



# PENSION COMMITTEE

THURSDAY, 25 NOVEMBER 2021

10.00 AM COUNCIL CHAMBER, COUNTY HALL, LEWES

MEMBERSHIP - Councillor Gerard Fox (Chair)  
Councillors Julia Hilton, Ian Hollidge, Paul Redstone and David Tutt

## A G E N D A

1. Minutes (*Pages 3 - 14*)
2. Apologies for absence
3. Disclosure of Interests  
Disclosures by all Members present of personal interests in matters on the agenda, the nature of any interest and whether the Members regard the interest as prejudicial under the terms of the Code of Conduct.
4. Urgent items  
Notification of items which the Chair considers to be urgent and proposes to take at the appropriate part of the agenda.
5. Pension Board Minutes (*Pages 15 - 24*)
6. Governance Report (*Pages 25 - 32*)
7. Employer Engagement Report (*Pages 33 - 38*)
8. Pensions Administration report (*Pages 39 - 50*)
9. East Sussex Pension Fund Annual Report and Accounts 2020/21 (*Pages 51 - 150*)
10. East Sussex Pension Fund Quarterly Budget Report (*Pages 151 - 154*)
11. Training Report (*Pages 155 - 158*)
12. Risk Register (*Pages 159 - 170*)
13. Work programme (*Pages 171 - 186*)
14. Investment Report (*Pages 187 - 234*)
15. Any other non-exempt items previously notified under agenda item 4
16. Exclusion of the public and press  
To consider excluding the public and press from the meeting for the remaining agenda item on the grounds that if the public and press were present there would be disclosure to them of exempt information as specified in paragraph 3 of Part 1 of the Local Government Act 1972 (as amended), namely information relating to the financial or business affairs of any particular person (including the authority holding that

information).

17. Investment Report (*Pages 235 - 430*)
18. Breaches Log (*Pages 431 - 436*)
19. Employer Admissions and Cessations (*Pages 437 - 444*)
20. Any other exempt items previously notified under agenda item 4

PHILIP BAKER  
Assistant Chief Executive  
County Hall, St Anne's Crescent  
LEWES BN7 1UE

17 November 2021

Contact Harvey Winder, Democratic Services Officer,  
01273 481796  
Email: [harvey.winder@eastsussex.gov.uk](mailto:harvey.winder@eastsussex.gov.uk)

NOTE: *As part of the County Council's drive to increase accessibility to its public meetings, this meeting will be broadcast live on its website and the record archived. The live broadcast is accessible at: [www.eastsussex.gov.uk/yourcouncil/webcasts/default.htm](http://www.eastsussex.gov.uk/yourcouncil/webcasts/default.htm)*

## PENSION COMMITTEE

MINUTES of a meeting of the Pension Committee held at County Hall, Lewes on 28 September 2021.

---

PRESENT Councillor Gerard Fox (Chair); Councillors Julia Hilton, Ian Hollidge, Paul Redstone and David Tutt

ALSO PRESENT Ray Martin, Chair of the Pension Board  
Ian Gutsell, Chief Finance Officer  
Sian Kunert, Head of Pensions  
Paul Punter, Head of Pensions Administration  
Dave Kellond, Compliance and Local Improvement Partner  
Michael Burton, Pensions Manager - Governance and Compliance  
Nigel Chilcott, Audit Manager  
Danny Simpson, Principal Auditor  
William Bourne, Independent Adviser  
David O'Hara, ISIO  
Andrew Singh, ISIO  
Martin Jenks, Senior Scrutiny Adviser  
Harvey Winder, Democratic Services Officer

### 30. MINUTES

30.1 The Committee RESOLVED to:

- 1) agree the minutes of the meeting held on 12<sup>th</sup> July 2021 were a correct record subject to adding a clarification to minute 25.3, bullet point 2 as follows: “the recommendation is to divest from the top 200 companies identified as the Carbon Underground 200 List, i.e., the top 100 oil & gas and top 100 coal publicly traded fossil fuel reserve holders globally ranked by the potential carbon emissions content in their reported reserves.”
- 2) clarify that the report requested under 25.5 should include a request for confirmation whether the two Absolute Return managers could meet their long-term investment strategy objectives if they were to divest from their current fossil fuel holdings.

### 31. APOLOGIES FOR ABSENCE

31.1 There were no apologies for absence.

## 32. DISCLOSURE OF INTERESTS

32.1 Cllr Tutt declared a personal, non-prejudicial interest in item 10 as the Leader of Eastbourne Borough Council.

## 33. URGENT ITEMS

33.1 There were no urgent items

## 34. PENSION BOARD MINUTES

34.1 The Pension Committee considered the minutes of the Pension Board meeting held on 14<sup>th</sup> September 2021.

34.2 The Board RESOLVED to note the minutes.

## 35. GOVERNANCE REPORT

35.1 The Committee considered a report providing an update on various governance workstreams completed and changes effecting the Local Government Pension Scheme (LGPS) and East Sussex Pension Fund (ESPF or the Fund).

35.2 It was clarified that all contracts for external advisers include a requirement for the external adviser to notify the Fund of any conflicts of interest. There is confidence that external advisers are compliant with this requirement, for example, Isio has a strict internal process in place to report any conflicts as soon as they arise. The Committee suggested the requirement to sign off a conflict of interest form on an annual basis would bring external advisers in line with Councillors, Board members and employees.

35.3 The Committee RESOLVED to:

- 1) Note the report;
- 2) Approve the changes to the conflict of interest policy (Appendix 1) subject to the addition of a requirement that external advisers should submit an annual conflict of interest form; and
- 3) Approve the changes in relation to General Data Protection Regulation (GDPR) on the Fund's Privacy notices (Appendices 3 & 4)

## 36. PENSIONS ADMINISTRATION REPORT

36.1 The Committee considered a report providing an update to the Pension Committee on matters relating to Pensions Administration activities.

36.2 The Committee's discussion included the following key issues:

- The Pensions Administration Team (PAT) has around 7-9 vacancies out of a Team of 35 Full Time Equivalent posts. The portion of the team focussed on business-as-usual work has only a couple of vacancies, with the majority of the vacancies falling in the project side of the team. The PAT had support from Surrey County Council, through the old Orbis arrangement up until the end of June but is now in the position of needing to outsource some one-off projects.. The vacancies have not affected the Team's ability to deliver the Annual Benefit Statement (ABS) project and maintain service levels at the standard set out in its Key Performance Indicators (KPIs), however, the PAT is aware of

the risks vacancies pose to the service and is very focussed on filling these posts by the end of the year.

- East Sussex County Council (ESCC) needs a contract in place with Mercer in order for it to complete the Guaranteed Minimum Pension (GMP) Reconciliation project. This is because Mercer's existing contract was with Orbis, for the six local authorities Orbis provided pensions administration for, and Mercer cannot divulge scheme data to an 'outside organisation', which ESCC would be under the current contract. Mercer initially rejected ESCC's standard contract and ESCC rejected Mercer's, however, it is expected that agreement will be reached in the next few weeks.
- The PAT queried around 2,500 points of member data sent through from employers during the most recent ABS, around 20% of data received, and went back with queries to around 60 employers. It is expected that once all employers are on iConnect, there will be far fewer issues. There are also a number of employees listed on the system as casuals with no earning for the year who will be removed from the system before the next issuing of the ABS. The Pension Board and Committee will consider at the next meetings in November whether the fact 100% of ABS were not issued by the deadline constitutes a breach of regulations that needs to be reported to the Pensions Regulator.

36.3 The Committee RESOLVED to note the report.

37. INTERNAL AUDIT REPORT - PENSION FUND ADMINISTRATION - PEOPLE, PROCESSES AND SYSTEMS 2020/21

37.1 The Committee considered The Pension Fund Administration - People, Processes and Systems 2020/21 Internal Audit report.

37.2 The Committee RESOLVED to note the report.

38. INDEPENDENT AUDITOR'S (GRANT THORNTON) REPORT TO THOSE CHARGED WITH GOVERNANCE AND ANNUAL REPORT 2020/21

38.1 The Committee considered by Grant Thornton (Independent Auditor) to those charged with governance, and to report on anticipated unqualified audit opinion on the 2020/21 Pension Fund Accounts.

38.2 It is recommended that no further actions are taken in regard to the issue whereby the discrepancy between the Fund Custodian's estimated value of illiquid funds as at the end of quarter 3 and the outturn value at quarter 4 reported by the fund manager is causing an immaterial breach. This method of reporting external valuations of the Fund's asset classes in the accounts is standard practice elsewhere and is part of Chartered Institute of Public Finance and Accountancy (CIPFA) best practice. It is also a common occurrence, and whilst large this time may in future be a lower value if the value of illiquid assets increases by less than 1% of the value of the Fund over the Quarter, i.e., approximately £41m – although as more assets are moved into this class, the chance of a material breach increases. Grant Thornton advised a note could be added to the accounts to explain that the latest available value will always be a Quarter behind the final report, and it is recommended this is the extent of the action that should be taken.

38.3 The Committee RESOLVED to:

36. 1) Note the draft Independent Auditor's (Grant Thornton) report to those charged with governance on Pension Fund Accounts 2020/21 (Appendix 1);

37. 2) Approve the Pension Fund Accounts for inclusion in the authorities Accounts (Appendix 2).

#### 39. EMPLOYER ENGAGEMENT REPORT

39.1 The Committee considered a report providing updates on employer engagement activities including communications and the collection of employer and member contributions up to June 2021 which were due on 19 July 2021.

39.2 The Committee RESOLVED to note the report.

#### 40. REPORT OF THE PENSION BOARD TO THE PENSION COMMITTEE

40.1 The Committee considered a report on the completed work by the Pension Board over the previous year.

40.2 The Committee RESOLVED to note the report from the Pension Board which covers the work completed in year.

#### 41. RISK REGISTER

41.1 The Committee considered the Fund's Risk Register.

41.2 The Committee's discussion included the following key issues:

- There should be a risk added relating to trading issues resulting from the completion of Brexit, for example, border risks such as Northern Ireland; labour shortages; and inflation of food prices.
- The ESPF is far more advanced in how it has structured its portfolio to mitigate climate change risk compared to other Local Government Pension Schemes (LGPS) and has done significant work to lobby government through the Institutional Investors' Group on Climate Change (IIGCC). Further examination of the risk of climate change to the Fund, however, is necessary and this is due to be undertaken in the new year via climate scenario modelling. This will help determine the Fund's best strategy for mitigating risk and the risk register will be updated following this work. This piece of work will look at the impact of various models of temperature change on the financial markets and how this could affect the value of companies that the Fund is invested in, via its fund managers, and the time period over which it will pose a risk. Climate modelling is complex and the Fund's officers are currently liaising with organisations about the best approach to undertaking this work, including speaking to fund managers about how they approached climate modelling that allowed them to publish their Taskforce for Carbon related Financial Disclosure (TCFD) statements.
- There are also potential risks to the Fund from climate change indirectly, for example, the cost to the Fund through its exposure to commercial property and the potential need over the next 15 years to retrofit these assets to meet any national target to decarbonise the economy.

41.3 The Committee RESOLVED to agree the Risk Register subject to officers considering the addition of the following:

- 1) a risk around the transition to new trading arrangements; and
- 2) a review of the climate change following the climate scenario modelling.

## 42. WORK PROGRAMME

42.1 The Committee considered its work programme.

42.2 The Committee RESOLVED to agree its work programme.

## 43. INVESTMENT REPORT

43.1 The Committee considered a report providing an update on the investment activities undertaken by the Fund.

43.2 The Committee's discussion included the following key issues:

- Isio is monitoring Longview's performance closely, however, their performance is not unexpected as their portfolio does less well when technology stocks are high and interest rates are low. The fund manager has had a couple of senior team changes and a junior member left too, which is not a problem at the moment, however, if there are further departures there could be a need for a review of the situation.
- WHEB has underperformed due to not holding sectors like oil and gas that have performed well in the past Quarter. WHEB's benchmark is the MSCI World global equity index. Wellington is using the same benchmark and has not performed as poorly, which shows that despite both being chosen as global impact funds that tilt away from fossil fuels, they have different stock selections, which is beneficial for the risk exposure of the Fund.
- The UBS infrastructure fund has performed poorly in the past quarter in part due to the fine imposed on Southern Water, which comprises a substantial element of the fund in which ESPF has £30m invested. Since its inception, the performance of the fund has been 4.3%, which is lower than many other funds in the portfolio. The strength of the secondary infrastructure market at the moment is very buoyant and the Fund could conceivably sell the UBS infrastructure fund without needing to provide much of a discount.
- UBS are due to set up an index run by Osmosis within the ACCESS pool and transfer the ESPF's passive market cap fund into it, as agreed by the ESPF in June. Osmosis has been working with UBS to come up with a solution where UBS remains the manager within the ACCESS Passive offering, in accordance with the requirements of LGPS pooling, whilst using the Osmosis index to ensure ESPF gets the exposure it wants. However, there have been delays to this process and issues remaining between both parties that means that it will not be completed during October as planned. Further discussions between ESPF, UBS, Osmosis and Isio may be needed to continue to move the process forward.

- The ACCESS pool has commissioned Minerva to develop a high-level set of Environmental, Social and Governance (ESG) principles for all of the 11 LGPS funds in the ACCESS pool to sign up to. There is confidence these will not be lowest common denominator principles and that individual funds generally appear to want to improve their current ESG commitments. ESPF will not need to replace its own ESG investment principles with those of the ACCESS pool if they are less robust.
- All LGPS funds remain sovereign entities but are expected by the Ministry of Housing Communities and Local Government (MHCLG) to make any new investments within their pooled fund unless investing in the pooled fund would compromise the fund's investment principles, or prevent it from achieving its investment strategy, and there is an asset type or product that is only available outside of the pool. Evidence would also need to be supplied that any outside investment is not too costly, or will not take too long to divest from should a similar product become available within the pool. ACCESS is not as developed as other pools, so the Fund took this approach of investing outside the pool when it invested in the ESG focussed equity funds WHEB, Wellington and Storebrand, as ACCESS had no equivalent products within its sub-funds. The MHCLG would also expect individual Funds to influence investments within their pools as a first course of action so that they are able to fulfil their investment strategies and deliver economies of scale through pooling. To this end, there is some evidence that other funds in the ACCESS pool may be interested in the global impact funds that ESPF invested in.
- The Statement of Responsible Investment Principles (SRIP) must be refreshed each year to reflect any decisions taken during the year, however, it is not possible to review in full each year. The Committee discussed reviewing the SRIP on a triennial basis starting from the completion of the triennial valuation of the Fund, the climate simulation work, and the agreement of the ACCESS ESG principles. This work is expected to be completed by the end of 2022.

#### 43.3 The Committee RESOLVED to:

- 1) note the report; and
- 2) Approve the changes to the Investment Strategy Statement (appendix 4); and
- 3) Agree to review the Statement of Responsible Investment Principles (SRIP) on a triennial basis from the end of 2022.

#### 44. EXCLUSION OF THE PUBLIC AND PRESS

44.1 The Committee RESOLVED to exclude the public and press from the meeting for the remaining agenda item on the grounds that if the public and press were present there would be disclosure to them of exempt information as specified in paragraph 3 of Part 1 of the Local Government Act 1972 (as amended), namely information relating to the financial or business affairs of any particular person (including the authority holding that information).

#### 45. INVESTMENT REPORT

45.1 The Committee considered a report providing an update on the investment activities undertaken by the Fund.

- 45.2 A summary of the discussion is set out in an exempt minute.
- 45.3 The Committee RESOLVED to agree actions which are set out in an exempt minute.

46. BREACHES LOG

- 46.1 The Committee considered a report providing an update on the Fund's Breaches Log.
- 46.2 The Committee RESOLVED to agree the recommendations as set out in the report

47. EMPLOYER ADMISSIONS AND CESSATIONS

- 47.1 The Committee considered an update on the latest admissions and cessations of employers within the Fund.
- 47.2 The Committee RESOLVED to note the report.

48. INDEPENDENT ADVISOR PROCUREMENT REPORT

- 48.1 The Committee considered a report providing an update on progress of the procurement of an Independent advisor for the Pension Committee.
- 48.2 The Committee RESOLVED to agree the recommendations as set out in the report

The meeting ended at 2.32 pm.

Councillor Gerard Fox (Chair)

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

## PENSION BOARD

MINUTES of a meeting of the Pension Board held via Microsoft Teams on 5 November 2021.

---

PRESENT Ray Martin (Chair) Councillor Tom Druitt, Stephen Osborn and Diana Pogson

ALSO PRESENT Councillor Gerard Fox, Chair of Pension Committee  
Sian Kunert, Head of Pensions  
Paul Punter, Head of Pensions Administration  
Michael Burton, Pensions Manager - Governance and Compliance  
Tim Hillman, Pensions Manager - Employer Engagement  
Martin Jenks, Senior Scrutiny Adviser  
Harvey Winder, Democratic Services Officer

### 51. MINUTES

51.1. The Board agreed the minutes were a correct record of the previous meeting.

### 52. APOLOGIES FOR ABSENCE

52.1. Apologies for absence were received from Niki Palermo. Cllr Toby Illingworth and Lynda Walker were not in attendance.

### 53. DISCLOSURE OF INTERESTS

53.1. There were no disclosures of interest.

### 54. URGENT ITEMS

54.1. There were no urgent items.

### 55. PENSION COMMITTEE AGENDA

55.1. The Board considered a report containing the draft agenda for the Pension Board meeting due to be held on 25th November 2021.

55.2. The Board RESOLVED to note the report.

## 56. GOVERNANCE REPORT

56.1. The Board considered a report providing an update on various governance workstreams completed and changes effecting Local Government Pension Schemes (LGPS) and the East Sussex Pension Fund (ESPF or the Fund).

56.2. The Chair asked whether there had been any developments on the Code of Practice that had been subject to consultation recently.

56.3. Michael Burton (MB), Pensions Manager - Governance and Compliance, said the consultation had shown there were quite a few concerns from consultees about certain areas of the Code and that the Pensions Regulator had decided to review it and re-publish in the new year. In the meantime, the Pensions Team is making preparations to be ready for any changes that might be expected in the Code.

56.4. Cllr Tom Druitt (TD) said he was happy with the terms of reference of the Communications Working Group but questioned whether it should be time limited and wind down once the current projects that it was set up to oversee were completed. Diana Pogson (DP) suggested that the Terms of Reference could include a clause to review the need for the working group every two years, as it is unlikely there will ever be a point where there are no communications issues that need to be looked at. Sian Kunert (SK), Head of Pensions, added that the Administration Working Group had evolved out of the Data Improvement Group, which was initially a time-limited group, so there could well be a continued need to review communications issues too.

56.5. The Chair, recognising that DP was due to leave her position on the Board, requested that officers write to her replacement and the other two employee representatives to see whether they wish to replace DP on the Administration Working Group.

56.6. The Chair asked whether there should be an employer representative on the Communications Working Group, as currently it was the Chair and Lynda Walker, an employee representative. SK said that all Board Members are invited to each meeting of the working group, but some of the draft communications planned for discussion might be more appropriate for employers and other times for employees, and this would likely determine attendance. TD offered to be the permanent employer representative, subject to availability, but he suggested that Cllr Illingworth was also offered the opportunity in case he preferred to hold the position.

56.7. The Board RESOLVED to:

- 1) note the report;
- 2) agree the draft terms of reference of the Communications Working Group subject to the addition of an agreement to review the terms of reference every two years;
- 3) endorse the draft terms of reference of the Administration Working Group;
- 4) request that officers contact the employee representatives to see if any wish to be members of the Administration Working Group;
- 5) note the interest of Cllr Druitt to be a permanent member of the Communications Working Group and request that officers contact Cllr Illingworth to see if he wishes to be member also;
- 6) thank Diana Pogson for her work as a Pension Board Member and wish her well in all future endeavours.

## 57. EMPLOYER AND CONTRIBUTIONS REPORT

57.1. The Board considered a report providing updates on Employer Engagement activities including communications and the collection of Employer contributions up to August 2021 which were due on 19 September 2021.

57.2. CD asked whether i-Connect is carrying out the functions it was expected to perform.

57.3. Tim Hillman (TH), Pensions Manager – Employer Engagement, said that it is broadly performing how expected in cleansing employer data and providing monthly updates, however, some issues have been encountered, for example, where employee IDs are entered differently by different payrolls and the system does not reconcile these properly. Paul Punter (PP), Head of Pensions Administration, said i-Connect offered more positives than negatives but the software provider, Aquila Heywood, has acknowledged there are issues with the software that it is planning to resolve next year, including how it reconciles different payroll numbers, but a workaround will be needed until then. There is also an issue where i-Connect receives payroll data so promptly that it will process the final pensions calculation of someone marked as a leaver by the employer and cleanses them from the system only for the employer to inform the Pensions Administration Team (PAT) that the employee still has unpaid holiday, meaning they need recreating in the system and their final benefits recalculated. There is also an issue with how i-Connect records top up employer contribution rates paid by employers. These issues are also due to be addressed by Aquila Heywood, but the PAT is exploring how best to deal with them in the interim.

