BRUNEL'S 2020-2022 POLICY OBJECTIVES

We will play an active and leading role in encouraging policy makers to establish comprehensive and robust climate change policy frameworks. Within this, we will focus particular attention on:

- + The adoption of a meaningful price on carbon, which is material (i.e. sufficient to drive change at the scale and rate required); progressive over time and widespread (i.e. applies to all major sectors of the economy).
- + The removal of fossil fuel subsidies.
- + The introduction of policy measures – for example, product standards, limitations on high carbon technologies, support for low carbon technologies – that accelerate the move away from high impact activities and sectors.
- + The removal or correction of regulatory barriers to progress and support financial policy makers and regulators in being ambitious and effective in implementation of plans to mitigate climate risk and under the Adaptation Reporting Power.
- + The integration of climate change into the mandates and into the oversight and control processes of prudential regulators and other regulatory bodies.
- + Ensuring that climate change policy is socially sustainable and takes due account of workers' rights and community interests (the 'Just Transition') when taking action to reduce greenhouse gas emissions and adapt to a changing climate.

We will play an active leading role in encouraging policy makers to integrate climate change into multilateral and bilateral trading frameworks, with a particular focus on the UK post Brexit.

We will encourage policy makers to introduce mandatory climate change disclosure requirements for companies, with a focus on providing clear, decision useful information and encouraging a clear articulation of the risks that companies and their investors face.

We will support the development of skills, knowledge and professional standards of those intermediaries who are critical influencers in the action of investors and companies. These include, but are not limited to, investment consultants, actuaries, lawyers and auditors.

Further details of Brunel's Climate Change policy are set out on its website <https://www.brunelpensionpartnership.org/>.

MONITORING AND REPORTING PROGRESS

Reporting on climate change is an area that is rapidly developing, and we are working with Brunel and other member funds to continue to improve this. We are supportive of Brunel's involvement in initiatives, such as the Institutional Investors Group on Climate Change ("IIGCC") Paris Aligned Investment Initiative, that are working to allow asset owners and investment managers to explain, in a consistent and comparable manner, how their portfolios compare to the goals of a net zero carbon future and of keeping global temperature rise below 2°C.

2022 STOCKTAKE AND ONGOING IMPROVEMENTS

The Gloucestershire Pension Fund is currently supportive of Brunel's approach of not issuing exclusion lists as we believe that simply stating exclusions or requiring divestment from specific stocks or sectors will not compel investment managers to develop their capacity on climate change or drive change in the companies in which they are invested.

Alongside Brunel and our partner funds, we will be undertaking a full review of our climate change policy approach in late 2022 to provide us with the opportunity to reflect on our progress, the effectiveness of our approach, and to raise our ambitions (ahead of the triennial strategy review).

One of the key questions that will be addressed as part of this review is whether Brunel's decision to engage with investment managers has been effective. Specifically, whether it has been effective in delivering change in the way investment managers work and in their ongoing engagement with companies to drive improvements in corporate strategies on climate change, so that these companies are on a trajectory to be aligned with the transition to a 2°C economy. If the answer is no, we will be expecting Brunel to consider whether they need to change investment managers and/or introduce selective divestment requirements for companies.

We will continue to monitor Brunel's progress on implementing its policy objectives and will work with them to achieve our collective climate change ambitions. If the Fund does not feel action is progressing at an appropriate pace, the Fund will seek to address this with the partnership.

STEWARDSHIP

The Committee believes one of the potential benefits of pooling, achieved through the scale and resources arising from pooling, is the improved implementation of stewardship practices. Brunel has published its Responsible Investment Stewardship Policy which outlines its approach and priorities.

The policy reflects the priorities of its underlying clients, and we were active in contributing to the policy.

With the support of the Gloucestershire Pension Fund and the other partner funds, Brunel has been using its influence to press for improved stewardship at external investment managers and has been actively involved in government consultations and other initiatives in the area. Once all equity assets have been transitioned, the Partnership and Brunel Ltd will seek to deliver best practice standards in responsible investment and stewardship in terms of company engagement as outlined in the Brunel Pension Partnership Investment Principles. More information is available on the website (www.brunelpensionpartnership.org).

