

Gloucestershire Local Government
Pension Fund



2014/15

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Contents

Introduction	03
Independent Investment Advisor's Report	05
Management and Financial Performance	07
<i>Scheme management and advisors</i>	07
<i>Risk management</i>	08
<i>Financial performance</i>	09
<i>Administrative management performance</i>	12
<i>Benchmarking Report</i>	20
Investment Policy and Performance Report	21
Scheme Administration Report	30
Executive Summary on the Last Triennial Valuation	31
Actuarial Report on Fund	33
Governance Compliance Statement	35
Fund Account, Net Assets Statement and Notes	44
Pensions Administration Strategy	75
Pensions Administration Strategy Report	80
Funding Strategy Statement	81
Statement of Investment Principles	112
Communications Policy Statement	119
Summary of Fund Benefits, Membership and Beneficiaries	121
Other Appropriate Material	123
Glossary of Terms	124

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 2015.

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 meets the cost of pension benefits due to current and former employees of these organisations.

This report is primarily aimed at Fund members and participating employer organisations within the Gloucestershire Pension Fund (listed on pages 17 to 20), to provide information on the management arrangements and performance of the Fund over the last 12 months. The latest version of the Fund's policy statements covering, investment principles, funding strategy, governance and communication, as well as details of Fund membership and a brief summary of scheme benefits are also included within the Report. The formal accounts of the Fund for the year ended 31st March 2015 can be found on pages 46 to 74. Membership of the Pension Fund continued to rise during the 2014/15 year, from around 50,000 to just under 52,000. A breakdown of the Fund membership is included on page 14.

At 31st March 2015 the Fund's investments were valued at £1,709 million, an increase of £203 million compared to the value at 31st March 2014. During the year the Fund achieved a 14.4 % return on its investments. This exceeded the average local authority universe return of 13.2 %, as calculated by GS Performance Services (a company that monitors the performance of pension funds) and places Gloucestershire in 29th position, which means the Gloucestershire Fund has continued to be one of the top performing Funds in 2014/15. This universe is a league table of 84 local authority pension funds. Further details on the Fund's performance can be found on page 22.

The performance of all of the Gloucestershire Pension Fund investment managers are kept under regular review to help ensure that our management policies have the best possible prospect of adding value over a full market cycle. During the period covered by this report no changes were made to either the Fund's Investment Managers or the investment mandates apart from a small increase in the size of one of our property mandates.

The Fund's investment strategies are set out in the Statement of Investment Principles, which is shown on pages 112 to 118 of this report. More details on the Fund's investments and performance can be found on pages 21 to 29.

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 of Communities and Local Government (CLG) and the scheme cannot be changed by the County Council or other scheduled employers of the Gloucestershire Pension Fund.

Following the Public Service Pensions Commission, chaired by Lord Hutton and consultation with employer and employee representatives, the future structure of all public sector pension schemes, including the LGPS, has been reviewed. The relevant legislation was enacted during 2013/14 and the new LGPS scheme commenced from April 2014. The terms of the new 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 new 2014 LGPS scheme can be found on pages 121 to 122.

To ensure the Fund holds sufficient investments to meet obligations to pay pension benefits to existing and future pensioners, the scheme's Actuary undertakes a valuation of the Fund every three years. The Actuary sets the employer contribution rates at a level to maintain the long-term solvency of the Fund so ensuring funding over the longer term will be sufficient to meet all payments to existing and future pensioners. The most recent completed valuation took place on 31st March 2013, with the new employer contribution rates being effective from 1st April 2014. These rates are the

minimum that Employers are required to pay for the three years to March 2017 and can be found on pages 106 to 110.

The actuarial report on the Fund can be found on pages 33 and 34. This outlines the approach taken to secure Fund solvency while keeping employer contributions stable and also gives the web link to the 2013 Fund Valuation Report which gives details of the actuarial assumptions and methods used to value liabilities.

Membership of the Pension Committee is shown on page 7. The Funds Independent Advisor, John Harrison, resigned in August 2014 and has been replaced by Stephen Tyson.

We express our thanks to all those involved with the investment, accounting and pension administration activities of the Fund. In this, we acknowledge the continuing work of the members of the Pension Committee in overseeing the Fund's investment management and administration arrangements.

We trust you find the report informative and as we are always seeking to make improvements we would welcome any constructive comments on its content and presentation. Further information is available from the contact points shown on page 8.

Raymond Theodoulou
Chairman of the Pension Committee

Jo Walker, CPFA
Strategic Finance Director

Independent Investment Advisor's Report

Economic Background

During the year under review, the UK and US economies picked up strongly, and the Eurozone tentatively emerged from recession. Japan's economy showed modest improvement, but China on the other hand slowed down as it tried to engineer a soft landing.

In the UK specifically, GDP was revised upwards in 2014. Several years of low interest rates and falling unemployment is spurring consumer confidence. Real wage growth has not yet responded, but the late winter and spring of 2015 have seen the first signs of this. The housing market is buoyant, initially in London and the South East, but has now spread nationwide.

Global inflation has been very modest in recent years, and it has continued to decline with a sharp and unexpected fall in the oil price contributing significantly in the last year.

In line with these economic developments, the Federal Reserve and the Bank of England ended their formal programmes of bond buying, also known as "quantitative easing". In contrast, the Bank of Japan and European Central Bank both announced significant policy easing measures, including buying bonds, asset-backed securities and improved forward guidance, designed to stimulate bank lending and hold interest rates at low levels. These measures are having a positive effect.

One of the main points of uncertainty during the year has been the future of the Euro, specifically whether Greece will manage to avoid default and stay within the common currency. The election of the left-wing Syriza party to government has caused an extended period of confrontation with the Eurozone core of Germany and France. As of the time of writing, Greece is still part of the Euro, but its future is extremely uncertain.

In emerging economies, Chinese growth has slowed, and it is widely viewed that the government manipulates the GDP data in any case. Brazil and Russia have both been negatively affected by declining commodity prices, whereas India has shown strong growth under a new government.

Market Returns

It has been a very strong year overall for asset returns, and this pace should not be expected to continue across the board.

UK Gilts were up strongly with the All Stock index up 13.9%, and with over 15 year Gilts up 26.9%. As noted elsewhere in the annual report, this is not all good news, as the basis on which actuaries value our pension liabilities rises when gilt yields fall. Global Government Bonds (ex-UK) were up 7.6% in sterling terms. The weakest area of the fixed income markets was high yield corporate bonds.

In equities, the FT All Share was up 6.6%, and actually this was one of the least strong markets

globally, with the MSCI World index up 19.9% in sterling terms. The UK stock market has been held back by its sectorial composition – there is a high proportion of oils, banks, mining and pharmaceutical stocks in the UK that are global companies, and these have not been strong sectors. The strongest markets have been the USA and Japan, respectively returning 25.1% and 27.1% in sterling terms. These are extremely strong numbers and warrant some caution going forward. All equity markets have been sustained by the low yield available on "safe" government bonds and the search for dividend yield. In this sense, QE (quantitative easing) has been a great success. In Japan specifically, the third "arrow" of Prime Minister Abe's economics programme was unveiled, and there is a new mood of improving corporate return on equity and increased share ownership by major pension funds that we hope is sustainable.

The least strong equity region in sterling terms was Europe. This is because of slow economic growth and fears over the future of the Euro, which was weak. It is hard to be optimistic about the Euro.

UK Property returns were up 18.3% as measured by the IPD All Properties index, and have been sustained by the increasing strength of the UK economy.

Economic and Market Outlook

It is now over six years since we emerged from the great financial

crisis of 2008/2009. The slow path to recovery has been built on very low interest rates and quantitative easing. These measures succeeded in averting what could have been a catastrophic failure of the financial system. The question now, is when, and if, full normality will return. Will interest rates revert to historic norms?

We are in an unprecedented period of financial repression, with not much sign yet of inflation other than in asset prices. Managing a smooth transition to higher interest rates by the central banks will be crucial, and the risk of a policy error – raising rates too early or too late – is a considerable challenge for the authorities. So we are entering a period of risk.

It is quite clear that the future rates of return on asset prices cannot match that of the last few years, thus we may be in for a period of much lower single digit returns on average over the next 5/10 years. Bonds for example, could show extended periods of low return. Equities are quite highly valued, but they may remain so, as there is a lack of alternatives.

Property returns may still be higher than other assets as the yield gap versus bonds makes property more attractive. However UK property will need to overcome the uncertainty surrounding a UK EU Referendum.

If returns are lower and volatility increases, then we will require our investment managers to be skilled in navigating such waters, with

good asset allocation and stock selection.

Strategic Asset Allocation

The Pension Fund has a long term horizon and the investment priority remains long term investment returns rather than short term risk mitigation.

The current investment strategy seeks to achieve this by having a core allocation to equities within a strategically diversified overall portfolio. The target allocation to equities is 65% and is broadly similar to other Local Authority pension funds.

During the year there was only one small change in asset allocation, allocating an additional £10m to property. There were no changes to the investment mandates. However late in the year we were making plans to change the underlying UK equity mandate to one based on a capped-index and this subsequently took place during May 2015 and will be reported in the next annual report.

Steve Tyson

1st July 2015

Management and Financial Performance

Scheme Management and Advisors

Administering Authority: Gloucestershire County Council

Pension Committee at 31st March 2015

Representing Gloucestershire County Council:



Cllr. R. Theodoulou
(Chairman)



Cllr. D. Brown



Cllr. J. Gill



Cllr. C. Hay



Cllr. S. Parsons



Cllr. L. Stowe



Representing Gloucestershire District Councils:

Cllr. N. Cooper

Representing Employees:

Mr. S. Kingston

County Council Officers:

Mrs. J. Walker
Strategic Finance Director

Mr. G. Burrow
Head of Pension Fund

Independent Advisor:

Mr. S. Tyson, AllenbridgeEpic

Fund Actuary:

Mr. D. Green, Hymans Robertson
Mrs J. West, Hymans Robertson

Scheme Administrator:

Gloucestershire County Council

Investment Managers as at 31st March 2015:

BlackRock Advisors (UK)
CBRE Global Collective Investors UK (CBRE)
Grantham, Mayo, Van Otterloo & Co LLC (GMO)
Hermes Real Estate Investment Management
Standard Life Investments
Western Asset Management Company
Technology Venture Partners (TVP)
(Formerly part of YFM)
Yorkshire Fund Managers (YFM) Group

AVC Provider:

Prudential Assurance Company Limited
Phoenix Life Limited

Auditor:

Grant Thornton UK LLP

Global Custodian:

BNY Mellon Asset Servicing SA/NV

Performance Measurement:

BNY Mellon Asset Servicing
GS Performance Services (name changed
from WM Company)

Banker:

HSBC

Legal Advisor:

Gloucestershire County Council in-house legal team

Post Year-End Changes

There are no year-end changes to report.

Enquiries

For information/contact details for committee members, fund managers and advisors or for details regarding the Fund's investments and accounting activities, please contact the Finance Manager at Shire Hall, Gloucester, phone (01452) 328945.

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
www.gloucestershire.gov.uk/pensionsinvestments

Benefits and Administration
www.gloucestershire.gov.uk/pensions

Pension Schemes Office Registration Number:

PSO 10079170

> Risk Management

The Pension Fund maintains a Risk Register which is reviewed and reported to the Pension Committee for consideration every 6 months. Risks are rated on a "traffic light system" and assigned to a lead officer for monitoring and review. Controls are documented and further actions identified where necessary.

These risks associated with the Fund's administration, management and investments are included in the Funding Strategy Statement (FSS). The risks and actions to manage and reduce them are shown within the FSS on pages 95 to 99 of this report. In addition the Fund's Statement of Investment Principles (SIP) details the individual responsibilities, (including the management of risk), of the Pension Committee, Investment Managers, Council Officers, Custodian and Investment Advisor.

Internal auditors also evaluate both risk and controls for the main

areas of governance, pension administration and investment management. This includes third party risk and involves obtaining assurances from the external fund managers on their governance and administration arrangements as well as acquiring copies of their latest accounts and internal control assurance reports, AAF01/06 or ISAE 3402. The internal audit results then feed into an annual governance statement.

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. Fund managers attend committee on a regular basis and are held to account on their performance return and relative risk measures. In addition further in-depth meetings are held at manager's offices during the year. Performance data is provided by the Fund's Custodian as well as by an independent specialist company, GS Performance Services. Performance is measured against both a customised fund benchmark and mandate specific benchmarks.

Pages 114 to 115 of the Statement of Investment Principles 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 66 to 73.

> Financial Performance

Analysis of pension contributions

The timeliness of employee and employer pension contributions which should be paid to the Pension Fund no later than 19 days from the date they were deducted from employees' salaries is shown below.

In total 24 (2013/14 28) monthly payments were received late, of which 22 (2013/14 27) were received within the month. The remaining two payments were received 96 days late.

The option to levy interest on overdue contributions was not exercised.

Employee and Employer Contributions	Total	On Time		Late	
	£000	£000	%	£000	%
2013/14	82,000	81,600	99.6	400	0.4
2014/15	90,000	89,500	99.4	500	0.6

Fund Account (inflows) and outflows

The following table shows the income and expenditure of the Pension Fund over the last two years together with an estimate for 2015/16.

Fund Account	2013/14 Actual £000	2014/15 Actual £000	2015/16 Budget £000
Contributions	-84,895	-92,866	-85,465
Transfers in	-4,719	-3,708	-4,223
Bulk transfer values in	-	-2,556	-
Investment income	-26,785	-23,614	-20,443
Other income	-297	-157	-243
Benefits payable	68,488	71,008	73,168
Payments to and on account of leavers	3,850	3,712	3,738
Bulk transfer values out	9,200	29,012	-
Administration and Oversight & Governance expenses	1,316	1,340	1,495
Investment management expenses	6,074	5,753	5,526
Profit, loss and change in market value	-93,887	-190,503	-143,706
Net increase in the Fund	-121,655	-202,579	-170,153

Bulk Transfers In

This represents an employer transferring its employees in from another Local Government Pension Scheme. The Pension Fund received a bulk transfer value of £2.56m to cover these liabilities.

Bulk Transfers Out

In 2013/14 an employer was merged with another

establishment and its assets and liabilities transferred to their Pension Fund.

In 14/15, due to national policy changes, all Probation Trusts across the country transferred their pension assets and liabilities into the Greater Manchester Pension Fund (GMPF). The Pension Fund paid a bulk transfer value of

£29.01m to cover the liabilities that transferred over.

Further information on these transfers can be found in Accounting Note 28.

Profit, loss and change in market value

Profit, loss and change in market value is the total of realised and

unrealised profits and losses of the Fund's investments.

Profits and losses realised on sales of investments during the year totalled a net profit of £21.0m (£13.0m in 2013/14). Of the £21.0m net profit, net profits of

£6.5m related solely to the sale of investments required to fund the bulk transfer value of the Probation Trust as detailed above.

The change in the market value of investments held at the 31st March 2015 on the previous year totalled

£169.5m (£80.9m 2013/14). During 2014/15 the Fund achieved a performance figure of 14.4% compared to 8.9% in the previous year.

Cash flow

For 2014/15 the inflow of cash to the Fund continued to exceed the outflow. Details of the net cash inflow to the Fund for the past 3 years and a forecast for the following year are shown opposite:

	2015/16 Forecast	2014/15 Actual	2013/14 Actual Re-stated	2012/13 Actual
	£000	£000	£000	£000
Net cash inflow	40,650	15,117	30,483	32,960

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. In 2014/15 there were extra-ordinary net payments out of £26.5m (£9.2m 2013/14) relating to transfers of staff to another pension fund.

Operational expenses

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

	2013/14 Actual £000	2014/15 Forecast £000	2014/15 Actual £000	2015/16 Forecast £000
Administrative costs				
Staff costs	449	656	500	692
Premises	42	42	42	42
IT	154	191	164	173
Supplies and services	181	173	172	183
Other central costs	32	52	55	51
Cost of democracy	-	-	-	-
Other	-	-	-	-
	858	1,114	933	1,141
Oversight & governance costs				
Staff costs	107	138	131	142
External audit fees	20	24	21	24
Actuarial fees	260	95	187	117
Pension Committee/Board	1	-	1	1
Performance monitoring service	38	18	38	19
Investment consultancy	23	20	20	20
Other professional fees	9	29	9	31
	458	324	407	354

	2013/14 Actual £000	Forecast £000	2014/15 Actual £000	2015/16 Forecast £000
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Investment management expenses

Management fees	3,752	4,206	4,733	4,594
Performance fees	1,915	734	598	836
Transaction costs	345	-	350	-
Custody fees	62	84	72	96
	6,074	5,024	5,753	5,526

Actual staff costs within Administrative Costs in 2014/15 are lower than the figure forecast due to unfilled vacancies.

Actual actuarial fees within Oversight & Governance contain actuarial expenses of £135,000 which arose as a result of

employer requests and was therefore recharged back to them. Net actuarial fees for 2014/15 were £52,000.

Financial Summary

	2014/15 £m	2013/14 re-stated** £m	2012/13 £m	2011/12 £m	2010/11 £m
Contributions and investment income *	122.7	116.4	107.5	112.4	115.5
Realised profit/(loss)	21.0	13.0	13.3	101.5	17.9
Less benefits and other expenses *	(110.6)	(88.6)	(74.6)	(74.0)	(71.6)
Annual surplus/(shortfall)	33.1	40.8	46.2	139.9	61.8
Increase/(decrease) in market value of investments	169.5	80.9	133.4	(92.1)	42.1
Increase/(decrease) in Fund during year	202.6	121.7	179.6	47.8	103.9
Market Value of net assets at 31st March	1,709.1	1,506.5	1,384.8	1,205.2	1,157.4

* Excludes recoverable expenditure

** The accounting treatment of expenses has changed, as per guidance received from the Chartered Institute of Public Finance and Accountancy (CIPFA), figures for 2013/14 have been re-stated to enable a meaningful comparison between 2013/14 and 2014/15.

Analysis of pension overpayments

	2014/15 £
Pension overpayments b/fwd	7,680
Pension overpayments in the current year	38,644
Overpayment recovered	(21,904)
Overpayments written off	(922)
Pension overpayments c/fwd	23,498

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 October 2014 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

- 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.

Match reports are being reviewed and additional information sought as necessary. The reports identified 27 pensioners who had died, where Pensions had not been informed of their death, in 14 of these cases the pension had already been suspended. Invoices have been raised to recover overpayments. No cases of fraud have been identified to date.

> Administrative Management Performance

Key administration performance indicators

The Pension Fund has a number of local performance targets which are detailed in the table below. The table shows the levels of achievement for the last five years.

Activity	Target	2014/15	2013/14	2012/13	2011/12	2010/11
Annual Benefit Statements sent by statutory deadline	100%	0%** see note below	100%	100%	100%	100%
Provide retirement estimates within 10 working days						
Total completed		646	531	655	754	749
Completed on time		505	428	594	685	693
Achievement	80%	78.2%	80.6%	90.7%	90.9%	92.5%
Pay retirement grants within 10 working days						
Total completed		707	745	739	889	775
Completed on time		634	721	716	844	763
Achievement	90%	89.7%	96.8%	96.9%	94.9%	98.5%
Pay death gratuities within 3 working days						
Total completed		40	57	65	45	51
Completed on time		39	54	58	37	39
Achievement	85%	97.5%	94.7%	89.2%	82.2%	76.5%

** Annual Benefit Statement – Statutory deadline was 30/09/2014. 100% of Annual Benefit Statements were sent out during December 2014.

The Pension Section not achieving its local performance targets has primarily been due to additional workloads experienced as a result of the unprecedented levels of statutory change and requirements of late. This has resulted not only in additional complexity and issues to be managed in the administration of the LGPS by the Pension Section, but also in the need to provide substantial additional support to both Employers and Scheme Members alike.

Results from employer satisfaction survey

The Fund also carries out an annual employer satisfaction survey to measure the level of benefit/improved understanding employers derive from attending the employers' forums and when contacting the Pensions Section.

% of employers completing the survey who agreed with the following statements:

	2014/15	2013/14	2012/13	2011/12	2010/11
	%	%	%	%	%
The forums had raised their understanding of current pension issues	83	83	88	100	100
Employers who felt that what they had learned would help them in their role as a pension fund employer	88	78	94	100	73
Where I have contacted the Pensions office regarding a pension related issue, I am satisfied with the assistance given in relation to the query raised	95	72	100	94	100

Complaints received

Type of complaint	2014/15
System error	-
Staff error	1
Staff attitude	-
Total	1
Total as % of workload	0.0%

> Financial Indicators

Scheme Administration Costs

The Pension Fund subscribes to the annual CIPFA Benchmarking Survey. This survey for 2014/15 shows that whilst the number of employers within the Gloucestershire Fund exceeded the average of all the Funds in the survey our administration costs per member are £13.45 compared to the average cost of £19.17 per member within the survey. This places the Fund in the lowest cost quartile.

Cost per member	2014/15	2013/14	2012/13	2011/12	2010/11
	£	£	£	£	£
Fund cost	13.45	13.08	14.40	14.68	15.59
Group average	19.17	20.75	20.87	21.54	22.14
Difference	(5.72)	(7.67)	(6.47)	(6.86)	(6.55)

Investment Management Costs

	2014/15	2013/14	2012/13	2011/12	2010/11
	£	£	£	£	£
Cost per member	111.07*	111.82	67.36	75.04	68.56

* Pension Fund expenses have been accounted for in accordance with the CIPFA guidance, Accounting for Local Government Pension Scheme Management Costs. In accordance with this guidance, from 2014/15 transaction costs previously included within the purchase cost/proceeds of investment purchases and sales have been added to Investment Management Costs with a corresponding offset against Profit on Disposal of Investments.

The management fees disclosed opposite include all 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.

A third category of expense, Oversight & Governance, has also been added and some costs previously included within Administration Costs and Investment Management Costs now come under this category.

Oversight and Governance Costs

	2014/15
	£
Cost per member	7.86

Key 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. This table shows a trend of a declining number of staff looking after an increasing number of fund members.

	2014/15	2013/14	2012/13	2011/12	2010/11
Number of full time equivalent Pension Fund staff	10.6	9.8	9.8	9.9	12.7
Total fund membership	51,794	50,419	47,712	46,214	44,939
Number of fund members to one member of administration staff	4,886	5,145	4,869	4,668	3,539

> Membership Summary

	2014/15	% diff	2013/14	% diff	2012/13	% diff	2011/12	% diff	2010/11
Contributors	18,141	+1.14	17,936	+6.27	16,877	+0.87	16,731	-3.29	17,301
Pensioners	13,719	+2.03	13,446	+5.15	12,788	+5.36	12,137	+7.00	11,344
Deferred pensioners	17,201	+5.48	16,307	+6.31	15,339	+4.60	14,664	+7.86	13,595
	49,061	+2.88	47,689	+5.97	45,004	+3.38	43,532	+3.06	42,240
Undecided leavers	2,733	+0.11	2,730	+0.81	2,708	+0.97	2,682	-0.63	2,699
	51,794	+2.73	50,419	+5.67	47,712	+3.24	46,214	+2.84	44,939

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.

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	16
F	15 to 19	93	19	0	26
M	15 to 19	58	17	0	32
F	20 to 24	557	342	0	27
M	20 to 24	299	205	0	19
F	25 to 29	732	822	0	1
M	25 to 29	336	369	0	1
F	30 to 34	1,022	1,140	1	0
M	30 to 34	309	449	0	0
F	35 to 39	1,349	1,260	0	3
M	35 to 39	305	398	0	1
F	40 to 44	2,226	1,812	6	6
M	40 to 44	400	447	2	7
F	45 to 49	2,880	2,572	17	11
M	45 to 49	499	613	6	17
F	50 to 54	2,675	2,607	37	24
M	50 to 54	557	664	23	24
F	55 to 59	1,868	2,064	283	51
M	55 to 59	475	608	148	56
F	60 to 64	836	550	1,867	62
M	60 to 64	364	160	823	56
F	65 to 69	198	55	2,223	119
M	65 to 69	79	20	1,190	67
F	70 to 74	14	2	1,376	154
M	70 to 74	9	6	859	75
F	75 to 79	0	0	859	198
M	75 to 79	0	0	589	90
F	80 to 84	1	0	469	228
M	80 to 84	0	0	367	41
F	85 to 89	0	0	252	211
M	85 to 89	0	0	217	47
F	90 to 94	0	0	113	143
M	90 to 94	0	0	74	7
F	95 to 99	0	0	22	25
M	95 to 99	0	0	16	1
F	100 to 104	0	0	4	4
M	100 to 104	0	0	3	0
F	105 to 109	0	0	0	2
F	110 to 114	0	0	0	1
Total Members	49,061	18,141	17,201	11,846	1,873

> Management Report

The Pension Scheme

The Local Government Pension Scheme (LGPS) is governed by statutory regulations. The statutory responsibility of the LGPS is with the department of Communities and Local Government (CLG). For the period covered by this report the Local Government Pension Scheme Regulations 2013 were in operation. The LGPS is a statutory funded scheme and was on a final salary basis until the 31st March 2014 when it went to a C.A.R.E. scheme (career average revalued earnings) and the benefits are defined and guaranteed by law. Any changes to the legislation of the scheme are governed by CLG – See page 121 and 122 for benefit changes since 1st April 2014.

The scheme applies to employees of local authorities and certain other bodies providing a public service. Teachers, police officers and fire officers have their own pension schemes and are excluded from this Fund. Under the LGPS Regulations, Gloucestershire County Council administers the Pension Fund in the county on behalf of its own employees and those of a number of other public bodies, in particular District

Councils. Within the County Council, staff from Strategic Finance are responsible for the investment administration of the Fund supported by the Fund's Global Custodian, BNY Mellon Asset Servicing, who provides custody and accounting support. The Fund is a member of the NAPF (National Association of Pension Funds) and delegates voting rights to fund managers to exercise these rights in line with NAPF or PIRC (Pensions and Investment Research Consultants) proxy voting guidelines. Details of the Fund's investment managers and their mandates are detailed on page 22 of this report. A list of participating employer bodies within the Fund is

shown on pages 17 to 20.