57.4. TD asked whether these issues would mean it necessary to advise employers to send data in a different way.

57.5. PP said the PAT is keen to avoid changing how data is collected from employers at the moment, because i-Connect is being rolled out and it would cause confusion if a new way of collecting employer contributions was imposed on employers still getting used to how i-Connect works. The PAT plans to advise employers that the issues are known about, but Aquila Heywood is developing solutions to them in the new year

57.6. The Chair asked for confirmation that this meant the PAT would not be looking at a new software supplier for the purposes of monthly data collection.

57.7. TH agreed that there were no plans to look for alternative software and that i-Connect had been beneficial, especially for small employers. It had also enabled the PAT to engage with these small employers more generally as part of the onboarding process. It would also make the Annual Benefit Statement (ABS) process more straightforward as data is received monthly throughout the year and data queries can be dealt with in a more timely manner; dealing with these queries from onboarded smaller employers at the moment is also why the PAT is pausing onboarding bigger employers for now.

57.8. The Chair asked whether the members self-service link on the new website was working.

57.9. TH confirmed the member self-service section is working and will be made a real focal point of the website in the future to enable people to get the answers they need to their queries online.

57.10. The Chair asked why the number of later employer contributions has increased steadily since March.

57.11. TH explained that some small employers are paying their contributions via cheque, for example, seven of ten during August were late cheques. These cheques are being sent to County Hall, where post is currently being reviewed weekly, so they are often not picked up until after the bank deadline of the 19th of each month. The PAT is speaking with these employers to see whether they can send via recorded delivery or electronic payment instead. Another late payment in August had been due to the employer changing payroll the month before, whilst another had not pressed the 'pay' button to send the payment through to ESPF. The PAT is making sure the process of payment is more efficient and reminders are sent early in the month.

57.12. The Chair of the Pension Committee asked whether there are any common characteristics to the late paying employers.

57.13. TH said the late payers are mostly small employers that pay by cheque, typically parish councils, who need more than one signatory for the cheque before it can be sent, making delays more likely. It is not the same employers each time, however, as a warning is sent after a late payment that an administration charge will be applied if there are any further late payments in the next 12 months, and so far no employer has been given this charge.

57.14. The Board RESOLVED to note the report

## 58. PENSIONS ADMINISTRATION REPORT

58.1. The Board considered a report providing an update on matters relating to Pensions Administration activities.

58.2. The Chair asked whether a target to pick up 75% of calls within 20 seconds was quite short compared to the industry standard, especially given how low the performance against the Key Performance Indicator (KPIs) was in September.

58.3. PP said that the point of that KPI was to make a challenging, aspirational target for the Helpdesk that would not be easy to achieve and he accepted it would be difficult to achieve. PP said that the Helpdesk was disappointed with the Quarter 3 performance so far, however, August and September were the team's busiest period and some slippage in performance was expected. There is currently no capacity in the PAT to assist the Helpdesk due to the team's own capacity issues. He said performance in August and September did not represent a downwards spiral in performance and that the call performance for September was being reviewed manually as the data provided by BT is believed to be inaccurate and performance is believed to have improved compared to August.

58.4. The Chair asked whether a decision had been made on how inactive casual workers would be dealt with on the system.

58.5. PP said that the number of inactive casual workers was still being calculated from the list of undecided leavers on the system. Once the exact number is known, the PAT intends to write to those employers for whom the casual workers are employed by to let them know they have been inactive for more than two years and ask whether they should continue as employees, and that the ESPF is minded to class them as leavers. PP said this was difficult if they have an open-ended contract to remove them.

58.6. TD asked whether it was the responsibility of employers to do something about inactive casual workers and what if any influence the ESPF could have in this area.

58.7. PP agreed that the employment status of an ESPF member is the result of their contract with their employer and they have the final say whether an employee should remain employed or not. The Fund could not legally force them to change an employee's status but will challenge employers where they have an employee who has not worked for two or more years and question whether it is really the case they are employed and could be called upon to work if they were required, due to the length of inactivity. The PAT will also remind employers about the purpose of the Fund and how it is meant for permanent workers and that there are potentially better options for casual workers available. PP added that they will be marked on the system as leavers, but if they were to begin working again, they can re-join the scheme easily.

58.8. The Chair added that employers may not realise the issues keeping these workers on their books causes the Fund, particularly with regard to producing an ABS, which is why there is clearly a need for the Fund to make these employers think about these employee's status. PP reminded the Board that current inactive casuals are marked with a nominal income of £1 as an ABS cannot be issued without a salary.

58.9. The Board RESOLVED to:

- 1) note the report; and
- 2) congratulate the PAT for their excellent performance.

## 59. TRAINING REPORT

59.1. The Board considered a report providing an update on training needs, opportunities undertaken and planned events.

59.2. DP clarified that the Public Service Toolkit did also contain the 'fraudulent activity targeting members' module that the covering report claimed was only available in the Trustee Toolkit (for private sector pensions), as she had filled it out herself.

59.3. The Chair expressed disappointment that three Board Members had not completed the Public Service Toolkit and that only one had filled out the self-assessment form. He asked whether it was a legal requirement to complete the toolkit.

59.4. TB said that it is not a legal requirement, but it is a useful tool for building a foundation of knowledge of pensions. There is also a high expectation that trustees of private pension schemes complete the Trustee Toolkit within six months of appointment and, whilst there is not such a strict requirement in the public sector, it is a useful goal to aim for. DP added that the toolkit is not very onerous to complete and can help provide a useful refresher for various topics.

59.5. The Chair asked the Pensions Team to contact all Pension Board members requesting they fill out both the self-assessment form and the Public Service Toolkit.

59.6. The Board RESOLVED to:

- 1) note the report; and
- 2) request that Board Members are reminded to fill out the self-assessment form and the Public Service Toolkit

## 60. ANNUAL REPORT AND ACCOUNTS 2020/21

60.1. The Board considered a report containing a draft Annual Report and Grant Thornton's (the external auditor) report offering an unqualified audit opinion on the 2020/21 Pension Fund Accounts.

60.2. TD asked whether the Annual Report could be produced in a more accessible format to ensure more people read its contents.

60.3. The Chair suggested it was common for trustees of private pensions to produce an abridged version and send it out to members, for example, alongside the ABS. DP said she is a member of the BBC Fund and gets an 8-10 page booklet once per year containing basic information such as how much money is in the fund and how it is spent. SK added that some Local Government Pension Scheme (LGPS) produced an annual pamphlet for distribution at their Annual General Meeting covering the key topics and highlights of the main report and this, or a newsletter, could be replicated for the ESPF. She clarified that the Annual Report is a statutory document and is so prescribed that the Chartered Institute of Public Finance and Accountancy (CIPFA) guidance document it is based on is almost as long. The version seen by the Board is itself shorter than the final version, as documents such as the Statement of Investment Principles were not included for brevity. SK said the Communications Manager position, which is currently being advertised, will play a key role in helping to produce an abridged version.

60.4. The Board RESOLVED to:

- 1) note the draft Independent Auditor's (Grant Thornton) report to those charged with governance on Pension Fund Accounts 2020/21; and
- 2) note the draft Pension Fund Annual Report and Accounts 2020/21; and
- 3) agree that the Communications Working Group consider whether an abridged annual report should be produced for the ESPF and what it should look like.

## 61. EAST SUSSEX PENSION FUND 2020/21 BUDGET QUARTERLY REPORT

61.1. The Board considered a report providing an update on the 2021/22 Forecast Financial Outturn.

61.2. The Board RESOLVED to note the report.

## 62. PENSION FUND RISK REGISTER

62.1. The Board considered the ESPF Risk Register.

62.2. TD welcomed the revised risk register and agreed it showed really good analysis of control measures and gave a high level of assurance.

62.3. The Chair asked for further details of the awards the Fund had been nominated for.

62.4. SK said that the Fund has been shortlisted for two awards at the Local Authority Pension Fund Forum (LAPFF) investments awards – one for its climate change strategy and one for "Fund of the Year" for a large fund. The results will be announced in the middle of December.

62.5. The Board RESOLVED to:

1) note the new International Trade risk; and

2) note climate risk will be considered further once the scenario modelling is underway and producing data

63. WORK PROGRAMME

63.1. The Board considered its work programme.

63.2. The Board RESOLVED to agree its work programme.

64. EXCLUSION OF THE PUBLIC AND PRESS

64.1 The Board RESOLVED to exclude the public and press from the meeting for the remaining agenda item on the grounds that if the public and press were present there would be disclosure to them of exempt information as specified in paragraph 3 of Part 1 of the Local Government Act 1972 (as amended), namely information relating to the financial or business affairs of any particular person (including the authority holding that information).

65. PENSION FUND BREACHES LOG

65.1 The Board considered a report providing an update on the Breaches Log and outstanding or new Internal Dispute Resolution Procedure (IDRP) cases.

65.2 A summary of the discussion is set out in an exempt minute.

65.3 The Board RESOLVED to agree actions which are set out in an exempt minute.

66. EMPLOYER ADMISSIONS AND CESSATIONS REPORT

66.1. The Board considered a report on the latest admissions and cessations of employers within the Fund.

66.2. The Board RESOLVED to note the report.

The meeting ended at 12.35 pm.

Ray Martin (Chair)

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

**Report to:** Pension Committee

**Date of meeting:** 25 November 2021

**By:** Chief Finance Officer

**Title:** Governance Report

**Purpose:** To provide an update on various governance workstreams completed and changes effecting the LGPS and Fund

---

## RECOMMENDATIONS

The Pension Committee is recommended to:

- 1) **Note the change to the central government department with oversight of Local Government**
  - 2) **Note the update of the TPR annual Scheme Return**
  - 3) **Endorse the draft terms of reference for the Administration working group**
  - 4) **Endorse the draft terms of reference for the Communications working group**
- 

### 1. Background

1.1 This report is brought to the Pension Committee to provide an update on the steps being taken to adopt good practice and ensure compliance with regulatory requirements for the East Sussex Pension Fund (the Fund or ESPF).

1.2 This report outlines changes to Pension Fund policy for comment and noting.

### 2. Ministerial change

2.1 There have been changes made to the distribution of ministerial responsibilities in central government.

2.2 Guy Opperman MP has retained his position as Pensions Minister and Thérèse Coffey MP remains as the Secretary of State for Work and Pensions.

2.3 The Ministry of Housing, Communities and Local Government has been renamed as the Department for Levelling Up, Housing and Communities, with Michael Gove MP replacing Robert Jenrick MP as Secretary of State.

### 3. Changes in Legislation and Regulation

3.1 The Pensions Regulator (TPR) [launched a consultation in September 2021](#) on how it will exercise the new powers introduced by the Pension Schemes Act 2021. The consultation ends on 22 December 2021 and the final policy is expected to be produced in 2022.

3.2 The consultation covers overlapping regulatory and criminal powers, the new ability to apply high fines, and the expanded information gathering powers. TPR has said it will not pursue both criminal and regulatory penalties for the same act.

3.3 Where there is a breach of legislation, excluding employer related investments for private occupational schemes, TPR would initially seek to rectify the situation using an Improvement

Notice unless there are aggravating factors. This is consistent with the current approach but TPR does now have a wider range of sanctions available to it.

3.4 High fines can relate to a number of issues. For the purposes of the Fund these would be limited to the failure to provide information about a Notifiable Event or misleading TPR. It is of note the new fines are significantly higher than those which could be previously levied.

3.5 When TPR seeks information from a scheme it would typically do so on a voluntary basis unless there is good reason not to, for example, wishing to interview a person suspected of fraud under caution. The consultation outlines the circumstances its formal powers apply and how it would approach any failure to comply with formal use of powers.

3.6 Since the Pension Board meeting of 5 November 2021 it has been announced by the Department for Work and Pensions that the new regulations covering the powers for Trustees and Scheme Managers to prevent transfers to scam schemes will come into force. The consultation for these regulations was highlighted in the June 2021 Pension Committee meeting.

#### **4. Scheme Return**

4.1 TPR has sent a request for this year's scheme return to be completed by 10 November 2021. The return includes:-

- Updated member statistics
- Member data quality scores
- Details of all employers
- Details of the Fund's insurers and auditors.

4.2 Completing the Scheme Return is a legal obligation. Failure to do so can result in a fine being applied by TPR. To date only one Public Service Pension Scheme has received such a fine. The Fund submitted the return on 20 October 2021.

#### **5. Working Group Terms of Reference**

5.1 The Fund has a number of working groups; these groups have agreed terms of reference setting out the objectives and membership of the working group. The Fund has recently set up a Communication working group at the request of the Board. The draft terms of reference are included in **appendix 1** and these were approved by the Pension Board on 5 November, as a working group of the Board.

5.2 The Funds Annual Benefit Statement (ABS) and Data Improvement (DIP) working group was set up in 2019, this working group has now reached the end of its original purpose outlined in the terms of reference approved in November 2019. In its place officers and the working group recommend this group is replaced with an Administration working group, which is an officer-led group. The draft terms of reference are included in **appendix 2** for endorsement.

#### **6 Conclusion**

6.1 The Committee is recommended to note the changes made by central government which impacts the people and departments connected to pensions and Local Government.

6.2 The Committee is recommended to note the completion of TPR scheme return to meet the Fund's duties and the existence of the latest consultation.

6.3 The Committee is recommended to endorse the draft terms of reference of working groups.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Mike Burton, Pensions Manager Governance and Compliance  
Email: [Michael.Burton@eastsussex.gov.uk](mailto:Michael.Burton@eastsussex.gov.uk)

This page is intentionally left blank

# Communications Working Group (CWG)

## Terms of Reference

### ***Objectives***

The CWG has an advisory and review role. Its purpose is to:

1. oversee the communications of the fund and aim to improve the user experience of key stakeholders of the Fund
2. undertake reviews of communication based documents to consider how the materials will be interpreted from an employer or beneficiary perspective
3. advise the Pension Board and Committee of possible improvements in communications including policy and delivery methods.
4. carry out research and consider other ways to communicate effectively with the Fund's stakeholders

### ***Exclusions***

The CWG is not a sub-committee of the Pension Board or Committee. No functions of the Pension Board or Committee are delegated to the CWG.

The CWG will not:

1. take decisions in relation to policy matters that are the responsibility of the Pension Committee
2. take decisions in relation statutory materials that are required by law and delegated to the Chief Finance Officer under the Scheme of Delegations to implement to administer the Fund.
3. oversee or advise on any other matter other than in relation to communications of the Fund.

### ***Membership***

The CWG is a Pension Board working group to progress communications within the Fund to improve the experience of scheme members and employers of the Fund, first and foremost. The CWG has originated as a result of a number of recommendations presented to the Pension Board in March 2021 from the Head of Communications for ESCC on his finding from a detailed communications review.

The CWG is chaired by Head of Pensions.

Membership comprises:

- Head of Pensions
- Pensions Manager – Employer engagement
- Pensions Communications Manager (yet to be appointed)
- Chair of the Pension Board
- Pension Board Members

Pension Committee Members or technical advisors may be invited by the chair of CWG when appropriate.

The CWG is not a committee or sub-committee established under the Section 101 of the Local Government Act 1972, so political proportionality rules under the Local Government and Housing Act 1989 do not apply.

Quorate:

The Quorum of the Working Group will be four Members and must include two Pension Board members and two officers.

## ***Meetings***

The CWG meets at least quarterly between Pension Committee meetings, or more as required to visit communication issues and make recommendations to Pension Board and Committee on improvements. Or to consider the phrasing and presentation of publications and communications to scheme members and employers, due to be issued as part of the operation of the Fund in line with Schemes of Delegation delegated to the Chief Finance Officer when required.

## ***Reporting***

An update on each meeting will be provided within the Employer Engagement and Communications report produced quarterly for Pension Board.

The CWG is not a committee or sub-committee established under the Section 101 of the Local Government Act 1972, so access to information regulations do not apply.

## ***Review***

The working group terms of reference and purpose will be reviewed after two years to ensure the group is still relevant.

# Administration Working Group (Admin WG)

## Terms of Reference

### **Objectives**

The AWG has an advisory and review role. Its purpose is to:

1. Oversee the administration projects of the East Sussex Pension Fund (ESPF)(the Fund) and aim to improve the members experience by ensuring high data quality of membership data within the Fund.
2. Take responsibility for strategic oversight of the ESPF Data Strategy driving the better use of data in the Fund and addressing any gaps and barriers preventing it.
3. tackle the key cross-cutting employer related issues that continue to be a barrier to the effective use of data.
4. Provide strategic oversight of t Pension Regulator (tPR) guidance which relates to data, shaping advice to the Pension Board and Committee on implementation.
5. To continue to oversee a small portfolio of projects to deliver data-enabled change and continue to learn and work through solutions to ongoing barriers.

### **Exclusions**

The Admin WG is not a sub-committee of the Pension Board or Pension Committee. No functions of the Pension Board or Committee are delegated to the Admin WG.

The Admin WG will not:

1. take decisions in relation to policy matters that are the responsibility of the Pension Committee
2. take decisions in relation statutory materials that are required by law and delegated to the Chief Finance Officer under the Schemes of Delegation to implement to administer the Fund.
3. oversee or advise on any other matter other than in relation to administration and data quality matters of the Fund.

### **Membership**

Membership will comprise relevant officers. The Working Group membership is also open to members of the Pension Board, who will work with delivery partners to drive data-enabled change across scheme employers.

The Admin WG is chaired by Head of Pensions Administration.

Membership comprises:

- Head of Pensions Administration

- Chief Finance Officer
- Head of Pensions
- Chair of the Pension Board
- Chair of the Pension Committee
- Stephen Osborne (Pension Board employer representative)
- Pension Board member representative to be confirmed

Senior external representatives may also be invited by the Chair to provide expert advice and opinion on the ESPF data agenda and activities.

The Admin WG is not a committee or sub-committee established under the Section 101 of the Local Government Act 1972, so political proportionality rules under the Local Government and Housing Act 1989 do not apply.

Quorate:

The Quorum of the Working Group will be four Members

### ***Meetings***

The Admin WG meets at least quarterly between Pension Committee meetings, or more as required to visit administration project or data quality issues and make recommendations to Board and Committee.

### ***Reporting***

A note of meetings will be reported in the quarterly work plan to Board and Committee with details on projects discussed during any Admin WG meeting provided in the Administration Report produced quarterly for Pension Board and Committee.

As the Admin WG is not established under the Section 101 of the Local Government Act 1972, access to information regulations do not apply.

### ***Review***

The working group terms of reference and purpose will be reviewed after two years to ensure the group is still relevant.

**Report to:** Pension Committee

**Date:** 25 November 2021

**By:** Chief Financial Officer

**Title:** Employer Engagement Report

**Purpose:** This report updates the Committee on Employer Engagement activities including communications and the collection of Employer contributions up to August 2021 which were due on 19 September 2021.

---

## RECOMMENDATION

The Committee is recommended to note the report

---

### 1. Background

1.1 This report is brought to the Pension Committee to provide an update on employer engagement tasks that directly affect the East Sussex Pension Fund (the Fund).

1.2 Under the Local Government Pension Scheme (LGPS) Regulations, East Sussex County Council is required to maintain a pension fund for its employees and other 'scheduled bodies' as defined in the Regulations known as the East Sussex Pension Fund (ESPF or the Fund). The Regulations also empower the Fund to admit employees of other 'defined' (e.g. other public bodies) bodies into the Fund.

1.3 The Employers (scheduled and admitted bodies) are required to pay both employee and employer contributions to the Fund monthly. The contribution rates for members is set out in the LGPS Regulations. The Employer contribution rate is set at the triennial valuation and recorded in the rates and adjustment certificate issued by the Funds actuary.

1.4 The Employers are required by regulations to make the payment of contributions to the Fund be made no later than 19 days of the following month in which the contributions were deducted from payroll (22 days by means of an electronic communication).

### 2. Supporting Information

#### Employer Engagement

2.1. The Employer Engagement Team have continued to work alongside the Pensions Administration (PAT) technical team to help deliver the Annual Benefit Statements. The sweep up of employer queries has continued and the engagement team has been communicating with employers to clear up any issues.