The Committee has delegated investment powers to Brunel and the Fund's investment managers (where assets have not yet transitioned to Brunel) to act in the best interests of the Fund. Brunel and the Fund's investment managers are encouraged to engage in constructive dialogue on behalf of the Fund and to use their influence to encourage companies to adopt best practice in key areas. Brunel and the Fund's investment managers have been asked to report to the Committee on the implementation of their stewardship and engagement activities, which will be reviewed on a regular basis.

Officers of the Fund have been involved in the Responsible Investment sub-group and discuss ESG and responsible investment matters regularly. A representative from Brunel is also present at the majority of Committee meetings and can report back on these activities.

The Fund recognises the importance of collaboration with other investors to achieve more effective and wider reaching outcomes. In this respect, the Fund is a member of the Local Authority Pension Fund Forum ("LAPFF") which aims to protect the long-term investment interests of beneficiaries by promoting the highest standards of corporate governance and corporate responsibility amongst investee companies.

2020 UK STEWARDSHIP CODE

In late 2019, the Financial Reporting Council ("FRC") published its revised 2020 UK Stewardship Code ("2020 Code"). The latest Code defines stewardship as "the responsible allocation, management and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society."

The FRC has described the 2020 Code as ambitious and highlighted the increased focus on 'activities and outcomes' as opposed to policy statements alone. As part of this increased remit, the 2020 Code covers a wider range of asset classes, requires signatories to consider the systematic integration of ESG and climate change in the stewardship and investment process, and is based on a more stringent 'comply and explain' basis.

The Committee will be reviewing its policy towards becoming a signatory to the Stewardship Code 2020 as published by the Financial Reporting Council. In relation to the asset classes where the UK Stewardship Code is relevant, our Fund Managers are signatories.

The Committee expects both the Brunel pool and any directly appointed fund managers to comply with the Stewardship Code 2020 and this is monitored on an annual basis. Through Brunel the Fund is affiliated with Institutional Investors Group on Climate Change (IIGCC); Share Action; The Task Force on Climate Related Financial Disclosures (TCFD); the UK Sustainable Investment and Finance Association (UKSIF) and Climate Action 100. We continue to explore opportunities to enhance our stewardship activities.

VOTING

The Committee has delegated the exercise of voting rights to Brunel and the Fund's investment managers (where assets have not yet transitioned to Brunel) on the basis that voting power will be exercised with the objective of preserving and enhancing long-term shareholder value.

As part of owning publicly listed companies Brunel, on behalf of its clients, will have the opportunity to vote at company meetings (AGM/ EGMs). Brunel aims to vote 100% of all available votes. To provide guidance to its managers, Brunel has a single voting policy for all assets managed by Brunel in segregated accounts. Hermes EOS has been appointed to support Brunel as its engagement and voting service provider. Brunel will publish its voting policy and provide online voting records at least annually. The Fund will publish the voting carried out on its behalf on its website.

Investment managers have produced written guidelines of their process and practice in this regard. They are encouraged to vote in line with their guidelines, in respect of all resolutions, at annual and extraordinary general meetings of companies. Investment managers are expected to report on their voting activity on a regular basis.

APPENDIX - Investment Beliefs

The Committee believes that:

- + It is important that funding related aspects and, in particular, funding level and cash flow profile feed into investment strategy decisions. Given this, actuarial and investment matters are looked at in tandem by the Committee, most notably when setting the investment strategy.
- + The Committee targets a strong funding level to provide some buffer to the risk of future employer contribution increases. This and knowledge of the future cash flow profile of the Fund enables the Committee to adopt a long-term investment horizon. This enables the Fund to accept short term volatility in investment returns or the illiquidity of some assets, in order to achieve higher investment returns. In this context, the Committee believes that, over the longer term, equities are expected to outperform other liquid assets, in particular, government bonds. The Committee is therefore comfortable that the Fund maintains a significant allocation to equities in order to support the affordability of contributions.
- + Strategic asset allocation is a key determinant of investment risk and return, and thus is typically more important than manager or stock selection which going forward will be delegated to the LGPS pool to which the Fund is a member. In addition, the Committee believes that periodic rebalancing of asset class weightings back to their strategic benchmark can add value over the long term.
- + Risk can be mitigated through the diversification of the portfolio, by selecting a variety of both asset classes and managers. A balance needs to be struck between the need for diversification and keeping a small enough number of mandates to ensure good governance.
- + Markets are dynamic and are not always efficient, and therefore offer opportunities for investors. Active management can add value over time but it is not guaranteed and can be hard to access. Where generating 'alpha' is particularly difficult, passive management may be preferred, but brings some of its own risks. In all cases, managers will be judged on net returns calculated after fees. It is one of the roles of the Investment Committee to monitor investment costs and challenge where necessary.
- + A strong ESG / RI policy is required by regulation and should be seen within the context of the Fund's long-term investment and futureproofing its financial security. ESG considerations can help identify superior long-term investments and the Committee requires its managers to include them as an integral part of their investment processes, provided these considerations do not detrimentally impact financial returns or risk. The Fund requires managers to report back on them on all ESG matters.
- + The Committee believe that controlling climate change will impact all investment decisions going forward and, therefore, require their investment managers to adopt a policy of engaging with investee companies to improve their behaviour in all areas but particularly regarding climate change. The committee believes that engagement with investee companies rather than exclusion, is the best approach to achieve material change and is more compatible with their fiduciary duty and more supportive of their long-term investment goals. However, where investee companies are not taking sufficient action or are not prepared to engage in good faith on these issues, we believe this is likely to impact future returns and expect our managers to act accordingly.
- + Effective governance and decision-making structures that promote decisiveness, efficiency and accountability add value to the Fund. The Committee believes in appointing good investment managers with which to work in partnership, delegates authority to them, and monitors their performance (on financial and other metrics) regularly. The Committee also believes that taking independent advice, notably in investment and actuarial matters, can strengthen governance, and add value to the Fund.

November 2021



COMMUNICATIONS POLICY STATEMENT

15

COMMUNICATIONS POLICY STATEMENT

COMMUNICATIONS POLICY

The following Communications Policy Statement outlines how the Fund communicates with scheme members, their representatives and employers and was reviewed in August 2018.

All employers are instructed to issue new employees with a pensions starter pack provided by the Administering Authority, which provides information regarding the pension scheme and the individual's options together with links to where more detailed scheme information can be obtained.

HR and Payroll Guides to the 2014 Scheme are provided by the Local Government Association on the National LGPS 2014 Regulations & Guidance website. A link to this information is provided on the Employer page of the Fund's website together with an administration guide to the 2008 Scheme.

During 2021/22 the Pension Fund communicated with scheme members, their representatives and employers as set out in the policy statement below other than the annual meeting and employer forums did not take place and the Pension Board has been enhanced with the appointment of one further employer representative and one further employee representative and now meets at least four times a year.

COMMUNICATIONS POLICY STATEMENT

Various means are employed to communicate with the Fund's stakeholders. These are described in respect of each interested group as follows:

MEMBERS OF THE SCHEME

An Annual Meeting is held each December and provides the main opportunity for the Fund to explain its performance and accounts to members of the Fund and employers.

The Fund's Annual Report is also placed on the pension pages of the County Council's website. This Report includes the Fund's policy statements covering Funding Strategy, Governance, Communication and Administration. In addition, each policy statement is listed separately on the website.

All pensioner members receive a pension newsletter each April that covers matters of interest.

An annual Benefit Statement is sent to all active and deferred members of the Fund showing their accrued benefits up to the end of the previous financial year. At this time the opportunity is also taken to include information on current matters of interest to scheme members.

Information on the scheme and changes to it are posted on the pension pages of the County Council's website and where appropriate these are also posted onto the "news" section of the staff intranet.

The Authority continues to send payslips to pensioners every April, May and October. The October pensioner pay slips include an invitation to the Fund's Annual Meeting and details on how to access the annual report and accounts.

Pay slips are also sent where the difference in the net pension payment is £10 or more from the previous month.

All active scheme members are sent an invitation to attend the Fund's Annual Meeting, via their employer and are given the link to the County Council's website to access a copy of the Fund's annual report and accounts. They are also given details on how to request a paper copy of the annual report and accounts.

PROSPECTIVE MEMBERS OF THE SCHEME

All employers are provided with a link to the employers' pages of the Fund's pension website, together with instructions on how to supply all prospective members of the scheme with a pensions pack. This pack informs individuals of the benefits of the scheme as well as details about where they can obtain further information.

Advice and guidance is provided by Pensions staff to all employers within the Fund on an on-going basis.

SCHEME EMPLOYERS

An online employers' guide to the scheme is made available to all new and prospective employers via the County Council's website.