The Fund is financed by contributions from employees and employers, together with proceeds from investments. Contributions in the financial statements represent those amounts receivable from various employing authorities in respect of their own contributions and those of their pensionable employees.

Employee Contributions

Employee contributions are prescribed by statute and are based on pay bands. The pay bands and rates applicable from April 2015 are detailed below:

Pensionable Pay	Employee Contribution Rate %
Up to £13,600	5.5
£13,601 to £21,200	5.8
£21,201 to £34,400	6.5
£34,401 to £43,500	6.8
£43,501 to £60,700	8.5
£60,701 to £86,000	9.9
£86,001 to £101,200	10.5
£101,201 to £151,800	11.4
More than £151,801	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 2013, were announced in March 2014 and set the employers' contribution rates payable in each of the three years commencing 1st April 2014. The next actuarial valuation is due as at 31st March 2016, which will prescribe the employer rates from 1st April 2017.

Employer Contributions as a % of pay	31st March 2013	31st March 2010	31st March 2007
(a) Future Service Funding Rate	19.7%	15.5%	14.6%
(b) Past Service Adjustment	13.2%	10.3%	7.7%
Total Common Contribution Rate	32.9%	25.8%	22.3%

Further information regarding the valuation and the scheme's funding position is included in the Actuarial Report on Fund on pages 33 to 34.

The LGPS exceeds the minimum pension requirements of the State Earnings Related Pension Scheme (SERPS) brought in by the 1975 Social Security Act, and is therefore contracted out of the State Scheme. 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 pages 121 to 122 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 2014 to 31st March 2017 may be found in the Funding Strategy Statement on pages 106 to 110.

2014/2015 Contributions	Employer Contributions	Employee Contributions	Total
Administering Authority			
Gloucestershire County Council*	32,525,077	7,098,567	39,623,644
Scheduled Bodies			
Cheltenham Borough Council	3,492,091	472,897	3,964,988
Cotswold District Council	2,121,149	462,083	2,583,232
Forest of Dean District Council	1,945,368	278,898	2,224,266
Gloucester City Council	4,578,159	401,312	4,979,471
Stroud District Council	2,773,469	597,829	3,371,298
Tewkesbury Borough Council	2,001,639	366,717	2,368,356
Police & Crime Commissioner for Gloucestershire	3,533,734	1,183,331	4,717,065
Gloucestershire Probation Board	209,081	46,340	255,421
Parish and Town Councils (pooled)	374,634	98,133	472,767
Cirencester College	414,145	115,543	529,688
Gloucestershire College	1,970,566	455,747	2,426,313
Hartpury College	825,637	255,828	1,081,465
University of Gloucestershire	3,237,716	972,729	4,210,445
Cheltenham Borough Homes	870,925	293,418	1,164,343
Cotswolds Conservation Board	82,953	27,905	110,858
Farmors Sport Centre Ltd	12,680	2,600	15,280
Gloucester City Homes	487,641	171,887	659,528
Gloucestershire & Severnside Valuation Tribunal	37,384	2,172	39,556
Lower Severn Drainage Board	131,879	32,655	164,534
Sir William Romney's Leisure	9,593	1,933	11,526
Academies			
Abbey View CCT	9,686	2,941	12,627
All Saints	168,878	42,389	211,267
Balcarras	195,359	57,536	252,895
Beaufort	271,540	59,626	331,166
Bishops Cleeve Primary	101,534	26,676	128,210
Blockley Primary	29,678	6,625	36,303
Bourton on the Water	59,309	12,933	72,242
Brockworth Primary	53,972	13,720	67,692

* including schools

continued...

2014/2015 Contributions	Employer Contributions	Employee Contributions	Total
Academies (continued)			
Charlton Kings Infants	50,111	12,336	62,447
Charlton Kings Junior	54,955	11,886	66,841
Cheltenham Bournside	257,081	64,527	321,608
Chipping Campden	144,606	40,029	184,635
Chosen Hill	206,078	54,195	260,273
Christ Church C of E	55,061	10,895	65,956
Churchdown Secondary	316,944	69,597	386,541
Churchdown Village Infants	55,939	14,020	69,959
Cirencester Deer Park	195,052	59,681	254,733
Cirencester Kingshill	137,945	44,452	182,397
Cleeve School	219,683	65,143	284,826
The Cotswold School	225,955	58,454	284,409
The Crypt School	91,963	29,147	121,110
Dene Magna	194,692	42,017	236,709
Dursley Primary	55,289	11,643	66,932
Farmors Academy	126,258	36,467	162,725
Field Court C of E Infant School	71,880	15,181	87,061
Field Court C of E Junior School	47,267	9,542	56,809
Forest E-Act Academy	129,683	24,053	153,736
Forest View Primary	79,013	15,944	94,957
Gloucester Academy	245,870	70,487	316,357
Gotherington Primary	27,987	5,146	33,133
Green Field Academy	20,927	4,513	25,440
Gretton Primary	26,184	3,687	29,871
Hardwicke Primary School	30,329	6,117	36,446
High School for Girls	112,928	31,194	144,122
Highnam C of E Primary	22,637	5,907	28,544
Katherine Lady Berkeley's School	284,106	62,001	346,107
Marling School	107,953	30,847	138,800
Millbrook Academy	168,381	39,778	208,159
Minchinhampton Academy	21,477	5,136	26,613
Mitton Manor Primary	37,139	8,438	45,577
Newent Community School	221,501	53,395	274,896
Offas Mead Primary	31,029	5,623	36,652
Pate's Grammar School	155,734	43,422	199,156
Peak Academy	40,713	9,117	49,830
Primrose Hill Academy	51,385	9,852	61,237
Redmarley C of E Primary	6,254	1,359	7,613
Ribston Hall	112,830	32,770	145,600
Robinswood Primary	141,834	40,738	182,572
Rosary Catholic Primary School	29,540	7,783	37,323
Rowanfield Junior	45,467	14,307	59,774
Severn Banks Primary	76,591	14,566	91,157
Severn Vale	185,461	56,649	242,110
Severn View Primary	23,733	4,673	28,406
Sir Thomas Rich's	133,805	35,195	169,000
Sir William Romney's School	107,136	24,907	132,043
Springbank Primary	53,553	17,639	71,192
St Davids Primary	45,208	11,392	56,600

continued...

2014/2015 Contributions	Employer Contributions	Employee Contributions	Total
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Academies (continued)

St Dominic's Catholic Primary School	18,229	4,619	22,848
St John's C of E Primary	62,512	11,514	74,026
St Mary's Catholic Primary School	47,375	13,268	60,643
St Peter's High School	375,021	76,849	451,870
Staunton and Corse C of E Primary	15,835	3,796	19,631
Stone with Woodford C of E Primary	18,238	3,507	21,745
Stroud High School	130,488	38,677	169,165
Tewkesbury School	291,983	68,336	360,319
The Dean Academy	203,027	40,487	243,514
The Ridge Academy	65,313	18,257	83,570
Thomas Keble	140,552	36,321	176,873
Tredworth Infants Academy	55,643	12,441	68,084
Winchcombe Abbey	36,397	8,349	44,746
Winchcombe School	110,482	26,961	137,443
Wyedean School	224,000	57,594	281,594

	37,078,641	8,229,226	45,307,867
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Admitted Bodies

Amey	337,512	84,556	422,068
APCOA	45,012	11,967	56,979
Aspire Sports and Cultural Trust	149,154	65,815	214,969
Barnardo's - Forest of Dean	46,343	12,683	59,026
Barnardo's - South Glos.	115,473	35,216	150,689
Barnardo's - Tewkesbury	64,972	18,177	83,149
Brandon Trust	60,219	8,274	68,493
Carers Glos. Parent Partnership	9,141	2,857	11,998
Carers Glos. Advice & Support	4,566	1,058	5,624
Cheltenham Leisure & Culture	158,111	52,353	210,464
Civica (FODDC)	84,989	22,297	107,286
Civica (Glos.)	190,143	54,571	244,714
Civica (Glos. IT)	55,368	5,233	60,601
Cotswold Archaeology	176,318	47,521	223,839
Enterprise (AOL)	184,466	59,108	243,574
Fosseway Housing Association (Bromford Group)	920,298	49,182	969,480
Gardners Lane & Oakwood Federation	251,814	84,534	336,348
Gloucester City Homes	25,749	8,172	33,921
Gloucestershire Airport	244,860	35,197	280,057
Gloucestershire Deaf Association	2,896	-	2,896
Gloucestershire Group Homes	107,479	24,585	132,064
Hill Valley & Vale Ltd	115,677	31,762	147,439
INTO University Partnerships	6,814	1,969	8,783
Gloucestershire Care Services NHS Trust	147,404	49,793	197,197
Lovells	131,312	19,000	150,312
The Orders of St John Care Trust	248,950	28,987	277,937
Prospects Youth Service	736,078	233,146	969,224
SSE	4,144	1,246	5,390
Severnvale Housing Association	714,304	39,898	754,202
Sport & Leisure Management	110,239	39,590	149,829

2014/2015 Contributions	Employer Contributions	Employee Contributions	Total
Admitted Bodies (continued)			
Stroud Court Community Trust	134,981	21,975	156,956
Two Rivers Housing	268,947	106,609	375,556
UBICO Ltd (Cheltenham)	490,930	133,512	624,442
UBICO Ltd (Cotswolds)	14,883	4,299	19,182
4Children (Cotswolds)	46,356	12,503	58,859
4Children (North Glos.)	94,957	25,971	120,928
	6,500,859	1,433,616	7,934,475
Total contributions	76,104,577	16,761,409	**92,865,986

* including schools

** includes ill health and early retirement contributions totalling £2.7m.

Some of the employers will include accruals for contributions due but not received as at 31st March 2015

> Benchmarking Report

The Fund's investment performance is benchmarked on an annual basis against other local authority pension funds subscribing to GS Performance Services Universe of 85 local authority pension funds. The Fund was 28th in 2014/15. Further details are given on pages 22 to 24 of this report.

The Fund's administration performance is benchmarked on an annual basis against other local authority pension funds subscribing to the CIPFA benchmarking service. Over the previous ten years this has consistently shown the Fund's administration cost per member to be below the average cost of

all the other funds which were benchmarked. Further details of the Fund's performance compared to other funds is given on page 13 of this report

Investment Policy and Performance Report

Investment Powers and Duties

The powers and duties concerning the investment of Fund monies, for the period covered by this report, are set out in the Local Government Pension Scheme Management and Investment of Funds Regulations 2009 (as amended). The 2009 Regulations require the County Council, as Administering Authority for the Gloucestershire LGPS Fund, to invest any monies that are not immediately required to pay pensions and other benefits.

The Regulations allow a wide range of investments, but set certain limits. The main asset categories in which investments may be made are:

- Any security on any recognised stock exchange (no single investment to exceed 10% of the value of the fund).
- Unlisted securities (subject to a maximum of 15% of the total value of the fund).
- Bank deposits etc. (subject to a maximum of 10% of the value of the fund in any single bank).
- Loans to approved institutions (subject to a maximum of 10% of the total value of the fund).
- Managed funds with an insurance company or similar body (subject to a limit of 35% of the total value of all investments in a single contract), unit trusts (subject to a limit of 35% of the value of the fund which may be invested in unit trusts managed by a single body), open-ended investment

companies (subject to a limit of 35% of the value of the fund which may be invested in open-ended investment companies managed by a single body), or stock lending (subject to a limit of 35% of the value of the fund).

- Investments in partnerships (subject to a maximum of 30% of the value of the fund).

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 directly responsible for the Fund's investment policy. During 2014/15 the Committee comprised of six 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 pages 35 to 38.

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 Statement of Investment Principles on pages 112 to 118 of this report. This includes details of the Fund's agreed strategic asset allocation to the various investment markets.

The Fund's policy in respect of Socially Responsible Investment issues may be found on page 115 of the Statement of Investment Principles contained within this report.

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 six specialist investment managers, Standard Life Investments, BlackRock, Western Asset Management, GMO, Hermes Investment Management and CBRE who each manage portfolios within specific asset categories of the Fund's investments.

The Pension Fund also invests in two private equity/venture capital funds run by Technology Venture Partners and The YFM Group respectively. As at the year-end date details of the Fund's investments:

1. The South West of England Regional Venture Capital Fund. Backed by the Department of Trade and Industry, supporting fast growing small and medium enterprises (SME's) across the South West region. The Pension Fund's maximum commitment to the Fund is £2.5m and this has now been fully drawn-down.

Technology Venture Partners LLP (TVP) took over the SWVF fund management contract on 23rd May 2014 from YFM Private Equity Limited

2. The Chandos Fund. This fund invests in small, fast growing businesses targeting, buy-outs, buy-ins, development capital, financing pre Initial Public Offerings,

and equity release/partial sales. The Pension Fund's maximum commitment to the Fund is £3m.

The Committee adopted a fund-specific benchmark commencing April 2005, and details of the Fund benchmark currently being used is shown on page 23. The benchmark represents the optimal

investment portfolio distribution between asset classes to deliver the Fund back to 100% funding in accordance with the principles outlined in our Funding Strategy Statement.

The Fund's Investment Managers are:	Mandate	Bid Market Value 31st March 2015 £m
Standard Life Investments	UK Equities	327.0
	Global Multi Asset Absolute Return Fund	78.8
BlackRock	Global Equities Including Emerging Markets	437.2
	Emerging Markets	58.5
Western Asset Management	Global Fixed Interest	287.3
	Global Multi Strategy Fixed Interest	72.6
GMO	Global Equities Including Emerging Markets	311.2
Hermes Investment Management	UK Property Unit Trusts	82.1
CBRE	Global Property	37.7
YFM Group	Private Equity	4.6

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

BNY Mellon Asset Servicing is the Fund's appointed global custodian. The appointment has been effective since January 2005.

Fund Performance

Primarily, BNY Mellon Asset Servicing and additionally, GS Performance Services, measure the Fund's investment performance. These companies provide independent performance measuring services for the Fund.

To 31st March 2015 the Fund realised the opposite returns: >

	Fund % p.a.	Benchmark % p.a.
1 year	14.4	15.5
3 years	12.6	11.1
10 years	8.1	8.3

For general market background information the following shows rates of return achieved on representative market indices over the 12 months to 31st March 2015:

- Japanese equities provided the best performance of the major equity asset categories, returning 27.1%. North America followed with 25.1%.
- UK equities returned 6.6%.
- Other International equities, Pacific equities and European equities (exc. UK) returned 19.9%, 12.7% and 7.5% respectively.
- UK bonds returned 13.9% and UK Index linked bonds returned 18.5%.
- Overseas bonds were the worst performers of the major fixed

interest categories with a return of 7.6%.

- Property returned 18.3%
- The UK Retail Price Index increased by 0.9% and the UK Consumer Price Index increased by 0.0%.

Local Authority Universe

For 2014/15, 85 local authority funds were included directly in the GS Performance Services Universe. The aggregate market value of these funds was £199.9 billion. The average investment return achieved by Local Authority Pension Funds within the Universe for 2014/15 was 13.2% (including property assets), 0.7% below the Gloucestershire Fund's return, placing Gloucestershire 28th out of the 85 funds.

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

Annualised returns over:	Average Local Authority Fund %
1 year	13.2
3 years	11.0
10 years	7.9

The annualised total Fund return of the Gloucestershire Fund compared to other local authority returns placed the Gloucestershire Fund 15th out of 81 and 36th out of 72 over the three and ten year periods respectively.

Investment Performance

31st March 2015 investment returns over 12 months and 3 years as derived from the various asset categories in the Gloucestershire Fund compared to the fund specific performance benchmark:

	12 months		3 years	
	Fund %	Benchmark %	Fund %	Benchmark %
UK Equities	3.5	6.6	11.9	10.6
Emerging Market Equities	13.1	12.8	3.2	2.8
Global Equities	19.5	18.6	16.1	14.1
UK Bonds	15.7	16.5	9.5	8.1
Overseas Bonds	7.6	3.7	4.6	3.4
UK Index-Linked	24.5	21.0	10.4	8.9
Global Multi Sector Bonds	4.7	17.9	4.4	8.4
Global Absolute Return	11.6	17.9	n/a	n/a
Property	18.4	16.8	12.3	9.5
Total Fund Return	14.4	15.5	12.6	11.1

10 year returns are not available in the same format, by each major asset class, as present performance reporting commenced from inception of the current mandates during 2005. However, the 10 year total fund performance returns are shown on page 22 and the 10 year local authority universe placing is shown opposite. Performance returns by fund manager are shown below.

Each mandate awarded over the asset categories has a targeted outperformance of their fund specific benchmark over a rolling 3 year period.

Investment performance by fund manager against benchmarks as at 31st March 2015, annualised for 1 and 3 years and since inception:

Mandate	Benchmark	1 year		3 years		Since Inception		
		Portfolio %	B/mark %	Portfolio %	B/mark %	Portfolio %	B/mark %	
Standard Life	UK Equity	FTSE All Share	3.4	6.6	11.4	10.6	7.5	7.6
Standard Life	Multi Asset Global Absolute Return	Composite UK/Overseas**	11.6	17.9	n/a	n/a	9.1	8.7
BlackRock	Global Equity Inc. Emerging Markets*	MSCI All Country World Index	23.5	18.4	17.2	13.5	10.2	9.1
BlackRock	Emerging Markets	MSCI Emerging Market Index	13.1	12.8	3.2	2.8	6.2	5.9
Western Asset	Global Fixed Interest	Composite UK/Overseas	17.5	17.9	9.3	8.4	7.1	7.4
Western Asset	Global Multi Strategy Fixed Interest	Composite UK/Overseas**	4.7	17.9	4.4	8.4	4.7	9.6
Hermes Investment	UK Property	IPD UK PPF Balanced PUT	19.3	16.9	12.6	9.5	6.2	4.1
CBRE	Global Property	IPD All Balanced Property Funds Index	16.8	16.6	12.8	9.8	11.3	8.8
GMO	Global Equity Inc. Emerging Markets	MSCI World Index	15.5	19.1	15.6	15.0	14.5	14.4

* The new Global Fund commenced 8th March 2012 replacing the regional funds and their benchmarks. Both performance and benchmark returns, for the original regional funds, are included above to the end of February 2012.

** These mandates are monitored against the benchmark of the investment (WAMCO – Global Fixed Interest) from where the original funding was taken.

Asset Allocation – Planned compared to actual

	Planned asset allocation with effect from 1st December 2012 %	Actual asset allocation as at 31st March 2014 %	Actual asset allocation as at 31st March 2015 %
UK Equity	20.0	22.2	19.2
Emerging Markets	4.0	3.1	3.4
Global Equity	17.5	18.6	18.3
Global Equity Including Emerging Markets	23.5	24.3	25.7
Total Equity	65.0	68.2	66.6
Global Fixed Interest (including Index Linked Securities) & Global Multi Strategy Fixed Interest	22.0	20.3	21.1
UK and Global Property	7.5	6.0	7.0
Multi Asset Global Absolute Return	5.0	4.6	4.6
Cash & Venture Capital	0.5	0.9	0.7
	100.0	100.0	100.0

Significant changes during the year:

Planned Strategic Asset Allocation – No changes.

Asset Allocations

Snapshot of the Fund's actual investment exposure in the worlds' markets as at 31st March 2015 and 31st March 2014 expressed as a percentage of the Fund:

Total Fund	Gloucestershire Fund	
	31st March 2015 %	31st March 2014 %
UK Equities	21.4	24.4
North American Equities	22.0	21.3
European Equities	9.2	9.1
Far East Equities	4.6	4.5
Emerging Markets	8.8	8.1
Fixed Interest	20.8	19.6
Property	7.0	6.1
Global Multi Asset	4.6	4.6
Private Equity	0.3	0.3
Cash	1.3	2.0
	100.0	100.0

< As at 31st March 2015 the scheme assets were invested in a diversified portfolio that consisted primarily of equity and debt securities. The majority of the equities held by the scheme are in international blue chip entities as included in the FTSE and MSCI Indices. The aim is to hold a globally diversified 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.

Voting

The Fund supports the principles of best practice in corporate governance and delegates authority to the investment managers to exercise these voting rights in line with NAPF and PIRC or other proxy voting guidelines on our behalf. The investment managers are required to report their voting actions as part of their quarterly reports to the Pension Committee.

The voting activity of the Pension Fund during the financial year for directly held investments is summarised in the following table.

Where voting activity took place	Number of meetings	Number of resolutions			
		In total	Voted for	Voted against	Abstained
UK & Channel Islands	91	1,694	1,632	25	37

Stewardship Code

Stewardship aims to promote the long term success of companies. Effective stewardship benefits companies, investors and the economy as a whole.

The UK Stewardship Code sets out seven principles of effective stewardship by investors and assists institutional investors better to exercise their stewardship responsibilities. These are set out in the following section.

Institutional investors should:

1. Publicly disclose their policy on how they will discharge their stewardship responsibilities.
2. Have a robust policy on managing conflicts of interest in relation to stewardship and this policy should be publicly disclosed.
3. Monitor their investee companies.
4. Establish clear guidelines on when, and how they will escalate their activities as a method

of protecting and enhancing shareholder value.

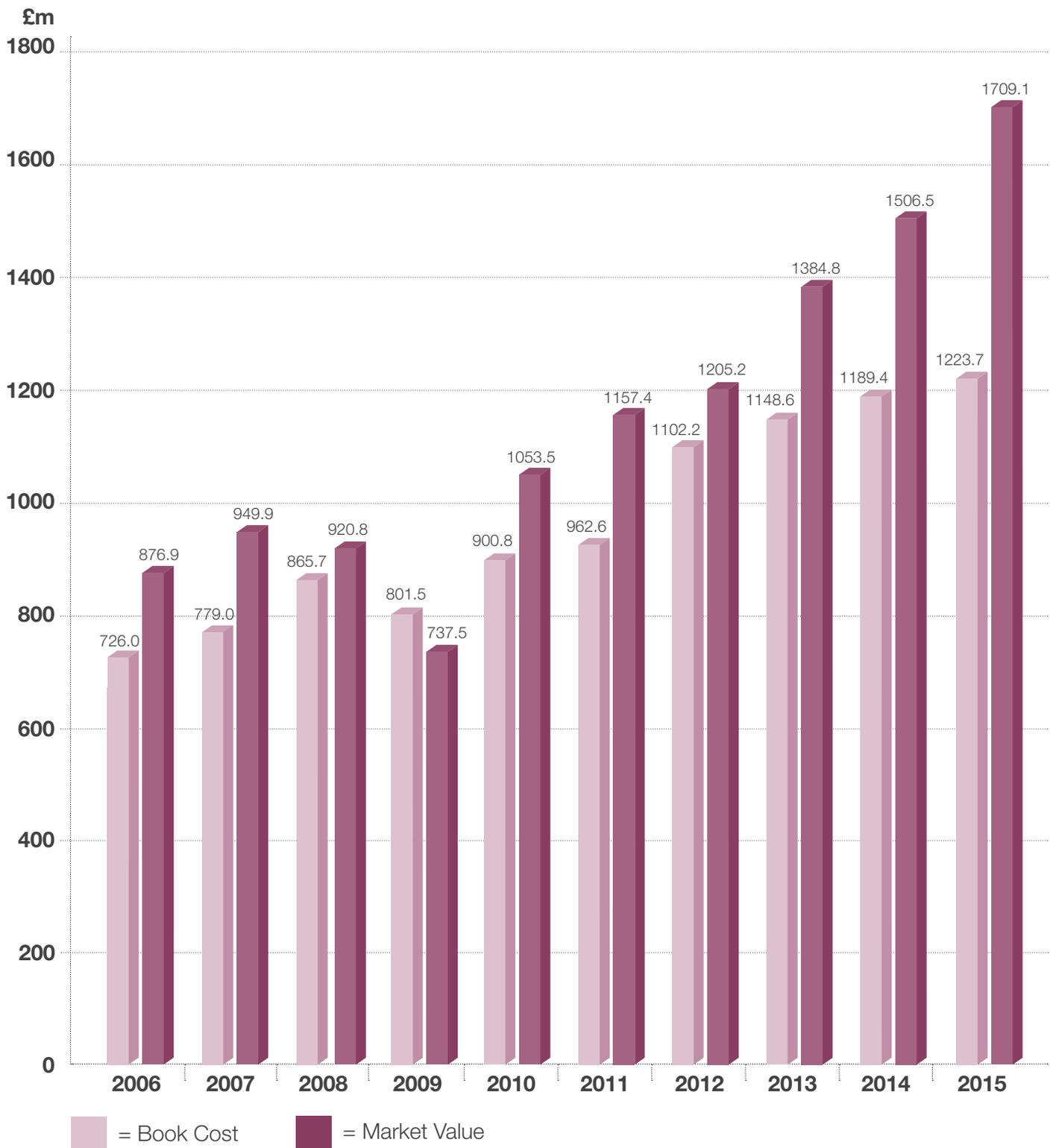
5. Be willing to act collectively with other investors where appropriate.
6. Have a clear policy on voting and disclosure of voting activity.
7. Report periodically on their stewardship and voting activities.

Details of the Fund's managers and whether they are signatories to the UK Stewardship Code are set out below.

Manager	Signatory to UK Stewardship Code	Notes
BlackRock Advisors (UK)	Yes	
CBRE Global Collective Investors	No	
GMO	No	GMO has clearly articulated proxy voting policies which are integral to their investment process and which they believe capture the broader themes included in the Code.
Hermes Real Estate Investment Management	Yes	Hermes has signed up to the Code. However whilst the Code itself is focused on equities, Hermes applies similar stewardship principles to all asset classes, where appropriate, including real estate.
Standard Life Investments	Yes	
Western Asset Management	No	Not relevant to the type of investment undertaken

Value of Fund

The Fund's investments were valued at £1,709.1m at 31st March 2015, an increase of £202.6m from the beginning of the year. The chart below illustrates the movement in the market value of the Fund over the last ten years by setting the purchase cost (book value) against the market value of investments.