2.2. The Employer Engagement team have been working alongside the PAT to help the onboarding process of the i-Connect project. We have so far fully onboarded 26 employers with a further 16 employers where the initial process has begun and further sessions are booked to go through the next onboarding steps. The team have encountered some issues with the i-Connect

software on a few processes. These issues are being looked at internally to find the best processes and manage the data that is getting sent through the i-Connect system.

2.3. As a result of some unexpected issues arising from the roll out of i-Connect the Fund has reached out to other authorities that have been using i-Connect for a longer period to review how they use the system to its full capabilities to take advantage of any lessons learn that we can embed into our processes.

2.4. Before rolling out the project to other larger employers the Fund plan to ensure the existing onboarded employers are all set up and running well, with no new questions or challenges in the data input or reconciliation process. Instead, the next stage of the roll out will be carried out focussing on the 'Online Return' method of data uploading which will be applicable for some of the smaller employers. It has been a great opportunity for the team to engage and speak to different employers on this project and start to build good relationships.

Still to onboard	Initial enquiries ongoing	Started onboarding process	Onboarded
73	5	16	26

2.5. Where discussions have already begun with larger employers in the Fund those larger employers have requested further time to build their monthly payroll files to ensure integrity of the system and data submissions.

2.6. The i-Connect project so far has helped to cleanse employee data for those already using the system and has provided some opportunities of engaging with employers on other matters. Although the anticipated benefit to the contribution reconciliation process has not transpired, as the i-Connect system does not yet account for secondary contributions, although this is planned for future development. The Engagement team are aware that some employers may find the transition to i-Connect problematic with limits on time and technology. The team will offer the relevant time and support to allow for a smooth transition alongside appropriate training.

## Communications

2.7. The Autumn Employer Newsletter has been created and communicated across all employers. The newsletter has been updated with some suggested changes from the Communication Working Group and will continue to be reviewed and restructured. The active Autumn newsletter is currently being drafted and communicated to active employees by the end of October.

2.8. We can confirm that the new East Sussex Pension Fund website is now live. The feedback of the new website so far has been very positive. Most of the feedback highlights how much fresher and modern looking it is, as well as being much easier to navigate and find information. The Engagement Team will continue to monitor the documentation and information on the new website and will work alongside the wider Pensions team on reviewing the forms, documents and content currently held.

2.9. The covenant project being carried out by PwC with a selection of higher risk employers is continuing. We have had responses from the majority of employers in scope and are chasing the remaining few that are still to return questionnaires. The final reminders have been sent out to employers and the next stage of the project is due to commence in the upcoming weeks.

2.10. The Employer Annual Forum is to be held virtually on 24 November. Communications have been sent to employers providing the date, times and agenda for the event. So far we have received notification from many employers that they are going to attend the event. We are sure that the topics and themes covered on the day will provide plenty of scope for employers to build their

knowledge and have the opportunity to get some questions answered. An agenda for the day is set out in **Appendix 1**.

## Employer Contributions

3.1 In line with regulations, the Fund has set the 19 days following the month in which the contributions were deducted from payroll to determine if a payment has been received on time. The below table sets out the number of payments received after the 19 days have elapsed.

*Table of Contributions received after the 19th day of the month following contributions deducted up to the 19 July 2021.*

	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
<b>*Total payments due</b>	122	123	125	126	126	128	128	129	129	127	127	127
<b>Payments received late</b>	3	3	3	8	3	3	7	11	8	8	3	10

*\*Total payments shown in February report have been amended to show the full year.*

3.2 In the past 12 month period there have been 70 late payments of contributions out of 1,395 expected payments. The majority of the missed payments we have is still down to some employers that still pay by cheque. As outlined previously, due to Covid restrictions, cheques are not always paid into the bank on a daily basis; this can lead to some delays in the cheque being received and credited. There have also been instances of cheques not arriving in the post causing a delay in cheques being cancelled and resent. Six of the late payments in August were due to cheque payments. The Engagement Team are continuing to liaise with these employers to establish a more robust method of sending cheques via recorded delivery and providing e-mail copies of date stamped cheques. The Team are also suggesting the use of BACs payments wherever possible. As Covid restrictions are removed it should improve efficiency of collating and paying in of cheque payments. The introduction to i-Connect may also provide an opportunity for cheque paying employers to review their processes.

3.3 Where no cheque payments have been received late, the team have communicated with the employers requesting payment and advising responsibility of the employer in relation to the regulations. Since September the team has started to assess each employers' conditions for lateness. We have sent official warning notification to late payments and outlined that if late again in a 12 month period administration charges will be sought in line with the administration strategy.

## Improvements to the contributions monitoring

3.4 The Engagement Team now monitor all contributions paid and pick up on any discrepancies on a monthly basis and revert back to the employer to amend asap. Through this process it has allowed the Engagement Team improve relationships with the employers so that any problems can be resolved quickly, and employers know they can also contact the Team for help.

3.5 The Fund will continue to engage with employers to understand the issues behind missed payments and providing support in order to reconcile. The Engagement Team are aware that it is essential the Fund reinforces the statutory obligation of employers to pay contributions on time or they suffer the risk of administration charges and any breaches are reported accordingly to the Regulator. The Fund is also assessing all 'new employer admissions' to the Fund and making sure any backdated contributions have been paid and reconciled, whilst also establishing the expectations of all employers in the Fund.

**4. Conclusion and reasons for recommendation**

4.1 The Pension Committee is recommended to note the updates provided in the report.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer:  
Email:

Tim Hillman, Pensions Manager Employer Engagement  
[Tim.Hillman@eastsussex.gov.uk](mailto:Tim.Hillman@eastsussex.gov.uk)

## **Virtual Employer Forum Agenda**

**10am-3pm (with lunch break) - 24<sup>th</sup> November 2021**

.....

### **10am Start:**

- **10:00 - 10:10 am** Welcome – Tim Hillman (Employer Engagement Manager)
- **10:10 - 10:20 am** Introduction and update – Councillor Fox
- **10:20 - 10:30 am** Update from Pension Board Chair – Ray Martin
- **10:30 - 10:40 am** East Sussex Pension Fund Update - Sian Kunert (Head of Pensions)
- **10:40 - 11:10 am** Barnett Waddingham (Fund Actuaries)- Update on projects effecting employers
- **11:10am** Coffee Break
- **11:20 - 11:50 am** Investment Manager –Presentation
- **11:50 - 12:10 pm** Governance Review – Employer specifics Michael Burton (East Sussex Pensions Governance Manager)
- **12:10 - 12:30pm** Pension Administration update – Paul Punter (Pension Admin Manager)

**LUNCH BREAK - 12:30pm – 1:00 pm**

*Afternoon – Interactive session – Q&A and feedback*

### **1pm start:**

- **1:00 - 1:10pm** Introduction to the Engagement Team/ New Website – Izzy Widdowson (CIPFA Trainee)
- **1:10 - 1:30pm** I-connect – update on the project/ onboarding - Paula Jenner, (Includes Q&A from Colin Lewis at i-Connect Heywoods)
- **1:30 - 1:45pm** Reminder of employer obligations on Contributions/ LGPS31 forms Dillon Piggott (CIPFA Trainee)

- **1:45 – 2:30pm**      Open discussions on the following topics:
  - Form completion/ Data requirements
  - Training needs
  - Upcoming Employer Projects
- **2:30 – 2:55 pm**      Q/A, Feedback – Tim Hillman
- **3:00pm**                  Close meeting

**Report to:** Pension Committee  
**Date of meeting:** 25 November 2021  
**By:** Chief Finance Officer  
**Title:** Pension Administration - updates  
**Purpose:** To provide an update to the Pension Committee on matters relating to Pensions Administration activities.

---

## RECOMMENDATION

The Committee is recommended to note the updates

---

### 1. Background

1.1 The in-house Pensions Administration Team (PAT) carries out the operational, day-to-day tasks on behalf of the members and employers of the East Sussex Pension Fund (ESPF) and for the Administering Authority. They also lead on topical administration activities, projects and improvements that may have an impact on members of the Local Government Pension Scheme (LGPS).

### 2. Key Performance Indicators (KPI)

2.1 The Performance Report for the period October 2020 to September 2021 can be found at **Appendix 1**. The PAT saw performance numbers during quarter three 2021, average at 98.37% (volume completed 2,370) improve from the previous quarter of 95.40% (volume completed 1,788). The numbers are quite different from the same period 12 months ago – 93.54% (volume completed 1,553).

2.2 Under the Good Governance Review, documents were developed and updated covering the Service Level Agreement and Roles & Responsibilities with the future “in-house” PAT rather than provided through Orbis Business Services. A fee has been agreed with Aquila Heywood to implement the new performance measurements and this work was completed in Altair in early October 2021. We are now creating a new Key Performance Indicator (KPI) reporting dashboard within Altair Insights and expect this to be presented in the new format. In the meantime, the KPI’s presented, whilst from the new East Sussex database, continue to be based upon the Orbis internal measurements.

2.3 The Orbis Pensions Helpdesk was introduced in November 2019 and their performance for the last 12 months is shown in **Appendix 2**. With effect from April 2021, we began the implementation of a new gold standard service provision. The final phase was the service improvement period before we commence formal performance management against the new East Sussex County Council (ESCC) KPI’s from October 2021.

### 3. Pension Administration Transfer and Staffing Update

3.1 All administration staff are continuing to work from home and only one team member has tested positive for COVID-19 (in September 2021) and fully recovered. Staff remain in good spirits and we closely monitor their wellbeing. The team did attend a team meeting in Lewes County Hall on 19 October 2021 followed by a lunch. It was lovely for everyone to meet, have a catch up and propose a team hybrid approach for a return to the office. It is, however, unlikely that the office will be widely available until early in 2022.

3.2 At the May 2021 meeting, we celebrated the Altair & MSS systems going live on time and budget. The Transition & Project Boards were closed down at the end of June 2021 when the IT Change Advisory Board approved the project closure and the systems are now business as usual (BAU). There were a small number of actions to be concluded and these are now been completed, including on 30 September 2021, the deletion of ESPF data from the Surrey County Council version of Altair.

#### 4. Internal Audit

4.1 The Internal Audit team has now completed the 2020/21 Pensions Administration Audit to ensure compliance with Regulatory Controls. The Audit has included a review and evidence of the completed 2019/20 Audit Management Actions. We are very pleased with the Audit opinion improving from minimal to reasonable assurance. An update on progress against the new Management Actions are presented in **Appendix 3**.

#### 5 Projects update

##### 5.1 Data Improvement Project

We have continued to work on clearing historical issues as well as new discrepancies found since 2019 (when Hymans Robertson did the data cut). The current position as at 08/10/21 was:

**Status 2 – 960 cases** many of these have been found as part of the year end data cleansing. We anticipate that i-Connect will change this considerably going forwards. We have received 100's of leaver forms over the last two months – many currently being processed by PAT. Expect the number to reduce significantly by 31 December.

**Status 8 – 114 cases** we are trying to minimise the use of this status. New errors and duplicates are being actioned immediately they are discovered. 100's of duplicate records created in error as we on-boarded new employers to i-Connect (pay reference has to be 100% accurate or creates a new record on Altair).

**Status 9 – 5,485 cases** procedure in place to review cases three months before five years refund limit. In July 21 we asked ITM to trace 385 non-responders (wrote to twice to try to obtain bank account details to pay refund of contributions). Results have now been received and PAT are working through (139 same address – writing saying must have refund, 189 new address – writing to verify correct person before going through refund process, 56 could not find marked up as gone away).

**CARE Pay** – All gaps in pay have been investigated as part of the 2021 ABS project. The Team made 4,000+ queries on pre-April 20 data, mainly salaries.

Most of the other actions will be validated when we run the next Pensions Regulator validator reports to assess the Common and Conditional data scores before the end of 2021.

##### 5.2 GMP Rectification

The project is on hold whilst the Orbis contract with Mercers is being agreed, it is anticipated this will be signed by the time the Committee meet. We will then provide Mercers with a data extract of the 2021 pension increases for the pensioner population and possible access to Altair. Mercers can then start determining the over and underpayments for pensioners and looking at the draft communications. The project may not be concluded until after the 2022 pension increases.

##### 5.3 Annual Benefits Statements (ABS) for 2020/21

All employers with active members provided year end data or submitted March 21 data via i-Connect. The data was verified and queries were raised on about 20% of employers' submissions. The data issues were passed back to employers and the vast majority corrected in time for ABS processing.

The ABS statutory deadline was 31 August 21 (31 October last year due to Covid-19) and the results of statements issued for eligible members were as follows:

<b>Member category</b>	<b>2020</b>	<b>2021</b>
Actives	97.20%	96.31%
Deferred	99.77%	99.69%

#### 5.4 Abatement changes with effect from 1 April 2021

As agreed by the Pension Committee in June 2021, this process has ceased to be operated and the PAT has now run a report to identify cases re-employed over the last five years. 20 partially reduced cases have been manually identified from the 140 in scope and correct benefits calculated in October 2021. We intend to repeat the process for re-employed cases between five and ten years ago, in November. A letter has been issued to all pensioners informing them of the change in policy and asking them to contact the helpdesk if they believe they are impacted and have not already heard from us.

#### 5.5 Annual Allowance historical review project

The project to correct the Annual Allowance for the period 2014/15 to 2019/20 has been awarded to Aon and a contract is in place. The PAT has provided them with the revised salary histories for the c.350 members in scope for review plus a couple of test cases prepared by Barnet Waddingham. We have now identified the cases impacted in 2020/21 and these have been contacted and added to the project scope.

5.6 Aon have queried the quality of the final pensionable pay data supplied by employers which is fundamental to the project. This will hold up the project until we have an opportunity to do some sample checks and determine the best way forward.

## 6 **Conclusion and reasons for recommendation**

6.1 The Pension Committee is asked to note the report

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Paul Punter, Head of Pensions Administration  
 Email: [paul.punter@eastsussex.gov.uk](mailto:paul.punter@eastsussex.gov.uk)

This page is intentionally left blank

APPENDIX 1

These are Orbis internal targets and the ESCC targets agreed in Sept 20 as a result of Good Governance review cannot commence until we go live with a separate database (AH currently installing).

East Sussex Pensions Administration - Key Performance Indicators

Activity	Measure	Impact	Target	Sep-21	Aug-21	Jul-21	Jun-21	May-21	Apr-21	Mar-21	Feb-21	Jan-21	Dec-20	Nov-20	Oct-20													
Scheme members	Pensioners, Active & Deferred			79102	79,492	79,393	79,151	79,070	79,172	79,071	79,027	78,990	78,448	78,426	77,920													
New starters set up				240	200	287	230	326	178	211	211	176	232	530	299													
				Volume	Score	Volume	Score	Volume	Score	Volume	Score	Volume	Score	Volume	Score													
1a	Death notification acknowledged, recorded and documentation sent	within 5 days	M	95%	31	100%	15	100%	18	100%	16	100%	18	100%	22	100%	43	100%	29	100%	64	100%	20	100%	28	100%	34	100%
1b	Award dependent benefits (Death Grants)	within 5 days	H	95%	16	100%	16	100%	8	100%	12	92%	21	96%	14	100%	9	89%	10	100%	9	100%	11	100%	7	86%	18	100%
2a	Retirement notification acknowledged, recorded and documentation sent	within 5 days	M	95%	95	95%	117	96%	128	99%	94	99%	104	100%	81	91%	84	95%	68	56%	74	94%	43	94%	56	97%	63	96%
2b	Payment of lump sum made	within 5 days	H	95%	147	90%	113	100%	107	100%	112	100%	147	97%	136	95%	96	87%	99	94%	82	93%	84	99%	85	97%	140	94%
3	Calculation of spouses benefits	within 5 days	M	90%	22	96%	15	100%	14	93%	18	95%	16	100%	20	100%	24	96%	19	100%	20	95%	8	100%	11	100%	23	100%
4a	Transfers In - Quote (Values)	within 10 days	L	90%	38	90%	35	89%	42	96%	47	73%	22	64%	12	67%	19	79%	26	74%	23	61%	18	95%	17	100%	21	96%
4b	Transfers In - Payments	within 10 days	L	90%	22	91%	27	100%	23	100%	34	65%	8	75%	14	93%	22	91%	17	95%	19	95%	5	100%	19	90%	22	100%
5a	Transfers Out - Quote	within 25 days	L	90%	43	91%	48	100%	103	100%	63	91%	47	98%	23	100%	40	75%	41	93%	28	90%	22	96%	27	97%	33	100%
5b	Transfers Out - Payments	within 25 days	L	90%	17	95%	9	89%	8	100%	33	100%	9	100%	21	91%	22	87%	12	92%	16	100%	8	100%	20	90%	11	100%
6a	Employer estimates provided	within 7 days	M	95%	19	100%	10	100%	26	97%	33	97%	42	96%	23	83%	28	68%	30	80%	33	79%	9	89%	12	100%	10	100%
6b	Employee projections provided	within 10 days	L	95%	14	100%	19	95%	23	100%	19	95%	33	97%	8	88%	14	93%	30	94%	9	100%	9	100%	22	96%	31	94%
7	Refunds	within 10 days	L	95%	54	100%	32	100%	32	100%	33	100%	29	97%	8	100%	22	100%	24	100%	37	100%	21	100%	32	100%	39	100%
8	Deferred benefit notifications	within 25 days	L	95%	329	100%	333	100%	202	100%	150	100%	147	100%	99	99%	127	100%	152	100%	203	100%	150	100%	150	98%	146	100%
<b>TOTAL TASKS COMPLETED</b>					<b>847</b>	<b>97.17%</b>	<b>789</b>	<b>98.61%</b>	<b>734</b>	<b>99.32%</b>	<b>664</b>	<b>94.73%</b>	<b>643</b>	<b>96.89%</b>	<b>481</b>	<b>94.59%</b>	<b>550</b>	<b>91.45%</b>	<b>557</b>	<b>90.84%</b>	<b>617</b>	<b>93.70%</b>	<b>408</b>	<b>98.28%</b>	<b>486</b>	<b>97.53%</b>	<b>591</b>	<b>98.31%</b>
Figures for the previous year					494	95.34%	516	92.64%	543	92.63%	394	96.70%	359	98.61%	454	98.02%	598	99.00%	642	99.53%								
Missed target cases					24		11		5		35		20		26		47		51		39		7		12		10	
9	Complaints received- Admin				2		1		6		5		7		8		4		2		0		0		2		2	
	Complaints received- Regulatory				0		0		0		0		0		0		0		0		0		0		0		0	
13	Compliments received				1		0		0		1		1		0		0		0		0		0		0		0	

Performance for the year July 20 to June 21 inclusive		
Total	Fails	% pass
338	0	100
151	3	98.0
1007	64	93.6
1348	49	96.4
210	5	97.6
320	57	82.2
232	23	90.1
518	29	94.4
186	10	94.6
275	31	88.7
231	10	95.7
363	1	99.7
2188	2	99.9
<b>7367</b>	<b>284</b>	<b>96.1</b>

Summary for failed cases				Sep-21	Aug-21	Jul-21	Jun-21	May-21	Apr-21	Mar-21	Feb-21	Jan-21	Dec-20	Nov-20	Oct-20
1b	Award dependent benefits (Death Grants)						1 overdue			1 Overdue by 2 days				1 Overdue by 13 days	
2a	Retirement notification acknowledged, recorded and documentation sent									4 Overdue by average of 7 days	30 overdue	4 overdue			
2b	Payment of lump sum made	Switch to Admin2Pay module - immed paym't							7 overdue by average of 4 days	12 Overdue by average of 4 days	1 overdue	6 overdue		8 Overdue by average of 7 days	
3	Calculation of spouses benefits									1 Overdue by 4 days					
4a	Transfers In - Quote (Values)		5 overdue by average of 3 days			13 overdue	8 overdue by average of 23 days	4 overdue by average of 6 days	4 Overdue by average of 7 days	7 overdue	9 overdue				
4b	Transfers In - Payments					11 overdue	2 overdue by average of 38 days		2 Overdue by average of 17 days	1 overdue					
5a	Transfers Out - Quote								10 Overdue by average of 15 days	3 overdue					
5b	Transfers Out - Payments		1 overdue by 2 days						2 overdue by average of 10 days	9 Overdue by average of 5 days	1 overdue				
6a	Employer estimates provided								4 overdue by average of 6 days	4 Overdue by average of 6 days	6 overdue	7 overdue	1 Overdue by 3 days		
6b	Employee projections provided									1 Overdue by 1 days	2 overdue			2 Overdue by average of 6 days	
8	Deferred benefit (DB5YE)														

			Two issues with transfers-in: 1. PAT TUPE cases 2. Use of reply received task lists Both now resolved	Two bank holidays. Highest tasks completed since 1 started.	Blackout period closed 8/4/21.	Resources diverted to data migration to support UAT and Parallel runs. Blackout period commenced 20/3/21.	Resources diverted to data migration to support UAT and Parallel runs.	Post received and tasks completed at highest levels in the last 12 months (up 50% on Dec 20). No. of deaths also very high.			Half the late lump sums are where retirements returned paperwork early. Redundancy quotes stopped early October.
Adam Lansley contract made a seasonal worker 10/6/21.			Adam Lansley contract starts 10/6/21.	Steve Plastow retired 12/5/21. Lewis Leslie started 26/5/21.	Michael Keogh started 8/4/21.	Jennie Shuttleworth commenced maternity leave		New structure chart showing new structure and agreed vacancies	Staff roles made permanent - Paul, Jennie, Julie & Joe		
Eight vacancies	Eight vacancies	Eight vacancies	Eight vacancies	Nine vacancies	Nine vacancies	Ten vacancies	Ten vacancies	Ten vacancies	Two vacancies	Two vacancies	Two vacancies

This page is intentionally left blank

## Appendix 2

### Helpdesk performance

Introduced the call centre for ESPF in November 2019

#### The main helpline for all six Pension Funds

Period	Offered (Calls received)	Handled (Calls answered)	Abandoned (Caller hung up)	Aband %	SLA % (75% of calls within 20 seconds)	Queue %	Abandoned Time
01/07/20 to 30/09/20	7,300	6,051	1,249	17.1%	Jul 22% Aug n/a Sep 24%	Jul 74% Aug 81% Sep 73%	Jul 6.42 Aug 7.57 Sep 6.19
01/10/20 to 31/12/20	6,881	5,975	906	13.2%	Oct 22% Nov 32% Dec 32%	Oct 75% Nov 64% Dec 63%	Oct 7.11 Nov 5.54 Dec 6.44
01/01/21 to 31/03/21	9,719	8,299	1,420	14.2%	Jan 12% Feb 21% Mar 48%	Jan 86% Feb 76% Mar 49%	Jan 6.35 Feb 6.51 Mar 4.19

Since lockdown the telephone service opening times has been restricted – phone line was open from 10am to 2pm and 2pm to 4pm.