Employers are also consulted on key revisions to the Funds strategy and policy documents - the Investment Strategy Statement, the Governance Policy and Compliance Statements, the Administration Strategy, the Communication Policy and the Funding Strategy Statement.

Employer forums are held with the administering authority at least twice yearly to help improve understanding of: the pension scheme; the employers' role and ways of improving the accuracy and timeliness of scheme administration. All employers are invited to attend. Minutes of the meetings and copies of any presentations are sent to all employers, including those unable to attend.

Copies of all relevant communications received centrally (i.e. from MHCLG, Treasury, HMRC, LGA, etc.) are circulated to employers to ensure they are kept informed. These documents are often discussed in detail at the Employers Forums. In addition, communications relating to operational requirements and changes are circulated to employers where required.

Where we are informed of a transfer, direct dialogue takes place between the administering authority and employers being affected by business transfers to ensure trades unions and prospective employers understand the pension scheme.

Every three years when the triennial valuation takes place meetings are arranged with the actuary to discuss the outcome of the valuation, contribution rates and e.g. options around phasing in any increase in contribution required.

Meetings are held with the Chief Financial Officers of District Councils where there is an opportunity for current developments and issues to be presented and discussed.

EMPLOYEE REPRESENTATION

The Pension Committee includes an employee representative nominated by the trades unions, as one of its members. The employee representative also represents pensioners and deferred members.

Employee representatives are involved in consultation where business transfers are proposed.

PENSION BOARD

The Gloucestershire Pension Board meets at least twice a year and includes two employer representatives and two employee representatives. Members of the public are able to attend as observers.



16

SUMMARY OF FUND BENEFITS

16

SUMMARY OF FUND BENEFITS

INTRODUCTION

The Gloucestershire Pension Fund is administered under the Local Government Pension Scheme (LGPS) Regulations. Benefits built up from 1st April 2014 are calculated on a Career Average Revalued Earnings (C.A.R.E.) basis. Benefits accrued prior to 1st April 2014 continue to be protected on a "final salary" basis.

The scheme is open to all eligible employees regardless of the hours worked and continues to provide a comprehensive set of benefits for its members. Shown below is a summary of the key features of the scheme currently in force from 1st April 2014. This summary is only provided as an illustrative guide of some of the key features of the scheme and is not intended to give details of all the benefits provided, or the specific conditions relating to the provisions of the scheme.

ENQUIRIES

Enquiries and more detailed information on the LGPS can be obtained by visiting the Gloucestershire County Council Pensions website at www.gloucestershire.gov.uk/pensions or from the Pensions Section at Shire Hall, Gloucester, telephone (01452) 328888.