Analysis of Investments as at 31st March 2015

31st March 2014 £000	Geographical Analysis	31st March 2015 £000	%
764,002	United Kingdom	815,123	47.7
320,890	North America	406,599	23.8
152,816	Europe	169,716	9.9
66,392	Far East & Australia	73,771	4.3
133,105	Emerging Markets	163,848	9.6
69,290	Global	80,017	4.7
1,506,495		1,709,074	100.0

31st March 2014 £000	Sector Analysis	31st March 2015 £000	%
331,456	Equities UK	326,170	19.1
695,592	Overseas*	806,836	47.2
141,352	Fixed Interest UK	156,993	9.2
76,137	Overseas*	94,569	5.5
78,543	Index-Linked UK	89,044	5.2
-	Overseas	14,638	0.9
84,233	Property Funds UK	107,701	6.3
7,426	Overseas	11,759	0.7
69,290	Multi Asset Global	78,772	4.6
22,310	Cash, Net Current Assets & Other Balances	22,954	1.3
156	Derivatives	-362	0.0
1,506,495		1,709,074	100.0

* Pooled funds within these categories may incorporate some UK assets

Main Holdings as at 31st March 2015

	Market Value £m	Fund %		Market Value £m	Fund %
United Kingdom					
Hermes Property Unit Trust	82.1	4.8	Treasury IL 1.125% 2037	10.9	0.6
Treasury 4.25% 2040	21.9	1.3	Prudential	10.8	0.6
Royal Dutch Shell 'B' Shares	18.5	1.1	GlaxoSmithKline Ord.	10.2	0.6
HSBC Holdings	18.2	1.1	Treasury 4.25% 2039	9.7	0.6
Treasury IL 1.875% 2022	14.9	0.9	Treasury IL 1.25% 2055	9.4	0.5
Treasury 3.75% 2021	14.5	0.8	Standard Life Smaller Companies Fund	9.2	0.5
Treasury IL 1.25% 2027	13.7	0.8	Barclays	8.8	0.5
Treasury IL Variable Rate 2035	13.1	0.8	Treasury IL 1.25% 2032	8.3	0.5
BP	12.5	0.7	Lloyds Banking Group	8.1	0.5
Vodafone Group	11.3	0.7	British American Tobacco	8.1	0.5
Overseas					
BlackRock Global Equity Fund	437.2	25.6	BlackRock Emerging Markets Index Fund	58.5	3.4
GMO World Equity Allocation Investment Fund	311.2	18.2	US Treasury 1.375% 2044	9.1	0.5
Standard Life Global Absolute Return Strategies	78.8	4.6	Global Alpha Fund	8.7	0.5
Legg Mason Global Funds – WA GMS	72.6	4.2	US Treasury 2.0% 2025	8.0	0.5
Cash Instruments					
BNY Mellon Sterling Liquidity Fund	3.4	0.2	BNY Mellon US Dollar Liquidity Fund	1.4	0.1

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 81 to 111.

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 86 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 86.

Scheme Administration Report

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 these functions the Fund's administration and investment performance is benchmarked on an annual basis against other local authority pension funds subscribing to the CIPFA benchmarking service and the GS Performance Services' Universe of 85 local authority pension funds respectively. 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.

The County Council website (see web addresses on page 8) contains detailed documents and information on the following areas:

- All the Pension Fund's policy statements.
- The actuary's triennial valuation report at March 2007, March 2010 and March 2013.
- Annual reports from 2004/05 to the present.

- Business Plan
- Funding Strategy Statements
- 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.
- Employer pages providing an Employer's Administration Guide and associated forms/documentation together with other relevant information.

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

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 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 or 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.

The Pensions Advisory Service (TPAS)

TPAS 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. TPAS can be contacted on 0845 601 2923.

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 TPAS, an application can be made to the Pensions Ombudsman within three years of the event that gave rise to the complaint or dispute.

The Ombudsman can investigate and determine any complaint or dispute involving maladministration of the scheme or matters of fact or law and his or her decision is final and binding (unless the case is taken to the appropriate Court on a point of law). Matters where legal proceedings have already started cannot be investigated by the Pensions Ombudsman. The

Pensions Ombudsman can be contacted at 0207 630 2200.

More detailed information can be found on the pages of the Pension Section's website by using the following link www.gloucestershire.gov.uk/lgpsmemberguides and downloading "Booklet 11 – Help with Pensions Problems".

Alternatively, you can contact the Pensions Section by telephoning (01452) 328888.

Details of scheme member appeals during 2014/2015 are as follows:

There have been no appeals against the County Council, as Administering Authority, during 2014/2015.

Executive Summary on the Last Triennial Valuation

An actuarial valuation of the Fund was carried out as at 31st March 2013. The results are briefly summarised below.

Funding Position

The table right summarises the financial position of the Fund at 31st March 2013 in respect of benefits earned by members up to this date.

The increase in deficit reflects the changes in market conditions since the previous valuation. In particular, the decrease in the real gilt yield has increased the value placed on the Fund's liabilities.

	31st March 2010	31st March 2013
Past Service Position	£m	£m
Past Service Liabilities	1,498	1,976
Market Value of Assets	1,054	1,385
Surplus / (Deficit)	(444)	(591)
Funding Level	70.4%	70.1%

Contribution Rates

The table below summarises the average employer contribution rate that would be required, based on this triennial valuation.

	31st March 2010	31st March 2013
Contribution Rates	% of pay	% of pay
Employer future service rate (incl. expenses)	15.4	19.7
Past service adjustment (20 year spread)	10.3	13.2
Total employer (common) contribution rate (incl. expenses)	25.8	32.9
Employee contribution rate	6.6	6.1
Expenses	0.6	0.5

Again, the increase in the total employer contribution rate is primarily due to the decrease in the real gilt yields which has increased both the employer future service rate and the past service adjustment.

The common contribution rate, shown opposite, is a theoretical figure – an average across the whole Fund based on all the individual employer rates, calculated using the actuary's assumptions, but without allowing for any agreed adjustments to individual employer rates as a result of stabilisation, phasing of increases or other adjustments. In practice, each employer that participates in the Fund has its own underlying funding position and circumstances, giving rise to its own contribution rate requirement. The minimum contributions to be paid by each

employer from 1st April 2014 to 31st March 2017 are shown in the Rates and Adjustment Certificate in Appendix G on pages 106 to 110.

Result of Interim valuation and monitoring

An interim monitoring report showed a funding level of 77.4% as at 30th June 2014.

The Fund continues to set life expectancy assumptions using ClubVita, which is a specialised longevity company and provides 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 2014/15 extra contributions of £1.2m (£2.0m 2013/14) were

collected from employers in connection with early retirements and £0.2m (£0.6m 2013/14) in connection with ill-health retirements.

Actuarial Report on Fund

This statement has been prepared in accordance with Regulation 57(1)(d) of the Local Government Pension Scheme (Administration) Regulations 2013, and Chapter 6 of the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the UK 2014/15.

Description of Funding Policy

The funding policy is set out in the administering authority's Funding Strategy Statement (FSS), dated February 2014. 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 (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.

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 below the market-derived rate required to return their portion of the Fund to full funding over 20 years if the valuation assumptions are borne out. Asset-liability modelling has been carried out which demonstrate that if these contribution rates are paid and future contribution changes are constrained as set out in the FSS, there is still approximately a two thirds chance that the Fund will return to full funding over 20 years.

Funding Position as at the Last Formal Funding Valuation

The most recent actuarial valuation carried out under Regulation 36 of the Local Government Pension Scheme (Administration) Regulations 2008 was as at 31st March 2013. This valuation revealed that the Fund's assets, which at 31st March 2013 were valued at £1,385 million, were sufficient to meet 70% of the liabilities (i.e. the present value of promised retirement benefits) accrued up to that date. The resulting deficit at the 2013 valuation was £591 million.

Individual employers' contributions for the period 1st April 2014 to 31st March 2017 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 valuation report dated 27th March 2014.

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 2013 valuation were as follows:

Financial assumptions	31st March 2013	
	% p.a. Nominal	% p.a. Real
Discount rate	4.6	2.1
Pay increases	3.8	1.3
Price inflation/Pension increases	2.5	-

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 2010 model, assuming the current rate of improvements has reached a peak and will converge to 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	22.5 years	24.6 years
Future Pensioners*	24.4 years	27.0 years

*Currently aged 45

Copies of the 2013 valuation report and Funding Strategy Statement are available on request from Gloucestershire County Council, the Administering Authority to the Fund and also available online at www.gloucestershire.gov.uk/pensionsinvestments

Experience Over the Period Since April 2013

Real bond yields have fallen dramatically, increasing the liability value, but the effect of this has been offset by the effect of strong asset returns. Overall the funding level is likely to have slightly improved, but the amount of deficit increased since both liability and asset values have risen.

The next actuarial valuation will be carried out as at 31st March 2016. The Funding Strategy Statement will also be reviewed at that time.

Douglas Green

Fellow of the Institute and Faculty of Actuaries
For and on behalf of Hymans Robertson LLP
8th May 2015

Governance Compliance

The Pension Fund's Governance structure and the roles and responsibilities of each element within the structure are contained in the Governance Policy Statement on pages 38 to 40 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 at Pension Committee meetings which includes fund manager and performance presentations, as well as officer and investment advisor briefings.

Member	Voting Rights	Meetings Attended	Training Received Number of Days	
			During 2014/15	From 2008/09 to 2013/14
Cllr. R. Theodoulou	Yes	5	2	14
Cllr. D. Brown*	Yes	6	1	4
Cllr. N. Cooper	Yes	6	2	3
Cllr. J. Gill*	Yes	6	1	3
Cllr. C. Hay*	Yes	5	1	4
Cllr. S. Parsons	Yes	3	1	3
Cllr. L. Stowe	Yes	4	1	4
S. Kingston* (Employee Rep)	No	0	0	4

* Joined the Pension Committee in 2013/14

Meetings were held on 16th May 2014, 8th August 2014, 7th November 2014, 28th November 2014 (Annual Meeting), 23rd January 2015 (Selection of Pension Board) and 13th February 2015.

The Fund has adopted the CIPFA Knowledge & Skills Framework to help assess and action the training needs of both Committee Members and Pension Fund Officers. An assessment of training needs was undertaken during 2013/14 and a training plan produced. The Strategic Finance Director is responsible for ensuring training requirements are implemented.

Fund Governance Compliance Statement

Pension Funds are required to produce a statement explaining how well they comply with a number of best practice principles covering governance arrangements for the Fund. Good governance means there are clear arrangements and controls in place to help ensure the Pension Fund is managed efficiently. The following Governance Compliance Statement details the areas where these best practice principles apply, for example, covering committee structure and representation, arrangements for training, etc. The Governance Compliance Statement then indicates whether the Fund is fully compliant in all these areas and refers to the relevant policy documents such as the Governance Policy Statement (on page 38) which gives more information on the governance arrangements which are in place.

Fund Governance Compliance Statement

Area	Principle	Level of Compliance	Reason for Non-Compliance
A) 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.	FULL - see Governance Policy Statement	
	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.	FULL - see Governance Policy Statement	
	c) That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.	Not Applicable - There is no secondary committee or panel	
	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.	Not Applicable - There is no secondary committee or panel	
B) Representation	a) That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include:		Concerns over logistics and potential size of Committee but will keep under review.
	i. employing authorities (including non-scheme employers, e.g. admitted bodies);	PARTIAL - not all employing authorities are represented	Employers are able to attend Committee as observers and submit written questions. Also, Employer Forums, which are open to all employers, are held at least twice a year.
	ii. scheme members (including deferred and pensioner scheme members);	FULL - see Governance Policy Statement	
	iii. where appropriate, independent professional observers; and	FULL - see Governance Policy Statement	
	iv. expert advisors (on an ad-hoc basis).	FULL - see Governance Policy Statement	
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.	FULL - see Governance Policy Statement		

Area	Principle	Level of Compliance	Reason for Non-Compliance
C) 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.	FULL - see Governance Policy Statement	
	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.	FULL - see Governance Policy Statement	
D) 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.	FULL - see Governance Policy Statement	
E) 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.	FULL - see Governance Policy Statement and Members Allowances scheme within the Council's Constitution	
	b) That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum.	FULL - see Governance Policy Statement and Members Allowances scheme within the Council's Constitution	
	c) That the administering authority considers the adoption of annual training plans for committee members and maintains a log of all such training undertaken.	FULL - see Governance Policy Statement	
F) Meetings - Frequency	a) That an administering authority's main committee or committees meet at least quarterly.	FULL - see Governance Policy Statement	
	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.	Not Applicable - There is no secondary committee or panel	
	c) That administering authorities who do not include lay members in their formal governance arrangements, provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.	FULL - see Governance Policy Statement	

Area	Principle	Level of Compliance	Reason for Non-Compliance
G) 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.	FULL - see Governance Policy Statement	
H) Scope	a) That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.	FULL - see Governance Policy Statement	
I) 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.	FULL - see Governance Policy Statement	

> Governance Policy Statement

Introduction

1. The County Council, as Administering Authority, has prepared this policy statement and consulted upon it with scheme employers.

2. This statement addresses the best practice principles identified in the statutory guidance issued and is in accordance with regulation 55 of the Local Government Pension Scheme (LGPS) Regulations 2013.

3. The County Council's Compliance Statement which identifies the level of compliance against these best practice principles is shown as an appendix to this policy statement.

Purpose of Governance Policy Statement

4. The regulations on governance policy and compliance statements require an administering authority, after consultation with such persons as they consider

appropriate, to prepare, maintain and publish a written statement setting out:

(a) whether it delegates its functions in relation to maintaining a pension fund to a committee, sub-committee or officer of the authority;

(b) and, if so, it must state:

- the frequency of any committee /sub-committee meetings;
- the terms of reference, structure and operational procedures of the delegation;
- whether the committee/sub-committee includes representatives of

- employing authorities (including non-scheme employers)

- scheme members

○ and, if there are such representatives, whether they have voting rights.

(c) the extent to which a delegation, or the absence of a delegation, complies with guidance given by the Secretary of State and, to the extent that it does not comply, the reasons for not complying; and

(d) details of the terms, structure and operational procedures relating to the local pension board established under regulation 53(4) (Scheme managers).

5. Thus, the policy statement should include information about all of the administering authority's pension fund governance arrangements. Information about the representation of employers should also cover any arrangements for representing admitted body employers (non-scheme employers).

A copy of the Terms of Reference for the Fund's local pension board is included on pages 41 to 43.

Principle A - Structure

6. 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.

7. Under the cabinet structure in local government, management of the pension fund is a

non-executive function. In Gloucestershire it is linked to the administration by virtue of the Chairman of the Pension Committee being the Cabinet Member for Finance and Change.

Pension Committee

The Pension Committee reports to County Council. It meets formally each quarter and more frequently if formal decisions on fund management are required.

Terms of Reference:

- To set the investment policies of the Fund, including the establishment and maintenance of a strategic benchmark for asset allocation, drawing upon professional service providers.
- To appoint and review the performance of all Fund Managers and associated professional service providers.
- To approve and keep under review the Funding Strategy Statement.
- To approve and keep under review the Statement of Investment Principles.
- To report annually to the full Council.
- To consider any other matter relevant to the proper operation and management of the Fund.
- To review the Council's performance as Administering Authority.
- 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.
- To decide upon requests for admission of qualifying organisations wishing to join the Fund.
- To decide upon key pension policy and discretions that are the responsibility of the Administering Authority.
- 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).
- To consider the Pension Board's proposed work plan for the forthcoming financial year.

8. The Pension Committee's formal terms of reference (above) are interpreted as including:

- Determining the overall investment strategy and strategic asset allocations of the Fund, with regard to investment suitability and diversification.

- Overseeing the preparation of the Statement of Investment Principles (SIP), including the Fund's policy on socially responsible investment and Corporate Governance.

- Annually reviewing the SIP.

- Monitoring compliance with the SIP.

- Overseeing the preparation of the Funding Strategy Statement.

- Approving the Annual Report.

- Appointing, reviewing and when necessary, dismissing, the Fund's investment managers and custodian.

- Reviewing investment manager performance against set benchmarks on a regular basis.

- Appointing, reviewing and when necessary, dismissing, the Fund's actuary, investment advisors/consultants and performance measurement consultants.

- Ensuring appropriate Pension

Fund governance arrangements are in place in accordance with the LGPS regulations and other regulatory requirements.

- Holding an annual meeting.

Principle B - Representation

9. The role of independent professional observers in e.g. assessing compliance with the Myners' principles and risk management will be met by elected councillors with support from officers within the County Council and the Fund's independent advisor.

Principle C – Selection & Role of Lay Members

10. The Agenda for any meetings of the Pension Committee will include an item at the start of the meeting inviting all committee members to declare any financial or pecuniary interest related to specific matters on the agenda.

Principle D – Voting

11. The Pension Committee comprises 6 County Councillors, including the Cabinet Member for Finance and Change, together with one voting district council representative and one non-voting scheme member representative (who also represents pensioners and deferred members). The scheme member representative is non-voting because as the LGPS is a statutory scheme with benefits fully protected by statute, any changes in investment or other policies which were voted on by the scheme member representative does not affect the scheme members' benefits.

The Fund's independent investment advisor and the Chief Financial Officer and staff support the Committee in its role.

12. Elected councillors already have legal responsibilities for the prudent and effective stewardship of LGPS funds and in more general terms have a clear fiduciary duty in the performance of their functions. Lay members (non councillors) should be reminded that they owe a duty of care to the fund beneficiaries and are required to act in their best interests at all times, particularly in terms of their investment decisions. They are not there to represent their own local, political or private interest.

Principle E – Training/ Facility Time/Expenses

13. Myners' first principle states that decisions should only be

taken by persons or organisations with the skills, information and resources necessary to take them effectively. Where trustees elect to take investment decisions, they must have sufficient expertise and appropriate training to be able to evaluate critically any advice they take. All members of the Committee (including lay members) are offered training; including that offered by the Employers Organisation (and are exposed to presentations at the Committee's quarterly meetings on investment matters). Substitutions are not permitted on the Pension Committee.

14. Committee members complete an annual training requirement self-assessment form. These are used to prepare annual training plans and a log of training undertaken is maintained by the Administering Authority.

15. The members' allowances scheme within the County Council's Constitution outlines the process for both councillors and lay members reclaiming expenses. The same rules apply to both councillors and lay members.

Principle F – Meetings (frequency/quorum)

16. The Pension Committee reports to County Council. It meets formally each quarter and more frequently if formal decisions on fund management are required.

Other ways of engaging stakeholders which the Council have adopted are:

- 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.

Principle G – Access

17. All members of the Pensions Committee have equal access to committee papers, documents and advice.

Principle H – Scope

18. The terms of reference of the Pensions Committee (as detailed in paragraph 7, on page 39 of this document) include general scheme and other administrative issues in connection with their role as Administering Authority.

19. The finance and operational arrangements of the Fund are subject to review and audit by both the Fund's external auditor, Grant Thornton, and the Council's own internal audit service. Reports issued by our auditors are subject to consideration by the Council's elected members acting as an audit committee.

Principle I – Publicity

20. The County Council is committed to the widest inclusion of all stakeholders in consultation and communication outside of the formal governance arrangements. In this respect it has made arrangements to make its publications available via the Council's public website and its intranet.

21. A copy of the Governance Compliance Statement will be published as part of the Pension Fund Annual Report. The Annual Report is discussed at the Fund's annual meeting which is open to all fund members and employers.

Terms of Reference for the Pension Board of the Gloucestershire Local Government Pension Fund

1. Role of the Pension Board

1.1 The role of the local Pension Board as defined by sections 5 (1) and (2) of the Public Service Pensions Act 2013, is to –

- Assist Gloucestershire County Council as Scheme Manager; –
 - to secure compliance with the Local Government Pension Scheme (LGPS) Regulations and any other legislation relating to the governance and administration of the LGPS
 - to secure compliance with requirements imposed in relation to the LGPS by the Pensions Regulator
 - in such other matters as the LGPS regulations may specify
- Provide the Scheme Manager with such information as it requires to ensure that any member of the Pension Board or person to be appointed to the Pension Board does not have a conflict of interest.

1.2 In addition the LGPS (Amendment) (Governance) Regulations 2015 expect the Pension Board to assist the Scheme Manager to secure the effective and efficient governance and administration of the LGPS for the Gloucestershire Local Government Pension Fund.

1.3 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 and mitigation steps proposed. The report will also be published on the Pension Fund's website. Any concerns requiring

reporting outside the annual process should be raised with the Pensions Committee.

1.4 The Pension Board will ensure it effectively and efficiently complies with the code of practice on the governance and administration of public service pension schemes issued by the Pension Regulator.

1.5 The Pension Board will also help ensure that the Gloucestershire Local Government Pension Fund is managed and administered effectively and efficiently and complies with the code of practice on the governance and administration of public service pension schemes issued by the Pension Regulator.

1.6 The cost of running the Pension Board will be met from the Pension Fund.

2. Appointment of Members of the Pension Board

2.1 The Pension Board shall consist of 5 members and be constituted as follows:

a) The Chairman.
The Chair of the Pension Board, who can demonstrate their knowledge and understanding of the Local Government Pension Scheme will be appointed by the Scheme Manager following a selection process to be determined by the Constitution Committee members. The Chair of the Pension Board cannot be a Gloucestershire County Councillor.

b) Two employer representatives who can demonstrate their capacity to represent other scheme employers, and their knowledge and understanding of the Local Government Pension

Scheme. To be appointed by the Scheme Manager following a selection process to be determined by the Constitution Committee members.

c) Two scheme member representatives who can demonstrate, their capacity to represent other scheme members, and their knowledge and understanding of the Local Government Pension Scheme. To be appointed by the Scheme Manager following a selection process to be determined by the Constitution Committee members.

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

3. Length of Term and Removal

3.1 The Chairman, each employer representative, and scheme member representative so appointed shall serve initially for a 4 year term, which may be extended for further 4 year terms subject to re-nomination and re-selection.

3.2 Board members can be removed on grounds of non attendance, breach of code of conduct and non participation in training.

3.3 Each Board member should endeavour to attend all Board meetings during the year and is required to attend at least **one** of the scheduled meetings each financial year. In the event of a Board member failing to do this, or other persistent non-attendance then the tenure of that member should be reviewed by the other Board members in liaison with the Constitution Committee members.

3.4 Other than by ceasing to

be eligible, a Board member may only be removed from office during a term of appointment by the unanimous agreement of all of the other members in attendance at the Board Meeting where this is being considered. The removal of the Chairman also requires the consent of the Scheme Manager.

4. Quorum

The Board shall have a formal quorum of 3 to include one employer representative and one member representative.

Because of the specialist nature of their work, no substitution is permitted.

5. Code of Conduct and Conflicts of Interest

The principles included in the County Council's Member Code of Conduct applies to all members of the Local Pension Board. Likewise, all other relevant County Council policies shall apply to members of the Pension Board.

As a condition of appointment, Board members shall be required to enter into a confidentiality agreement with the County Council.

6. Knowledge and Skills

A member of the Pension Board will be conversant with –

- The legislation and associated guidance of the Local Government Pension Scheme (LGPS).
- Any document recording policy about the administration of the LGPS which is for the time being adopted by the Gloucestershire Local Government Pension Fund.

A member of the Pension Board must have knowledge and

understanding of –

- The law relating to pensions, and
- Any other matters which are prescribed in regulations.

7. Board Meetings and Publication of Board Information

7.1 The Board shall meet no less than twice per annum. If there is a need for an additional meeting this will be determined by the Chair of the Board.

7.2 The agenda and supporting papers shall be distributed to members of the board 5 clear working days prior to each meeting.

7.3 Pension Board papers, agendas and minutes of meetings will be published on the Gloucestershire Local Government Pension Fund website subject to the Rules on Access to Information and the Data Protection Act 1998.

8. Remit of the Board

The Board shall:

- i. Ensure the Pension Fund's strategy and policy documents are in place and have been maintained in accordance with the LGPS Regulations. These documents are the communications policy statement, funding strategy statement, governance compliance statement, pensions administration strategy, Pension Fund annual report and accounts and statement of investment principles.
- ii. Ensure the Pension Fund's internal Risk Register is in place and reviewed at least annually.
- iii. Review 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.

iv. Review the Pension Fund's performance in complying with the requirements of the Pension Regulator.

v. Provide advice and make recommendations when required, to the Pensions Committee, on areas that may improve the governance of the Pension Fund.

vi. Each January, submit a proposed work plan for the forthcoming financial year, to the Pensions Committee.

vii. To carry out any other activities relating to the efficient governance and administration of the Pension Fund, which the Pensions Committee may request the Pension Board to undertake.

9. Voting Rights and Decision Making

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

9.2 A majority of Board members, with a voting right and present at a meeting, will be required to agree any decision of the Board, including any referrals back to the Pensions Committee.

10. Accountability

The Pension Board will be collectively and individually accountable to the Scheme Manager.

Definitions

The undernoted terms shall have the following meaning when used in this document:

- “Pension Board” or “Board”** Means the local Pension Board for Gloucestershire County Council as Administering Authority for the Gloucestershire Local Government (LGPS) Pension Fund as required under the Public Service Pensions Act 2013
- “Scheme Manager”** Means Gloucestershire County Council as Administering Authority of the Gloucestershire Local Government (LGPS) Pension Fund
- “LGPS”** The Local Government Pension Scheme as constituted by the Local Government Pension Scheme Regulations 2013, the Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014 and The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009
- “Scheme”** Means the Local Government Pension Scheme as defined under “LGPS”

Fund Account and Net Assets Statement

> Statement of Accounts 2014/15

Statement of Responsibilities and Foreword to Accounts

The audited accounts and notes following on pages 46 to 74, 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 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.



Jo Walker, CPFA
Strategic Finance Director
(and Section 151 Officer)
25th September 2015

Independent Auditor's Statement to the Members of Gloucestershire County Council on the Pension Fund Financial Statements included in the Pension Fund Annual report

We have examined the pension fund financial statements of Gloucestershire County Council for the year ended 31 March 2015 under the Audit Commission Act 1998, which comprise the fund account, the net assets statement and the related notes.

This statement is made solely to the members of Gloucestershire County Council, as a body, in accordance with Part II of the Audit Commission Act 1998 and as set out in paragraph 48 of the Statement of Responsibilities of Auditors and Audited Bodies published by the Audit Commission in March 2010. Our work has been undertaken so that we might state to the members of the authority those matters we are required to state to them in an auditor's statement 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 work, for this report, or for the opinions we have formed.