#### From April 2021 the main helpline has been separated for ESPF

Period	Offered (Calls received)	Handled (Calls answered)	Abandoned (Caller hung up)	Aband %	SLA % (75% of calls within 20 seconds)	Queue %	Abandoned Time
01/04/21 to 30/06/21	2,561	2,417	144	5.7%	Apr 53% May 44% Jun 56%	Apr 44% May 52% Jun 39%	Apr 4.33 May 3.16 Jun 4.10
01/07/21 to 30/09/21	2,601	2,380	221	8.5%	Jul 43% Aug 31% Sep 23%	Jul 50% Aug 57% Sep 49%	Jul 3.30 Aug 4.51 Sep 5.01

East Sussex PAT the telephone opening times are being reverted back to the pre-pandemic opening times of 9am to 4pm.

### Helpdesk (website) performance

#### All six Pension Funds

Period	Calls received	Handled	Abandoned	Abandoned %	SLA %	Queue %	Abandoned Time
01/07/20 to 30/09/20	1,032	926	106	10.27%	Jul 1% Aug n/a Sep 39%	Jul 41% Aug 46% Sep 26%	Jul 4.45 Aug 3.28 Sep 1.37
01/10/20 to 31/12/20	451	362	89	19.73%	Oct 37% Nov 32% Dec 37%	Oct 35% Nov 39% Dec 32%	Oct 1.54 Nov 4.57 Dec 6.14
01/01/21 to 31/03/21	529	435	94	17.77%	Jan 17% Feb 43% Mar 53%	Jan 60% Feb 24% Mar 19%	Jan 3.29 Feb 2.19 Mar 2.36
01/04/21 to 30/06/21	796	505	81	14.00%	Apr 30% May 31% Jun 48%	Apr 38% May 44% Jun 20%	Apr 1.39 May 2.10 Jun 1.06

<b>01/07/21 to 30/09/21</b>	558	496	62	11.11%	Jul 39% Aug 44% Sep 49%	Jul 33% Aug 33% Sep 67%	Jul 2.28 Aug 3.50 Sep 2.48
-----------------------------	-----	-----	----	--------	-------------------------------	-------------------------------	----------------------------------

A new dedicated ESPF website helpline was introduced 14 Aug 21, this will be presented separately from 1 October 21.

## ES Helpdesk service levels for helpdesk services – new measurement approach post April 21

KPI	A	B	C	D
	First time fix	Call answer time	Abandoned call rate	Email response time
Gold	85% of enquiries dealt with at first point of contact	75% of calls answered in 20 seconds	Less than 5% of calls abandoned	100% of emails answered within 3 working days
Silver	80% of enquiries dealt with at first point of contact	50% of calls answered in 20 seconds	Less than 10% of calls abandoned	75% of emails answered within 3 working days
Bronze	70% of enquiries dealt with at first point of contact	30% of calls answered in 20 seconds	Less than 15% of calls abandoned	75% of emails answered within 10 working days
Below Bronze	<70% of enquiries dealt with at first point of contact	<30% of calls answered in 20 seconds	>15% of calls abandoned	<75% of emails answered within 10 working days

- Allow a three months' shadow period to adjust to the required higher standards where we will not consider applying performance penalties
- Thereafter quarterly performance assessed against the scoring mechanism with rectification plan for underperformance including penalty clauses for sustained underperformance.

### Main Helpline for ESPF

Period	First time fix	Call answer time	Abandoned call rate	Email response time
<b>GOLD TARGETS</b>	85%	75%	5%	100%
April 21	96%	53%	5%	100%
May 21	95%	44%	7%	100%
June 21	95%	56%	5%	100%
July 21	91%	43%	9%	100%
August 21	88%	31%	9%	100%
September 21	86%	23%	6%	100%

### Website Helpline (all six Pension Funds)

Period	First time fix	Call answer time	Abandoned call rate	Email response time
<b>GOLD TARGETS</b>	85%	75%	5%	100%
April 21	N/A	30%	18%	N/A
May 21	N/A	31%	15%	N/A
June 21	N/A	48%	10%	N/A
July 21	100%	39%	10%	100%
August 21	100%	49%	21%	100%
September 21	100%	67%	6%	100%

The Helpdesk suspect that there are some errors with the reporting which has caused the SLA% to be lower than expected in September for both helplines. It is currently under investigation with BT. They have started to manually capture daily data for October so that they can check for accuracy.

## Appendix 3 - Internal Audit Report – Pension Administration - People, Processes and Systems 2020/21

Ref.	Finding	Potential risk implication	Risk	Agreed action	Owner	Target Date
1	<p><b>Indemnity from Admitted Bodies</b></p> <p>We reviewed controls over the admission of new bodies into the Fund and identified the following issues:</p> <p>1. For 1 of 5 admitted bodies (N-Viro) tested, clause 9.3 &amp; 9.4 of the signed admission agreement indicated a requirement for a bond of £160k. The agreement, signed in Dec 20, was not accompanied by a completed bond. We understand the bond is not being chased because the contract will be terminated from 1 April 21. It has later transpired that no bond was actually required in this instance due to a subsequent agreement between all parties (see "Agreed Action" opposite).</p> <p>2. Clause 9.3 of the signed agreement with Churchill (which relates to St. Paul's Church of England Academy) required either a bond or a guarantee (where the Administering Authority determines that a bond is not required.) However, in discussion with the Head of Pensions, that it had been agreed by both parties that a guarantee would suffice in this instance and no reference to a "bond" should have been made. To avoid confusion and potential future disagreement between parties, additional care should be taken in wording agreements. In addition, Clause 9.2 of the same agreement refers to the level of risk exposure arising on the premature termination of the service provision or assets by reason of insolvency, winding up or liquidation of the Admission Body, as the sum of £XXXXXX. Clearly, this should have provided a specific value to accurately reflect the overall financial risk to the Fund and guarantee required.</p>	In both cases, it transpires that the bonds were not required despite the agreements indicating otherwise. It is therefore important that agreements are clearly worded, and subsequently amended are required and agreed, to avoid any confusion and uncertainty over the requirement to obtain bonds. Without, this, it may not be clear where bonds are required and they may not be obtained, therefore exposing the Fund to avoidable liabilities arising from potential financial difficulties.	Medium	Significant work has been actioned on admissions to ensure agreements outstanding are resolved and new admissions are managed effectively in initiation. Work in this area includes the production of an outsourcing guide which has been shared with all employers and a training session on this topic took place at the employer forum in Nov 20. Admissions status has been reported quarterly at pensions board and committee meetings to show transparency and progress. The N-Viro contract fails to have a bond in place, which would have been in line with the wording in the signed admission agreement. Prior to signing, all parties agreed that a guarantee from the parent company was appropriate instead of a bond. It appears the admission agreement was not changed to reflect this point prior to signing. The N-Viro contract is due for termination and a bond will not be sought to align with the agreement. The Fund has recruited into key posts now which means that new admissions are being managed more effectively and process notes to ensure all steps are fully documented will be created to ensure the Fund is complete in its actions in this area. In addition, after discussions with legal, the Fund have agreed to use a portal-based approach to admission agreements which will speed up and streamline the process and ensure, where bonds are required, this documentation is created at the outset. This new portal will also improve the Fund's ability to communicate with costs associated with admissions due to the flat fee structure for the legal side. Orbis Law will continue to execute admissions for the Fund.	Sian Kunert	01/11/2021
4	<p><b>Lack of Formal Documented Pension Administration Procedures</b></p> <p>The processes and activities involved in the management of the Pension Fund are complex and involve regulations which evolve over time. In reviewing these processes, we found that:</p> <p>1. Despite the complexity of the processes, we noted that there are no documented detailed procedures and/or flowcharts which define the end-to-end processes performed by the team. Examples of activities which require formal procedures include new starters, transfers in, leavers, transfers out, retirement benefit calculations for deferred, active and dependants of deceased members, change to member details such as bank, address death etc.</p> <p>2. Currently, there is reliance on the use of checklists for tasks performed by the team. The checklists do not provide the team with an overall picture of the links between various tasks, teams or how the processes fit together, including key risks and controls to mitigate these risks.</p> <p>3. From walkthroughs of the processes performed, we also noted that much of the knowledge and experience of team members is "in their heads" and gained over the years. To ensure consistency and to help new starters, this should be documented.</p> <p>Procedures help to identify gaps in controls and if in place often help to make processes more effective and efficient. They also serve to provide new staff with clear guidance and instruction.</p>	Where procedures are not formally documented, staff may not be fully aware of their responsibilities and key tasks may not be performed.	Medium	ESCC PAT team have inherited the Orbis processes and agreed that processes are not well documented, but the checklists are in place for pretty much all tasks. It would be normal to review the processes and procedures as part of a data migration exercise and it's part of the Aquila Heywood standard project plan. However, due to the project's tight timeframe, we have to cut out non essential activities. It was always acknowledged the work would be looked at post go live over the Summer 2021. We will create a project plan to review these in August, with an expectation to complete many of these this year.	Paul Punter	01/08/2022 The first process to be reviewed will be the TV-out (including pension scams) and a small team are meeting in County Hall on 6/10/21 to document the current process and prepare a flowchart using Visio software.
8	<p><b>Key Person Dependence/Risk - Updates to Altair Factor Tables</b></p> <p>Our review of processes in place to ensure accuracy of retirement benefit calculations by the Altair system identified a key person dependency within PAT.</p> <p>1. Currently, only one individual within the ESCC has responsibility for and can update the factor tables in Altair. At the moment, the alternative resource for this task is from the Surrey PAT. Discussions with the Fead of Pensions noted that this is a short term risk and the Surrey team will provide support until the end of June 2021 when it is anticipated that new staff will be recruited.</p> <p>2. In addition, there is no evidence indicating that there is an independent review of the updates to the factors performed by the individuals above.</p> <p>3. For career average revalued earnings (CARE) benefits, they are revalued annually through updates made to the factor tables in Altair. However, there was no evidence to indicate that the revaluations were subject to independent review to ensure the system calculations are accurate.</p>	With the transfer of pension administration back to ESCC, should the key individual responsible for updating the factor tables in Altair be unavailable for any reason, there may not be appropriate cover to undertake this function. Without independent checks of the factors unloaded, errors in calculations may not be detected timely.	Medium	We are all aware that following the TUPE transfer we have signification recruitment to undertake. Recruitment is now a priority for the Fund, particularly now support for the project work from Surrey ceased on 30/6/21. whilst we do currently have a few key person risks, we do endeavour to still have their work checked. As a last resort, the Fund are still able to call on SCC for limited support where SCC can accommodate. The Fund is aware of this key person risk and while recruitment is underway to fill the gaps in establishment from being PAT inhouse this risk is being tolerated. In addition, staff in the team are cross training each other where possible to mitigate this risk. This risk is also included within the risk register reported to Board and Committee quarterly. When factors are changed and revaluation tables updated, these are communicated to PAT and extra care taken to check the first few cases therefore to check factors	Paul Punter	Dec-21

Ref.	Finding	Potential risk implication	Risk	Agreed action	Owner	Target Date
2	<b>Processing of Changes to Addresses</b> Members addresses represent personal data that should be adequately protected. We reviewed the controls for processing changes made to this information to validate that the change was valid and authorised. 10 changes to addresses were tested and we identified the following issues:	Lack of independent checking of changes to addresses in Altair increases the risk of errors or invalid changes being processed. Where acknowledgement letters confirming address changes are not sent to members following instructions from employers, any incorrect/invalid changes are less likely to be identified.	Medium	1. The actions carried out during the period of audit were in line with the procedures set by the Orbis Pensions team managed in SCC. Orbis Pensions did not verify "Change of Address" for any of the six Funds in scope. When Surrey introduced i-Connect, again, they refused to allow a task to be created for the ESCC cases. Whilst disaggregating from Orbis to a sovereign ESCC Pensions function, additional controls were put in place as the ESCC pensions management team were concerned with the lack of check in this part of the process. In the ESCC version of Altair, which went live in April 2021, address changes created a workflow task (there is no checklist for COA tasks). In addition to the workflow check to confirm accuracy for the record change, the PAT always write a letter to the new address to verify the details. 2. With much of Pensions communications moving towards e-comms we are encouraging members to selfserve via MSS website. Therefore, we accept COA by email as the MSS system informs PAT electronically of the change. Any changes via the portal are secure as the member has already passed the website password security to log-in. 3. This item has been corrected. 4. Same as point 1, at the time the PAT correctly followed the Orbis process which has since been replaced. 5. This item has been corrected.	Paul Punter	Complete
3	<b>Controls over Changes to Bank Details</b> A sample of 10 changes to bank details was tested. In one instance, we noted had a handwritten instruction dated 28/11/19 to transfer the bank account to Nationwide, although the letter did not indicate the new sort code/account number. A review of the member's Altair payroll details indicates the request was processed using a new Nationwide account without the relevant supporting documentation on record. We understand that, in this instance, the documents to support the change were not uploaded to the Altair record.	Where supporting documents are not uploaded to the Altair record, it is not possible to check that bank detail changes are valid and have been accurately input.	Low	This case was valid and updated correctly, but the supporting documents were not oloaded to the Altair record. The team (including the Fund team) have been reminded of the wider importance of only acting once all the appropriate documents have been received & stored appropriately on Altair.	Paul Punter	Complete
5	<b>Altair User Access Review</b> Following the previous audit of Pensions in 2019/20, management agreed to perform a review of Altair users access with a view to restrict access appropriately. Our review noted that the review of access was performed in December 2020. However, the list provided for review was not comprehensive and excluded some internal and external users (including Hymans).	Without a complete review of access/profiles, there is a risk of inappropriate and/or unauthorised changes to member records.	Medium	A complete review of Altair user access was undertaken as part of the new Altair database. Every user was reviewed and only a limited number of previous Orbis users now have access to the new ESCC database. We are working with ICT to create a documented Altair Access Monitoring Process. This will cover Altair i-Connect, Insights and MSS.	Paul Punter	Complete
6	<b>Processing of Tasks in a Timely Manner</b> 1. Five transactions were sampled from the list of outstanding tasks provided as of 2 Feb 2021. 3 of these had not been resolved at the time of our fieldwork (12 March 21). 2 of 3 were enquiries about being incorrectly recorded as working part time. In discussing this issue with management, it is clear that a noticeable fall in tasks completed should have been expected during Feb to April 21 due to the dissolution of Orbis Pensions and the implementation of Altair. 2. In one of the three cases above, the member emailed on 15 Jan 20 enquiring about two items, one was addressed and the other was not. As noted above, the issue not addressed reflected the member service period as being part time instead of full time. Subsequently, the member made contact again on 19/02/21 raising the same issue, but as the time of our audit, the task was still outstanding. As referred to above, it is important to reflect on the potential reasons why these tasks might have slipped, including the dissolution project and the implementation of the new system, all of which has resulted in considerable pressure on the PAT. Management have been very vocal to the Pension Board and Committee that there would be a noticeable fall in delivery during this period.	Where tasks are not resolved on a timely basis, this increases the risk of members dissatisfaction and might potentially result in reputational damage.	Low	It is important to note on this finding that the PAT have an agreed set of KPI's which define the timeliness of processing many of the main activities completed by the team. The KPI's are not to achieve 100% within the desired timelines, the KPI achievement target has to date been monitored against a target of 90-95%. The KPI targets are reported quarterly to Committee and Board with explanations on service issues in achieving the targets. The KPI target measures are tighter than the statutory requirements to complete these activities. The KPIs currently in place were a handover from the standard reported Orbis Pensions targets managed by SCC.ESPF defined its own KPI/SLA targets in late 2020, however, these KPIs were not implementable while PAT was under the Orbis structure. In addition the PAT activity KPI reporting, the team also report Helpdesk monthly performance to the Pensions Board and Committee quarterly. The timing of the audit was unfortunate in that it coincided with the dissolution of the PAT from Orbis pensions and is not representative of the usual activity, as the team were carrying out dual pensioner payrolls, user acceptance testing and managing the dissolution. The Fund agree that where tasks are not resolved on a timely basis,	Paul Punter	target 30/09/2021 but went live 13/10/21 The new KPI's have been created by Aquila Heywood and put into the Altair System for review. These have been reviewed by the PAT and some minor changes made. We meet with
7	<b>Key Performance Indicators</b> Each month, the PAT generates KPI scorecard which is reported to the Pensions Committee. This measures actual performance against a set of agreed standards Whilst 13 activities are currently measured, some key service standards included in the pension's strategy document are not being tracked, including: 1. Letters/emails acknowledged within 10 days 2. Changes in member details including bank details within 9 days. 3. Calls to the pensions team answered within 3 rings.	Where key performance standard are not monitored, this increases the risk that service and delivery levels might drop.	Medium	As noted in finding Ref 6 - the KPI's currently in place were a handover from the standard reported Orbis Pension targets managed by SCC. ESPF defined its own KPI/SLA targets in the 2020 Administration Strategy which went live January 2021 after consultation with Employers in late 2020, however, these KPIs were not implementable while PAT was under the Orbis structure. To monitor against the new KPI activities as per the admin strategy, the Fund has had to request these be built into the ESCC version of Altair after it went live. These have recently been released into	Paul Punter	target 30/09/2021 but went live 13/10/21 The new KPI's have been created by Aquila

<p>4. New starters processed within 10 days of receipt of the notification.</p>		<p>the test vesion of Altair for review. Once these have been tested and loaded to the live system,the Fund will be able to start reporting against these KPI's. It is anticipated that there will be some reporting difficulties until these KPI's are fully established, but the Fund will continue to report and explain to Committee and Board during this process. In addition to the KPI targets, the Altair system currently does not indicate the statutory deadlines for tasks, and this is being addressed in the work Aquila Heywoods have been asked to implement for us. All calls should go via the Pensions Helpdesk and their performance is again reported to the Pensions Board &amp; Committee. In addition, Altair Insights has been implementaed and the Management information module is live and includes a live performance dashboard.</p>	<p>Heywood and put into the Altair System for review. These have been reviewed by the PAT and some minor changes made. We meet with Aquila Heywood 29/9 (postponed from 23/9)</p>
<p><b>9 Lack of Independent Validation and Retention of Supporting Documentation</b></p>			
<p>In completing our work, we identified some instances where there was no evidence of checks taking place or supporting documentation on file, including retirement benefit payments and death benefits (dependent pension payments).</p>	<p>Without independent checks, there is a risk of erroneous payments. Where documentation is not retained on member records, this results in inadequate audit trails and potentially invalid transactions.</p>	<p>Medium</p> <p>As previously stated, we currently have checklists as our key evidence of tasks being checked. The other is Altair itself as work passes from the doing to checkers task list so there is an online audit trail of who has done and checked tasks. We agree that copies of all documents should be retained on Altair and that is our expectation. This has been reiterated to staff across the whole Fund.</p>	<p>Paul Punter</p> <p>Complete</p>
<p>In terms of the Payment of Death Grant form (TM10), there is no specific checklist on the form for the checker to complete, as there is with other forms.</p>			

This page is intentionally left blank

**Report to:** Pension Committee

**Date:** 25 November 2021

**By:** Chief Financial Officer

**Title:** Annual Report and Accounts 2020/21

**Purpose:** To present the Annual Report and Accounts 2020/21 for approval

---

## **RECOMMENDATION**

**The Committee is recommended to Review and approve the draft Pension Fund Annual Report and Accounts 2020/21**

---

### **1. Background**

1.1 This report has been prepared to enable the approval of the Annual Report and Accounts 2020/21 in advance of the required publication by 1 December 2021.