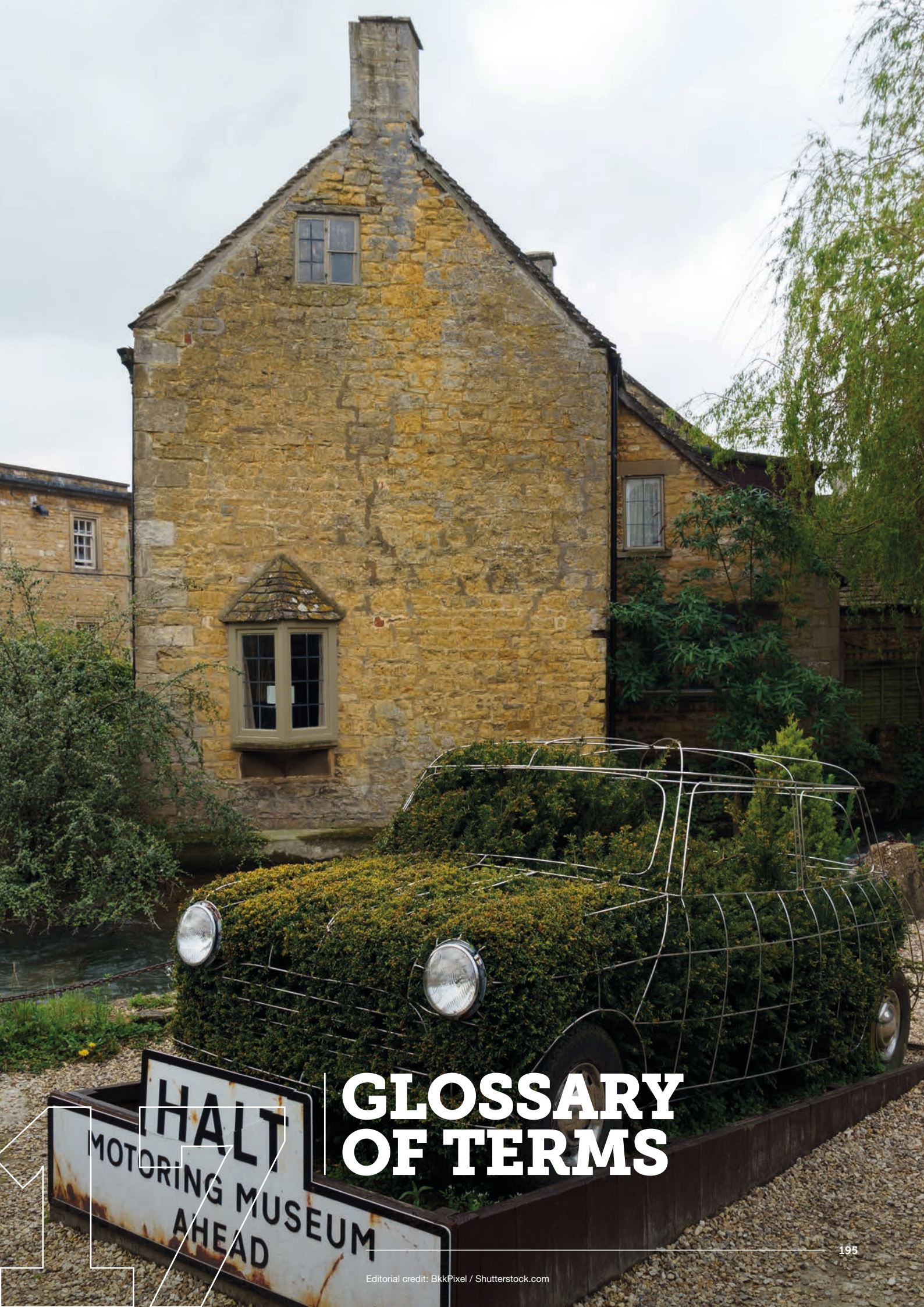
Local Government Pension Scheme (LGPS) Regulations 2013 (as amended) –

Principal Features of the Scheme in Force from 1st April 2014

- + Employee Contribution Rate – Variable (9 Band Rates) between 5.5% and 12.5% depending on level of earnings.
- + Annual Pension and Lump Sum
 - C.A.R.E. Pension based on 1/49th of pensionable pay attributable to each year of membership (index linked by C.P.I.) from 1st April 2014 PLUS option to exchange up to ¼ of pension pot for a lump sum (each £1 of pension providing £12 lump sum)
 - Any membership between 1st April 2008 and 31st March 2014 will provide a pension based on 1/60th of final years pensionable pay for each year of membership PLUS option to exchange up to ¼ of pension pot for a lump sum (each £1 of pension providing £12 lump sum)

– Any pre 1st April 2008 membership will provide "standard benefits" of a pension based on 1/80th of final years pensionable pay for each year of membership PLUS a lump sum of three times the pension. There is also the option to exchange part of the pension to increase the lump sum to ¼ of the pension pot (each £1 of pension providing £12 lump sum).

- + 50:50 Option - allowing members the option to pay half contributions for half pension benefits.
- + Normal Retirement Date - Later of State Pension Age or age 65. Member also has the right to retire from age 55 (although benefits will normally suffer an actuarial reduction).
- + Earliest Retirement Date – age 55 in cases of – Member initiated Early Retirement / Flexible Retirement / Redundancy / Efficiency of the Service.
- + Ill Health Retirement – early payment of benefits (irrespective of age) if "permanently" incapable of continuing in the employment the member was engaged in due to medical reasons and is not immediately capable of undertaking any "gainful employment" in the future. Level of benefits based on a three tier system, depending on likelihood of being able to obtain "gainful employment".
- + Provision for an ongoing pension is provided for a spouse, registered civil partner, eligible cohabiting partner (subject to certain qualifying conditions) and/or any eligible children in the event of a member's death.
- + Lump Sum Death Grant - In the event of death in service, a lump sum death grant of three times actual annual pay is payable.
- + Index Linking - Pensions are increased in accordance with annual review orders made under the Pension (Increase) Act 1971. The index currently used for this purpose is the Consumer Price Index (CPI).
- + Additional Pension Benefits – In house facilities to increase potential benefits by:
 - paying additional monthly contributions to purchase additional pension (to a maximum (at 1st April 2021) of £7,316). From 1st April 2022 this increased to £7,352
 - making additional voluntary contributions to Prudential's in-house AVC arrangement to provide an additional pension benefit at retirement.