Respective Responsibilities of Strategic Finance Director and Auditor

As explained more fully in the Statement of the Strategic Finance Director's Responsibilities, set out on page 2 of the audited pension fund financial statements, the Strategic Finance Director is responsible for the preparation of the Statement of Accounts of Gloucestershire County Council,

which include the pension fund financial statements, in accordance with applicable law, proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2014/15, and for being satisfied that they give a true and fair view.

Our responsibility is to state to you our opinion on the consistency of the pension fund financial statements included in the pension fund annual report with the pension fund financial statements included in the Statement of Accounts of Gloucestershire County Council, and its compliance with applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2014/15.

In addition we read the other information contained in the pension fund annual report and consider the implications for our statement if we become aware of any apparent misstatements or material inconsistencies with the pension fund financial statements. The other information consists of

- Introduction
- Independent Investment Advisor's Report
- Management and Financial Performance
- Investment Policy and Performance Report
- Scheme Administration Report
- Executive Summary on the Last Triennial Valuation
- Actuarial Report on Fund
- Governance Compliance Statement
- Fund Account, Net Assets Statement and Notes
- Pensions Administration Strategy Report

- Funding Strategy Statement
- Statement of Investment Principles
- Communications Policy Statement
- Summary of Fund Benefits, Membership and Beneficiaries
- Other Appropriate Material
- Glossary of Terms.

We conducted our work in accordance with guidance issued by the Audit Commission. Our report on the administering authority's annual Statement of Accounts describes the basis of our opinion on those financial statements.

Opinion

In our opinion, the pension fund financial statements are consistent with the pension fund financial statements included within the annual Statement of Accounts of Gloucestershire County Council for the year ended 31 March 2015 and comply with applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2014/15.

We have not considered the effects of any events between the date we signed our report on the annual Statement of Accounts of Gloucestershire County Council on 25 September 2015 and the date of this statement.

**Grant Thornton UK LLP
Chartered Accountants**

**Hartwell House
55 – 61 Victoria Street
Bristol BS1 6FT**

22nd October 2015

Fund Account for the year ended 31st March 2015

2013/14 re-stated £000	2014/15		Note
	£000	£000	
Dealings with members, employers and others directly involved in the scheme			
Contributions			
-68,809	from employers	-76,113	N20
-16,086	from members	-16,753	N20
-84,895		-92,866	N7
Transfers in from other pension funds			
-4,719	individual transfers in from other schemes	-3,708	
0	group transfers in from other schemes	-2,556	N28
-4,719		-6,264	
Other income			
-297	recoveries for services provided	-157	N22
Benefits			
58,316	pensions	60,335	
9,165	commutation of pensions and lump sum retirement benefits	8,918	
1,007	lump sum death benefits	1,755	
68,488		71,008	N7
Payments to and on account of leavers			
10	refunds of contributions	102	
-3	state scheme premiums	31	
3,843	individual transfers out to other schemes	3,579	
9,200	group transfers out to other schemes	29,012	N28
13,050		32,724	
-8,373	Net (addition)/withdrawal from dealings with scheme members	4,445	
7,390	Management expenses	7,093	N9, N19 & N22
Returns on investments			
-26,786	investment income	-23,655	N15 & N19
1	taxes on income	41	N3 & N15
-93,887	Profit(-) and losses on disposal of investments and changes in market value of investments	-190,503	N4 & N19
-120,672	Net returns on investments	-214,117	
-121,655	Net increase (-) / decrease in the net assets available for benefits during the year	-202,579	
1,384,840	Opening net assets of the scheme	1,506,495	
1,506,495	Closing net assets of the scheme	1,709,074	

Net Asset Statement as at 31st March 2015

2013/14		2014/15	
£000		£000	Note
Investment assets			
150,399	Fixed interest securities	173,518	
316,478	Equities	312,365	
78,543	Index-linked securities	103,682	
842,755	Pooled investment vehicles	978,743	
90,919	Property unit trusts	113,586	N10
172	Derivative contracts	587	N2 & N17
4,934	Other investments - Venture Capital/Private Equity	4,587	N10
17,025	Cash held on behalf of the investment managers	6,876	
4,584	Other investment balances	5,439	
1,505,809		1,699,383	
Investment liabilities			
-16	Derivative contracts	-949	N2 & N17
-1,449	Other investment balances	-1,436	
-1,465		-2,385	
Long term assets			
609	Contributions due from employer	338	
3,090	Other long term assets (debtors)	2,472	
3,699		2,810	N24
Current assets			
3,050	Contributions due from employers	3,076	
294	Other current assets	581	
618	Money due re. transfer of staff to another pension scheme	1,236	
7,451	Cash balances	6,413	N2, N23 & N27
11,413		11,306	N24
Current liabilities			
-61	Unpaid benefits	-5	
-12,900	Other current liabilities	-1,975	
0	Receipts in advance	-60	
-12,961		-2,040	N25
1,506,495	Net assets of the scheme available to fund benefits at the period end	1,709,074	N4, N5, N14 & N18

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 N26.

The notes on the following pages form part of these Financial Statements.

> Notes to the Accounts 2014/15

N1 Introduction

The County Council is the administering body for the Gloucestershire Local Government Pension Fund. 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 on pages 17 to 20. The Local Government Pension Scheme is a statutory funded pension scheme. It is "contracted out" of the state scheme and is termed a defined benefit scheme. 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 up-rated annually in line with the Consumer Price Index. The scheme is voluntary and made available to all (*) employees except fire fighters, police and teachers (who have their own separate nationally-administered schemes). The Fund is financed by contributions paid in by the existing employees and their employers and by earnings from the investment of Fund monies. The number of contributors at 31st March 2015 was 18,141 (2014 17,936). The Fund is governed by the Public Service Pensions Act 2013 and administered in accordance with the following secondary legislation:

- The LGPS Regulations 2013 (as amended)
- The LGPS (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended)
- The LGPS (Management and Investment of Funds) Regulations 2009 (as amended)

A full analysis of membership, funding and benefits can be found in the Pension Fund's Annual

Report. 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.

N2 Accounting Policies

Basis of Preparation

The Statement of Accounts summarises the Funds' transactions for the 2014/15 financial year and its position at year end as at 31st March 2015. The accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2014/15 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 pensions and 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 26 of these accounts. The accounts are prepared on a going concern basis.

Accruals Concept Applied

Income and expenditure have been accounted for on an accruals basis so far as amounts due have been determined in time for inclusion in the accounts. Any amount due in year but unpaid will be classed as a current financial asset.

Benefits payable and refunds of contributions have been brought into the accounts on the basis of all valid claims approved during the year. Individual transfer values are accounted for when they are paid or received. 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. Consequently Administrative Expenses and Investment Management Expenses have been amalgamated under Management Expenses and the comparator figures for 2013/14 have been restated to reflect the implementation of the CIPFA guidance. Management expenses reported in the Fund Account for 2013/14 have also been increased by £0.5m to £7.39m and Profit and Loss on disposal of investments and changes in the market value of investments has similarly been increased by £2.7m to £93.89m to reflect the fees which had been deducted at source or previously offset against dividend income. A more detailed breakdown of management expenses can be found in Note N22.

Investment Management Expenses

The managers' fees have been accounted for on the basis contained within their management agreements. Broadly these are based on the market value of the investments under management and therefore increase or decrease as the value of these investments change. In addition the Fund has agreed with the following managers that an element of their fee be performance related:

* There are restrictions with some casual staff

- Standard Life Investments - UK Equities
- Hermes - Property Unit Trusts

Hermes deducts its fees from a combination of assets held and income distributions. GMO and Yorkshire Fund Managers deduct their fees from the value of the assets under their management.

Acquisition and Transaction Costs of Investments

Pension Fund expenses have been accounted for in accordance with the CIPFA guidance Accounting for Local Government Pension Scheme Management Costs. Consequently acquisition costs of investments (e.g. stamp duty) and transaction costs previously included within the purchase cost/proceeds of investment purchases and sales have now been added to Investment Management Expenses with a corresponding offset against Profit on Disposal of Investments; comparator figures for 2013/14 have been restated to reflect the implementation of the CIPFA guidance. In addition to the transaction costs disclosed, indirect costs are incurred through the bid/offer spread on investments within pooled investment vehicles. The amount of indirect costs are not separately provided to the Fund. Please also see Note 19. A more detailed breakdown of management expenses can be found in Note N22.

Administration Expenses

All administrative expenses are accounted for on an accrual basis. All staff costs associated with administration are charged to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund. A more detailed breakdown of administrative expenses can be found in Note N22.

Oversight & Governance Expenses

All oversight and governance expenses are accounted for on an accrual basis. All staff costs associated with oversight and governance are charged to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund. A more detailed breakdown of oversight and governance expenses can be found in Note N22.

Where the Fund has obtained investment advice from external consultants the cost is now included in Oversight & Governance charges.

Valuation of Assets

The SORP requires securities to be valued on a Fair Value Basis therefore assets, where there is an active and readily available market price, are valued at the bid (selling) price and liabilities on an offer (buying) price basis. Where assets do not actively trade through established exchange mechanisms a price is obtained from the manager of the investment asset. Investments held in foreign currencies are shown at market value translated into sterling at the exchange rates prevailing as at 31st March 2015. 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. Fixed interest securities are recorded at net market value based on their yields. 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.

Property within the property unit trusts are independently valued in accordance with the Royal Institute of Chartered Surveyors valuation standards. Private Equity is valued using the latest financial statements published by the respective fund managers and in accordance with the International Private Equity and Venture Capital Guidelines.

Cash

Cash balances held in accordance with the County Council's Treasury Management Strategy and those held with the Fund's Custodian BNY Mellon, on behalf of investment managers, are in instant access accounts, subject to timing deadlines.

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. Amounts due from the broker represent the amounts outstanding in respect of the initial margin (representing collateral on the contracts) and any variation margin which is due to or from the broker. 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 exempt from UK capital gains tax on the proceeds of investments sold. 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

2014/15 Asset Class	Market value at 31st March 2014	Purchases at cost and derivative payments	Sales proceeds and derivative receipts	Change in market value, new money and accruals	Market value at 31st March 2015
	£000	£000	£000	£000	£000
Fixed Interest	150,399	38,750	-32,542	16,911	173,518
Equities	316,478	39,878	-44,212	221	312,365
Index Linked	78,543	15,373	-5,030	14,796	103,682
Derivatives	156	201	-498	-221	-362
Pooled Investments	842,755	19,448	-24,507	141,047	978,743
Property Unit Trusts	90,919	11,111	-603	12,159	113,586
Private Equity	4,934	259	-	-606	4,587
	1,484,184	125,020	-107,392	184,307	1,686,119
Cash movement, currency adjustments and other end of year settlements	22,311			6,196	22,955
	1,506,495			190,503	1,709,074

2013/14 Asset Class	Market value at 31st March 2013	Purchases at cost and derivative payments	Sales proceeds and derivative receipts	Change in market value, new money and accruals	Market value at 31st March 2014
	£000	£000	£000	£000	£000
Fixed Interest	151,104	56,997	-52,359	-5,343	150,399
Equities	282,317	57,014	-48,244	25,391	316,478
Index Linked	74,137	20,788	-11,358	-5,024	78,543
Derivatives	-106	-	-437	699	156
Pooled Investments	763,382	9,940	-	69,433	842,755
Property Unit Trusts	77,721	7,276	-	5,922	90,919
Private Equity	4,369	-	-	565	4,934
	1,352,924	152,015	-112,398	91,643	1,484,184
Cash movement, currency adjustments and other end of year settlements	31,916			*2,244	22,311
	1,384,840			93,887	1,506,495

*Please see Note N19 – Changes to Comparative Figures.

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 derivatives in the previous table represent futures and forward foreign exchange contracts. The closing market value 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 total 'cash movement' 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:

	2013/14		2014/15	
	£000	%	£000	%
Western Asset Management Company	307,305	20.4	359,868	21.1
BlackRock	414,786	27.5	495,689	29.0
CBRE	21,839	1.5	37,728	2.2
GMO	280,844	18.6	311,184	18.2
Standard Life Investments	404,913	26.9	405,851	23.7
Hermes Investment Management Property Unit Trust	69,715	4.6	82,073	4.8
YFM Group	4,935	0.3	4,587	0.3
Total - External Managers	1,504,337	99.8	1,696,980	99.3
In-house cash and accruals	2,151	0.2	12,075	0.7
Cash instruments with Custodian	7	0.0	19	0.0
	1,506,495	100.0	1,709,074	100.0

Where the value of an investment exceeds 5% of the total value of net assets or 5% of its asset class, details have been disclosed in note N18.

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 2013 and established the minimum contribution payments for the three years until 31st March 2017. The next valuation will take place as at March 2016.
- The estimate of the pension fund liability is subject to significant

variations, based on changes to the underlying assumptions used - see below.

- The results of the 2013 valuation showed that the total common contribution rate was 32.9% (25.8% 2010 valuation) for the three years to 31st March 2017. Individual employers' rates will vary from the common contribution rate depending on the demographic and actuarial factors particular to each employer. Full details of the contribution rates payable can be found in the 2013 actuarial valuation report and the Funding Strategy Statement on the Fund's website. This rate of contribution is the rate which, in addition to the contributions paid

by the members, is sufficient to meet:

- 100% of the liabilities arising in respect of service after the valuation date;
- plus an adjustment over a period of 20 years to reflect the shortfall of the value of the County Council's notional share of the Fund's assets over 100% of its accrued liabilities, allowing, in the case of members in service, for future pay increases.
- The market value of the Fund's assets at the March 2013 triennial valuation date was £1,385m (£1,054m March 2010) and represented 70.1% (70.4% March 2010) of the Fund's

accrued liabilities, allowing for future pay increases. When a valuation reveals a deficiency, the employer contribution rates are adjusted to target restoration of a solvent position over a period of years (the recovery period). The recovery period applicable

for each participating employer is set by the Administering Authority in consultation with the Scheme Actuary and employer, with a view to balancing the various funding requirements against the risks involved due to such issues as the financial strength of the employer

and the nature of its participation in the Fund.

- The contribution rate has been calculated using the projected unit method in line with accepted guidelines and the main actuarial assumptions used are as follows:

	Funding Basis	
	2010	2013
Rate of return on investments (Discount Rate)	6.1% pa	4.6% pa
Rate of general pay increases*	4.8% pa**	3.8% pa
Rate of increase to pensions in payment (in excess of guaranteed minimum pension)	3.3% pa	2.5% pa

* Plus an allowance is also made for promotional pay increases.

** 1% pa for 2010/11 and 2011/12, reverting to 4.8% pa thereafter.

- The full actuarial valuation reports for 2007, 2010 and 2013 are published on the County Council's website and can be viewed using the following web address: www.gloucestershire.gov.uk/pensionsinvestments
- See note N26 for details of the Actuarial Present Value of Promised Retirement Benefits.

N7 Analysis of Contributions Receivable and Benefits Payable

	2013/14		2014/15	
	Contributions receivable £000	Benefits payable £000	Contributions receivable £000	Benefits payable £000
Gloucestershire County Council (Administering Authority)	37,946	37,147	39,624	39,057
Scheduled Bodies (141 14/15)# (137 re-stated 13/14)** (Bodies admitted by right)	39,487	28,592	*45,308	28,613
Admitted Bodies (35 14/15) (31 13/14)** (Bodies admitted by agreement)	7,462	2,749	7,934	3,338
	84,895	68,488	92,866	71,008

Scheduled Bodies now include 75 (70 13/14) schools who have converted to academy status.

This figure contains one school which in 2014/15 changed from being a Foundation School (which was already included within Scheduled Bodies) to an Academy.

* The increase in scheduled bodies' contributions of £5.8m is due mainly to the increase in employers' pension contributions as a result of the 2013 Actuarial Valuation and an employer paying an extra £1m to improve its funding level.

** These numbers relate to active employers with active members.

N8 Statement of Investment Principles

A Statement of Investment Principles, which sets out the Pension Fund's long-term investment objectives, its style of management and policies together with risk management, performance targets and details of how that performance is monitored and reviewed, can be found on pages 112 to 118. This statement is also available on the website at the following address www.gloucestershire.gov.uk/pensionsinvestments

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.

	2013/14 £000	2014/15 £000
Administrative expenses	1,256	1,412

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 N2, N23 and N27

Of the County Council's key management personnel, some of the Director: Strategic Finance's remuneration costs were charged to the Fund to reflect time spent. These consisted of salary, fees and allowances of £10,813 (£10,276 2013/14) and employers' pension contributions £2,801 (£2,559 2013/14).

The Director: Strategic Finance is a member of the Fund as a contributing Gloucestershire County Council employee. This does not impact on her role as Finance Director and S151 officer, which is clearly defined.

Four members of the Pension Committee, excluding the District Council Representative, are also District Council members and these are detailed opposite:

In addition Councillor L. Stowe is Cotswold District Council's nominated shareholder for Ubico Limited, Councillor C. Hay sits on the Boards of Cheltenham Borough Homes and Cheltenham Leisure & Culture Trust and Councillor N. Cooper is a governor of Archway School. Ubico Limited, Cheltenham Borough Homes, Cheltenham Leisure & Culture Trust and Archway School are employers in the Fund.

Member	District Council
Cllr. D. Brown	Gloucester City Council
Cllr. C. Hay	Cheltenham Borough Council
Cllr. L. Stowe	Cotswold District Council
Cllr. R. Theodoulou	Cotswold District Council

Transactions between employers and the Fund are disclosed in note N7.

N10 Contingent Liabilities and Contractual Commitments

The Fund has an investment within a private equity fund managed by Yorkshire Fund Managers. The following table shows the Fund's total commitment and the remaining liability, following drawdowns, at the year end.

	Total Commitment £000	Outstanding liability 2013/14 £000	Outstanding liability 2014/15 £000
Chandos Fund	3,000	546	286
CBRE	30,000	1,749	591
	33,000	2,295	877

In May 2014 the commitment to CBRE, the global property manager, was increased from £20m to £30m.

N11 Contingent Assets

Due to retrospective adjustments to how pension payments are made for Registration staff working additional hours or on a fee basis, a contingent asset of £38,504 (13/14 £38,504) has been recorded for possible additional contributions from ex members of staff, during 2015/2016 and future years.

N12 Unquoted Holdings

The following holdings are unquoted:

Pooled investment vehicles	2013/14 £000	2014/15 £000
UK equity unitised insurance policy	10,044	9,218
Global equity managed funds	280,844	311,184
Overseas equity unitised insurance policies	367,653	437,153
UK limited liability partnerships	740	5,874
Overseas limited liability partnerships	1,528	4,607
Global multi asset unitised insurance policy	69,290	78,772
	730,099	846,808
Property unit trusts		
UK property unit trust	14,505	19,755
Overseas property unit trust	7,426	11,759
	21,931	31,514
	752,030	878,322

N13 Stocklending

The Pension Funds' custodian has been authorised to release stock to third parties under a stock lending arrangement. At 31st March 2015 the value of stock out on loan was £4.8m (2013/14 £3.9m) of which £4.8m (£3.9m) were UK equities. Collateral of £5.1m (£4.2m) equal to 106% (108%) of stock out on loan was held in the form of AA rated (or better) UK and G10 Overseas Government debt. The Pension Fund stipulates those institutions that are allowed to borrow its stock and the type of collateral that is acceptable.

N14 Financial Asset Analysis

Financial assets			2013/14 £000	2014/15 £000	Note
Fixed interest securities					
UK	- Public Sector	- Quoted	62,670	63,141	
	- Other	- Quoted	78,682	93,852	
Overseas	- Public Sector	- Quoted	6,796	13,678	
	- Other	- Quoted	2,251	2,847	
			150,399	173,518	
Equities					
UK		- Quoted	316,478	312,365	
Index-linked securities					
UK	- Public Sector	- Quoted	78,543	89,044	
Overseas	- Public Sector	- Quoted	-	14,638	
			78,543	103,682	
Pooled investment vehicles					
Unit Trusts					
Overseas	- Equities	- managed from outside the UK	- Quoted	47,095	58,499
Unitised Insurance Policies					
UK	- Equities		- Unquoted	10,044	9,218
Overseas	- Equities	- managed from outside the UK	- Unquoted*	367,653	437,153
Global	- Multi Asset	- managed from within the UK	- Unquoted	69,290	78,772
Other Managed Funds					
O.E.I.C.'s	- Overseas Fixed Interest	- managed from outside the UK	- Quoted*	65,561	73,436
	- Global Equities	- managed from outside the UK	- Unquoted*	280,844	311,184
Limited Liability Partnerships					
	- UK Property	- managed from within the UK	- Unquoted	740	5,874
	- Overseas Fixed Interest	- managed from outside the UK	- Unquoted	1,528	4,607
			842,755	978,743	
Property Unit Trusts					
UK	- managed from within the UK		- Quoted	68,988	82,072
	- managed from within the UK		- Unquoted	-	2,595
	- managed from outside the UK		- Unquoted	14,505	17,160
Overseas	- managed from outside the UK		- Unquoted	7,426	11,759
			90,919	113,586	N10
Derivative Contracts					
Futures	- UK		16	27	
Forward Foreign Exchange Contracts			156	560	
			172	587	N17
Other Investments					
Venture Capital/Private Equity - UK			4,934	4,587	N10
Cash (Managers)					
Cash instruments	- UK		15,082	4,261	
	- Overseas		1,122	1,441	
Cash Deposits	- UK		704	377	
	- Overseas		117	797	
			17,025	6,876	
Other Investment Balances					
Debtors					
Outstanding settlement of investment transactions			-	1,092	
Accrued dividend income and tax reclaims due on dividend income			4,584	4,347	
			4,584	5,439	
Total Financial Assets			1,505,809	1,699,383	

* These overseas pooled funds may incorporate some UK assets.

Continued - Financial Asset Analysis

Financial Liabilities	2013/14 £000	2014/15 £000	Note
Derivative Contracts			
Futures – Overseas	-	-73	
Forward Foreign Exchange Contracts	-16	-876	
	-16	-949	N17
Other Investment Balances			
Creditors			
Outstanding settlement of investment transactions	-1,449	-1,436	
Total Financial Liabilities	-1,465	-2,385	
Long Term Assets			
Contributions due from employers	609	338	
Money due re. transfer of staff to another pension scheme	3,090	2,472	
	3,699	2,810	N24
Current Assets			
Contributions due from employers	3,050	3,076	
Other current assets (debtors)	294	581	
Money due re. transfer of staff to another pension scheme	618	1,236	
Cash balances	7,451	6,413	N23
	11,413	11,306	N24
Current Liabilities			
Unpaid benefits	-61	-5	
Other liabilities (creditors)	-12,900	-1,975	
Receipts in advance	-	-60	
	-12,961	-2,040	N25
	1,506,495	1,709,074	

N15 Investment Income

Investment income arises from the following investment categories:

	2013/14 £000	2014/15 £000
Fixed interest	6,307	6,537
Equities	13,192	11,105
Index-linked	2,050	1,264
Pooled investment vehicles	4,504	4,631
Interest on cash deposits	125	93
Private equity	586	-
Other income from stocklending, underwriting and class actions	22	25
	26,786	23,655
Withholding tax	-1	-41
	*26,785	23,614

*Please see Note 19 – Changes to Comparative Figures.

N16 Separately Invested Additional Voluntary Contributions (AVC's)

Gloucestershire County Council LGPS 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 section 4 (2) (b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 (SI 2009/3093).

	Prudential		Phoenix Life		Total Investments	
	2013/14	2014/15	2013/14	2014/15	2013/14	2014/15
	£000	£000	£000	£000	£000	£000
Value of investments at 1st April	7,390	7,416	138	115	7,528	7,531
Prior year adjustments	-	2	-	-	-	2
Contributions received in year*	664	661	2	0	666	661
Death in service premiums paid by members	-7	-6	-	-	-7	-6
Sales of investments	-957	-946	-25	-21	-982	-967
Changes in value of investments	326	400	-	-	326	400
Present value of investments	7,416	7,527	115	94	7,531	7,621

* Contributions paid by members in the Prudential scheme during 2014/15 totalled £661,109 (2013/14 £664,112) which included additional death in service premiums totalling £6,417 (2013/14 £6,794).

N17 Derivatives

Investments in derivatives are only made if they contribute to a reduction of risks and facilitate efficient portfolio management. 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 fixed income portfolio uses futures and options for duration and yield curve management purposes. Additionally, the investment strategy

for this manager, for all overseas currency exposures, is to be fully hedged back in to Sterling which is achieved by the use of foreign exchange forward contracts. To mitigate large unrealised profits or losses accruing with any one counterparty the contracts are split between a handful of banks and the contracts rolled quarterly in order that any gains or losses are realised at regular intervals.

The investment strategy of the property manager with overseas holdings is to place forward currency trades with the intention of

hedging foreign currency exposure to ensure the portfolio is not impacted by currency fluctuations. The hedges are achieved by placing foreign exchange forward contracts with the Fund's custodian.

In the table opposite, the 'notional value' of the stock purchases under futures contracts is the economic exposure and the value subject to market movements as at 31st March 2015.

Derivative Contract Analysis

	Contract type*	2013/14 Notional Value £000	2014/15 Notional Value £000	Expiration	2013/14 Market Value £000	2014/15 Market Value £000
Investment Assets						
Futures						
UK - Fixed Interest						
UK Long Gilt Future	ET	4,162	2,415	Less than 3 months	16	27
UK Futures		4,162	2,415		16	27
Total Futures		4,162	2,415		16	27
Forward foreign exchange contracts	OTC	16,411	21,631	Less than 6 months	156	560
Total Derivative Assets		20,573	24,046		172	587
Investment Liabilities						
Futures						
Overseas - Fixed Interest						
US Treasury Bond Future	ET	-	3,753	Less than 3 months	-	-73
Overseas Futures		-	3,753		-	-73
Total Futures		-	3,753		-	-73
Forward foreign exchange contracts	OTC	658	32,462	Less than 6 months	-16	-876
Total Derivative Liabilities		658	36,215		-16	-949
Net Futures					156	-362

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

The total Futures' initial margin for 2014/15 was £0.0m (£0.1m 2013/14) and the total variation margin was £0.2m (£0.2m 2013/14). The initial margin is an amount of money deposited by both buyers and sellers of Futures contracts to ensure performance of the terms of the contract. The variation margin reflects the accumulated cash flows from the daily marking to market that accrues in the futures broker's account.