### **2. Supporting Information**

2.1 Annual Report Requirements - Local authorities responsible for administering a pension fund (scheme manager) forming part of the Local Government Pension Scheme (LGPS) are required by the LGPS Regulations to publish a pension fund annual report. The publication of the annual report is separate from the authority's own statutory accounts and contains financial statements in respect of the pension fund. Local authorities are required to publish the Annual Report by 1 December.

2.2 It is the role of the Pension Committee to approve the Pension Fund Annual Report and accounts having considered whether appropriate accounting policies have been followed and any issues raised by Grant Thornton from the audit. The accounts were considered and approved by Pension Committee on 28 September 2021 and have been incorporated within the Council's Statement of Accounts which was completed and published on 19 October 2021, with an unqualified audit opinion. The accounts are included as a copy in the Annual Report, which is prepared based on the Chartered Institute of Public Finance and Accountancy (CIPFA) guidance for LGPS funds on preparing the annual report published in 2019. The draft report is included in **Appendix 1**.

### **3. Conclusion and reasons for recommendation**

3.1 The Pension Fund Annual Report sets out the financial, performance and governance activities of the East Sussex Pension Fund during the 2020/21 financial year. The Pension Committee is recommended to review and approve the Pension Fund Annual Report and Accounts for 2020/21, for publication in advance of 1 December 2021.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Sian Kunert, Head of Pensions  
Email: [Sian.kunert@eastsussex.gov.uk](mailto:Sian.kunert@eastsussex.gov.uk)



# **East Sussex Pension Fund Annual Report and Accounts**

## **2020-2021**

## Contents

1	Chairman's report	3
2	Welcome from Chair of Pension Board	5
3	Introduction	6
4	Scheme Management and Advisers	7
5	Governance	9
6	Report of the Pension Board	13
7	Scheme Administration	16
8	Actuarial report	20
9	Employers	22
10	Risk management	25
11	Financial performance	27
12	Investment policy and performance	30
13	Independent adviser's report	46
14	Asset pools	48
15	Fund account, net assets statement and notes	52
a.	East Sussex Pension Fund Account	52
b.	Net Assets Statement for the year ended 31 March 2020	53
c.	Notes to the East Sussex Pension Fund Accounts for the year ended 31 March 2020	54
16	External auditor's report	74
17	Pension's administration strategy report	91
Appendix 1.	Funding strategy statement	92
Appendix 2.	Investment strategy statement	128
Appendix 3.	Communications policy statement	129
Appendix 4.	Governance policy statement	130

# 1. Welcome from Chair of Pension Committee

## Welcome to the East Sussex Pension Fund Annual Report for 2020/21

As chair of the East Sussex Pension Fund (the Fund) Pension Committee, I have the pleasure in introducing the Fund's Annual Report and Accounts for 2020/21. The accounts focus on the financial implications of activity in 2020/21 but so much more has been achieved over the past year, including the Fund's resilience to working from home through the pandemic and embedding new ways of working.

The Fund had £4,244m as funds under management at 31 March 2021 to meet the accrued benefits, with a funding position of 107% comparing assets to liabilities, putting the Fund in a very strong position. The investment return for the year to 31 March 2021 was 22%, which was an outperformance of the benchmark by 3%, with returns outperforming the benchmark in each of the 1, 3 and 5 year periods. The membership of the Fund at March 2021 was 78,466 people (active – 25,002, pensioner – 22,230 and deferred – 31,234) and 127 employer organisations.

The Fund has come a long way in 2020/21 with many changes made both internally and externally to respond to challenges faced and with the aspiration of achieving best practice across everything we do. The year started with the country still in lockdown from the COVID-19 pandemic, which meant our staff had to find new ways of working and supporting our members from home. The team got on with everything required of them, using remote access technology, providing a high-quality service, keeping up with performance targets and response times, proving that remote and hybrid working was possible. It was also challenging for the members themselves with changes in the way they could communicate with us and the move to more electronic methods to provide documentation. This has led to the department becoming almost paper free in the year.

The Pension Committee is responsible for managing the Fund, with the assistance of the Pension Board, East Sussex County Council officers, external advisors and fund managers. In responding to the Scheme Advisory Board Good Governance review, the Fund carried out a major review in 2019 and 2020 saw these findings being implemented. This included a major restructure of the team resources in recognition of increasing regulatory environment for LGPS Funds and increased reporting requirements to ensure the Fund has sufficient resources to implement the Fund's strategies and policies. The Project also led to an overhaul of the terms of reference for the Pension Committee, Pension Board and officer delegations. In addition a number of key policies were implemented or refreshed to align with best practice including a new conflicts of interest policy and a complete redesign of the administration strategy.

The Fund made some significant changes in relation to responsible investment, and more specifically climate change risk, in the financial year with more work planned on this in the months and years. The Fund have taken climate strategy as one of the key focuses of its ongoing work, to develop an in depth understanding on the financial risks to the Fund of the climate emergency and focusing on ways in which the Fund can both reduce this risk but also find opportunities to help with the energy transition to find sustainable solutions. As a result of this strategic focus, the Fund implemented a Statement of Responsible Investment Principles that clearly set of the Fund's beliefs on responsible investment and climate risk and how the Fund would manage these risks and commitments from the Fund for implementation. One of the key risks identified during the work in this area was an unconscious exposure to companies that have a significant impact on climate risk and other risks with an ESG focus such as human rights or governance issues, leading the Fund to commit to moving all its investment away from traditional index linked passive fund. Instead the Fund moved this investment into a range of sustainable funds including two active impact funds that have a strong conviction on the companies in which they invest and a move into a smart beta fund which excludes companies that fail to meet its ESG standards and favours companies aligned with the Paris agreement. The climate strategy hasn't ended with equities, which is the easier place to implement these changes, but has also moved into Infrastructure, where the Fund also entered into a new investment which minimises climate risk through modelling of climate change risk scenarios. The Fund continues to favour engagement with companies to have a say in how they are run and influence change, rather than reduce the investable market by excluding industries and this is in line with all guidance to the Fund from governmental bodies and investor advisory groups.

One of the major projects the Fund faced during 2020/21 was the transfer of the Pension Administration Team back into East Sussex from Surrey County Council. The project took seven months to complete by 7 April 2021, with the change ensuring the Fund has increased control and governance of pension benefit payments and records and allows us to quality assure processes and to focus on our East Sussex Fund members. Overall, the project was a success, although

we still have some staff to recruit into new roles as a result of the breadth of work required within Pensions Administration, but we believe this will be so beneficial to the fund and its members.

The Fund has continued to be an active member in the ACCESS (A Collaboration of Central, Eastern and Southern Shires) investment pool, together with 10 partner LGPS Funds. By the end of 2020/21 a total of £20.4bn was invested on the ACCESS platform, with seven new sub funds launched., invested across 22 sub funds. A further £11.1bn is managed via ACCESS for passive equities. In total 57% of ACCESS Fund assets have been pooled.

The Pension Committee and Pension Board have worked tirelessly to transform the East Sussex Pension Fund landscape. I would like to take this opportunity to express my thanks for all the support and input provided by Committee and Board members and officers. I look forward to continuing to work with members and officers in the new financial year as the Fund seeks to meet the challenges of an ever-changing national and global environment. In presenting the Annual Report, I hope you find it helpful in underspending the Fund. The Fund has refreshed its website and is now a ready source of up to date information, please log on to [www.eastsussexpensionfund.org](http://www.eastsussexpensionfund.org) for further information.

Councillor Gerard Fox

Chairman of the East Sussex Pension Fund

DRAFT

## 2. Welcome from Chair of Pension Board

As the Independent chair of the Funds Pension Board, I am happy to highlight some of the key areas of focus of the Board over the 2020/21 financial year.

The past year has seen significant changes made to how the Fund operates. Pension Administration is now provided by an in-house team based in the Lewes council offices, where previously it was provided through the Orbis partnership with Surrey County Council. Additionally, following a review by the Committee, supported by the Pension Board, the resources made available to the Fund for governance, including the number of staff working for the Fund has increased substantially. This has allowed for a review of the internal controls, policies and procedures. As a result, the Fund's officers, with Pension Board members, were able to conduct a review of member data quality and improve the employer admissions and cessations processes.

Pension Board members provided oversight of the changes being made, by sitting on various working groups which reviewed, with Committee members, an improvement of the Fund's Governance standards. The Pension Board and the Committee have been mindful of the good governance review conducted by the Scheme Advisory Board as part of this process to ensure best practice is being implemented.

The Board has supported the Fund in increasing its staff headcount to meet the new governance policy of the Fund. As part of this the Fund has been able to develop several new policies including a more detailed risk register. The new risk register has been reviewed and the Board agreed with the recommendation made to the Committee that it should be adopted. The Board is aware that further improvements will be made to this document, with oversight from the Board.

Members of the Pension Board have participated in the data improvement working group. The related workstream has, working with employers participating in the Fund, led to significant improvements in the quality of member data held. By improving the quality of member data records this reduces the risk that members will not be provided information about their benefits in a timely manner, simultaneously mitigating the risk that beneficiaries do not receive the correct amount owed to them on time.

As part of the review of the admissions and cessations processes, new templates have been created to ensure smoother onboarding of new scheme employers and admitted bodies. The Pension Board has engaged closely with officers and the Committee on this topic.

Other work that the Pensions Board has engaged in during the year is understanding the McCloud judgement on age discrimination, and how this will potentially impact members pension benefits, reviewing how employers manage the cost of ill-health retirement and providing an insurance option for them to use respect, reviewing quarterly the performance of the administration team against the agreed service standards, and, finally, reviewing the communications to members

### Looking Forward

Much of the Pension Board's business in 2021-22 will reflect its business in previous years i.e. its scrutiny of the administration team's service to members and employers and its compliance with regulatory standards and expectations of The Pensions Regulator. For example, development of more detailed service performance indicators, efforts to further improve data quality and more detailed and frequent customer surveys. Implementation of the changes because of the "McCloud case", will also feature heavily at the Pension Board's meetings,

In March 2021, The Pensions Regulator launched a consultation on its intention to combine its codes of conduct. The Pension Board responded to that consultation in May 2021, expressing its concern about the lack of clarity in a number of areas, including requiring the use of a new term "Governing Body". The Pension Board will work with the Fund's officers to respond to changes to the regulator's code(s) to assess compliance and assist with changes required to ensure full compliance.

Going forward, the Board has representatives on the McCloud working group and will also have members as part of the communications working group. This will give Pension Board members increased opportunities to use their knowledge and understanding to assist with the development of the Fund's processes and the adoption of best practice.

The Pension Board would like to thank the Fund's administrators, officers and employers for the hard work they have put in, during difficult working conditions with the pandemic, to maintain the service to members, to improve the Fund's governance, and to substantially improve the quality of member data held in the Fund's records.

Ray Martin

Chair of Local Pension Board

### **3. Introduction to the LGPS**

#### **Local Government Pension Scheme**

The LGPS is a statutory scheme, established by an Act of Parliament, the Superannuation Act 1972 and, since April 2014 the Public Service Pensions Act 2013. The Local Government Pension Scheme Regulations 2013 came into force on 1 April 2014. Membership of the LGPS is open to all employees of local authorities except teachers, fire fighters and police, who have their own separate schemes. It is also open to employees of other employers specified within the legislation.

The LGPS is a registered public service pension scheme under Chapter 2 of Part 4 of the Finance Act 2004 meaning that members receive tax relief on contributions. The Scheme complies with the relevant provisions of the Pension Schemes Act 1993, the Pensions Act 1995 and the Pensions Act 2004.

East Sussex County Council has a statutory responsibility to administer and manage the East Sussex Pension Fund on behalf of all the participating employers of the Fund in East Sussex, and in turn the past and present contributing members, and their dependents.

A major responsibility of the County Council as the administering authority is to undertake a valuation of the Pension Fund's assets and liabilities (triennial valuation). The main purpose of this exercise is to assess the size of the Fund's current and future liabilities against the Fund's assets, and then set the employer contribution to the Fund for each participating employer for the following three-year period. The most recent actuarial valuation of the Fund was carried out as at 31 March 2019. The funding level at this at this valuation is 107%.

It is important to note that ultimate responsibility for both the administration of the Pension Fund and the investment of all monies associated with the Fund remains with East Sussex County Council, as administering authority for the East Sussex Pension Fund. This has been delegated to the East Sussex Pension Committee supported by the East Sussex Pension Board.

## 4. Scheme Management and Advisers

Responsibility for the East Sussex Pension Fund is delegated to the County Council's Pension Committee Members with support from the East Sussex Pension Board. The Pension Board comprises members representing employers and members in the Fund with an Independent Chairman. The Pension Committee receives advice from the County Council's Chief Finance Officer, Actuary, Investment Consultants and an independent Investment Advisor.

### 2020/21 PENSION COMMITTEE MEMBERS

#### EAST SUSSEX COUNTY

##### COUNCILLORS:

Gerard Fox (Chairman)	Conservative
Simon Elford (to July 2020)	Conservative
Andy Smith (from September 2020)	Conservative
Nigel Enever	Conservative
David Tutt	Liberal Democrats
Trevor Webb	Labour

### 2020/21 PENSION BOARD MEMBERS

#### INDEPENDENT CHAIRMAN:

[pensionboard@eastsussex.gov.uk](mailto:pensionboard@eastsussex.gov.uk)

Ray Martin

#### EMPLOYER REPRESENTATIVES:

Councillor Carmen Appich (to September 2020)	Brighton & Hove City Council
Councillor Tom Druitt (from October 2020)	
Councillor Chris Collier	Districts & Borough Councils
Stephen Osborn	Educational Bodies

#### MEMBER REPRESENTATIVES:

Niki Palermo	Active & Deferred
Diana Pogson	Pensioners
Lynda Walker	Active & Deferred

#### SCHEME ADMINISTRATOR:

East Sussex County Council  
[Pensions@eastsussex.gov.uk](mailto:Pensions@eastsussex.gov.uk)

#### BANKERS TO THE FUND:

NatWest Bank

#### AUDITOR:

Grant Thornton UK LLP  
London

### PENSION FUND OFFICERS

[escppensionsmanager@eastsussex.gov.uk](mailto:escppensionsmanager@eastsussex.gov.uk)

#### TREASURER / S151 OFFICER:

Ian Gutsell

#### HEAD OF PENSIONS:

Sian Kunert

#### HEAD OF PENSIONS ADMINISTRATION:

Paul Punter

#### INVESTMENTS AND ACCOUNTING:

Russell Wood

#### GOVERNANCE AND COMPLIANCE:

Mike Burton

#### EMPLOYER ENGAGEMENT:

Tim Hillman

## ADVISORS TO THE FUND

<b>ACTUARY:</b>	Until December 2020 Hymans Robertson 20 Waterloo Street Glasgow G2 6DB	From January 2021 Barnet Waddingham 163 West George Street Glasgow G2 2JJ
<b>LEGAL ADVISORS:</b>	Appointed from National LGPS Framework for Legal Services	
<b>INVESTMENT ADVISER:</b>	Until January 2021 Hymans Robertson	From February 2021 Isio
<b>INDEPENDENT ADVISER:</b>	William Bourne	
<b>ASSET POOL:</b>	ACCESS Pool	
<b>ASSET POOL OPERATOR:</b>	Link Funds Solution	
<b>FUND MANAGERS:</b>	Adams Street Partners Harbourvest Longview Partners* M&G** Newton* Pantheon Ruffer* Schroders UBS Wellington WHEB Atlas Storebrand	
<b>CUSTODIAN:</b>	Northern Trust	
<b>AVC PROVIDER:</b>	Prudential	
<b>BODIES TO WHICH THE FUND IS MEMBER, SUBSCRIBER OR SIGNATORY:</b>	Pensions and Lifetime Savings Association (PLSA) Local Authorities Pension Fund Forum (LAPFF) CIPFA Pensions Network Club Vita Local Government Association (LGA) Local Government Pension Scheme National Framework: <ul style="list-style-type: none"><li>• Passive Investments,</li><li>• Legal Services,</li><li>• Actuarial Benefits and, Governance</li><li>• Investment Consultants</li><li>• Stewardship Advisory Services</li></ul> Principles for Responsible Investing (PRI) Institutional Investors Group on Climate Change (IIGCC) Climate Action 100+	

\* Appointed through the ACCESS Pool operator

\*\* Corporate Bonds mandate appointed through ACCESS other mandates directly appointed.

## 5. Governance

### Pension Committee

East Sussex County Council (Scheme Manager) operates a Pension Committee (the Pension Committee) for the purposes of facilitating the administration of the East Sussex Pension Fund, i.e. the Local Government Pension Scheme that it administers. Members of the Pension Committee owe an independent fiduciary duty to the beneficiaries of the Pension Fund. Such members are therefore required to carry out appropriate levels of training to ensure they have the requisite knowledge and understanding to properly perform their role.

### Pension Board

The Scheme Manager is also required to establish and maintain a Pension Board, for the purposes of assisting with its duties. The Pension Board is constituted under the provisions of the Local Government Pension Scheme (Governance) Regulations 2015 and the Public Service Pensions Act 2013. Members of the Pension Board should also receive the requisite training and development to enable them to properly perform their compliance role, as required by legislation.

### ACCESS Pool Joint Committee

The ACCESS Pool operates a Joint Committee which has been set up through an Inter Authority Agreement (IAA) which was formalised and executed by each Individual Authority between May and June 2017 and came into effect on the 31 July 2017 at the first formal Joint Committee meeting. The role of the ACCESS Joint Committee, which has one representative from each Fund is to:

- Ensure pool delivers value for money;
- Appointment and termination of the Operator;
- Ensures pool meets needs of individual funds e.g. sub-funds the operator must provide to support individual fund strategies;
- Set pool level policies e.g. sharing of costs;
- Monitor Operator performance against KPIs;
- Monitor investment performance;

### Committee membership and attendance

During the year ended 31 March 2021 there were 4 meetings of the Pension Committee, 4 meetings of the Pension Board and one annual employers' forum.

Member attendance at committee meetings during 2020/21

<b>2020/21 Pension Committee Members</b>		
		Nos. of meetings attended
<b>East Sussex County Councillors:</b>	Gerard Fox (Chairman)	4/4
	Simon Elford <sup>1</sup>	1/1
	Nigel Enever	4/4
	Andy Smith	3/3
	David Tutt	4/4
	Trevor Webb	4/4

Member attendance at Board meetings during 2020/21

<b>2020/21 Pension Board Members</b>		
		Nos. of meetings attended
<b>Independent Chairman:</b>	Ray Martin	4/4
<b>Employer Representative:</b>		
Brighton & Hove City Council	Councillor Carmen Appich <sup>2</sup>	1/1
	Councillor Tom Druitt <sup>3</sup>	2/2
Districts & Borough Councils	Councillor Chris Collier	4/4
Educational Bodies	Stephen Osborn	4/4
<b>Employee Representative:</b>		
Active & Deferred	Niki Palermo	3/4
Active & Deferred	Lynda Walker	4/4

<sup>1</sup> Councillor Simon Elford was replaced by Councillor Andy Smith in August 2020

<sup>2</sup> Councillor Carmen Appich was replaced by Councillor Tom Druitt in October 2020, one meeting took place when this post was vacant.

<sup>3</sup> Councillor Carmen Appich was replaced by Councillor Tom Druitt in October 2020, one meeting took place when this post was vacant

Pensioners	Diana Pogson	4/4
------------	--------------	-----

Member attendance at ACCESS Pool joint committee meetings during 2020/21

2020/21 Joint Committee Members		
		Nos. of meetings attended
East Sussex County Councillors:	Gerard Fox	5/5

### **The Knowledge and Skills Framework**

The Fund's objectives relating to knowledge and understanding are to:

- Ensure the Fund is appropriately managed and those individuals responsible for its management and administration have the appropriate knowledge and expertise;
- Ensures that there is the appropriate level of internal challenge and scrutiny on decisions and performance of the Fund
- Ensure the effective governance and administration of the Fund; and
- Ensure decisions taken are robust and based on regulatory requirements or guidance of the Pensions Regulator, the Scheme Advisory Board (SAB) and the Secretary of State for Housing, Communities and Local Government.