GLOSSARY OF TERMS

17 GLOSSARY OF TERMS

Accrual

An amount to cover income or spending that has not yet been paid but which belongs to that accounting period.

Actuary

An advisor on financial questions involving probabilities relating to mortality and other contingencies. Every three years the Scheme appointed actuary reviews the assets and the liabilities of the Fund and reports to the Strategic Finance Director (and Section 151 Officer) on the financial position. This is known as the triennial actuarial valuation.

Active Investment Management

A style of investment management where the fund manager aims to outperform a benchmark by superior asset allocation, market timing or stock selection (or by a combination of each).

Admitted Body

An organisation that chooses and is allowed by the scheme to be admitted to the LGPS using an Admission Agreement in order to provide access to the scheme for some or all of its employees.

Additional Voluntary Contributions (AVC's)

Contributions over and above a member's normal contributions which the member elects to pay in order to secure additional benefits.

Augmentation

This is when extra pension benefits can be bought for a pension scheme member. They are usually paid for by the employer.

Benchmark

A target or measure against which performance is to be judged, which is commonly used to assess the investment performance of a fund or portfolio.

Bid/Offer/Mid Price

Bid – The price at which a Market-maker or dealer is prepared to buy securities or other assets.

Offer – The price at which a Market-maker or dealer is prepared to sell securities or other assets.

Mid – The average of the current bid and offer price.

Bond

Certificate of debt issued by a Government or company, promising regular payments on a specified date or range of dates, usually with final capital payment at redemption.

Consumer Price Index (CPI)

Measure of price inflation in the UK. Differs from the RPI in the range of goods and services included, and the way the index is constructed.

Deferred Retirement Benefit

A retirement benefit that a member has accrued but is not yet entitled to receive.

Derivatives

See definition on note N15, page 116.

Equities

Share in the ownership of a company, giving the holder the right to receive distributed profits and to vote at annual general meetings of the company. A term used for ordinary shares.

Exchange Traded Funds (ETFs/ET's)

A fund that tracks a selection or 'basket' of related securities within a stock market index but can be traded on an exchange like a stock or share.

Fair Value

A price deemed to accurately reflect the value of a security based on measurable valuation fundamentals. Considered to be an equitable valuation from the point of view of both buyer and seller.

FTSE

Indices maintained by the FTSE Group (an independent company originally set up by the Financial Times and the London Stock Exchange) which measures the performance of the shares listed on the London Stock Exchange.

Funding Level

The relationship at a specified date between the actuarial value of assets and the actuarial liability. Normally expressed as a funding ratio or percentage. Used as a measure of the fund's ability to meet future liabilities.

Futures Contracts

A contract which binds two parties to complete a sale or purchase at a specified future date at a price which is fixed at the time the contract is effected. Futures contracts have standard terms. Margin (deposit) payments are required, and settlement dealt via a clearing house.

Gilts

A bond issued by the UK Government and so-called because certificates used to be gilt-edged.

Global Custodian

An organisation which is responsible for the safe-keeping of assets, income collection and settlement of trades, independent of the asset management function.

Guaranteed Minimum Pension (GMP)

The minimum pension which a salary related occupational pension scheme must provide in respect of contracted out contributions paid between April 1978 and 1997, as a condition of contracting out of the state-earnings related pension scheme (SERPS).

Hedge

A means of protecting against financial loss, normally by taking an offsetting position in a related investment.

Index Tracking

An investment process which aims to match the returns on a particular market index either by holding all the stocks in the particular index or, more commonly a mathematically calculated sample of stocks that will perform as closely as possible to the index.

Investment Management Agreement

The document agreed between an investment manager and the Fund setting out the basis upon which the manager will manage a portfolio of investments for the Fund.

Investment Strategy

The Fund's long-term distribution of assets amongst various asset classes, taking into consideration, for example, the goals of the Pension Committee and their attitude to risk and timescale.