A breakdown of the open forward foreign exchange contracts at 31st March 2015 is given below:-

Open Forward Currency Contracts at 31st March 2015

Settlement	Currency bought	Local Value	Currency Sold	Local Value	Asset Value	Liability Value
		000		000	£000	£000
Up to six months	GBP	13,982	EUR	18,642	484	
Up to six months	GBP	2,860	USD	4,195	32	
Up to three months	USD	1,757	BRL	5,559	19	
Up to three months	GBP	1,292	MXN	29,110	8	
Up to six months	GBP	758	AUD	1,466	7	
Up to six months	GBP	413	HKD	4,702	5	
Up to six months	GBP	387	MYR	2,125	3	
Up to six months	GBP	174	CNY	1,589	2	
Up to six months	GBP	599	JPY	106,365	-	
Up to six months	GBP	10,868	USD	16,643		-346
Up to three months	GBP	7,650	USD	11,750		-267
Up to six months	GBP	5,478	USD	8,340		-142
Up to six months	EUR	5,959	GBP	4,416		-102
Up to three months	GPB	1,190	USD	1,787		-14
Up to six months	GBP	2,706	EUR	3,738		-4
Up to six months	GBP	154	NZD	309		-1
					560	-876
Net forward currency contracts at 31st March 2015						-316
Prior year comparative						
Open forward currency contracts at 31st March 2014					156	-16
Net forward currency contracts at 31st March 2014						140

N18 Investments Exceeding 5% of Total Net Assets or that Exceed 5% of their Asset Class

At 31st March 2015 the Pension Fund held two, (2013/14, two) investments that each exceeded 5% of the total value of the net assets of the scheme. These are detailed as follows:

Investments exceeding 5% of Total Net Assets	2013/14		2014/15	
	£000	%	£000	%
* BlackRock Global Equity Fund	367,653	24.4	437,153	25.6
* GMO World Equity Allocation Investment Fund	280,844	18.6	311,184	18.2
	648,497	43.0	748,337	43.8

* Indicates assets which are in excess of 5% of both net assets and their asset class for 2014/15

*BlackRock investments are Unitised Insurance Policies
GMO Investment Fund is an O.E.I.C. investing in global equities*

Investments exceeding 5% of their Asset Class	2013/14		2014/15	
	£000	%	£000	%
Fixed interest securities				
Treasury 4.25% 2040	19,247	12.8	21,942	12.6
Treasury 3.75% 2021	13,714	9.1	14,479	8.3
Treasury 4.25% 2039	8,864	5.9	9,725	5.6
Treasury 1.25% 2018**	11,366	7.6	-	-
Equities				
Royal Dutch Shell 'B' Shares	19,788	6.3	18,476	5.9
HSBC Holdings	18,933	6.0	18,174	5.8
Index-linked securities				
United Kingdom IL 1.875% 2022	14,393	18.3	14,932	14.4
United Kingdom IL 1.25% 2027	12,359	15.7	13,681	13.2
Treasury IL Variable Rate 2035	11,302	14.4	13,109	12.6
United Kingdom IL 1.125% 2037	9,052	11.5	10,873	10.5
US Treasury IL 1.375% 2044	-	-	9,132	8.8
Treasury IL 1.25% 2055	6,992	8.9	9,390	9.1
United Kingdom IL 1.25% 2032	7,211	9.2	8,339	8.0
United Kingdom IL 0.375% 2062	7,277	9.3	5,831	5.6
Treasury IL 0.75% 2047	4,017	5.1	5,202	5.0
Pooled investment vehicles				
* BlackRock Global Equity Fund	367,653	43.6	437,153	44.7
* GMO World Equity Allocation Investment Fund	280,844	33.3	311,184	31.8
Standard Life Global Absolute Return Strategies Fund	69,290	8.2	78,772	8.0
Legg Mason Global Funds - WA GMS	64,647	7.7	72,587	7.4
BlackRock Emerging Markets Index Fund	47,095	5.6	58,499	6.0
Property unit trusts				
Hermes Property Unit Trust	68,988	75.9	82,072	72.3
Global Alpha Fund	5,136	5.6	8,671	7.6
Derivative contracts - assets				
UK Long Gilt Future (LIF) Exp Jun 14	16	100.0	-	-
UK Long Gilt Future (LIF) Exp Jun 15	-	-	27	100.0
Derivative contracts - liabilities				
US Treasury Bond Future (CBT) Exp Jun 15	-	-	-73	100.0
Other investments - Venture Capital/Private Equity				
South West Venture Fund	2,931	59.4	2,833	61.8
Chandos Fund	2,003	40.6	1,754	38.2

** Investment held is now below 5% of asset class.

N19 Changes to Comparative Figures

Management expenses (Notes 1 and 22) >

Pension Fund expenses have been accounted for in accordance with the CIPFA guidance Accounting for Local Government Pension Scheme Management Costs. This has resulted in Administrative Expenses and Investment Management Expenses being amalgamated under Management Expenses and the comparator figures for 2013/14 being restated to reflect the amalgamation.

Transaction costs previously included within the purchase cost/proceeds of investment purchases and sales have now been added to Investment Management Expenses with a corresponding offset against Profit on Disposal of Investments.

Fees previously deducted at source and offset against dividend income are now offset against Profit on Disposal of Investments.

A more detailed breakdown of management expenses can be found in Note N22.

Nature and extent of risks arising from Financial Instruments (Note N27)

Other Price Risk - Sensitivity Analysis

Pooled Funds containing global equities were previously classified under Overseas Equities. As these funds may incorporate some UK assets they have been re-classified as Multi National Equities.

The 2014/15 Values on Increase and Decrease have been valued on a 3 year standard deviation and the 2013/14 values have been re-stated to ensure a direct comparison. Both the re-stated figures and the original figures for 2013/14 are shown in Note 27.

	2013/14 £000	2013/14 re-stated £000	Difference £000
Fund Account			
Administrative expenses	1,256	-	-1,256
Investment management expenses	5,638	-	-5,638
Management expenses	-	7,390	7,390
Investment income	-29,005	26,786	2,219
Profit and losses on disposal of investments and changes in market value of investments	-91,172	-93,887	-2,715
			-
Investment Movement Summary (Note 4)			
Cash movement, currency adjustments and other end of year settlements	-471	2,244	2,715
Investment Income (Note 15)			
Pooled investment vehicles	6,723	4,504	-2,219

N20 Contributions Breakdown

The employers' monthly contributions and deficit funding payments are based on a percentage of pensionable pay and have been identified below. The deficit funding contributions relate to past service benefit accrual and are payable over an agreed recovery period, not exceeding 20 years.

Contributions Breakdown	2013/14 £000	2014/15 £000
From Employers:		
Normal	38,166	41,158
Augmentation	-	-
Deficit Funding	27,700	32,228
Other	2,943	2,727
	68,809	76,113
From Members:		
Normal	15,774	16,379
Additional Voluntary	312	374
	16,086	16,753

Other contributions are those contributions paid by an employer to compensate the Pension Fund for early retirement costs, excess ill health retirement costs or to improve their funding levels.

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; however at 31st March 2015 £0.1m (2013/14 £0.2m) was due to the Pension Fund for early retirements, which have been accrued.

Excess ill health retirement costs are invoiced for as they arise and funding level payments are made by an employer voluntarily.

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.

N21 Custody of Investments

The accounts for the year ended 31st March 2015 use the valuations for the Fund's assets provided by our custodian, BNY Mellon Asset Servicing SA/NV. This reflects the position of the custodian who is ultimately the master book of

record. Fund Managers must make sure that their records agree with those kept by the custodian, although the investment values may be obtained from different sources. 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 BNY Mellon Asset Servicing SA/NV 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.

N22 Management Expenses

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

This has resulted in Administrative Expenses and Investment Management Expenses being amalgamated under Management Expenses.

Transaction costs of £350,127 (£345,271 2013/14) previously included within the purchase cost/proceeds of investment purchases and sales have now been added to Investment Management Expenses with a corresponding offset against Profit on Disposal of Investments.

A third category of expense, Oversight & Governance, has also been added.

Comparator figures for 2013/14 have been re-stated to reflect the amalgamation and the addition of the third category and the re-categorisation of some of the expenses.

	2013/14 re-stated £000	2014/15 £000
Investment management expenses *	6,074	5,753
Administration expenses	858	933
Oversight & governance	458	407
Please see note N19	7,390	7,093

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

Within oversight and governance costs there were actuarial expenses of £134,997 (£197,343 2013/14) generated by specific employer requirements, these were then charged back to the employer. The corresponding income is included within Recoveries for Services Provided in the Fund Account.

The management fees disclosed opposite include all investment management fees directly incurred by 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.

The change in management fees is due to a combination of an increase in market values on which most of the Fund Managers' fees are based and a reduction in performance fees. In 14/15 the fee basis of one manager was changed from a combination of a percentage of assets under management and an outperformance element to purely a percentage of assets under management.

Investment management expenses*	2013/14 re-stated £000	2014/15 £000
Management fees		
- invoiced	2,598	2,865
- deducted from investment	1,154	1,868
	3,752	4,733
Performance fee		
- invoiced	1,563	244
- deducted from investment	352	354
	1,915	598
	5,667	5,331
Transaction costs	345	350
Custody costs	62	72
	6,074	5,753

N23 Cash

From the 1st April 2010 the Pension Fund has had its own bank account. At 31st March 2015 cash of £6.4m (£7.5m 2013/14) was invested through the County Council's short-term investment procedures. During the year the average investment balance was £4.4m (£10.3m 2013/14) earning interest of £20k (£57k 2013/14).

N24 Current & Long Term Assets

	2013/14 £000	2014/15 £000
Contributions due - Employees	551	572
Contributions due - Employers	2,499	2,504
Sundry debtors	294	581
Money due re. transfer of staff to another pension scheme*	618	1,236
	3,962	4,893
Cash balances	7,451	6,413
	11,413	11,306

*The annual instalment of £618k due from a transfer of staff to another pension scheme in 2014/15 was not received in 2014/15. Therefore an accrual has been included for the 2014/15 and 2015/16 instalments within Current Assets. Instalments due beyond 2015/16 have been included under Long Term Assets. The instalment relating to 2014/15 has now been received.

	2013/14 £000	2014/15 £000
Analysis of debtors		
Current assets		
Central government bodies	628	1,311
Other local authorities	1,381	1,399
NHS bodies	15	16
Public corporations and trading funds	-	-
Academies	402	405
Other entities and individuals	1,536	1,762
	3,962	4,893
Long term assets		
Central government bodies	3,090	2,472
Other entities and individuals	609	338
	3,699	2,810

One central government body has transferred to another pension fund and the resulting bulk transfer value due is being paid over a number of years. The total amount was credited to the Pension Fund and an accrual has been made for the outstanding amount. The accrual will be rolled forward each year and adjusted for payments made.

Payments of £1,236,000 are due to the Pension Fund within the next twelve months.

It had been agreed that two employers who left the Fund could spread the payment of their deficits over a number of years. The total amount was credited to the Pension Fund and accruals

made for the outstanding amount. Accruals are rolled forward each year and adjusted for deficit payments made. One employer has now paid its deficit in full. Payments of £26,000 are due to the Pension Fund within the next twelve months.

N25 Current Liabilities

	2013/14 £000	2014/15 £000
Benefits payable	-61	-5
Sundry creditors	-12,900	-1,975
Receipts in advance	-	-60
	-12,961	-2,040
Analysis of creditors		
Central government bodies	-589	-690
Other local authorities	-9,368	-178
Other entities and individuals	-3,004	-1,172
	-12,961	-2,040

Sundry Creditors in 2013/14 contained an accrual of £9.2m relating to a bulk transfer value due to another pension fund; £9.5m was subsequently paid in June 2014.

N26 Actuarial Present Value of Promised Retirement Benefits

In addition to the triennial funding valuation (See Note N6), the fund's Actuary also undertakes a valuation of the pension fund liabilities on an IAS19 basis every year. These liabilities have been projected using a roll forward approximation from the last triennial valuation as at 31st March 2013.

Balance Sheet

Year ended	31st March 2014 £m	31st March 2015 £m
Present Value of Promised Retirement Benefits	2,304	2,748

Net Assets Available for Benefits

Year ended	31st March 2014 £m	31st March 2015 £m
Net Assets	1,506	1,709

The assumptions used are those adopted for the Administering Authorities IAS19 report, as required by the Code of Practice, and these differ from those used for the triennial valuation. It is estimated that the impact of the change of assumptions to 31st March 2015 is to increase the actuarial present value by £364m (£94m 2013/14).

Significant Actuarial Assumptions Used

Financial assumption:

Year ended	31st March 2014 % pa	31st March 2015 % pa
Inflation/Pension Increase Rate	2.8	2.4
Salary Increase Rate	4.1	3.8
Discount Rate	4.3	3.2

Longevity assumption:

The life expectancy assumption is based on the Fund's VitaCurves with improvements in line with the CMI 2010 model, assuming the current rate of improvements has reached a peak and will converge to a long term rate of 1.25% p.a. Based on these assumptions the average future life expectancies at age 65 are summarised below:

	Males Years	Females Years
Current Pensioners	22.5	24.6
Future Pensioners**	24.4	27.0

**Future pensioners are assumed to be currently aged 45.

Commutation assumption:

An allowance is included for future retirements to elect to take 50% of the maximum additional tax free cash up to HMRC limits for pre-April 2008 service and 75% of the maximum tax free cash for post-April 2008 service.

N27 Nature and Extent of Risks Arising from Financial Instruments

The Gloucestershire Local Government 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 securities (equities, bonds), collective investment schemes (or pooled funds) and cash and cash equivalents. In addition debtors and creditors arise as a result of its operations. The value of 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 by the appointed Investment Managers. 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 Local Government 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 manager and considers and takes advice on the nature of the investments made and associated risks.

The Fund's investments are held by BNY Mellon Asset Servicing, who acts 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 2015. 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 2015 by the amounts shown overleaf:

As at 31st March 2015	Value £000	Volatility of return %	Value on Increase £000	Value on Decrease £000
UK Bonds	170,671	6.8	182,277	159,066
UK Index Linked Gilts	89,045	10.4	98,305	79,784
UK Equities	321,583	10.7	355,992	287,174
Overseas Bonds	95,528	5.1	100,400	90,656
Multi National Equities*	885,608	9.0	965,313	805,903
UK Property	107,701	2.7	110,609	104,793
Overseas Property	11,759	14.7	13,488	10,030
Venture Capital/Private Equity	4,587	14.3	5,243	3,931
	1,686,482		1,831,627	1,541,337
Total Gloucestershire Fund	1,686,482	6.5	1,796,103	1,576,861

As at 31st March 2014 - re-stated	Value £000	Volatility of return %	Value on Increase £000	Value on Decrease £000
UK Bonds	150,399	6.0	159,423	141,375
UK Index Linked Gilts	78,543	10.0	86,397	70,689
UK Equities	326,521	13.7	371,254	281,788
Overseas Bonds	67,090	5.7	70,914	63,266
Multi National Equities*	764,882	11.3	851,314	678,450
UK Property	84,233	2.7	86,507	81,959
Overseas Property**	7,425	8.9	8,086	6,764
Venture Capital/Private Equity	4,935	14.1	5,631	4,239
	1,484,028		1,639,526	1,328,530
Total Gloucestershire Fund	1,484,028	8.1	1,604,235	1,363,822

* Previously classified as Overseas Equities

** Unable to use 3 year standard deviation therefore standard deviation used to cover period

*** Please see Note 19 - Changes to Comparative Figures

As at 31st March 2014 - original	Value £000	Volatility of return %	Value on Increase £000	Value on Decrease £000
UK Bonds	150,399	6.9	160,777	140,022
UK Index Linked Gilts	78,543	9.3	85,822	71,263
UK Equities	326,521	15.3	376,495	276,547
Overseas Bonds	67,090	17.8	79,052	55,127
Overseas Equities	764,882	19.4	912,955	616,808
UK Property	84,233	3.5	87,166	81,301
Overseas Property	7,425	8.9	8,087	6,765
Venture Capital/Private Equity	4,935	13.1	5,579	4,290
	1,484,028		1,715,933	1,252,123
Total Gloucestershire Fund	1,484,028	8.1	1,604,235	1,363,822

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 the bond

portfolio, as at the 31st March 2015 is set out below along with the interest rate sensitivity analysis data.

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. Over the last five years long term yields, as measured by the yield on the FTSE Over 15 Year Gilt Index, have averaged 3.4% (2013/14 3.7%) and moved between a high of 4.6% (4.5% 2013/14) and a low

of 2% (2.8% 2013/14). As at the end of March 2015 this yield was 2.2% (3.4% 2013/14). 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.

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.

Asset Type	Carrying amount as at 31st March 2015 £000	Change in the year in the net assets available to pay benefits	
		+100BPS £000	-100BPS £000
Bond Portfolio - Fixed Interest Securities excluding cash	355,601	-46,138	46,138

Asset Type	Carrying amount as at 31st March 2014	Change in the year in the net assets available to pay benefits	
		+100BPS	-100BPS
	£000	£000	£000
Bond Portfolio - Fixed Interest Securities excluding cash	294,926	-35,041	35,041

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. Apart from permitting the fixed income portfolio manager and global property manager to hedge currency exposures back to Sterling, the Fund's current policy is to not hedge foreign currency exposure.

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 5.6% (as measured by one standard deviation).

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

A 5.6% 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:

2014/15 Currency exposure - Asset Type	Asset value as at 31st March 2015	Change to net assets available to pay benefits	
		+5.6%	-5.6%
	£000	£000	£000
Global Fixed Interest	2,283	2,411	2,155
UK Equities	739	780	698
Global Equities	721,333	761,728	680,938
Emerging Market Equities	58,499	61,775	55,223
Global Multi Asset	78,772	83,183	74,361
	861,626	909,877	813,375

2013/14 Currency exposure - Asset Type	Asset value as at 31st March 2014	Change to net assets available to pay benefits	
	£000	£000 +5.3%	£000 -5.3%
Global Fixed Interest	1,133	1,193	1,073
UK Equities	725	763	687
Global Equities	623,502	656,548	590,456
Emerging Market Equities	47,095	49,591	44,599
Global Multi Asset	69,290	72,962	65,618
	741,745	781,057	702,433

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 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. The Fund manages its 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 portfolios have significant credit risk through its 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 Council 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 to high grade sovereign debt and baskets of liquid equities. Cash collateral is not 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 portfolios can be analysed using standard industry credit ratings and the analysis as at 31st March 2015 is set out overleaf.

Credit Analysis 31st March 2015	AAA £000	AA £000	A £000	BBB £000	BB £000	B £000	Unrated £000
UK Gilts	63,475	-	-	-	-	-	-
UK Index Linked	89,296	-	-	-	-	-	-
Overseas Govt Bonds	12,229	-	-	-	-	-	-
Overseas Inflation-linked	13,548	-	-	-	-	-	-
Corporate Bonds	-	3,419	36,006	24,390	9,076	-	1,815
Asset Backed	1,779	1,448	6,186	12,748	-	-	-
Emerging Markets	-	-	1,797	2,237	-	-	-
Mortgages	1,105	-	-	-	-	-	-
Supra/Sov/Local Govts	4,669	-	-	-	-	-	-
Cash/Cash Equivalents/ Currency Forwards	-	-	-	-	-	-	2,182
	186,101	4,867	43,989	39,375	9,076	-	3,997
% of Fixed Interest Portfolio	64.8	1.7	15.3	13.6	3.2	-	1.4

Credit Analysis 31st March 2014	AAA £000	AA £000	A £000	BBB £000	BB £000	B £000	Unrated £000
UK Gilts	59,499	-	-	-	-	-	-
UK Index Linked	78,890	-	-	-	-	-	-
Overseas Govt Bonds	6,081	-	-	-	-	-	-
Overseas Inflation-linked	-	-	-	-	-	-	-
Corporate Bonds	-	3,165	25,770	86,249	4,948	2,001	1,033
Asset Backed	1,538	2,296	5,712	11,373	-	-	-
Emerging Markets	-	-	-	-	-	-	-
Mortgages	1,015	-	-	-	-	-	-
Supra/Sov/Local Govts	4,502	-	-	851	-	-	-
Cash/Cash Equivalents/ Currency Forwards	3,715	-	-	-	-	-	8,841
	155,240	5,461	31,482	98,473	4,948	2,001	9,874
% of Fixed Interest Portfolio	50.5	1.8	10.2	32.0	1.6	0.7	3.2

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 2015 is shown below:

Account Name	Balances as at 31st March 2014		Balances as at 31st March 2015	
	Rating*	£000	Rating*	£000
Ignis Liquidity Fund	AAAmmf	2,427	AAAmmf	3,837
Federated Prime Rate Liquidity Fund	AAAmmf	-	AAAmmf	2,019
**HSBC Instant Access	A1/AA-	20	A-1+/AA-	531
HSBC Current Account	A1/AA-	4	A-1+/AA-	25
Svenska Handelsbanken	A1/AA-	5,000	A-1+/AA-	-
Total		7,451		6,412

* Ratings quoted are all Standard and Poors as at 31st March 2015 and 2014 with the exception of Federated Prime, which is Fitch rated as at 31st March 2015.

** Renamed

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 a significant proportion is 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.

All financial liabilities are due within one year.

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 Bond portfolio is mitigated through credit and liquidity analysis of all investments and diversification by issuer and maturity. The CBRE Property Fund 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.

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. 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.
- Level 2 - Inputs other than quoted prices under Level 1 that are observable for the asset or liability, either directly or indirectly.
- Level 3 - Unobservable inputs for the asset or liability used to measure fair value that rely on the reporting entity's own assumptions concerning the assumptions that market participants would use in pricing an asset or liability, including assumptions about risk.

The following sets out the Fund's investment assets (by class) measured at fair value according to the fair value hierarchy, as held by the Fund's custodian, at 31st March 2015.

2014/15	Level 1	Level 2	Level 3
Type of Asset	£000	£000	£000
UK Equities	312,365	-	-
Global Equities	309,628	1,556	-
Emerging Market Equities	58,499	-	-
Fixed Interest	156,993	-	-
Index Linked Securities	89,045	-	-
Overseas Fixed Interest	89,916	4,607	-
Overseas Indexed Linked	14,638	-	-
Unitised Insurance Policy	446,370	78,772	-
Property	-	101,494	17,966
Private Equity	-	-	4,587
Cash & Cash Equivalents	5,702	-	-
Total	1,483,156	186,429	22,553

2013/14	Level 1	Level 2	Level 3
Type of Asset	£000	£000	£000
UK Equities	316,478	-	-
Global Equities	280,844	-	-
Emerging Market Equities	47,095	-	-
Fixed Interest	141,368	-	-
Index Linked Securities	78,543	-	-
Overseas Fixed Interest	74,609	1,528	-
Overseas Indexed Linked	-	-	-
Unitised Insurance Policy	446,986	-	-
Property	-	79,316	12,343
Private Equity	-	-	4,935
Cash & Cash Equivalents	17,200	-	-
Total	1,403,123	80,844	17,278

N28 Transfers in and out of the Pension Fund

Transfers in from other pension funds

During 2014/15 an employer transferred its employees in from another Local Government Pension Scheme. The Pension Fund received a bulk transfer value of £2.56m to cover these liabilities.

Transfers to other pension funds

The Pension Fund received notification from the Government that all Probation Trusts across the country would be transferring their pension assets and liabilities into the Greater Manchester Pension Fund (GMPF). This involved transferring the Gloucestershire Probation Trust's records, pensioners and members to GMPF together with the Probation Trust's share of the Pension Fund assets. At the time of the last Annual Report this figure was estimated to

be approximately £25m. When the transfer of assets was completed the actual amount calculated by the Actuaries was £28.7m and this was paid in November 2014.

N29 Accounting Standards that have been issued but have not yet been adopted

The Code of Practice on Local Authority Accounting in the United Kingdom 2014/15 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.

The Pension Fund has yet to adopt International Financial Reporting Standard (IFRS) 13 Fair Value Measurement (May 2011). IFRS 13 defines fair value and sets out in a single IFRS a framework for measuring

fair value. It also identifies the disclosure requirement for items measured at fair value. Although this new standard was originally issued in May 2011, and applied to accounting periods beginning on or after 1st January 2013, its adoption was deferred by the CIPFA/LASSAC Local Authority Accounting Code Board until the 2015/16 Code.

It is anticipated that this Standard will not have a material impact on our accounts when it is applied prospectively from 1st April 2015.

N30 Events after the reporting date

Preliminary figures received from the Custodian indicated that at the end of August 2015 the value of the Pension Fund's investments had fallen by approximately 9% on year end values. However investments are valued at fair value and the benefit only realised upon sale and therefore any change is considered a non-adjusting event.

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:

59.(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 Website', 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. 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.

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. 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.

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 is the 14th 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 14th May at the latest. Where the 14th falls on a weekend or Bank Holiday, the due date becomes the last working day prior to the 14th.

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.

Payment Method

Apart from Additional Voluntary Contributions, all other Contributions and other payments (e.g. transfers and invoice payments) should be paid to the Gloucestershire Pension Fund's bank account, by Direct Debit or BACS.

Remittance Advices

Employers must submit a remittance advice with each payment. Employers who are paying 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 excluding 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 excluding 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 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.

Additional costs incurred will be collated and invoiced each 6 months.

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 will 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.

Pensions Administration Strategy Report

Levels of performance expected from the employing authorities and the Pension Fund are detailed in Section 2.2 of the Pensions Administration Strategy. Performance against some of those targets is shown below. The Fund monitors the timeliness of data submissions and the payment of pension contributions by the employer and has the power to seek compensation from employers in respect of any service standard breaches. During 2014/15 the option to levy interest on overdue contributions was not exercised. Charges of £175 were levied against employers not meeting the expected level of performance.