#### ***CIPFA/Solace Knowledge and Skills Framework – Pension Fund Committees***

Although there is currently no legal requirement for knowledge and understanding for members of the Pension Committee, it is the Fund's opinion that members of the Pension Committee should have no less a degree of knowledge and skills than those required in legislation by the Local Pension Board. The SAB's 'good governance' project signals a much stronger requirement on Pension Committee members knowledge and understanding.

The CIPFA framework, that was introduced in 2010, covers six areas of knowledge identified as the core requirements:

- Pensions legislative and governance context;
- Pension accounting and auditing standards;
- Financial services procurement and relationship development;
- Investment performance and risk management;
- Financial markets and products knowledge; and
- Actuarial methods, standards and practice.

Under each of the above headings the Framework sets out the knowledge required by those individuals responsible for Fund's management and decision making.

#### ***CIPFA Technical Knowledge and Skills Framework – Local Pension Boards***

CIPFA extended the Knowledge and Skills Framework in 2015 to specifically include Pension Board members, albeit there is an overlap with the original Framework. The 2015 Framework identifies the following areas as being key to the understanding of local pension board members;

- Pensions Legislation;
- Public Sector Pensions Governance;
- Pensions Administration;
- Pensions Accounting and Auditing Standards;
- Pensions Services Procurement and Relationship Management;
- Investment Performance and Risk Management;
- Financial markets and product knowledge;
- Actuarial methods, standards and practices.

#### ***Links to The Scheme Advisory Board's Good Governance project***

In February 2019 the Scheme Advisory Board commissioned Hymans Robertson to consider options for enhancing LGPS governance arrangements to ensure that the Scheme is ready for the challenges ahead and at the same time retains local democratic accountability. Following extensive consultation and engagement with the LGPS community

the SAB has published 3 reports. The most recent report, published in February 2021, includes recommendations on the following areas:-

- Conflicts of Interest – Funds will be expected to produce and publish a policy covering actual, potential and perceived conflicts of interest
- Representation – Funds will produce and publish a policy on the representation of members and employers, explaining how voting rights work
- Knowledge and Understanding – Highlighting that key individual should have the knowledge and understanding to fulfil their functions, including the s.151 Officer.
- Service delivery – This covers publishing details of decision makers' roles and responsibilities, publishing an administration strategy, reporting on performance and including the Committee in business planning.
- Compliance and Improvement – Undergoing a biannual Independent Governance review

The findings of the Good Governance Review have yet to be formally adopted in statutory form, however, the Administering Authority recognises the principles behind the recommendations and seeks to embed them into the culture of the East Sussex Pension Fund.

### ***The Pensions Regulator's E-learning toolkit***

The Pensions Regulator has developed an online toolkit to help those running public service schemes understand the governance and administration requirements set out in its code of practice 14 Governance and administration of public service pension schemes.

The toolkit covers 7 short modules, which are:

- Conflicts of Interests;
- Managing Risk and Internal Controls;
- Maintaining Accurate Member Data;
- Maintaining Member Contributions;
- Providing Information to Members and Others;
- Resolving Internal Disputes;
- Reporting Breaches of the Law.

The modules of the Regulator's toolkit are by their very nature generic, having to cater for all public service pension schemes. While they give a minimum appreciation of the knowledge and understanding requirements set out in the Code of Practice they do not cater for the specific requirements of the individual public service schemes.

As a result the Regulator's toolkit does not cover knowledge and skills requirements in areas such as Scheme regulations, the Fund's specific policies and the more general pension's legislation. The Trustee Toolkit, a separate aid produced by the Pensions Regulator, includes a newly released module of scams. Whilst the Trustee Toolkit is designed for Trustees of private occupational pension schemes, some aspects of it have value for those connected to public service pension schemes.

The Pension Committee under the constitution of East Sussex County Council, has the responsibility "To make arrangements for the investment, administration and management of the Pension Fund".

Members of the Committee must, therefore, have an understanding of all aspects of running the Fund and how to exercise their delegated powers effectively.

Members of the Pension Committee require an understanding of:

- their responsibilities as delegated under the constitution of East Sussex County Council as the administering authority for the fund;
- the requirements relating to pension fund investments;
- the management and administration of the Fund;
- controlling and monitoring the funding level; and
- effective governance and decision making in relation to the management and administration of the Fund.

There also exists a specific requirement under MiFID II, that those making investment decisions, must be able to demonstrate that they have the capacity to be treated as professional investors.

### ***Expectations on Pension Committee Members***

The role of Pension Committee member is an important one and there are certain expectations on those undertaking the role. These include;

- A commitment to attend and participate in training events and to adhere to the principles of the Training Strategy
- The ability to use acquired knowledge to participate in meetings and to ask questions constructively of the information provided by officers, advisers and others
- Judge the information provided in a fair and open minded way that avoids pre-determining outcomes
- Operate within the terms of reference for the Pension Committee and the elected member code of conduct

### ***Local Pension Board***

Under the constitution the Local Pension Board is required to provide assistance to East Sussex County Council as the LGPS Scheme Manager in securing compliance with:

- LGPS Regulations and any other legislation relating to the governance and administration of the LGPS
- requirements imposed in relation to the LGPS by The Pensions Regulator
- the agreed investment strategy
- any other matters as the LGPS regulations may specify.

The role of the Local Pension Board is to provide assistance to the administering authority to ensure that the Fund is well run and complies with its legal responsibilities and best practice. The Local Pension Board does not replace the administering authority or make decisions which are the responsibility of the administering authority.

Local Pension Board members must be conversant with:

- the relevant LGPS Regulations and any other regulations governing the LGPS;
- guidance issued by The Pensions Regulator and other competent authorities, relevant to the LGPS;
- any policy or strategy documents as regards the management and administration of the Fund; and
- the law relating to pensions and such other matters as may be prescribed.

## 6. Report of the Pension Board

**Report to:** Pension Committee

**Date of meeting:** 28 September 2021

**By:** Chair of Local Pension Board

**Title:** Report of Pension Board to Pension Committee

**Purpose:** Report to Pension Committee, to consider understand the work completed by the Pension Board

---

**RECOMMENDATIONS: The Pension Committee is recommended to:**

**1) Note the report from the Pension Board which covers the work completed in year**

---

**1. Background**

1.1 This document outlines the actions taken by the Local Pension Board of the East Sussex Pension Fund (ESPF). It also details the training undertaken in the past 12 months to enable individual Pension Board members to develop and maintain the required level of knowledge and understanding to enable them to fulfil their function of supporting the Administering Authority, which is also known as the Scheme Manager.

1.2 This document will allow the Pension Committee to build a more detailed understanding of the work being done by the Pension Board to improve the operation of ESPF.

**2. Membership and attendance**

2.1 The membership of the Local Pension Board is

Employer Representatives

- Stephen Osborn - Deputy Director of Finance, University of Brighton
- Cllr. Chris Collier - East Sussex District and Borough Councils (until July 2021)
- Cllr. Tom Druitt - Brighton & Hove City Council (from October 2020)
- Cllr. Toby Illingworth- East Sussex District and Borough Councils (from July 2021)

Member Representatives

- Lynda Walker – UNISON
- Niki Palermo – GMB
- Diana Pogson – Pensioners' representative

Independent Chair

- Ray Martin

2.2 Cllr Appich stepped down from the Board in September 2020 and was replaced by Cllr Druitt in October 2020. Cllr Collier stepped down from the Board in June 2021 and has been replaced by Cllr Illingworth in July 2021.

2.3 Attendance at meetings has been high in the past year

	7 September 2020	16 November 2020	15 February 2021	1 June 2021
Stephen Osborn	Y	Y	Y	Y
Cllr Chris Collier	Y	Y	Y	N
Cllr. Tom Druitt		Y	Y	Y
Lynda Walker	Y	Y	Y	Y
Niki Palermo	N	Y	Y	Y
Diana Pogson	Y	Y	Y	Y

Ray Martin	Y	Y	Y	Y
------------	---	---	---	---

**3. Work of the Pensions Board**

3.1 Meetings are held shortly before each Pension Committee meeting, where all papers relating to administration, governance, policy, audit and communications are first considered by the Board prior to final versions being presented at Committee for approval. This allows the Board to feed in on matters of governance and represent the views of members and employers in the documents that are then taken for approval.

3.2 Members of the Pension Board sit upon, and have attended meetings of, the Communications Working Group, the Data Improvement Working Group and the McCloud Working Group. By sitting on the working groups members of the Pension Board are able to use their knowledge and experience to support officers of ESPF during the development of new policies and procedures. One example of the input of Pension Board members is the creation of a new way Fund members can contact Pension Board members.

3.3 The Pension Board considers its work programme at each meeting taking into account the regular items it sees and what is planned for upcoming committee meetings and are able to request areas of focus to be added to the Board work plan. An example of this working is the request of Board in 2020 to see a regular paper on employer contributions to have transparency on late payments by employers; this report is now a standing item for Board as part of the employer engagement report.

**4. Actions**

4.1 The Pension Board has supported the Pension Committee with its review and oversight of the disaggregation of ESPF from the Orbis partnership. This has seen ESPF administration services become an in-house operation providing more control to the ESPF to manage its operations and ensure transparency of quality of service provided to the ESPF members. Going forward the Pension Board will continue to work with the Administration Team to develop an updated approach to measuring service standards for the Fund.

4.2 The Board has also been a strong advocate, alongside the Committee, for the Good Governance project which completed in November 2020. Throughout this the Pension Board supported requests for extending the staffing budget at the Fund, which resulted in the number of officers increasing substantially to reflect the workload and responsibility of the Pension Fund across four work streams of Governance, Employer Engagement, Administration and Accounts and Investments. The changes made have led to significant improvements in the overall governance of the Fund and further improvements are in hand.

4.3 At its quarterly meetings members of the Pension Board have reviewed new policies and procedures being developed. This has ensured that the approach being taken by the Administering Authority is consistent with the recommendations made as part of the Scheme Advisory Board's good governance project along with statutory and regulatory requirements.

4.4 The independent chair represented the Board at the Employer forum in November 2020 with an overview of the work of the Board, updating the employers of the Fund on the key data quality work that has been achieved through the data improvement working group projects and implementation of the new administration strategy.

**5. Training**

5.1 In the past year members of the Pension Board took part in a survey conducted by Hymans Robertson to help understand their level of knowledge and understanding. The report received is broken down into the key areas, such as administration, and also measures the Pension Board against its peers in the other Funds that took part. This survey identified that particular focus should be given to pension administration and actuarial methods. It also showed that the ESPF's Pension Board members' knowledge and understanding scored 6<sup>th</sup> highest out of the 21 boards that took part.

5.2 Since the Hymans report was produced there has been a change of membership of the Pension Board. The Chair of the Pension Board is currently working with the Fund's Training Co-ordinator to develop a new method of tracking individual Pension Board member's knowledge and understanding which will allow for a more in-depth analysis of areas of focus.

5.3 When the new members of the Pension Committee were appointed members of the Pension Board were invited to attend the induction session, which included an introduction to the role of the Fund's lawyer, actuary and investment consultant.

5.4 All Board members are working towards ensuring they have completed the Pension Regulators Toolkit modules and will shortly be invited to carry out a self-assessment on their training needs.

5.5 Members of the Pension Board have attended a range of webinars covering topics ranging from governance to investment. In addition, Board members have attended training provided in house on McCloud, Covenant strength and outsourcing implications for employers within the LGPS. Members of the board regularly attend the CIPFA Pension Board member seminars that are run in the Spring and Autumn to update on all key regulatory changes and areas the Board may wish to ask questions on of their Funds.

**Ray Martin**  
**Chair of ESPF Local Pension Board**

DRAFT

## 7. Scheme Administration

### Service Delivery

During 2020/21, East Sussex County Council as Administering Authority for the East Sussex Pension Fund undertook the day to day pensions administration through Orbis, which is a shared services partnership covering the three councils of East Sussex, Surrey and Brighton and Hove. The Administration of the Fund has moved back in house to be managed by East Sussex County Council from 6 April 2021.

During the 2020/21 year, the Orbis Pensions Administration team, with oversight from the East Sussex Head of Pensions Administration, were responsible for

- administering the LGPS Scheme on behalf of the ESPF scheme employers in accordance with relevant legislation and Pension Committee decisions, also provision of services in connection with the uniformed fire officers;
- calculation of pensions and lump sums for retiring members of the LGPS and provision of early retirement estimates;
- maintenance of the database of pension scheme members and provision of annual benefit statements and deferred benefit statements;
- administration of new starters, including transfers in;
- administration and calculations relating to leavers;
- payment of pensions and other entitlements.

Communication to employers and members of administration is carried out where possible through access to the MyPensionsPortal for members to view their Annual benefit statements, nominations, personal details and carry out benefit calculations. The Orbis team also sent annual newsletters to scheme member and employers.

The Pension Fund website [www.eastsussexpensionfund.org](http://www.eastsussexpensionfund.org) provides scheme members and employers access to up to date information on the LGPS and the East Sussex Pension Fund.

Administration of the Fund is discussed quarterly at Pension Committee to ensure the service is managed and governed well with key performance indicators reviewed at each meeting. In addition, Pension Board consider the activities of the Pensions Administration team at each meeting. During 2019/20 the Fund set up an annual benefit working group as part of its Data Improvement Programme to deliver cleansing of employer common and specific data to ensure complete and accurate membership records. The Fund looks to achieve value for money in the administration of the Fund by providing the service in a cost effective and efficient manner utilising technology appropriately. Achievement of KPIs and high services levels helps the fund monitor the effectiveness of the fund.

### Internal Dispute Resolution Procedure

The LGPS is required by statute to make arrangements for the formal resolution of any disagreements on matters in relation to the scheme that may arise between the managers of the Scheme and the active, deferred and pensioner members of their representatives.

Where complaints cannot be resolved informally, there is access to a two-stage dispute resolution procedure. The first stage of this process is for the complainant to ask the Adjudicator appointed by the East Sussex Pension Fund to consider the matter under dispute. If the complainant is not satisfied with the response they can ask for a further review of the decision, along with any new evidence they might provide. The person responsible for reviewing stage 2 complaints is the Assistant Chief Executive. Ultimately the complainant has the right to refer their complaint to The Pension Ombudsman and seek assistance from the Pension Advice Service.

The following table summarises the number of disputes made through the Fund's Internal Dispute Resolution Procedure at each stage of appeal:

	2020/21
First Stage	6
Upheld	0
Declined	1
Ongoing	5
Second Stage	1
Upheld	0
Declined	0
Ongoing	1

This table reflects the position for the 2020/21 financial year and is not the current position. The complaint at stage 2 was received in stage 1 of the same time period.

### Key administration performance indicators

Performance Indicator	Impact	Measure	Target %	Achieved by Fund %
Death notification acknowledged, recorded and documentation sent	Medium	within 5 days	95%	100
Award dependent benefits (Death Grants)	High	within 5 days	95%	97
Retirement notification acknowledged, recorded and documentation sent	Medium	within 5 days	95%	91
Payment of lump sum made	High	within 5 days	95%	95
Calculation of spouses' benefits	Medium	within 5 days	90%	99
Transfers In - Quote (Values)	Low	within 10 days	90%	89
Transfers In - Payments	Low	within 10 days	90%	91
Transfers Out - Quote	Low	within 25 days	90%	95
Transfers Out - Payments	Low	within 25 days	90%	94
Employer estimates provided	Medium	within 7 days	95%	74
Employee projections provided	Low	within 10 days	95%	93
Refunds	Low	within 10 days	95%	100
Deferred benefit notifications	Low	within 25 days	95%	100

	2019/20	2020/21
Number Of Complaints	5	18

### Financial indicators of administrative efficiency

The table below shows management expenses by members. The benchmark used is the average fund costs in 2019/20 from the SF3 returns.

Unit Costs Per Member	East Sussex Pension Fund		Benchmark Unit Costs £
	2019/20 £	2020/21 £	
Excluding investment management expenses	30.07	44.75	33.23
Including investment management expenses	225.65	220.43	232.31

### Key staffing indicators

At 31 March 2021, staffing numbers within Pension Administration were 18.9 full time equivalent members of staff.

This provides the fund with a staff to fund member ratio of 1:4,155.

With average reportable KPI cases per member of staff ratio of 1:316

### Membership

During 2020/21 the number of contributing members within the Pension Fund increased by 4.9% from 23,835 to 25,002. In summary, the number of members contributing to the Scheme is:

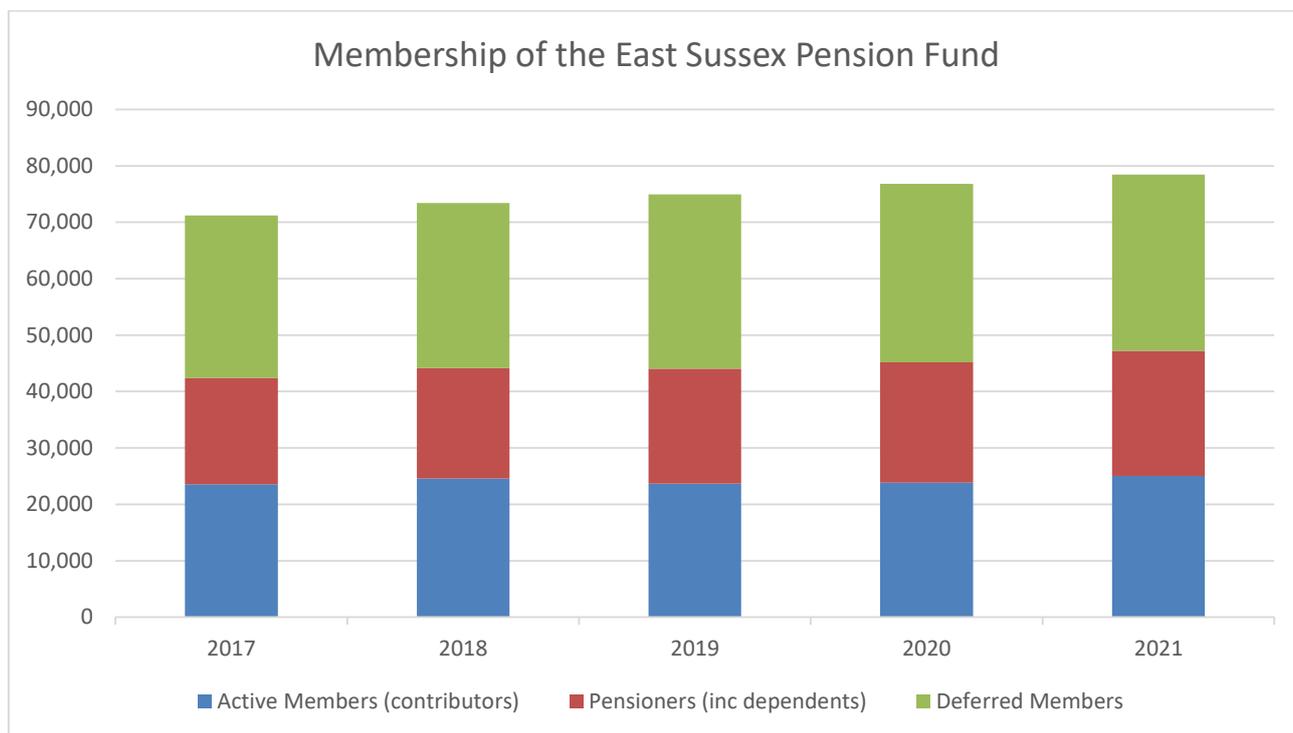
	2019/20	2020/21
East Sussex County Council	7,980	8,163
Scheduled Bodies	15,561	16,360
Admitted Bodies	294	479
<b>Total</b>	<b>23,835</b>	<b>25,002</b>

The number of pensioners in receipt of payments from the Fund increased from 21,335 to 22,230 (or 4.2%).

The following table and bar chart provide a summary of contributing members, pensioners in payment and deferred pensioners over the last five years:

	Mar-17	Mar-18	Mar-19	Mar-20	Mar-21
Active Members (contributors)	23,567	24,570	23,646	23,835	25,002

Pensioners (inc dependents)	18,812	19,597	20,403	21,335	22,230
Deferred Members	28,853	29,253	30,916	31,622	31,234
<b>Total</b>	<b>71,232</b>	<b>73,420</b>	<b>74,965</b>	<b>76,792</b>	<b>78,466</b>



Under the Local Government Pension Scheme (LGPS) (Administration) Regulations 2013, the East Sussex County Council administers the Pension Fund for approximately 78,000 individuals employed by 127 different organisations. Underpinning everything we do is a commitment to putting our members first, demonstrating adherence to good practices in all areas of our business and controlling costs to ensure we provide outstanding value for money.