Leverage

The use of borrowed money to over-invest a portfolio which magnifies both gains and losses. This may be achieved by derivative instruments. Also refers to the debt/equity ratio in a company's balance sheet.

Managed Fund

A pooled fund that invests across a wide range of asset classes. (See Pooled Investment Vehicle).

Market Value

The price at which an asset might reasonably be expected to be sold in an open market.

Membership

Local authority employment during which time pension contributions were made or deemed to have been made providing entitlement to benefits under the scheme.

MSCI Index

Indices maintained and produced by Morgan Stanley Capital International that track equity markets throughout the world. MSCI indexes are weighted by market capitalisation and include various countries, regions and industries in both developed and emerging markets.

Net Asset Value (NAV)

The value in a company or mutual fund, calculated by subtracting total debt from total assets and dividing the result by the number of shares or units in existence.

Notional Value

The value of a derivative's underlying assets.

Open Ended Investment Company (OEIC)

A pooled investment vehicle structured as a limited company. Investors can buy and sell shares on an on-going basis.

Options

The right but not the obligation to buy (call option) or sell (put option) a specific security at a specified price (the exercise or strike price), at or within a specified time (the expiry date). This right is obtained by payment of an amount (known as the premium) to the writer (seller) of the option, and can be exercised whatever happens to the security's market price.

Over The Counter (OTC)

Any market which does not operate through a recognised exchange.

Pensionable Pay

The earnings on which benefits and/or contributions are calculated under the scheme rules.

Performance Measurement

Calculation of a fund's historic return on its investments.

PIRC

PIRC is an independent research and advisory consultancy providing services to institutional investors on corporate governance, corporate social responsibility and performance management.

Pooled Investment Vehicle

A fund in which a number of investors pool their assets, which are managed on a collective basis. The assets of a pooled investment vehicle are denominated in units that are re-valued regularly to reflect the values of underlying assets. Vehicles include: open ended investment companies, real estate investment trusts and unit trusts.

Projected Unit Method

An accrued benefits funding method in which the actuarial liability makes allowance for projected pensionable pay. The primary contribution rate is that necessary to cover the cost of all benefits which will accrue in the control period following the valuation date by reference to pensionable pay projected to the dates on which benefits become payable.

Quoted Investments

Investments that have their prices quoted on a recognised stock exchange.

Realised Gains/(Losses)

Profit/(losses) on investments when they are sold at more/(less) than the purchase price.

Retail Price Index (RPI)

Measure of price inflation in the UK. The RPI measures the average change from month to month in the prices of goods and services purchased by most households in the UK.

Risk

The likelihood of a return different from that expected and the possible extent of the difference. It can also indicate the volatility of different assets.

Securities

General name for stocks and shares of all types that can be traded freely on the open market.

Segregated Fund

Where the assets of a particular fund are managed independently of those of other funds under the fund manager's control.

Specialist Management

When an investment manager's mandate is restricted to a specific asset class or sector. The Pension Committee determines allocations to each asset class.

Strategic Asset Allocation

The process of dividing investments between the main asset classes to meet the Fund's risk and return objectives.

Transfer Payment

A payment made from one pension scheme to another pension scheme in lieu of benefits which have accrued to the member or members concerned, to enable the receiving pension scheme to provide alternative benefits.

Transfer Value

The amount of the transfer payment.

Unitised Insurance Policy

Investors are issued with a life policy representing title. Investors' 'holdings of units' represent a means of calculating the value of their policy. The life fund/company holds the pool of investments and is the owner of all the assets.

Unit Trust

Unit trusts are collective funds which allow private investors to pool their money in a single fund, thus spreading risk, getting the benefit of professional fund management and reducing dealing costs. Unit trust trading is based on market forces and their net asset value - that is the value of their underlying assets divided by the number of units in issue. The activities of unit trusts are regulated by the FCA.

Universe

Term sometimes used to describe the total number of funds in a performance survey.

Unlisted Securities

Stocks and shares not available for purchase or sale through the stock market.

Unquoted Investments

Stocks that are not listed on an exchange and so have no publicly stated price.

Venture Capital

Investment in a company that is at a relatively early stage of development and is not listed on a stock exchange. A venture capitalist raises money from investors to invest in such opportunities. These investments are typically risky but potentially very profitable.