	2014/15 %	2013/14 %
Pension contributions paid on or before the due date	99.4	99.6
Employers providing the Pension Fund with a copy of their discretions policy document (144 out of 190)	75.8	64.0
Provision of named pensions contacts for the employer	100.0	100.0

Activity	Target	2014/15	2013/14	2012/13	2011/12	2010/11
Annual Benefit Statements sent by statutory deadline	100%	0%** see note below	100%	100%	100%	100%
Provide retirement estimates within 10 working days						
Total completed		646	531	655	754	749
Completed on time		505	428	594	685	693
Achievement	80%	78.2%	80.6%	90.7%	90.9%	92.5%
Pay retirement grants within 10 working days						
Total completed		707	745	739	889	775
Completed on time		634	721	716	844	763
Achievement	90%	89.7%	96.8%	96.9%	94.9%	98.5%
Pay death gratuities within 3 working days						
Total completed		40	57	65	45	51
Completed on time		39	54	58	37	39
Achievement	85%	97.5%	94.7%	89.2%	82.2%	76.5%

** Annual Benefit Statement – Statutory deadline was 30/09/2014. 100% of Annual Benefit Statements were sent out during December 2014.

The Pension Section not achieving its local performance targets has primarily been due to additional workloads experienced as a result of the unprecedented levels of statutory change and requirements of late. This has resulted not only in additional complexity and issues to be managed in the administration of the LGPS by the Pension Section, but also in the need to provide substantial additional support to both Employers and Scheme Members alike.

Funding Strategy Statement

The Funding Strategy Statement shown below is the current version of this statement. Should you wish to see the previous version applicable to the period that this report covers please contact the Finance Manager at Shire Hall, Gloucester, on (01452) 328945.

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 advisor. It is effective from 1st April 2014.

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 County Council 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;
- 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 of 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 Statement of Investment Principles (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, and in what circumstances you might need to pay more. 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 Finance Manager in the first instance at e-mail address peninv@gloucestershire.gov.uk or on telephone number 01452 328945.

2. Basic funding issues

(More detailed and extensive descriptions are given in Appendix D).

2.1 How does the actuary calculate a contribution rate?

Employer contributions are normally made up of two elements:

- a) the estimated cost of future benefits being built up from year to year, referred to as the "*future service rate*"; plus

b) an adjustment for the difference between the assets built up to date and the value of past service benefits, referred to as the “*past service adjustment*”. If there is a deficit the past service adjustment will be an increase in the employer’s total contribution; if there is a surplus there may be a reduction in the employer’s total contribution. Any past service adjustment will aim to return the employer to full funding over an appropriate period (the “deficit recovery period”).

2.2 How is a deficit (or surplus) calculated?

An employer’s “funding level” is defined as the ratio of:

- the market value of the employer’s share of assets, 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.

If this is less than 100% then it means the employer has a shortfall, which is the employer’s deficit; if it is more than 100% then the employer is said to be in surplus. The amount of deficit or shortfall is the difference between the asset value and the liabilities value.

A larger deficit will give rise to higher employer contributions. If a deficit is spread over a longer period then the annual employer cost is lower than if it is spread over a shorter period.

2.3 How are contribution rates calculated for different employers?

The Fund’s actuary is required by the Regulations to report the

Common Contribution Rate, for all employers collectively at each triennial valuation, combining items (a) and (b) above. This is based on actuarial assumptions about the likelihood, size and timing of benefit payments to be made from the Fund in the future, as outlined in Appendix E.

The Fund’s actuary is also required to adjust the *Common Contribution Rate* for circumstances specific to each individual employer. The sorts of specific circumstances which are considered are discussed in Section 3. It is this adjusted contribution rate which the employer is actually required to pay, and the rates for all employers are shown in the Fund’s Rates and Adjustments Certificate.

In effect, the *Common Contribution Rate* is a notional quantity, as it is unlikely that any employer will pay that exact rate. Separate future service rates are calculated for each employer together with individual past service adjustments according to employer-specific circumstances.

Details of the outcome of the Actuarial Valuation as at 31st March 2013 can be found in the formal valuation report dated 27th March 2014, including an analysis at Fund Level of the *Common Contribution Rate*. Further details of individual employer contribution rates can also be found in the formal report.

2.4 What else might affect the employer’s contribution?

Employer covenant, and likely term of membership, are also considered when setting contributions: more details are given in Section 3.

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.

If an employer is approaching the end of its participation in the Fund then its contributions may be amended appropriately, so that the assets meet (as closely as possible) the value of its liabilities in the Fund when its participation ends.

Employers’ contributions are expressed as minima, with employers able to pay contributions at a higher rate. The Fund Actuary will take account of the higher rate at subsequent valuations as this will directly impact on the asset share of an employer.

2.5 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, 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 over whether to continue to allow its non-teaching staff to join the Fund. There has also been guidance issued by the DCLG 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 this FSS are not met.

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;
- 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.

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;

◦ 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; and

◦ 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.

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 Fund 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. This helps the Fund establish a picture of the financial standing of the employer, i.e. its ability to meet its long term Fund commitments.

For instance, where an employer is considered relatively low risk then the Fund may permit greater smoothing of contributions (such as stabilisation or a longer deficit recovery period relative to other employers) which 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, and that lower levels of contributions now may mean higher contributions in the future.

On the other hand, an employer whose risk assessment indicates a less strong covenant will generally be required to pay higher contributions (for instance, with a more prudent funding basis or a shorter deficit recovery period relative to other employers). This is because of the higher probability that at some point it will fail or be unable to meet its pension contributions, with its deficit in the Fund then falling to other Fund employers.

The Fund actively seeks employer input, including to its funding arrangements, through various means: see Appendix A.

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, 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
- the use of some form of security or guarantee to justify a lower contribution rate than would otherwise be the case.

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 may, at its sole discretion, direct the actuary to adopt alternative funding approaches on a case by case basis for specific employers.

3.2 The effect of paying contributions below the theoretical level

Employers which are permitted to use one or more of the above methods will often be paying, for a time, contributions less than the theoretical contribution rate (as calculated by the method set out in Section 2.1). 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 choice of method,
- lower contributions in the short term will be assumed to incur a greater loss of investment returns on the deficit. Thus, deferring a certain amount of contribution will lead to higher contributions in the long-term, and
- it will take longer to reach full funding, all other things being equal.

Opposite (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
	Local Authorities, Police & Lower Severn Drainage Board	Other Scheduled Bodies	Open to new entrants	Closed to new entrants	(all)
Sub-type					
Basis used	Ongoing, assumes long-term Fund participation (see Appendix E)		Ongoing, but may move to “gilts cessation basis” - see Note (a)		Ongoing, assumes fixed contract term in the Fund (see Appendix E)
Future service rate	Projected Unit Credit approach (see Appendix D – D.2)			Attained Age approach (see Appendix D – D.2)	Projected Unit Credit approach for open contracts and Attained Age approach for closed contracts (see Appendix D – D.2)
Stabilised rate?	Yes - see Note (b)	No	No	No	No
Maximum deficit recovery period – Note (c)	20 years	20 years	Future working lifetime	Future working lifetime	Outstanding contract term
Deficit recovery payments – Note (d)	Monetary amount	Monetary amount	Monetary amount	Monetary amount	Monetary amount
Treatment of surplus	Covered by stabilisation arrangement	Preferred approach: contributions kept at future service rate. However, reductions may be permitted by the Admin. Authority		Reduce contributions by spreading the surplus over the remaining contract term	
Phasing of contribution changes	Covered by stabilisation arrangement	3 years - Note (e)	3 years - Note (e)	3 years - Note (e)	None
Review of rates – Note (f)	Administering Authority reserves the right to review contribution rates and amounts, and the level of security provided, at regular intervals between valuations				Particularly reviewed in last 3 years of contract
New employer	n/a	n/a - but see note (g) for Academies	Note (h)		Notes (h) & (i)
Cessation of participation: cessation debt 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 debt principles applied would be as per Note (j).		Can be ceased subject to terms of admission agreement. Cessation debt 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 (if any) calculated on ongoing basis. Awarding Authority will be liable for future deficits and contributions arising.

Note (a) (Basis for CABs and Designating Employers)

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/or
- 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 vary the discount rate used to set employer contribution rate. In particular contributions may be set for an employer to achieve full funding on a more prudent basis (e.g. using a discount rate set equal to 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).

On the basis of extensive modelling carried out for the 2013 valuation exercise (see Section 4), the stabilised details are as follows:

Type of Employer	Employers with precept (tax raising) powers
Max contribution increase per annum	1% to 2.5% *
Max contribution decrease per annum	1% to 2.5% *

* the percentage increase applied to these employers will be determined by the Administering Authority in discussion with the actuary and will depend on an employer's individual circumstances including deficit levels, funding position, cash flow and maturity.

The stabilisation criteria and limits will be reviewed at the 31st March 2016 valuation, to take effect from 1st April 2017. This will take into account the employer's membership profiles, the issues surrounding employer security, and other relevant factors.

Note (c) (Deficit Recovery Periods)

The deficit recovery period starts at the commencement of the revised contribution rate (1st April 2014 for the 2013 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 spreading periods, for example where there were no new entrants.

Where stabilisation applies, the resulting employer contribution rate would be amended to comply with the stabilisation mechanism.

For employers with no active members at this valuation, the deficit should be recovered by a fixed monetary amount over a period to be agreed with the body or its successor and the Administering Authority.

Note (d) (Deficit Recovery Payments)

Deficit recovery payments will be set as a monetary amount for most employers in the Fund. However, for employers where stabilisation is not being applied, the deficit recovery payments for each employer covering the three year period until the next valuation will sometimes be set as a percentage of salaries.

The Administering Authority reserves the right to amend these rates between valuations and/or to require these payments in monetary terms instead, for instance where:

- the employer is relatively mature, i.e. has a large deficit recovery contribution rate (e.g. above 15% of payroll), in other words its payroll is a smaller proportion of its deficit than is the case for most other employers, 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) (Phasing in of contribution changes)

For employers contributing at less than the future service rate calculated at the 2013 valuation, the employer should pay at least the future service rate in 2014/15.

All phasing is subject to the Administering Authority being satisfied as to the strength of the employer's covenant.

Employers which have no active members at this valuation will not be phased.

Note (f) (Regular Reviews)

Such reviews may be triggered by significant events including but not limited to: significant reductions in payroll, altered employer circumstances, Government restructuring affecting the employer's business, or failure to pay contributions or arrange appropriate security as required by the Administering Authority.

The result of a review may be to require increased contributions (by strengthening the actuarial assumptions adopted and/or moving to monetary levels of deficit recovery contributions), and/or an increased level of security or guarantee.

Note (g) (New Academy employers)

The Fund's policies on academies' funding issues are as follows:

a) 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 those of the other academies in the MAT;

b) 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;

c) 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 asset allocation will be based on market conditions and the academy's active Fund membership on the day prior to conversion; and

d) The new academy's initial contribution rate will be calculated using market conditions, the council funding position and, membership data, all as at the day prior to conversion.

The Fund's policies on academies may change in the light of any amendments to DCLG guidance. Any changes will be notified to academies, and will be reflected in a subsequent version of this FSS.

Note (h) (New Admission Bodies)

With effect from 1st 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 fall in gilt yields;
- allowance for the possible non-payment of employer and member contributions to the Fund;
- the current deficit.

For all new Transferee Admission Bodies, 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. The Administering Authority requires all the Pension Fund liabilities of the Transferee Admission Body to be guaranteed by the letting Scheduled Body.

The Administering Authority will only consider requests from Community Admission Bodies (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 or a government department, guaranteeing their liabilities and also providing a form of security as above if requested.

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 the 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 at the end of the contract term in respect of assets and liabilities attributable to service accrued during the contract term.

iii) Fixed contribution rate agreed

Under this option the contractor pays a fixed contribution rate and doesn’t pay any cessation deficit.

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. The Admission 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;
- redundancy and early retirement decisions.

Note (j) (Admission Bodies Ceasing)

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;
- 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 cessation, the Administering Authority will instruct the Fund actuary to carry out a cessation valuation to determine whether there is any deficit or surplus. Where there is a deficit, payment of this amount in full would normally be sought from the Admission Body; where there is a surplus it should be noted that current legislation does not permit a refund payment to the Admission Body.

For a Transferee Admission Body, the cessation valuation will be carried out on an ongoing basis. This is the same basis that would have been used to award assets on joining the Fund but updated for current market conditions. Therefore the Transferee Admission Body is responsible for any deficit which may arise on all of the members' service including service prior to the contract start date. Once the cessation deficit is paid the Employer will be fully funded on an ongoing basis at the date of calculation. However, the Awarding Authority retains responsibility for any deficit that may arise in the future or any deficit that can't be met by the Transferee Admission Body.

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:

a) Where there is a guarantor for future deficits and contributions, the cessation valuation will normally be calculated using the ongoing basis as described in Appendix E;

b) Alternatively, it may be possible to simply transfer the former Admission Body's liabilities and assets to the guarantor, without needing to crystallise any deficit. This approach may be adopted where the employer cannot pay the contributions due, and this is within the terms of the guarantee;

c) Where a guarantor does not exist then, in order to protect other employers in the Fund, the cessation liabilities and final deficit will normally be calculated using a "gilts cessation basis", which is more prudent than the ongoing 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.

Under (a) and (c), 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 would look to any bond, indemnity or guarantee in place for the employer.

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.

As an alternative, where the ceasing Admission Body is continuing in business, the Fund at its absolute discretion reserves the right to enter into an agreement with the ceasing Admission Body. Under this agreement the Fund

would accept an appropriate alternative security to be held against any deficit, and would carry out the cessation valuation on an ongoing basis: deficit recovery payments would be derived from this cessation debt. This approach would be monitored as part of each triennial valuation: the Fund reserves the right to revert to a "gilts cessation basis" and seek immediate payment of any funding shortfall identified. The Administering Authority may need to seek legal advice in such cases, as the Body would have no contributing members.

3.4 Pooled contributions

From time to time the Administering Authority may set up pools for employers with similar characteristics. This will always be in line with its broader funding strategy.

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. Transferee Admission Bodies are usually also ineligible for pooling.

Smaller admitted bodies may be pooled with the letting employer, provided all parties (particularly the letting employer) agree.

Employers who are permitted to enter (or remain in) a pool at the 2013 valuation will not normally be advised of their individual contribution rate unless agreed by the Administering Authority.

LEA Schools generally are also pooled with their funding Council. However there may be exceptions for specialist or independent schools.

Those employers which have been pooled are identified in the Rates and Adjustments Certificate.

At the 2004, 2007 and 2010 valuations, a separate pool was operated for Town and Parish Councils.

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 deficit recovery period, 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;
- 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

Employers in the Fund have an 'ill health allowance' determined by the Fund's Actuary. The Fund monitors each employer's ill health experience on an ongoing basis. If the cumulative cost of ill health retirement in any financial year exceeds the allowance at the previous valuation, the employer will be charged additional contributions on the same basis as apply for non ill-health cases.

3.8 Ill health insurance

If an employer provides satisfactory evidence to the Administering Authority of a current insurance policy covering ill health early retirement strains, then:

- the employer's contribution to the Fund each year is reduced by the lesser of the amount of that year's insurance premium and the employer's ill health allowance and

The employer must keep the Administering Authority notified of any changes in the insurance policy's coverage or premium terms, or if the policy will cease.

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 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 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.

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 Statement of Investment Principles (SIP), 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 after 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 asset outperformance assumption contained in the discount rate (see E3) is within a range that would be considered acceptable for funding purposes; it is 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 A1).

However, in the short term – such as the three yearly assessments at formal valuations – there is the scope for considerable volatility and there is a material chance that in the short-term and even medium term, asset returns will fall short of this target. The stability measures described in Section 3 will damp down, but not remove, the effect on employers' contributions.

The Fund does not hold a contingency reserve to protect it against the volatility of equity investments.

4.4 How does this differ for a large stable employer?

The Actuary has developed four key measures which capture the essence of the Fund's strategies, both funding and investment:

- Prudence - the Fund should have a reasonable expectation of being fully funded in the long term;
- Affordability – how much can employers afford;
- Stewardship – the assumptions used should be sustainable in the long term, without having to resort to overly optimistic assumptions about the future to maintain an apparently healthy funding position;
- Stability – employers should not see significant moves in their contribution rates from one year to the next, and this will help to provide a more stable budgeting environment.

The key problem is that the key objectives often conflict. For example, minimising the long term cost of the scheme (i.e. keeping employer rates affordable) is best achieved by investing in higher returning assets e.g. equities. However, equities are also very volatile (i.e. go up and down fairly frequently in fairly large moves),

which conflicts with the objective to have stable contribution rates.

Therefore a balance needs to be maintained between risk and reward, which has been considered by the use of Asset Liability Modelling: this is a set of calculation techniques applied by the Fund's actuary, to model the range of potential future solvency levels and contribution rates.

The Actuary was able to model the impact of these four key areas, for the purpose of setting a stabilisation approach (see 3.3 Note (b)). The modelling demonstrated that retaining the present investment strategy, coupled with constraining employer contribution rate changes as described in 3.3 Note (b), struck an appropriate balance between the above objectives. In particular the stabilisation approach currently adopted meets the need for stability of contributions without jeopardising the Administering Authority's aims of prudent stewardship of the Fund.

Whilst a stabilisation mechanism is to remain in place until 2017 for eligible employers, it should be noted that this will need to be reviewed following the 2016 valuation.

4.5 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 Meeting.

> Appendix A Regulatory framework

A1 Why does the Fund need an FSS?

The Department for Communities and Local Government (DCLG) 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 2012) and to its Statement of Investment Principles.

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 autumn 2013 for comment;
- b) Comments were requested within 6 weeks;
- c) There was an Employers meeting on 29th November 2013 at which questions regarding the FSS could be addressed;
- d) Following the end of the consultation period the FSS was updated where required and then published, in April 2014.

A3 How is the FSS published?

The FSS is made available through the following routes:

- Published on the website, at <http://www.gloucestershire.gov.uk/extra/pensions/investments>
- A copy sent by e-mail to each participating employer in the Fund;

- A copy sent to employee/pensioner representatives;
- A full copy included in the annual report and accounts of the Fund;
- Copies sent to investment managers and independent advisers;
- Copies made available on request.

A4 How often is the FSS reviewed?

The FSS is reviewed in detail at least every three years as part of the triennial valuation. This version is expected to remain unaltered until it is consulted upon as part of the formal process for the next valuation in 2016.

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 Pension 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 Statement of Investment Principles, 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/pensionsinvestments

> 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:-

- operate the Fund as per the LGPS Regulations;
- effectively manage any potential conflicts of interest arising from its dual role as Administering Authority and a Fund employer;
- collect employer and employee contributions, and investment income and other amounts due to the Fund;
- ensure that cash is available to meet benefit payments as and when they fall due;
- pay from the Fund the relevant benefits and entitlements that are due;
- invest surplus monies (i.e. contributions and other income which are not immediately needed to pay benefits) in accordance with the Fund's Statement of Investment Principles (SIP) and LGPS Regulations;
- communicate appropriately with employers so that they fully understand their obligations to the Fund;
- take appropriate measures to safeguard the Fund against the consequences of employer default;

- manage the valuation process in consultation with the Fund's actuary;
- prepare and maintain a FSS and a SIP, after consultation;
- notify the Fund's actuary of material changes which could affect funding (this is covered in a separate agreement with the actuary); and
- monitor all aspects of the fund's performance and funding and amend the FSS/SIP as necessary and appropriate.

B2 The Individual Employer should:-

- deduct contributions from employees' pay correctly;
- liaise regularly with the Administering Authority to ensure correct data and records are held in respect of employees' benefits;
- pay all contributions, including their own as determined by the actuary, promptly by the due date;
- have a policy and exercise discretions within the regulatory framework;
- make additional contributions in accordance with agreed arrangements in respect of, for example, augmentation of scheme benefits, early retirement strain; and
- notify the Administering

Authority promptly of all changes to its circumstances, prospects or membership.

B3 The Fund Actuary should:-

- 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;
- 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);
- prepare advice and calculations in connection with bulk transfers and individual benefit-related matters;
- assist the Administering Authority in considering possible changes to employer contributions between formal valuations, where circumstances suggest this may be necessary;
- advise on the termination of Admission Bodies' participation in the Fund; and
- fully reflect actuarial professional guidance and requirements in the advice given to the Administering Authority.

B4 Other parties:-

- investment advisers (either internal or external) should ensure the Fund's SIP remains appropriate, and consistent with this FSS;
- investment managers, custodians and bankers should all play their part in the effective investment (and dis-investment) of

Fund assets, in line with the SIP;

- 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;
- governance advisers may be appointed to advise the

Administering Authority on efficient processes and working methods in managing the Fund;

- 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.

> Appendix C Key risks and controls

C1 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:

- investments/financial;
- funding/demographic;
- administration/regulatory; and
- governance.

C2 Financial risks

Risk	Summary of Control Mechanisms
Fund assets fail to deliver returns in line with the anticipated returns underpinning valuation of liabilities over the long-term.	<p>Only anticipate long-term return 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 four key outcomes.</p> <p>Chosen option considered to provide the best balance.</p>
Fall in risk-free returns on Government bonds, leading to rise in value placed on liabilities.	<p>Stabilisation modelling at whole Fund level allows for the probability of this within a longer term context.</p> <p>Inter-valuation monitoring, as above.</p> <p>Some investment in bonds helps to mitigate this risk.</p>

C2 Financial risks (continued)

Risk	Summary of Control Mechanisms
Increasing Pension Fund deficit.	<p>Actuarial review via Triennial Valuation and regular update reports.</p> <p>Regular consideration by Pension Committee on manager performance relative to funding assumptions, funding position and funding strategy</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 index-linked 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.	<p>An explicit stabilisation mechanism has been agreed for eligible employers as part of the funding strategy. Other measures are also in place to limit sudden increases in contributions.</p> <p>Obtain information on financial strength of individual employers. Discuss with employers their ability to absorb rises in their level of contribution.</p> <p>Where appropriate mitigate impact through deficit spreading and phasing in of contribution rises, with appropriate security from employers and further analysis by the Fund's actuary.</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>

C3 Funding/Demographic risks

Risk	Summary of Control Mechanisms
<p>Pensioners living longer, thus increasing cost to Fund.</p>	<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> <p>The Fund also sets life expectancy assumptions using ClubVita, which is a specialised longevity company and provides life expectancy assumptions based on the profile of the Fund's own membership.</p> <p>Administering Authority encourage any employers concerned at costs to promote later retirement culture. Each 1 year rise in the average age at retirement would save roughly 5% of pension costs.</p>
<p>Maturing Fund – i.e. proportion of actively contributing employees declines relative to retired employees leading to the possibility of there not being sufficient liquid funds available to pay liabilities as they fall due.</p>	<p>Continue to monitor at each valuation, seeking monetary amounts rather than % of pay. Between valuations regularly monitor level of active members on both a total Fund basis and by individual employer. Regularly monitor how cash flow positive the Fund is. Regularly review investment strategy.</p>
<p>A company admitted to the Fund as an admission body may become financially unviable.</p>	<p>A surety bond is required to cover the potential risk of the admitted body becoming insolvent and the value of this surety or bond is reviewed regularly to ensure it provides adequate cover for the financial risks involved.</p>
<p>Deteriorating patterns of early retirements.</p>	<p>Employers are charged the extra cost of non ill-health retirements following each individual decision.</p> <p>Employer ill health retirement experience is monitored, and insurance is an option.</p>
<p>Reductions in payroll causing insufficient deficit recovery payments.</p>	<p>Require employers to pay sums due for deficit recovery contributions as a fixed monetary amount rather than being expressed as a % of pay.</p>
<p>Ill-health retirements significantly more than anticipated.</p>	<p>Monitoring of each employer's ill-health experience on an ongoing basis. The employer may be charged additional contributions if this exceeds the ill-health assumption built in.</p>
<p>Effect on the Fund's investment strategy and employer contributions if large numbers of active members are outsourced on a "closed" (to new entrants) basis.</p>	<p>Take advice from the Fund actuary on the likely impact this will have on Fund investment out performance assumptions and employer contributions. Monitor levels of outsourcings on a "closed" basis and advise employers of implications so these are taken into account when they consider the business case for an outsourcing. Regularly review investment strategy and strategic asset allocation.</p>

C4 Administration/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 results of the most recent reforms have been built into the 2013 valuation. Any changes to member contribution rates or benefit levels will be carefully communicated with members to minimise possible opt-outs or adverse actions.</p>
Failure to collect and account for contributions from employers and employees on time.	Regular monthly monitoring and reconciliation of Fund contributions received, including a detailed analysis of individual employer contributions and employee contributions by pay banding. Robust debt management processes are in place to recover any late payments
Loss of funds through fraud or misappropriation.	Procedures and processes are in place and applied in relation to e.g.: checking for “ghost” scheme members; multiple levels of authorisation for claims and fund payments plus secondary checking of lump sum payments. Procedures are documented and staff are trained and managed in carrying these out. The Fund’s internal auditors carry out regular reviews.

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 (under Regulation 38) between triennial valuations</p> <p>Deficit contributions may be expressed as monetary amounts.</p>
Actuarial or investment advice is not sought, or is not heeded, 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>

C5 Governance risks (continued)

Risk	Summary of Control Mechanisms
<p>An employer ceasing to exist with insufficient funding or adequacy of a bond.</p>	<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, wherever 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). ◦ Monitoring funding levels more closely as approaching cessation and reviewing contributions well ahead of cessation if thought appropriate (see Note (a) to 3.3).
<p>Failure to comply with the Myners' Investment Principles.</p>	<p>Compliance as detailed in the Statement of Investment Principles is kept under regular review.</p>
<p>Lack of relevant expertise, knowledge and skills at officer and member level in relation to administering the LGPS.</p>	<p>Training needs assessments for the Administering Authority are carried out and an annual training plan produced. The Fund subscribes to the CIPFA Knowledge and Skills Framework for the LGPS and makes this information available to all members of the Pension Committee and relevant officers. Appropriately qualified external advisers and consultants are used as appropriate.</p>
<p>Failure to hold personal data securely and keep pension records up-to-date and accurate.</p>	<p>Personal data and scanned documents relating to scheme members are maintained in an online system via individual password access for those that need to maintain and access this information. Procedures for maintaining pension records are documented and the process is monitored and managed within the Pensions Administration team. Procedures are regularly reviewed by the Fund's internal auditors.</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.