### New pensioners by pensioner type

New pensioner type	
Normal Retirements	259
Redundancies	129
Ill Health	23
Employee's Choice of Early Pension	779
<b>Total New Pensioners</b>	<b>1,190</b>

### 2020 Annual Benefit Statement

The Fund is required to produce an Annual Benefit Statement (ABS) before the 31st of August each year for all active and deferred members. In 2020 due to Covid this deadline was extended to 31 October.

At 31 March 2020, the number of active members in the scheme requiring a statement was 22,262 and 29,727 deferred members. The number of members who were due to receive an ABS but we failed to issue prior to the deadline was 623 Active members and 67 deferred members. The Fund achieved a completion rate of 97.2% for active members and 99.8% for deferred members. After the Fund reporting itself to the regulator after the 2019 ABS process, 2020 was a great improvement and success for the Fund.

## 8. Actuarial report

# East Sussex County Council Pension Fund

## Actuary's statement as at 31 March 2021

Barnett Waddingham LLP

29 June 2021

### Introduction

The last full triennial valuation of the East Sussex County Council Pension Fund (the Fund) was carried out as at 31 March 2019 as required under Regulation 62 of the Local Government Pension Scheme Regulations 2013 (the Regulations) and in accordance with the Funding Strategy Statement of the Fund. The results were published in the triennial valuation report dated 31 March 2020.

### Asset value and funding level

The results for the Fund at 31 March 2019 were as follows:

- The market value of the Fund's assets as at 31 March 2019 was £3,633m.
- The Fund had a funding level of 107% i.e., the value of assets for valuation purposes was 107% of the value that they would have needed to be to pay for the benefits accrued to that date, based on the assumptions used. This corresponded to a surplus of £247m.

### Contribution rates

The employer contributions rates, in addition to those paid by the members of the Fund, are set to be sufficient to meet:

- the annual accrual of benefits allowing for future pay increases and increases to pensions in payment when these fall due;
- plus an amount to reflect each participating employer's notional share of the Fund's assets compared with 100% of their liabilities in the Fund, in respect of service to the valuation date.

The primary rate of contribution on a whole Fund level was 18.0% of payroll p.a. The primary rate as defined by Regulation 62(5) is the employer's share of the cost of benefits accruing in each of the three years beginning 1 April 2020.

In addition each employer pays a secondary contribution as required under Regulation 62(7) that when combined with the primary rate results in the minimum total contributions. This secondary rate is based on their particular circumstances and so individual adjustments are made for each employer.

Details of each employer's contribution rate are contained in the Rates and Adjustments Certificate in Appendix 3 of the triennial valuation report.

# Assumptions

The key assumptions used to value the liabilities at 31 March 2019 are summarised below:

Assumptions	Assumptions used for the 2019 valuation
Financial assumptions	
Market date	31 March 2019
CPI inflation	2.3% p.a.
Long-term salary increases	2.3% p.a.
Discount rate	4.0% p.a.
Demographic assumptions	
Post-retirement mortality	
<i>Base tables</i>	Based on Club Vita analysis
<i>Projection model</i>	CMI 2018
<i>Long-term rate of improvement</i>	1.25% p.a.
<i>Smoothing parameter</i>	7.0
<i>Initial addition to improvements</i>	
<i>Males</i>	0.5% p.a.
<i>Females</i>	0.25% p.a.

Full details of the demographic and other assumptions adopted as well as details of the derivation of the financial assumptions used can be found in the 2019 valuation report.

## Updated position since the 2019 valuation

### Update to funding basis and assumptions

The Fund appointed a new fund actuary with effect from 1 January 2021. For employers commencing participation in the Fund on or after 1 January 2021, the calculated contribution rate will be set to meet a funding target over a specified time horizon. The funding target is set based on a single set of financial assumptions. These assumptions are set so as to achieve broad consistency with the previous fund actuary's approach.

With effect from 1 January 2021, the salary growth assumption was reviewed and salaries are now assumed to increase at CPI plus 1.0% p.a. with no additional promotional salary scale. The derivation of CPI is discussed below.

We have updated the derivation of the CPI inflation assumption to be 0.8% p.a. below the 20 year point on the Bank of England (BoE) implied inflation curve. The assumption adopted at the 2019 valuation was that CPI would be 1.0% p.a. below the 20 year point on the BoE implied inflation curve. This update was made following the Government's response (on 25 November 2020) to the consultation on the reform of RPI, and the expectation that the UK Statistics

Authority will implement the proposed changes to bring RPI in line with CPIH from 2030. This updated approach leads to a small increase in the value of liabilities.

The discount rate assumption is set with reference to the Fund's long term investment strategy and therefore reflects the long term expected return on assets for the Fund. We have included in the discount rate assumption an explicit prudence allowance of 1.1%. This incorporates an allowance for current uncertainties in LGPS benefits (relating to the effects of the McCloud/Sargeant judgement and the cost cap).

## **Liabilities**

The key assumption which has the greatest impact on the valuation of liabilities is the real discount rate (the discount rate relative to CPI inflation) – the higher the real discount rate the lower the value of liabilities. As at 31 March 2021, the real discount rate is estimated to be lower than at the 2019 valuation due to lower future expected returns on assets in excess of CPI inflation.

The update to the CPI assumption mentioned above leads to a small increase in the value of liabilities. The value of liabilities will also have increased due to the accrual of new benefits net of benefits paid.

It is currently unclear what the impact of the COVID-19 pandemic is on the Fund's funding position. It is expected that COVID-related deaths will not have a material impact on the Fund's current funding level, however, impact on future mortality rates may be more significant and we will be reviewing the Fund's mortality assumption as part of the next valuation.

## **Assets**

Returns over the year to 31 March 2021 have been strong, helping to offset the significant fall in asset values at the end of the previous year. As at 31 March 2021, in market value terms, the Fund assets were more than where they were projected to be based on the previous valuation.

## **Overall position**

On balance, we estimate that the funding position (allowing for the revised funding basis) has improved compared to the funding position as at 31 March 2019.

Future investment returns that will be achieved by the Fund in the short term are more uncertain than usual, in particular the return from equities due to actual and potential reductions and suspensions of dividends.

There is also uncertainty around future benefits due to the McCloud/Sargeant cases and the cost cap process. The Fund could opt to monitor the funding level using LGPS Monitor on a regular basis.

**Barry McKay FFA**

**Partner, Barnett Waddingham LLP**

## 9. Employers

The East Sussex Pension Fund was established in 1974 to cover the future pension entitlement of all eligible employees of the County Council and former District Councils. The Fund excludes provision for teachers, police officers and fire fighters, for whom separate arrangements exist. A number of other bodies also participate in the Scheme. These include Parish and Town Councils, Further Education Colleges, Academy Schools, Police and Fire Authorities (non-uniformed staff only) and Admitted Bodies. Admitted Bodies are those which are able to apply for membership of the Scheme under the Regulations. If the Pension Fund Committee agrees to the application, an Admission Agreement is drawn up admitting the body into the Scheme.

Note 28 to the accounts provide a list of all organisations currently contributing to the Fund. It includes their contribution rates, expressed as a percentage of employees' pensionable pay, and additional annual payments for those participating bodies which would otherwise have a shortfall in contributions by the end of the recovery period.

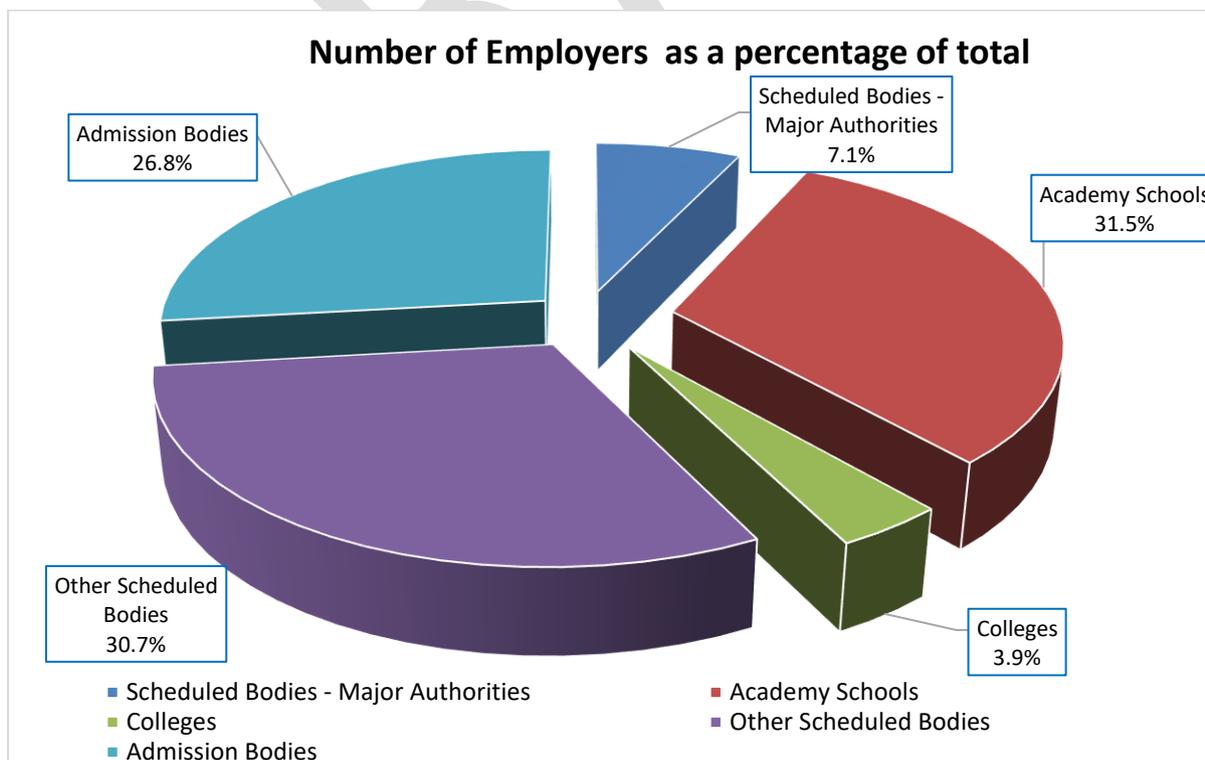
Below is a summary of the number of employers in the fund analysed by scheduled bodies and admitted bodies which are active (with active members) and ceased (no active members but with some deferred members and pensioners).

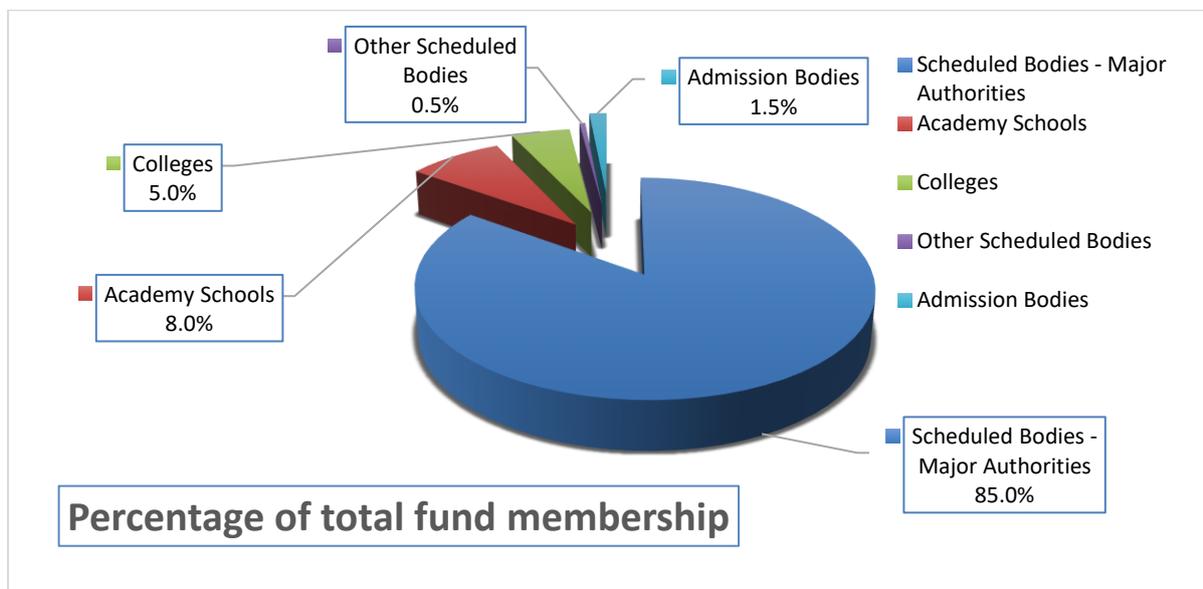
	Active	Ceased	Total
<b>Scheduled body</b>	93	24	117
<b>Admitted body</b>	34	30	64
<b>Total</b>	127	54	181

### Employer statistics by Employer type

Employer Type	Number of Employers as a percentage of total	Percentage of total fund membership	Number of Employers in Group
<b>Scheduled Bodies - Major Authorities</b>	7.1%	85.0%	9
<b>Academy Schools</b>	31.5%	8.0%	40
<b>Colleges</b>	3.9%	5.0%	5
<b>Other Scheduled Bodies</b>	30.7%	0.5%	39
<b>Admission Bodies</b>	26.8%	1.5%	34

Note - all percentages have been rounded to the nearest one decimal place





The Local Government Pension Scheme Regulation 59(1) of the (Administration) Regulations 2013 covers the requirement for an administering authority to prepare a written statement of policies as it considers appropriate in the form of a Pensions Administration Strategy. The East Sussex Pension Fund Pension Administration Strategy is kept under review and revised to reflect changes to LGPS regulations and Fund policies.

The Pensions Administration Strategy document sets out a framework by way of outlining the policies and performance standards to be achieved when providing a cost-effective inclusive and high quality pensions administration service. In particular it sets out:

- The roles and responsibilities of both the Fund and the employers within the Fund.
- The level of service the Fund and employers will provide to each other
- The performance measures used to evaluate the level of service

This administration strategy statement will be reviewed in line with each valuation cycle. All scheme employers will be consulted before any changes are made to this document. The latest version of the administration strategy statement will always be available on the ESCC website.

Employers are able to contact the Pension Fund directly depending on the type of request. The Employer Engagement Team will deal with employers directly on day to day questions and queries. The Pensions Admin team will deal with any employee requests that come via the employer. The employers have been informed of direct contact details for all requests and questions to the pension Fund.

The Local Government Pension Scheme regulations require employers who participate in the Local Government Pension Scheme (LGPS) to draw up and publish a discretions policy and to keep it under review. Discretions are powers that enable employers to choose how to apply the scheme in respect of certain provisions. All new employer admissions to the Scheme will complete a discretions policy on joining and discretion policies will be reviewed every 3 years in line with each valuation cycle.

All new admissions to the LGPS will be provided with a guide to outsourcing and admissions. This guide will provide information to all new potential admissions to the Fund and will lay out the necessary process that will need to be adhered to before admissions can be undertaken. All new admissions will be sent the relevant legal agreements and documentation that will require signing before proceeding.

Any employer with a potential TUPE or outsourcing must contact the employer engagement team where support and advice will be provided on the necessary steps that will need to be undertaken. Relevant information, timings and paperwork will need to be completed before any TUPE/outsourcing can commence. Employers will be provided a direct contact throughout the whole project to answer questions and provide support.

A reminder is sent to all employers annually to provide details of the employers responsibilities and obligations to the Fund. The admin strategy also provides details for employers of their responsibilities.

Employers have a responsibility that they must meet as part of the East Sussex Pension Fund. The table below provides details on monthly/annual deadlines that must be met.

<b>Employer Deadlines</b>	
<b>Employer Responsibility</b>	<b>Deadline</b>
Complete and submit LGPS31 forms (contribution forms)	<b>18<sup>th</sup> day</b> of the month following that to which the payment relates
Payment of correct contributions	<b>19<sup>th</sup> day</b> of the month following that to which the payment relates
Provide end of year data requirements	<b>By 30th April</b> following the year end (unless already onboarded to i-Connect)

If the above deadlines are not met then warnings are issued. If an employer breaches the above deadlines on more than 1 occasion in a 12 month period then administration charges can be levied.

Employer contribution amounts are provided to all employers at the Employer Forum following the valuation. A reminder of the new rates are also annually sent to employers in March. The new amounts are sent in March in preparation for the new rates to be applicable from the April contribution payment

## 10. Risk management

Risk management is the process of identifying risks, evaluating their likelihood and potential impact and determining the most effective methods of controlling or responding to them. The Fund has an active risk management programme in place, which is subject to periodic review. The Fund's approach is to manage risk rather than eliminate it entirely.

Risk is identified and managed as follows:

**Separation from Orbis risk** – The administration of the Fund has been brought in-house. This has involved setting up a new database so member data can be hosted by the Fund, as opposed to Surrey County Council (Surrey CC) under the terms of the previous agreement. Extensive testing was carried out to ensure the smooth transfer of data, helped by the Fund using the same technology for the database as Surrey CC. Data is securely hosted and backed up daily. There is a testing data set to allow for upgrades to be checked without risk to member data and the Fund's ability to calculate and pay benefits.

Other services previously provided to the Fund through the agreements with Surrey and the Orbis collective have been identified. New agreements have been created to ensure the ongoing provision of these services and short term support with outstanding projects. An agreement has also been reached to ensure the effective deletion of member data relating to members of the East Sussex Fund that was held by Surrey CC.

**Management Risk** - A significant risk is the potential insolvency of scheme employers, leaving outstanding liabilities in the Fund. This risk is increased due to the ongoing impact of the Covid-19 pandemic. To this end the Fund requires all admission bodies that wish to join the Fund to be guaranteed by a scheme employer(s) or to provide a bond to protect the Fund in the event of insolvency. In the monitoring of employers, consideration is given to the Funding Strategy Statement (FSS), which outlines the Fund's approach to how employer liabilities are measured, and one of the aims of the FSS is to reduce the risk from employers defaulting on its pension obligations. The Fund monitors the financial sustainability of the scheme employers and takes this into account in the valuation exercise. Some funding risks can be mitigated by the Investment Strategy and the funding and investment strategies focus on the expected real returns from the assets, thus mitigating the effect of inflation on the value of the pension liabilities.

This risk can manifest itself in several ways:

- Failure to process pensions
- Failure to collect contributions
- Failure to have proper business continuity plans in place
- Fraud or misappropriation
- Failure to maintain up-to-date and accurate data and hold it securely
- Failure to maintain expertise or over-reliance on key staff
- Failure to communicate effectively with members and employers
- Failure to provide the service in accordance with sound equality principles

To aid the pace of onboarding new admission bodies, work has been undertaken to streamline the process and develop bond templates.

**Benefits Administration Risk**- Relates mainly to the inability of the Fund to meet its obligations and pay benefits accurately and on time as agreed with employers or under statute. These could include non or late payment of members' benefits, incorrect calculation of benefits, breach of Data Protection Regulations and the failure to comply with Freedom of Information Act requests or Disclosure of Information requirements

All of the above could lead to adverse publicity, loss of reputation and ultimately statutory fines. In addition, the Fund is dependent on a sole supplier of pension administration software. There are processes in place to mitigate administration risks and those which are connected to benefit administration, such as employer risks.

**Internal Control Framework** - Internal controls and processes are in place to manage administration, financial and other operational risks. The East Sussex County Council's Internal Audit assesses the Fund's internal control processes in order to provide independent assurance that adequate controls are in place. The Fund is committed to using best practice and will account for recommendations made as part of audits.

**Financial/Funding Risk** - This is the risk that the funding level drops and/or contribution rates must rise due to one or more of the following factors:

- Investment Risk – This is the risk that the investment assets underperform the level assumed in the Triennial Actuarial Valuation. This can occur due to poor economic/market conditions, the wrong investment strategy or

poor selection of investment managers. Investment risk is regularly considered by Members and Officers, advised by the Fund's Investment Consultants. The annual investment strategy meeting reviews the current ESPF strategy and looks at risk in more detail. The main investment risks to the Fund are from interest rates, inflation and market volatility.

- **Liability Risk** – This is the risk that there is a fall in the so-called “risk free” returns on Government bonds, which form the basis of assumptions about future investment returns. The assumed future investment return is used to “discount” future liabilities (i.e. over the next 0-80 years) back to today's values (net present value). Therefore, falling bond yields means higher liabilities.
- **Inflation Risk** – Notwithstanding other factors, Pension Fund liabilities increase in line with inflation, because the CPI is applied to pensions annually. Therefore, rising inflation causes the liabilities to increase.
- **Insufficient Funds Risk** - This is the risk that there is insufficient money in the Fund to pay out pensions as they become due.