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 future benefits being accrued, referred to as the “future service rate”; plus

b) an adjustment for the funding position of accrued benefits relative to the Fund’s solvency target, “*past service adjustment*”. If there is a surplus there may be a reduction in the employer’s contribution rate. If there is a deficit there will be an increase in the employer’s contribution rate, with the surplus or deficit spread over an appropriate period. The aim is to return the employer to full funding over that period. See Section 3 for deficit recovery periods.

The Fund’s actuary is required by the regulations to report the *Common Contribution Rate*¹, for all employers collectively at each triennial valuation. It combines items (a) and (b) and is expressed as a percentage of pay; it is in effect an average rate across all employers in the Fund.

The Fund’s actuary is also

required to adjust the *Common Contribution Rate* for circumstances which are deemed “peculiar” to an individual employer². It is the adjusted contribution rate which employers are actually required to pay. The sorts of “peculiar” factors which are considered are discussed below.

In effect, the *Common Contribution Rate* is a notional quantity. Separate future service rates are calculated for each employer together with individual past service adjustments according to employer-specific past service deficit spreading and increased employer contribution phasing periods.

D2 How is the Future Service Rate calculated?

The future service 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 future service 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 calculation is on the “ongoing” valuation basis (see Appendix E), but where it is considered appropriate to do so the Administering Authority reserves the right to set a future service rate by reference to liabilities valued on a more prudent basis (see Section 3).

The approach used to calculate each employer’s future service contribution rate depends on whether or not new entrants are being admitted. Employers should note that it is only Admission Bodies and Designating Employers that may have the power not to automatically admit all eligible new staff to the Fund, depending on the terms of their Admission Agreements and employment contracts.

a) Employers which admit new entrants

These rates will be derived using the “Projected Unit Method” of valuation with a one year period, i.e. only considering the cost of the next year’s benefit accrual and contribution income. If future experience is in line with assumptions, and the employer’s membership profile remains stable, this rate should be broadly stable over time. If the membership of employees matures (e.g. because of lower recruitment) the rate would rise over time.

b) Employers which do not admit new entrants

To give more long term stability to such employers’ contributions, the “Attained Age” funding method is normally adopted. This measures benefit accrual and contribution income over the whole future anticipated working lifetimes of current active employee members.

Both approaches include expenses of administration to the extent that they are borne by the Fund, and include allowances for benefits payable on death in service and ill health retirement.

1. See LGPS (Administration) Regulations 36(5).

2. See LGPS (Administration) Regulations 36(7).

D3 How is the Solvency / Funding Level calculated?

The Fund's actuary is required to report on the "solvency" of the whole Fund in a valuation which should be carried out at least once every three years. As part of this valuation, the actuary will calculate the solvency position of each employer.

'Solvency' is defined to be the ratio of the market value of the employer's asset share to the value placed on accrued benefits on the Fund actuary's chosen assumptions. This quantity is known as a funding level.

For the value of the employer's asset share, see D5 below.

For the value of benefits, the Fund actuary agrees the assumptions to be used with the Administering Authority – see Appendix E. These assumptions are used to calculate the present value of all benefit payments expected in the future, relating to that employer's current and former employees, based on pensionable service to the valuation date only (i.e. ignoring further benefits to be built up in the future).

The Fund operates the same target funding level for all employers of 100% of its accrued liabilities valued on the ongoing basis, unless otherwise determined (see Section 3).

D4 What affects a given employer's valuation results?

The results of these calculations for a given individual employer will be affected by:

- past contributions relative to the cost of benefits that have accrued;
- different liability profiles of employers (e.g. mix of members by age, gender, service vs. salary);

- the effect of any differences in the valuation basis on the value placed on the employer's liabilities;
 - any different deficit/surplus spreading periods or phasing of contribution changes;
 - the difference between actual and assumed rises in pensionable pay;
 - the difference between actual and assumed increases to pensions in payment and deferred pensions;
 - the difference between actual and assumed retirements on grounds of ill-health from active status;
 - the difference between actual and assumed amounts of pension ceasing on death;
 - the additional costs of any non ill-health retirements relative to any extra payments made;
- over the period between each triennial valuation.

Actual investment returns achieved on the Fund between each valuation are applied proportionately across all employers, to the extent that employers in effect share the same investment strategy.

D5 How is each employer's asset share calculated?

The Administering Authority does not account for each employer's assets separately. Instead, the Fund's actuary is required to apportion the assets of the whole Fund between the employers, at each triennial valuation.

This apportionment uses the income and expenditure figures provided for certain cash flows for each employer. This process adjusts for transfers of

liabilities between employers participating in the Fund, but does make a number of simplifying assumptions, for example, individual membership transfers occur with a sum broadly equivalent to the reserve required on the ongoing basis being exchanged between the two employers. The split is calculated using an actuarial technique known as "analysis of surplus".

The Fund actuary does not allow for certain relatively minor events, including but not limited to:

- the actual timing of employer contributions within any financial year;
- the effect of the premature payment of any deferred pensions on grounds of incapacity.

These effects are swept up within a miscellaneous item in the analysis of surplus, which is split between employers in proportion to their liabilities.

The methodology adopted means that there will inevitably be some difference between the asset shares calculated for individual employers and those that would have resulted had they participated in their own ring-fenced section of the Fund.

The asset apportionment is capable of verification but not to audit standard. The Administering Authority recognises the limitations in the process, but it considers that the Fund actuary's approach addresses the risks of employer cross-subsidisation to an acceptable degree.

The Administering Authority intends to move to a unitised approach of monitoring assets from 1 April 2014.

> Appendix E

Actuarial assumptions

E1 What are the actuarial assumptions?

These are expectations of future experience used to place a value on future benefit payments (“the liabilities”). 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 measured value of future service accrual and past service liabilities, and hence the measured value of the past service deficit. However, different assumptions will not of course affect the actual benefits payable by the Fund in future.

The combination of all assumptions is described as the “basis”. A more optimistic basis might involve higher assumed investment returns (discount rate), or lower assumed salary growth, pension increases or life expectancy; a more optimistic basis will give lower liability values and lower employer costs. A more prudent basis will give higher liability values and higher employer costs.

E2 What basis is used by the Fund?

The Fund’s standard funding basis is described as the “ongoing basis”, which applies to most

employers in most circumstances. This is described in more detail below. It anticipates employers remaining in the Fund in the long term.

However, in certain circumstances, typically where the employer is not expected to remain in the Fund long term, a more prudent basis applies: see Note (a) to 3.3.

E3 What assumptions are made in the ongoing basis?

a) Investment return / discount rate

The key financial assumption is the anticipated return on the Fund’s investments. This “discount rate” assumption makes allowance for an anticipated out-performance of Fund returns relative to long term yields on UK Government bonds (“gilts”). There is, however, no guarantee that Fund returns will out-perform gilts. The risk is greater when measured over short periods such as the three years between formal actuarial valuations, when the actual returns and assumed returns can deviate sharply.

Given the very long-term nature of the liabilities, a long term view of prospective asset returns is taken. The long term in this context would be 20 to 30 years or more.

For the purpose of the triennial funding valuation at 31st March 2013 and setting contribution rates effective from 1st April 2014, the Fund actuary has assumed that future investment returns earned by the Fund over the long term will be 1.6% per annum greater than gilt yields at the time of the valuation (this is the same as that

used at the 2010 valuation). In the opinion of the Fund actuary, based on the current investment strategy of the Fund, this asset out-performance assumption is within a range that would be considered acceptable for the purposes of the funding valuation.

b) Salary growth

Pay for public sector employees is currently subject to restriction by the UK Government until 2016. Although this “pay freeze” does not officially apply to local government and associated employers, it has been suggested that they are likely to show similar restraint in respect of pay awards. Based on long term historical analysis of the membership in LGPS funds, the salary increase assumption at the 2013 valuation has been set to 1% above the retail prices index (RPI) per annum.

c) Pension increases

Since 2011 the consumer prices index (CPI), rather than the retail price index (RPI), has been the basis for increases to public sector pensions in deferment and in payment. This change was allowed for in the valuation calculations as at 31st March 2010. Note that the basis of such increases is set by the Government, and is not under the control of the Fund or any employers.

As at the previous valuation, we derive our assumption for RPI from market data as the difference between the yield on long-dated fixed interest and index-linked government bonds. This is then reduced to arrive at the CPI assumption, to allow for the “formula effect” of the difference

between RPI and CPI. At this valuation, we used a reduction of 0.8% per annum. This is a larger reduction than at 2010, which will serve to reduce the value placed on the Fund's liabilities (all other things being equal).

d) 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.

It is acknowledged that future life expectancy and, in particular, the allowance for future improvements in life expectancy, is uncertain. There is a consensus amongst actuaries, demographers and medical experts that life expectancy is likely to improve in the future. Allowance has been made in the ongoing valuation basis for future improvements in line with the CMI 2010 model with peaked improvements and a 1.25% per annum minimum underpin to future reductions in mortality rates. This is a higher allowance for future improvements than was made in 2010.

The combined effect of the above changes from the 2010 valuation approach, is to add

around 1 year of life expectancy on average. 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.

e) General

The same financial assumptions are adopted for all employers, in deriving the past service deficit and the future service rate: 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

Actuarial assumptions/basis

The combined set of assumptions made by the actuary, regarding the future, to calculate the value of **liabilities**. The main assumptions will relate to the **discount rate**, salary growth, pension increases and longevity. More prudent assumptions will give a higher liability value, whereas more optimistic assumptions will give a lower value.

Administering Authority

The council with statutory responsibility for running the Fund, in effect the Fund's "trustees".

Admission Bodies

Employers which voluntarily participate in the Fund, so that their employees and ex-employees are **members**. There will be an Admission Agreement setting out the employer's obligations. For more details (see 2.5).

Common contribution rate

The Fund-wide **future service rate** plus **past service adjustment**. It should be noted that this will differ from the actual contributions payable by individual **employers**.

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.

Deficit

The shortfall between the assets value and the **liabilities** value. This relates to assets and liabilities built up to date, and ignores the future build-up of pension (which in effect is assumed to be met by future contributions).

Deficit repair/recovery period

The target length of time over which the current **deficit** is intended to be paid off. A shorter period will give rise to a higher annual **past service adjustment** (deficit repair contribution), and vice versa.

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.

Discount rate

The annual rate at which future assumed cash flows (in and out of the Fund) are discounted to the present day allowing for future expected investment return. This is necessary to provide a **liabilities** value which is consistent with the present day value of the assets, to calculate the **deficit**. A lower discount rate gives a higher liabilities value, and vice versa. It is similarly used in the calculation of the **future service rate** and the **common contribution rate**.

Employer

An individual participating body in the Fund, which employs (or used to employ) **members** of the Fund. Normally the assets and **liabilities** values for each employer are individually tracked, together with its **future service rate** at each **valuation**.

Funding level

The ratio of assets value to **liabilities** value: for further details (see 2.2).

Future service rate

The actuarially calculated cost of each year's build-up of pension by the current active **members**, excluding members' contributions but including Fund administrative

expenses. This is calculated using a chosen set of **actuarial assumptions**.

Future working lifetime

The average remaining working lifetime of the contributing members, with an allowance in line with the Fund's demographic assumptions, for those members to leave employment prior to retirement.

Gilt

A UK Government bond, i.e. 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 their main use in funding is as an objective measure of solvency.

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.

Liabilities

The actuarially calculated present value of all pension entitlements of all **members** of the Fund, built up to date. This is compared with the present market value of Fund assets to derive the **deficit**. It is calculated on a chosen set of **actuarial assumptions**.

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 101 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).

Past service adjustment

The part of the employer's annual contribution which relates to past service **deficit** repair.

Pooling

Employers may be grouped together for the purpose of calculating contribution rates, so that their combined membership and asset shares are used to calculate a single contribution rate applicable to all employers in the pool. A pool may still require each individual employer to ultimately pay for its own share of **deficit**, or (if formally agreed) it may allow **deficits** to be passed from one employer to another. For further details of the Fund's current pooling policy (see 3.4).

Profile

The profile of an employer's membership or liability reflects various measurements of that employer's **members**, i.e. 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 least every three years 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 three year period until the next valuation is completed.

Scheduled Bodies

Types of employer explicitly defined in the LGPS Regulations, whose employers 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).

Solvency

In a funding context, this usually refers to a 100% **funding level**, i.e. where the assets value equals the **liabilities** value.

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 tax-raising employers in the Fund. Different methods may involve: probability-based modelling of future market movements; longer deficit recovery periods; higher discount rates; or some combination of these.

Theoretical contribution rate

The employer's contribution rate, including both **future service rate** and **past service adjustment**, which would be calculated on the standard **actuarial basis**, before any allowance for **stabilisation** or other agreed adjustment.

Valuation

An actuarial investigation to calculate the liabilities, future service contribution rate and common contribution rate for a Fund, and usually individual employers too. This is normally carried out in full every three years (last done as at 31st March 2013), but can be approximately updated at other times. The assets value is based on market values at the valuation date, and the liabilities value and contribution rates are based on long term bond market yields at that date also.

> Appendix G

Rates and Adjustments Certificate

Following the 2013 valuation, the minimum employer contributions shown in the Statement to the Rates and Adjustments Certificate attached to the 2013 valuation report are based on the deficit recovery periods and phasing periods. An explanation of the “common contribution rate” is given within the Executive Summary on the Last Triennial Valuation on page 31 and also in the glossary on page 104.

Statement to the Rates and Adjustments Certificate

The Common Rate of Contribution payable by each employing authority under regulation 36(4)(a) of the Administration Regulations for the period 1st April 2014 to 31st March 2017 is 32.9% of pensionable pay.

Individual Adjustments are required under regulation 36(4)(b) of the Administration Regulations for the period 1st April 2014 to 31st March 2017 resulting in Minimum Total Contribution Rates expressed as a percentage of pensionable pay are as set out below:

The contributions shown include expenses and the expected cost of lump sum death benefits but exclude early retirement strain and augmentation costs which are payable by Fund employers in addition.

Employer Code	Employer Name	As Per Triennial Valuation March 2013 Minimum Contributions For The Year Ending		
		31st March 2015	31st March 2016	31st March 2017
Gloucestershire County Council and Schools Pool		%	%	%
1	Gloucestershire County Council	15.6% plus £14,035,000	15.6% plus £15,892,000	15.6% plus £17,749,000
77	Finlay Community School	25.9	26.9	27.9
79	Oakwood Primary School	25.9	26.9	27.9
86	Berry Hill Primary	25.9	26.9	27.9
87	Grange Primary	25.9	26.9	27.9
88	Harewood Junior School	25.9	26.9	27.9
93	Gardners Lane School	25.9	26.9	27.9
134	Coopers Edge School	25.9	26.9	27.9
503	Andoversford Primary School	25.9	26.9	27.9
513	Berkeley Primary School	25.9	26.9	27.9
523	BlueCoat C of E Primary School	25.9	26.9	27.9
527	British School	25.9	26.9	27.9
537	Carrant Brook Junior School	25.9	26.9	27.9
588	Glebe Infants School	25.9	26.9	27.9
605	Heron Primary School	25.9	26.9	27.9
642	Minchinhampton Parochial C of E	25.9	26.9	27.9
669	Picklenash County Junior	25.9	26.9	27.9
672	Primrose Hill C of E School	25.9	26.9	27.9
689	St. Gregory's R.C. School	25.9	26.9	27.9
727	Swindon Village County Primary School	25.9	26.9	27.9
732	Tirlebrook School	25.9	26.9	27.9
744	Warden Hill Primary School	25.9	26.9	27.9

continued...

**As Per Triennial Valuation March 2013
Minimum Contributions For The Year Ending**

Employer Code	Employer Name	31st March 2015	31st March 2016	31st March 2017
		%	%	%
760	Cam Woodfield Junior School	25.9	26.9	27.9
803	Barnwood Park Arts College	25.9	26.9	27.9
804	Beaufort School	25.9	26.9	27.9
822	Lakers School	25.9	26.9	27.9
823	Maidenhill School	25.9	26.9	27.9
826	Pittville School	25.9	26.9	27.9
827	Rednock School	25.9	26.9	27.9

Town and Parish Councils Pool

3	Tewkesbury Town Council	23.9	25.2	26.5
6	Painswick Parish Council	23.9	25.2	26.5
13	Stonehouse Parish Council	23.9	25.2	26.5
20	Lydney Town Council	23.9	25.2	26.5
21	Prestbury Parish Council	23.9	25.2	26.5
22	Cirencester Town Council	23.9	25.2	26.5
25	Fairford Town Council	23.9	25.2	26.5
34	Cinderford Town Council	23.9	25.2	26.5
38	Hardwicke Parish Council	23.9	25.2	26.5
39	Shurdington Parish Council	23.9	25.2	26.5
40	Dursley Town Council	23.9	25.2	26.5
42	Bishops Cleeve Parish Council	23.9	25.2	26.5
43	Ashchurch Parish Council	23.9	25.2	26.5
46	Charlton Kings Parish Council	23.9	25.2	26.5
48	Tetbury Town Council	23.9	25.2	26.5
49	Cam Parish Council	23.9	25.2	26.5
50	Nailsworth Town Council	23.9	25.2	26.5
51	Coleford Town Council	23.9	25.2	26.5
52	Wotton-under-Edge Town Council	23.9	25.2	26.5
53	Lechlade Town Council	23.9	25.2	26.5
55	Northleach with Eastington Town Council	23.9	25.2	26.5
58	Brockworth Parish Council	23.9	25.2	26.5
59	Cainscross Parish Council	23.9	25.2	26.5
63	Chalford Parish Council	23.9	25.2	26.5
66	Rodborough Parish Council	23.9	25.2	26.5
72	Hucclecote Parish Council	23.9	25.2	26.5
75	Leonard Stanley Parish Council	23.9	25.2	26.5
80	Berkeley Town Council	23.9	25.2	26.5
443	Newent Town Council	23.9	25.2	26.5
444	Stroud Town Council	23.9	25.2	26.5
168	Kings Stanley Parish Council	23.9	25.2	26.5

continued...

**As Per Triennial Valuation March 2013
Minimum Contributions For The Year Ending**

Employer Code	Employer Name	31st March 2015	31st March 2016	31st March 2017
		%	%	%
Councils				
11	Gloucester City Council	15% plus £2,357,000	15% plus £2,612,000	15% plus £2,867,000
7	Cheltenham B.C.	14.6% plus £2,134,000	14.6% plus £2,540,000	14.6% plus £2,946,000
12	Forest of Dean D.C.	14.3% plus £1,188,000	14.3% plus £1,382,000	14.3% plus £1,576,000
14	Stroud D.C.	13.7% plus £1,515,000	13.7% plus £1,799,000	13.7% plus £2,083,000
18	Tewkesbury B.C.	14.7% plus £1,141,000	14.7% plus £1,337,000	14.7% plus £1,533,000
19	Cotswold D.C.	14.2% plus £1,136,000	14.2% plus £1,338,000	14.2% plus £1,540,000
Individual Employers				
8	Gloucestershire and Severnside Valuation Tribunal	22.1% plus £30,000	22.1% plus £30,000	22.1% plus £30,000
9	Gloucestershire Probation Trust*	30.5		
16	University of Gloucestershire	15.3% plus £1,091,000	15.3% plus £1,091,000	15.3% plus £1,091,000
17	Lower Severn Drainage Board	18.9% plus £52,000	18.9% plus £64,000	18.9% plus £76,000
24	Gloucestershire Deaf Association**	£10,000		
31	Stroud Court Community Trust	23.2% plus £28,000	23.2% plus £28,000	23.2% plus £28,000
35	Police & Crime Commissioner for Gloucestershire	12.8% plus £1,223,000	12.8% plus £1,411,000	12.8% plus £1,599,000
37	Gloucestershire Group Homes	25.2% plus £21,000	25.2% plus £21,000	25.2% plus £21,000
41	Fosseway Housing (Bromford Group)	18.8% plus £778,000	18.8% plus £778,000	18.8% plus £778,000
44	Cotswold Water Park Trust	0% plus £12,000	0% plus £26,000	0% plus £50,000
47	Severn Vale Housing Society	23.9% plus £440,000	23.9% plus £440,000	23.9% plus £440,000
60	Two Rivers Housing	18.1% plus £17,000	18.1% plus £17,000	18.1% plus £17,000
61	Cheltenham Borough Homes Ltd.	18.9% plus £51,000	18.9% plus £51,000	18.9% plus £51,000
62	Gloucestershire Care Services NHS Trust	25.4	25.4	25.4
64	The Order of St. John Care Trust	27.8% plus £111,000	27.8% plus £111,000	27.8% plus £111,000
65	Cotswold Conservation Board	19.5% plus £5,000	19.5% plus £5,000	19.5% plus £5,000
67	Gloucester City Homes	18.4% plus £80,000	18.4% plus £80,000	18.4% plus £80,000

continued...

**As Per Triennial Valuation March 2013
Minimum Contributions For The Year Ending**

Employer Code	Employer Name	31st March 2015	31st March 2016	31st March 2017
		%	%	%
70	Brandon Trust	22.8% plus £28,000	22.8% plus £28,000	22.8% plus £28,000
71	SSE Contracting	19.7	19.7	19.7
73	Enterprise (AOL)	19.7	19.7	19.7
76	Aspire Sports & Cultural Trust	14.9	14.9	14.9
81	Lovell Partnerships	24.8% plus £46,000	24.8	24.8
84	Gloucester Academy	23.4	25.1	26.9
85	Sir Thomas Rich's	27.7	28.5	29.2
94	The Cotswold School	24.7	26.6	28.4
95	Pate's Grammar School	24.3	26.0	27.6
96	Balcarras School	22.4	24.2	26.1
97	Chosen Hill School	23.9	26.1	28.2
98	Cirencester Deer Park	22.3	24.8	27.3
99	The Crypt School	20.3	22.2	24.0
100	High School for Girls	22.2	24.7	27.2
101	Robinswood Primary	22.9	25.4	27.9
102	Cheltenham Bournside	24.6	27.1	29.6
103	Cleeve School	20.3	22.6	24.8
104	Ribston Hall	22.9	25.3	27.8
105	Winchcombe Secondary	26.1	28.3	30.5
106	Stroud High School	22.4	24.0	25.5
107	Charlton Kings Infants	23.8	26.3	28.8
108	Charlton Kings Junior	27.8	30.3	32.8
109	Chipping Campden	22.5	25.0	27.5
110	Cirencester Kingshill	19.8	21.1	22.5
111	Katharine Lady Berkeley's	29.4	30.3	31.2
112	Marling School	22.1	23.9	25.7
113	Sir William Romney's	26.9	29.1	31.2
114	Thomas Keble	23.1	25.4	27.7
115	Springbank Primary Academy	18.7	20.6	22.4
116	Bishops Cleeve Primary	23.4	24.2	25.1
117	Churchdown Village Infants	22.7	23.8	24.8
118	Farmor's School	22.1	24.0	26.0
119	Gotherington Primary	30.9	33.4	35.9
120	Highnam C of E	23.7	24.7	25.6
121	Redmarley C of E	26.8	28.6	30.3
122	Rowanfield Junior	19.5	21.1	22.8
123	St. Mary's Catholic Primary	21.1	22.3	23.6
124	St. Peter's High School & Sixth Form	25.3	27.1	28.9
125	Staunton & Corse Primary	24.8	26.9	29.1

continued...

**As Per Triennial Valuation March 2013
Minimum Contributions For The Year Ending**

Employer Code	Employer Name	31st March 2015	31st March 2016	31st March 2017
		%	%	%
126	Severn Vale Academy	19.4	21.9	24.4
127	All Saints Academy	23.3	23.8	24.4
128	Dene Magna	28.7	31.1	33.5
129	Field Court Infants	27.1	28.2	29.4
130	Field Court Junior	31.6	33.3	34.9
131	St. Dominics Catholic Primary	23.5	26.0	28.5
132	The Rosary Catholic Primary	22.5	25.0	27.5
133	Wyedean School	24.6	26.6	28.5
135	Churchdown Secondary	29.1	31.4	33.8
136	Civica (Glos)	21.6	21.6	21.6
137	Millbrook Academy	25.5	25.5	25.5
138	Tewkesbury Academy	26.0	27.2	28.4
139	Gretton Primary	26.1	26.2	26.4
140	Ubico (Cheltenham Waste)	23.1	23.1	23.1
141	Ubico (Cotswold Waste)	22.5	22.5	22.5
142	Brockworth Primary School	23.6	23.6	23.6
143	Forest E-ACT Academy	29.1	29.1	29.1
144	Greenfield Academy	26.8	28.4	29.9
145	Newent Community School Academy	26.9	26.9	26.9
146	Offas Mead Primary	30.8	31.1	31.5
147	Peak Academy	26.9	27.0	27.0
148	Severn View Primary Academy	28.3	29.3	30.2
149	St. John's C of E (Coleford)	32.1	32.1	32.1
150	The Ridge School	20.6	20.7	20.7
151	Christ Church C of E Primary (Cheltenham)	30.3	31.3	32.3
152	The Dean Academy	28.9	29.3	29.8
153	Civica (FoDDC)	22.7	22.7	22.7
154	Severnbanks Primary School	30.6	30.6	30.6
155	St. David's Primary School	23.6	23.6	23.6
156	Forest View Primary	29.6	29.9	30.2
157	Bourton on the Water Primary Academy	27.3	27.3	27.3
410	Cotswold Archaeological Trust Ltd	22.5% plus £29,000	22.5% plus £29,000	22.5% plus £29,000
442	Gloucestershire Airport Ltd	21.7% plus £148,000	21.7% plus £148,000	21.7% plus £148,000
900	Gloucestershire College	18.8% plus £598,000	18.8% plus £621,000	18.8% plus £645,000
904	Hartpury College	20.2	20.2	20.2
905	Cirencester Tertiary College	21.8	21.8	21.8

*Gloucester Probation Trust transferred out of the Fund during the year 2014/15. The rate shown above applies for the period from 1st April 2014 until the employer left the Fund.

**Payments for Gloucestershire Deaf Association are set out in a separate legal agreement and are required in addition to the payments set out in the Rates and Adjustments Certificate.

Further comments

Contributions expressed as a percentage 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 augmentation using methods and factors issued by me from time to time.

Further sums may be required to be paid to the Fund by employers to meet the capital costs of any ill-health retirements that exceed those included within my assumptions.

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.

Ill health liability insurance

Note that, if an employer has ill health liability insurance in place with a suitable insurer and provides satisfactory evidence to the administering authority, then their Minimum Total Contribution Rate may be reduced by the minimum of their insurance premium and ill health budget, for the period the insurance is in place.

Statement of Investment Principles

> Gloucestershire County Council Pension Fund

1. Introduction

The Local Government Pension Scheme (LGPS) was established in accordance with statute to provide death and retirement benefits for all eligible employees.

The County Council is the designated statutory body (Administering Authority) responsible for administering the Gloucestershire LGPS Fund on behalf of its scheduled and admitted bodies. The Council is responsible for setting investment policy, appointing suitable persons to implement that policy and carrying out reviews and monitoring of investments and performance.

The Council have delegated the duties of the Administering Authority to the Pension Committee, whose role it is to advise the full Council on any matter relating to the proper management and maintenance of the Gloucestershire Pension Fund.

The Committee can appoint investment advisors and consultants to assist them in this role.

The Committee has delegated the day-to-day management of the Fund's investments to professional investment managers, whose activities are governed by Investment Management Agreements.

The LGPS (Management and Investment of Funds) Regulations 2009 require administering authorities to prepare, maintain and publish a written statement of the principles governing decisions about the investment of fund

money. These regulations also require the statement to state the extent to which the administering authority complies with guidance given by the Secretary of State and to the extent the authority does not so comply, the reasons for not complying. This guidance consists of the six updated Myners' principles for pension fund investment, scheme governance, disclosure and consultation as detailed in the CIPFA publication "investment decision making and disclosure".

This Statement of Investment Principles was last updated at August 2012.

2. Investment Responsibilities

The Pension Committee's duties in relation to investments are:

- To set the investment policies of the Fund, including the establishment and maintenance of a strategic benchmark for asset allocation, drawing upon appropriate professional advice.
- To appoint and review the performance of all Fund Managers and associated professional service providers.
- To consider any other matter relevant to the proper operation and management of the Fund.
- To approve and keep under review the Funding Strategy Statement.
- To approve and keep under review the Statement of Investment Principles.

- To report annually to County Council.

Officers are responsible for:

- Supporting and advising the Pension Committee in all the above.
- Ensuring compliance with all relevant investment legislation.
- Liaising with Investment Managers, Custodian and Investment Advisors.

The Investment Managers are responsible for:

- The investment of the Fund's assets in compliance with the prevailing legislation, their investment management agreement and this statement.
- Tactical asset allocation around the strategic benchmarks set out in this statement.
- Stock selection within asset classes.
- The Fund's assets under their management.
- Constructive shareholder engagement and shareholder voting in matters of socially responsible investment and the promotion of good corporate governance.
- Providing monthly valuations of the Fund's assets under their management with details of all transactions during that month.
- Preparation of compliance statements with respect to this statement insofar as it relates to the investment managers' services to the Fund.

The Custodian is responsible for:

- The custody of the Fund’s assets.
- Settlement of all investment transactions, collection of all income and making tax reclaims.
- Reconciliation of asset, transaction and dividend records with the investment fund managers.

The Pension Committee appointed BNY Mellon as the Fund’s global custodian in July 2004.

The Investment Advisor is responsible for:

- Assisting the Pension Committee in the selection and appointment of investment fund managers and custodian.
- Assisting the Pension Committee in their regular monitoring of the investment managers’ performance.
- Advising on strategic asset allocation and benchmarks.
- Advising the Pension Committee on investment and market developments, corporate governance and socially responsible investment issues.

The Pension Committee appointed an independent investment advisor in October 2003.

3. Investment Policy

The long-term investment objectives for the Fund are to:

- Maximise investment returns over the long-term within an acceptable level of risk judged by the Pension Committee to be appropriate.
- Ensure that sufficient assets are readily available to meet liabilities as they fall due.
- Aim for long-term stability in the employers’ contribution rates.
- Achieve and maintain funding

levels at, or close to, 100% of the Fund’s liabilities.

The investment style is to appoint expert investment managers with clear performance benchmarks set against specific investment indices, and place maximum accountability for performance against those benchmarks on the investment managers.

The Pension Committee has approved specialist investment mandates covering UK Equity, Global Equity, Emerging Market Equity, Global Fixed Interest and Property (as detailed in the table below).

The managers’ fees are either an *ad valorem* fee, i.e. a percentage of the value of the funds they manage or a combination of an *ad valorem* and a performance related fee. The principle of performance related fees is based on a lower base fee element and a performance fee which is paid if they achieve or exceed their performance target.

Following an asset/liability study and a strategy review in 2011 a number of changes were made to the Fund’s investment strategy and

strategic asset allocation. These involved the following –

- A reduction in UK equities and an increase in global equities.
- An increase in emerging market equities.
- A change in the benchmark index used for global equities.
- A movement of part of the Fund’s bond (fixed interest) portfolio into an absolute return bond strategy.
- Appointment of a property multi manager.
- Managing the emerging markets portfolio on an index tracking rather than an active basis.

There was also a strategic asset review in August 2012 which moved part of the Fund’s bond (fixed interest) portfolio into a pooled multi asset (absolute return) fund.

The following table shows the Fund’s current asset allocation compared to the previous allocations. All figures are shown as a percentage of the Fund.

Effective from:	1st Dec 2008 %	1st Dec 2011 %	1st Dec 2012 %
UK Equities	25.0	20.0	20.0
Global Equities (including UK & excluding Emerging Markets)	15.0	17.5	17.5
Global Equities (excluding UK & Emerging Markets)	21.3	0.0	0.0
Global Equities (including UK & Emerging Markets)	0.0	23.5	23.5
Pooled Multi Asset	0.0	0.0	5.0
Bonds (Fixed Interest)	25.0	27.0	22.0
Property	10.0	7.5	7.5
Emerging Market Equities	3.7	4.0	4.0
Cash & Venture Capital	0.0	0.5	0.5
Total	100.0	100.0	100.0

Mandate	Manager	Benchmark
UK Equities	Standard Life	FTSE All Share
Global Equities inc UK	GMO	MSCI World Index
Global Equities inc UK & Emerging Markets	BlackRock	MSCI All Countries World Index (ACWI)
Pooled Multi Asset	Standard Life	6 month Sterling Libor + 5%
Global Fixed Interest	Western Asset	Composite UK/Overseas
Global Fixed Interest	Western Asset	3 month Sterling Libor + 2%
Property	Hermes Property Asset Management	IPD UK Pooled Property Balanced PUT Index
Property	CBRE Investors	IPD All Balanced Property Fund Index
Emerging Markets	BlackRock	MSCI Emerging Markets Index

These changes have resulted in the Fund's total exposure to Emerging Market equities increasing from 3.7% to 7.0%, its total exposure to bonds reducing from 27.0% to 22.0% and its total exposure to UK Equities reducing from 26.4% to 23.5%.

The table above details the Fund's managers, their mandates and their relevant performance benchmarks.

There are also investments with Yorkshire Fund Managers, a specialist private equity/venture capital manager, in two of their funds, as follows –

- South West Region Venture Capital Fund - supporting fast growing SME's across the South West region. £2.5m maximum commitment.
- Chandos Fund - identifies modestly priced, conservatively geared businesses which can provide medium term value growth. £3m maximum commitment.

The investment managers may, subject to the limitations of legislation, their management

contract and this statement, invest in those assets to which their specialist mandates relate. This enables the Fund to:

- Receive specialist advice from the managers on the strategies each is following.
- Monitor the performance of the asset allocations agreed by the Committee as being appropriate to the Gloucestershire Fund.
- Develop performance benchmarks appropriate to the Fund's objectives.
- Monitor the performance of the managers against specific performance measures.

"Rebalancing" between asset classes is considered every quarter. Rebalancing will usually be achieved through the adjustment of the cash flow to each manager, but where absolute differences of 3% or more arise then rebalancing will be achieved by moving cash between asset classes.

The Fund continues to hold a greater proportion of its assets in equities, which are currently considered to provide the most appropriate match with the Fund's

liabilities and should provide a better long-term return than fixed interest investments.

Based on assumptions used by the Fund's actuary, estimated returns for the major asset classes as at March 2010 were:

Equities	7.8% per annum
Bonds	5.0% per annum
Property	5.8% per annum

4. Performance Management

As well as overall Fund performance, the Committee considers the individual investment managers performance against their index benchmarks on a quarterly basis. In addition, the investment advisor and officers are in regular contact with investment managers over performance. This process is also assisted by the Fund's custodian and the GS Performance Services who review and analyse Fund and manager performance.

5. Risk Management

The Fund controls risk through its strategic asset allocation policy which achieves a wide

diversification of investments across a selection of managers and by monitoring the risk inherent in managers' performance. When setting individual manager's performance targets, independent advice is taken on the appropriateness of the target for that portfolio and in relation to the Fund's overall investment and funding objectives. Investment managers are also required to implement appropriate risk management measures and to operate in such a way that the possibility of undershooting the performance target is kept within acceptable limits. This will include an appropriately diversified portfolio of holdings.

Investment managers make quarterly reports to the Pension Committee on investment performance, book and market values of investments and transaction details.

Investment manager performance against benchmark is reviewed quarterly by the Fund's custodian and GS Performance Services who analyse fund performance. There is also an annual review of the Fund's performance against benchmarks and other Funds.

6. Realisation of Investments

The Fund has a positive cash flow and therefore has no present requirement to realise assets in order to meet its liabilities. However, the Fund is structured so that the majority of investments held could be quickly realised if required. Investments are sold as part of normal investment management activities.

7. Socially Responsible Investments (SRI)

With regard to socially responsible investment the Committee has to take account of the following legal principles that apply to all pension schemes:

- Administering authorities are free to adopt a policy of socially responsible investment, providing that they treat the financial interests of all classes of scheme members as paramount and their investment policies are consistent with the standards of care and prudence required by law.
- Administering authorities are not entitled to subordinate the interests of members to ethical or social demands. The financial performance of the Fund, proper diversification and prudence are paramount.
- Administering authorities may avoid certain kinds of prudent investment which they consider scheme members would regard as objectionable so long as they make equally financially advantageous and prudent investments elsewhere. They may also make "ethical" investments provided these are otherwise justifiable on investment grounds.

Where the Committee invests in a pooled fund it is not possible to require the avoidance of certain kinds of investments within that fund.

As a responsible investor, the Pension Committee supports corporate social responsibility, good practice and improved company performance amongst all companies in which the Fund invests via a segregated fund. In furtherance of these policies the Committee would wish the investment managers to be active in their constructive shareholder engagement with these companies regarding socially responsible investment issues but recognises this will not be possible where an investment manager uses quantitative methods of share selection without engaging directly with companies.

Issues that should be addressed include:

- Environmental issues.

- Employment standards.
- Human rights.
- Community involvement.

Investment managers should report such discussions/ involvement as part of their quarterly reports to the Pension Committee.

8. Corporate Governance

Corporate governance is defined as "the system by which companies are controlled and directed". Effective corporate governance ensures checks and balances in company management without restricting necessary incentives. Pension funds, as major shareholders, should promote good corporate governance as a means of ensuring good performance. The UK Steering Committee on Local Government Pensions (UKSC), Chartered Institute of Public Finance and Accountancy (CIPFA), Pension and Investment Research Consultants (PIRC) and the National Association of Pension Funds (NAPF), all advise pension funds to ensure voting rights are used to promote good corporate governance.

PIRC have established the following principles for corporate governance policy:

- Shareholders should assume the responsibility of ownership.
- Shareholders' voting rights are an asset, which need managing.
- Shareholders' voting rights should be exercised in an informed and independent manner.
- Shareholders' voting policies should reflect three main concerns:
 - To protect their rights as shareholders.
 - To ensure that corporate governance standards are consistent with protecting assets.

- To promote corporate governance standards in order to enhance long term value.

The Pension Committee supports the principles of best practice in corporate governance and delegates authority to the investment managers to exercise these voting rights in line with NAPF or PIRC or other proxy voting guidelines which are detailed in the investment managers' Investment Management Agreement.

Investment managers should report their voting actions as part of their quarterly reports to the Pension Committee.

9. Stock Lending

The Pension Fund allows stock held within its segregated portfolios to be lent out but only to borrowers approved by the Pension Committee. The Committee have agreed a list of approved borrowers and this lending is managed on behalf of the Fund by its global custodian. The borrowers are required to provide collateral to protect the Fund's assets and the Fund receives income from this lending.

10. Cash Management

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 will be invested separately from Gloucestershire County Council monies, with the Fund receiving the actual interest earned and bearing the risk of any investment. Pension Fund investments will mirror the same criteria for counterparties, etc, as approved by Gloucestershire

County Council and detailed in their Treasury Management Strategy.

In addition, no Pension Fund cash will be lent for periods exceeding 3 months. Also, a minimum of £1.5 million will be held on call and the remaining balance will be managed to reflect projected Pension Fund cash flows, daily cash requirements and the quarterly rebalancing of the Pension Fund.

The Treasury Management team will advise officers of actual Pension Fund lending activity on a monthly basis and will also advise if there is any proposed change in their Treasury Management Strategy.

11. Compliance

The Statement of Investment Principles is available on the Pension Fund pages of the County Council's website at

www.gloucestershire.gov.uk/pensionsinvestments

and is included in the Pension Fund's Annual Report which is published every November.

The Pension Committee will on a quarterly basis review:

- o The investment performance of the Fund, both in total and by individual investment fund manager.
- o The qualitative performance of the investment fund managers - this will include changes in ownership of the organisation, changes in personnel managing the Fund and the quality and timeliness of information from the manager.
- o The need to re-balance between asset classes to maintain the strategic asset allocation at its agreed level.

The Pension Committee will review the Fund's strategic asset allocations (and associated risks), at least every three years, following the triennial valuation.

The Pension Committee, representing the Administering Authority, is required to state the extent to which it complies with guidance given by the Secretary of State on the following six Myners' investment principles:

Response to Myners' Principles

Principle 1: Effective Decision Making

Administering authorities should ensure that:

- o *decisions are taken by persons or organisations with the skills, knowledge, advice and resources necessary to make them effectively and monitor their implementation; and*
- o *those persons or organisations have sufficient expertise to be able to evaluate and challenge the advice they receive and manage conflicts of interest.*

Fund Compliance - Full

The Fund has a clear governance policy setting out the role of the Pension Committee, its officers and advisors as well as details of equal access to allowances, committee papers and training and publishes a governance compliance statement.

Account is taken wherever possible of relevant skills, experience and continuity when making appointments to the committee and the Chief Financial Officer ensures the training needs of committee members are identified, an annual training plan is prepared and training logs are maintained for members. The Committee uses the skills and knowledge framework published by CIPFA when developing future training plans and uses the CIPFA trustee toolkit.

An annual business plan is produced and considered by the

committee which includes major milestones, financial estimates, key targets and a review of the level of resources needed by the Committee to carry out its functions effectively.

The Committee publishes an administration strategy which refers to the relationship and communication between the committee and scheme employers as well as its governance policy including skills and knowledge.

Principle 2: Clear Objectives

An overall investment objective(s) should be set out for the Fund that takes account of the scheme's liabilities, the potential impact on local taxpayers and the attitude to risk of both the Administering Authority and scheme employers and these should be clearly communicated to advisors and investment managers.

Fund Compliance - Full

The Fund's Statement of Investment Principles (SIP) and Funding Strategy Statement (FSS) sets out its investment objectives which are agreed after consultation with the fund actuary and take account of cash flow and the fund's relatively immature liabilities and the secure nature of most employers' covenants.

The investment strategy is reviewed following the triennial valuation with advice from specialist independent advisors.

After taking advice from the Actuary the Chief Financial Officer and the Committee consider the impact of funding levels and employer contribution rates on council tax levels over time and aim to keep employer contribution rates as stable as possible.

Following discussions with the Actuary it has been decided not to

establish sub funds with different investment objectives.

Fund managers are set individual performance targets and benchmarks based on advice from an independent advisor and their performance is measured and reviewed by the Committee on a quarterly basis.

These benchmarks and the Fund's asset allocation are reviewed by the Committee, with the most recent change in December 2012.

In addition an external strategic asset review takes place following the triennial actuarial valuation and at this stage the Committee will also decide whether to commission an asset liability modelling study.

When necessary, the external procurement of investment managers etc. is conducted within the EU procurement regulations and the authority's own procurement rules.

The Committee are made aware of investment management fees and other transaction related costs and appropriate actions are taken to reduce these costs where possible.

Principle 3: Risk and Liabilities

In setting and reviewing their investment strategy, administering authorities should take account of the form and structure of liabilities.

These include the implications for local tax payers, the strength of the covenant for participating employers, the risk of their default and longevity risk.

Fund Compliance - Full

The Committee in setting its investment strategy, as detailed in its SIP and FSS, has taken account of the form and structure of its liabilities following advice from the fund's actuary and believes its funding and investment

policies balance the key objectives of stability of contributions, affordability for employers, transparency of process and prudence.

The Fund's overall long term investment target is expressed as a return in excess of index linked government bonds. The Committee recognises the possibility of volatility in market conditions and given the proportion of equities held by the Fund, in the short to medium term, accepts returns can fall short of the Fund's investment target.

The Fund's SIP describes the risk assessment process when considering current and future investments and all the key risks relevant to the Pension Fund are also detailed in the FSS and are maintained on a risk register. These risks are considered as part of the annual review of the FSS by the Committee and if at any other time there is a significant change in the Fund's risk profile appropriate recommendations to mitigate the risk are made to the Committee. As part of the triennial valuation the Actuary will produce a risk assessment relating to the valuation of the Fund's liabilities and assets and will analyse and advise on factors affecting its long term performance.

The Pension Fund Annual Report includes an overall risk assessment relating to the Fund's activities.

Principle 4: Performance Assessment

Arrangements should be in place for the formal measurement of performance of the investments, investment managers and advisors.

Administering Authorities should also periodically make a formal assessment of their own effectiveness as a decision-making body and report on this to scheme members.

Fund Compliance - Full

In addition to overall Fund performance, the Committee considers the individual investment managers performance against their index benchmarks on a quarterly basis. This quarterly data is verified by the Fund's global custodian and by GS Performance Services. When appointing a new manager the Committee takes advice from its independent investment advisor and other external advisors on the appropriate index benchmark to be used and to ensure it will support the Fund's overall investment strategy.

The Committee recognises active fund management can result in performance diverging from benchmark and therefore considers manager performance over the long term. As a minimum this is on a rolling 3 year basis but is also from inception, which for most managers is currently 5 years.

The Fund obtains regular performance reports from GS Performance Services comparing both its overall performance and by asset class with other Local Government Pension Funds. The Fund also receives comparative performance data from its global custodian.

The Fund's actuaries and advisors are assessed on an ongoing basis in relation to cost, quality and consistency of advice. The Committee will also include its own performance expectations on e.g. reviews of governance, achievement of training and attendance targets, in its business plan. This assessment will be included in the Fund's Annual Report.

Principle 5: Responsible Ownership

Administering Authorities should:

- adopt, or ensure their

investment managers adopt, the Institutional Shareholders' Committee Statement of Principles on the responsibilities of shareholders and agents.

- include a statement of their policy on responsible ownership in the Statement of Investment Principles.

- report periodically to scheme members on the discharge of such responsibilities.

Fund Compliance - Full

Where the Institutional Shareholders Committee Statement of Principles (SCSP) are applicable, the Fund ensures its investment managers adopt these principles.

The Fund's policies on socially responsible investments (SRI) and corporate governance are shown in its SIP and the Fund's Annual Report contains details of how these responsibilities are discharged.

When selecting investment managers for appointment and once appointed, when discussing their subsequent performance, the Committee consider the potential for environmental, social and governance issues to add value.

The Fund delegates authority to fund managers to exercise voting rights in line with NAPF and PIRC guidelines and the managers are required to report their voting actions as part of their quarterly reports to the Committee.

Principle 6: Transparency and Reporting

Administering Authorities should:

- act in a transparent manner, communicating with stakeholders on issues relating to their management of investment, its governance and risks, including performance against stated objectives.

- provide regular communication

to scheme members in the form they consider most appropriate.

Fund Compliance - Full

The Fund publishes the following policy statements on its website www.gloucestershire.gov.uk/pensionsinvestments and in its Annual Report:

- Statement of Investment Principles (SIP).
- Funding Strategy Statement (FSS).
- Governance Policy Statement.
- Governance Compliance Statement.
- Communications Policy Statement.

The Communications Policy Statement contains details of the Fund's policy on: providing information about the scheme to members and employers; the format, frequency and method of distributing such information; the promotion of the scheme to prospective members and their employing authorities.

In addition to the Annual General Meeting held each November to which all scheme members and employers are invited, the Administering Authority holds Employer Forums at least twice a year and invites all scheme employers.

The SIP fully describes: the roles of members, officers, investment managers, etc.; the investment monitoring process; the asset allocation and investment returns; individual mandates; fee structures.

The Governance Compliance Statement details compliance with CLG guidance and if not fully compliant details why not and a copy of the statement is sent to CLG.

Communications Policy

The following Communications Policy Statement outlines how the Fund communicates with scheme members, their representatives and employers and was reviewed in August 2015.

All employers are instructed to issue new employees with a pensions starter pack based on a template 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.

Employers are informed of their duty to automatically admit new employees, where relevant, unless they specifically request not to.

During 2014/15 the Pension Fund communicated with scheme members, their representatives and employers as set out in the policy statement overleaf.

> Communications Policy Statement

Various means are employed to communicate with the Fund's stakeholders. These are described in respect of each interested group as shown below:

Members of the Scheme

An Annual Meeting is held each November 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 all of the Fund's policy statements covering Funding Strategy, Investment Principles, Governance, Communication and Administration. In addition, each policy statement is listed separately on the website.

All pensioner members receive a pension newsletter each May 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 Funds Annual Meeting and details on how to access the annual report and accounts.

Pay slips are also sent where there is a material change in the pension paid during a particular 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.

When invited by the employing authority, pensions staff visit employers premises to explain and promote membership of the scheme.

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 revisions to the Funds strategy and policy documents - the Statement of Investment Principles, 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 DCLG, 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.

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.

Quarterly 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.

Summary of Fund Benefits, Membership and Beneficiaries

Introduction

The Gloucestershire Pension Fund is administered under the Local Government Pension Scheme (LGPS) Regulations. As part of the Governments reform of public sector pensions, a new LGPS was introduced from 1st April 2014. The principal change to the scheme was the move from benefits being calculated on a “final salary” basis, to benefits being 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 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, phone (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 pre 1st April 2008 membership will provide 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.
 - 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).
- 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”.
- Widows/Widowers & Dependants Pensions - Widow(er)s pension and/or eligible children’s pensions payable in the event of a scheme member’s death.
- Partners Pensions – Partner pension payable to eligible partner.
- Lump Sum Death Grant - In the event of death in service, a lump sum death grant of three times 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).

o 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 2014) of £6,500);

- making additional voluntary contributions to Prudential's in-house AVC arrangement to provide an additional pension benefit at retirement.

Beneficiaries

Membership summary by type of employer

	Pensioners	Widow(er)s/ Dependants	Deferreds	Contributors
County Council (including non academy schools)	7,144	1,064	10,609	9,390
District Councils	2,502	586	2,515	1,703
Academies	149	14	806	3,152
Colleges	790	75	1,912	1,674
Other Scheduled Bodies	528	77	808	1,039
Admitted Bodies	733	57	551	1,183
Total	11,846	1,873	17,201	18,141

In addition, at 31st March 2015, there were 2,733 undecided leavers; members who are no longer accruing service and to whom a refund of contributions or transfer out may be due.

Other Appropriate Material

Employer Summary

Please find listed below a summary of the number of employers in the Fund during 2014/15 analysed by scheduled bodies and admitted bodies which were active (with active members) and ceased (no active members) during the year.

	Active at 1st April 2014	New Actives	Ceased	Total at 31st March 2015
Scheduled body	138*	6	2	142
Admitted body	31	4	-	35
Total	169*	10	2	177

* Re-stated from last year.

Analysis of Fund Assets as at 31st March 2015

	UK £m	Non UK £m	Global £m	Total £m
Equities	364.5	763.9	-	1,128.4
Bonds	318.0	37.2	-	355.2
Property (direct holdings)	-	-	-	-
Alternatives*	112.0	11.7	-	123.7
Cash and cash equivalents	20.6	2.4	-	23.0
Other**	-	-	78.8	78.8
Total	815.1	815.2	78.8	1,709.1

Analysis of Investment Income Accrued During the Reporting Period

	UK £000	Non UK £000	Global £000	Total £000
Equities	11,081	-	-	11,081
Bonds	7,551	263	-	7,814
Property (direct holdings)	-	-	-	-
Alternatives*	4,501	113	-	4,614
Cash and cash equivalents	109	-4	-	105
Total	23,242	372	-	23,614

*Alternatives are taken to mean holdings in private equity, hedge funds, pooled property funds, infrastructure funds and derivatives.

** Other denotes assets not falling into any other category such as investments in vehicles where the underlying investments may comprise of assets of more than one type.

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 or the pension scheme.

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 - A price at which a security or a unit in a pooled fund can be sold.

Offer - A price at which a security or a unit in a pooled fund can be purchased.

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 particular households it represents, 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 N17, page 57.

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.

The Myners Review

The review of issues and challenges affecting institutional investment decision making carried out by Paul Myners on behalf of the UK Government, which was published in 2001. A key recommendation was that pension fund trustees should embrace a set of principles now known as the Myners Code.

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.

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 Earnings

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 and corporate social responsibility.

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 standard 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. The activities of life companies are regulated by the FSA.

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 FSA.

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.

Notes



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