The ESPF Investment Strategy Statement (Appendix 2), sets out the governance requirements for the ESPF and it is reviewed annually by the Administering Authority. The Pension Fund receives external assurance reports from Investment Managers and the Custodian, detailing their internal control systems, scrutinised by their external auditors. Each report is reviewed when available and the conclusion of each was that the control procedures are suitably designed and operated during the 12-month period under review.

**Demographic/Mortality Risk** - This is the risk of that the pensioners live longer and therefore the liabilities of the Fund increase. Frequent interactions with the Fund Actuary mitigate this risk as the Fund can be informed of changes to mortality tables where this may impact the assumptions previously made.

**Regulatory Risk** - This risk could manifest itself in several ways. For example, it could be the risk that the liabilities will increase due to the introduction of an improved benefits package, or that investment returns will fall due to tighter regulation being placed on what can be invested in. It could also arise through a failure to comply with LGPS or other regulations. Changes in the Regulatory environment are routinely reviewed by Fund Officers.

**Governance Risk** - This is the risk that governance arrangements of the Fund are sub-optimal. For example, this could arise through a lack of expertise on the Committee arising from insufficient training. Another possibility is that potential conflicts of interest between the Fund and the Council are not managed sufficiently well. Over the past year steps have been taken to update the Fund's internal controls following a review of compliance with TPR's Code 14 and the relevant legislation; this includes:-

- Improving the risk register;
- creating a new risk management policy; and
- updating the Internal Dispute Resolution Procedure

**Employer Risk** - This is the risk that an employer is unable to meet its financial obligations to the Fund, either during its membership of the Fund, or at its ceasing when the last contributing member leaves. Where a guarantor is in place they will pick up the cost of any default, but where there is not one, the cost must be spread across all employers in the Fund.

The Fund has developed a Pension Administration Strategy, outlining the responsibilities of both the Fund and employers. This includes a framework for escalating concerns and ensuring compliance with Admission Agreements.

**Third Party Risk** - Contribution payments are monitored closely for accuracy and timeliness. A reporting process is in place to escalate any late/inaccurate payments to ensure all payments are received.

A Risk Register has been formally adopted by the East Sussex Pension Committee and a report of the key highlights is reported to the Pension Board at each quarterly meeting. The full risk register can be seen within the quarterly Pensions Committee papers.

# 11. Financial performance

## Analytical Review

The following tables provide a brief review of the major movements in the Fund Account and the Net Assets Statement for the financial year. More detail is provided in the Investment Policy and Performance report from page 30.

	2019/20 £000	2020/21 £000
<b>Fund Account</b>		
Net (Contributions)/withdrawals	(4,453)	(3,253)
Management Expenses	17,333	17,296
Return on Investments	140,238	(778,984)
<b>Net Increase in Fund</b>	<b>153,118</b>	<b>(764,941)</b>

	2019/20 £000	2020/21 £000
<b>Net Asset Statement</b>		
Bonds	212,331	128,765
Equities	-	-
Pooled Funds	3,189,335	4,045,225
Cash	63,715	56,736
Other	(135)	(418)
<b>Total Investment Assets</b>	<b>3,465,246</b>	<b>4,230,308</b>
Non-Investment Assets	13,848	13,727
<b>Net assets of the fund available to fund benefits at the year end.</b>	<b>3,479,094</b>	<b>4,244,035</b>

## Analysis of pension contributions

The table below shows the number of primary pension contributions received late in the financial year 2020/21.

Month	Payments Due	Payments Received Late
April	120	8
May	120	3
June	120	3
July	120	2
August	120	4
September	122	3
October	123	3
November	125	3
December	126	8
January	126	3
February	128	3
March	128	7

No interest was charged on any of the late payments.

## Forecasts

The following tables show the forecasts and outturn for the Fund Account and the Net Asset Statement.

Fund Account	2019/20		2020/21		2021/22
	Forecast £000	Actual £000	Forecast £000	Actual £000	Forecast £000
Contributions	(141,600)	(138,719)	(118,600)	(137,521)	(120,000)
Payments	137,600	134,266	134,700	134,268	135,000
Administration expenses	940	1,106	1,080	1,680	2,644
Oversight and governance costs	709	1,208	1,365	1,831	813
Investment expenses:					
fees invoiced to the fund	5,100	4,370	1,350	3,409	3,698
fees deduced at source	-	10,649	-	10,376	-
Net investment income	(27,000)	(26,487)	(27,200)	(39,070)	(39,900)
Change in market value	(206,300)	166,725	(134,600)	(739,914)	(153,200)
<b>Net increase in the Fund</b>	<b>(230,551)</b>	<b>153,118</b>	<b>(141,953)</b>	<b>(764,941)</b>	<b>(170,940)</b>

Contributions and payments are based on amounts provided by the actuary used the strategy of the Fund; the administration and investment management expenses are based on current budgets; and the net investment income and change in market value are based on the long-term forecast returns for each asset class.

Net Asset Statement	2019/20		2020/21		2021/22
	Forecast £000	Actual £000	Forecast £000	Actual £000	Forecast £000
Equities	2,273,600	1,332,597	1,403,200	1,864,834	1,958,100
Bonds	781,100	595,691	611,600	572,345	577,000
Property	356,400	318,129	329,600	319,533	326,900
Alternatives	265,200	321,996	341,000	414,980	439,900
Cash	195,200	63,715	43,900	56,736	40,600
Other	3,800	833,118	869,700	1,001,880	1,041,000
<b>Total Investment Assets</b>	<b>3,875,300</b>	<b>3,465,246</b>	<b>3,599,000</b>	<b>4,230,308</b>	<b>4,383,500</b>

The forecasts for total investment assets are based on the underlying assets within the pooled funds multiplied by the historic long-term returns for each asset class used. Net contributions, less administration and investment management expenses and oversight and governance costs, are added to the Cash figure to reflect new money into the Fund. The forecasts do not take into account potential additions or disposals of investments within these asset classes during the period as potential changes are not known with any degree of certainty.

## Management Expenses

	2019/20		2020/21		2021/22
	Forecast £000	Actual £000	Forecast £000	Actual £000	Forecast £000
<b>Pension Fund Staff Costs</b>					
ESCC Recharge	279	307	385	739	1,768
Staff costs total	<b>279</b>	<b>307</b>	<b>385</b>	<b>739</b>	<b>1,768</b>
ESCC Support Services	-	-	-	-	237
Orbis Business Operations Support Services	854	952	935	894	-
Supplies and Services	41	114	145	555	689
<b>Administration total</b>	<b>895</b>	<b>1,066</b>	<b>1,080</b>	<b>1,449</b>	<b>926</b>
<b>Oversight and governance costs</b>					
ESCC Support Services	-	-	-	28	286
Supplies and Services	475	941	980	1,273	527
Third Party Payments	130	97	150	87	100
Other Income	(130)	(97)	(150)	(65)	(100)
<b>Oversight and governance total</b>	<b>475</b>	<b>941</b>	<b>980</b>	<b>1,323</b>	<b>813</b>
<b>Investment Management</b>					
Investment expenses:					
fees invoiced to the fund	5,100	4,370	1,350	2,416	3,698
fees deducted at source*	-	10,649	-	11,369	-
<b>Investment Management Total</b>	<b>5,100</b>	<b>15,019</b>	<b>1,350</b>	<b>13,785</b>	<b>3,698</b>
<b>Management Expenses Total</b>	<b>6,749</b>	<b>17,333</b>	<b>3,795</b>	<b>17,296</b>	<b>7,205</b>

\* During the year, the Pension Fund incurred management fees which were deducted at source for 2020/21 of £2.2m (£3.7m in 2019/20) on its private equity investments, fees of £1.1m (£1.3m in 2019/20) on its infrastructure investments, fees of £5.1m (£2.6m in 2019/20) on investments in the ACCESS Pool and fees of £1.9m (£3.0m in 2019/20) on other mandates. These fees are deducted at the individual portfolio level rather than being paid directly by the Pension Fund.

## Pension overpayments

When an overpayment of pension benefits has been identified the recovery of this debt needs to be pursued. The details of the debt is collated and an invoice is raised to the relevant party for payment. The Fund follows the East Sussex County Councils procedure for recovering income which has escalation points set if the debt remains unpaid with the final stage this is passed on to the East Sussex legal team to pursue. The table below shows the pension overpayments and recoveries for the past 5 years:

Year		Overpaid Pensioners	Recoveries	Write Off	Outstanding
2020/21	Number	19	4	0	15
	Value £000	9	1	0	8
2019/20	Number	10	8	0	2
	Value £000	6	4	0	2
2018/19	Number	30	21	1	8
	Value £000	70	59	6	5
2017/18	Number	52	41	3	8
	Value £000	52	42	1	9
2016/17	Number	73	45	2	26
	Value £000	61	30	4	27

The Fund's administrator introduced mortality screening of the active pensioners each month in 2020 and this has reduced the number of overpayments. The tell us once initiative has also been implemented with the aim to further reduce the overpayments made by the Fund.

## 12. Investment policy and performance

The Fund's strategic asset allocation was revised following decisions taken at the June 2020 Committee meeting, with a number of changes implemented over the 2020/2021 financial year.

The changes to the strategic asset allocation involved restructuring the Fund's equity allocation whilst maintaining the 40% overall weighting. This 40% allocation was to be retained through the addition of active impact equity, as well as smart beta passive equity with an Environmental, Social and Governance (ESG) tilt, to replace the Fund's 'Climate Aware' and 'Fundamentally Weighted' allocations. These changes were made in line with the Fund's ESG objectives. In addition, the Fund's strategic allocation to infrastructure increased from 2% to 8%, with this being partial achieved over the period through a 2% allocation to unlisted infrastructure. The remainder will be considered further and built up over time.

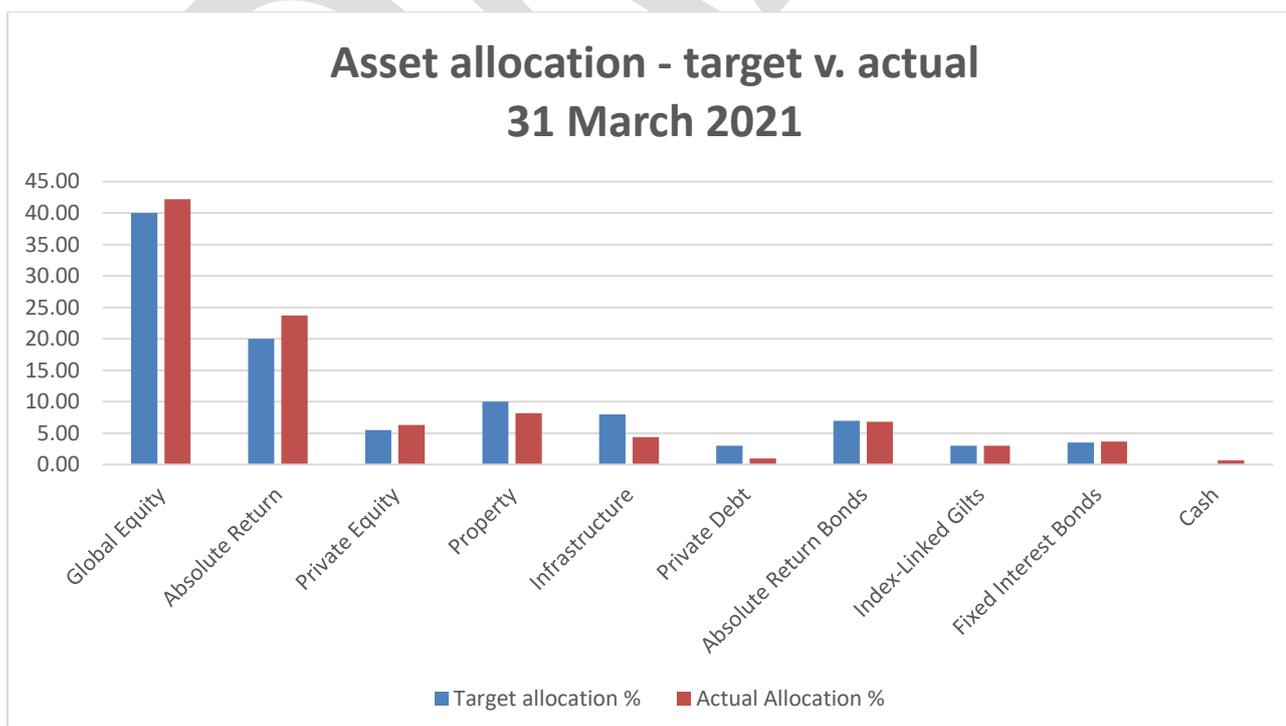
In order to achieve the strategic allocations mentioned above, the Fund made allocations of 5% (c. £200m) to Wellington Global Impact Fund and WHEB Sustainability Fund respectively, as well as a 10% (c. £400m) allocation to Storebrand Global ESG Plus Fund. These allocations were funded through termination of the Fund's Fundamentally Weighted Equity Index Fund, and the Climate Aware Equity Fund, as well as a reduction in the UK equities allocation held with UBS, in order to align more broadly to a global market cap index. The residual excess funds were rolled into the Fund's allocation in Longview Global Equity, increasing its strategic allocation from 7% to 10%. In addition, the Fund made a 2% (c. £80m) investment to the ATLAS Global Infrastructure Fund to meet the 2% strategic allocation to listed infrastructure, funded by modest reductions to the absolute return and index linked gilt target allocations.

The Committee demonstrate their consideration of ESG and climate related issues through the abovementioned equity restructuring. Similarly, the Fund's fossil fuel exposure is estimated on a quarterly basis, with this estimated as c.2% of total Fund assets as at 31 March 2021.

### Asset Allocation

The Fund's asset allocation maintains a significant allocation to equities, which are expected to be a core driver of returns over the long term, but typically the most volatile. However, the equity portfolio is diversified across regions and styles to target a balanced exposure. The increase to the Fund's infrastructure allocation provides additional diversification to the portfolio, as well as contractual type returns, which are expected to provide a more certain return once fully deployed. Infrastructure is also expected to provide an inflation-linked source of income. The Fund also maintains a significant allocation to property, providing further diversification from traditional investment markets such as equities and bonds.

Credit mandates such as corporate bonds, index-linked gilts and absolute return credit also provide diversification, due to differing return drivers than equities, while also offering source of liquidity. The absolute return mandates combine a number of asset classes in order to provide a smoother path of returns, offering the manager flexibility to alter allocations to benefit from varying market conditions.



## Investment Managers

The Fund employs a number of investment managers across the various mandates, with differing approaches or styles, as well as sectoral and geographic focus, and benchmarks. This is in order to ensure sufficient diversification, limiting downside risk during periods of market volatility. The Fund's investment manager structure is broadly as follows:

- The Fund's equity mandate is split across a number of managers, having previously been largely allocated to UBS. The allocation is broadly split 50/50 in terms of active and passive, with the active sleeve allocated half to a global equity mandate with Longview, and half to active impact equity strategies split equally between Wellington and WHEB. The passive sleeve is split 50/50 passive regional funds, weighted broadly in line with global market capitalisation, and ESG systematic/smart beta, with the regional fund allocation held with UBS, and the Smart Beta ESG invested in Storebrand. At the March 2021 meeting, the Committee indicated a slight preference for active management and a continued focus on ESG with the intention of investing in a new 'core' active manager as well as an allocation to Osmosis Resource Efficiency, which is likely to be implemented in H2 2021.
- Absolute return mandates are held with Newton and Ruffer and allow managers to flexibly alter allocations to a variety of underlying asset classes based on specific market conditions.
- The Fund's property mandate is held with Schroders, with a 'fund of funds' approach adopted, adding an additional layer of diversification to the mandate.
- Corporate bonds, absolute return credit and commercial real estate debt mandates are managed by M&G, while the Fund's passive index-linked gilts mandate is held with UBS.
- The Fund's infrastructure holdings are split between M&G, UBS, Pantheon (all unlisted) and ATLAS (listed), who adopt varying styles and focus areas.
- Private equity mandates are split between Adams Street and HarbourVest with new allocations due to be made with each manager over the course of 2021.

The Committee intend to undergo a full strategy review in H2 2021 and will potentially implement new mandates and additional investment managers to achieve a more efficient portfolio towards the end of 2021.

The Fund has the following objectives for its investment managers:

- Each (active) manager delivers on its objective, net of fees.
- Each mandate adds a layer of diversification and offers different qualities to the Fund, be that through varying approaches, and focus areas (geographic and sectoral).
- Consider all financial and non-financial risks and considerations including Environmental, Social and Governance (ESG) factors (including but not limited to climate change). The Fund's strategic asset allocation was unchanged during the year to 31 March 2020, set out below, strategic target and actual allocations, at the end of the 2020/21 financial year.

## Custodian

A specialist provider of Custodian Services, Northern Trust, is employed by the East Sussex Pension Fund.

The responsibilities of the Custodian are:

- Collection of investment income.
- Arranging for the custody of the scheme's assets in compliance with the custody agreement.
- Providing quarterly valuations of the scheme's assets, details of all transactions and investment accounting.
- Responsibility for cash management and investing the daily cash balances in a "Triple A" rated cash pool.

## Investment Allocations pooled and unpooled

Mandate	Q1 2020 (£m)	Actual (%)	Target (%)	Q1 2021 (£m)	Actual (%)	Target (%)
ACCESS - Global Equity (Longview)	238.8	6.90%	7.00%	458.8	10.80%	10.00%
ACCESS - Absolute Return (Ruffer)	418.5	12.00%	10.50%	510.0	12.10%	10.00%
ACCESS - Real Return (Newton)	414.8	11.90%	10.50%	492.3	11.70%	10.00%
ACCESS - Sterling Corporate Bond (M&G)	144.3	4.10%	3.50%	158.4	3.70%	3.50%
<b>Total Investments held in ACCESS</b>	<b>1,216.4</b>	<b>34.90%</b>	<b>31.50%</b>	<b>1,619.5</b>	<b>38.30%</b>	<b>33.50%</b>
<b>Equities (passive):</b>						
UBS - Fundamental Indexation	363.2	10.40%	11.50%	-	-	-
UBS - Global Emerging Markets	36.2	1.00%	1.50%	62.2	1.50%	1.50%
UBS - Regional Equities	312.4	9.00%	8.00%	299.9	7.10%	7.00%
UBS - UK Equities	220.9	6.30%	7.00%	66.7	1.60%	1.50%
UBS - Climate Aware	160.0	4.60%	5.00%	-	-	-
<b>Equities (active):</b>						
Storebrand - Global ESG Plus	-	-	-	454.5	10.70%	10.00%
Wellington - Global Impact	-	-	-	222.8	5.30%	5.00%
WHEB- Sustainability	-	-	-	222.7	5.30%	5.00%
<b>Total Equities</b>	<b>1,092.7</b>	<b>31.3%</b>	<b>33.0%</b>	<b>1,328.8</b>	<b>31.5%</b>	<b>30.0%</b>
<b>Bonds:</b>						
UBS - 5yr ILG	212.3	6.10%	5.00%	128.8	3.00%	3.00%
M&G - Alpha Opportunities	239.1	6.90%	8.00%	285.1	6.70%	7.00%
<b>Total Bonds</b>	<b>451.4</b>	<b>13.00%</b>	<b>13.00%</b>	<b>413.9</b>	<b>9.70%</b>	<b>10.00%</b>
<b>Other Investments:</b>						
Schroder - Property	351.8	10.10%	10.00%	347.8	8.20%	10.00%
M&G - Infrastructure	20.7	0.60%	1.00%	32.7	0.80%	2.00%
Pantheon - Infrastructure	30.1	0.90%	2.00%	38.1	0.90%	2.00%
UBS - Infrastructure	16.7	0.50%	1.00%	37.7	0.90%	2.00%
Atlas - Infrastructure	-	-	-	77.3	1.80%	2.00%
Adams Street - Private Equity	135.6	3.90%	2.80%	154.5	3.60%	2.75%
HarbourVest - Private Equity	109.5	3.10%	2.80%	110.5	2.60%	2.75%
M&G Real Estate Debt VI	38.8	1.10%	3.00%	42.4	1.00%	3.00%
Cash account	23.9	0.70%	0.00%	31.4	0.70%	0.00%
<b>Total Other Investments</b>	<b>727.1</b>	<b>20.90%</b>	<b>22.60%</b>	<b>872.4</b>	<b>20.50%</b>	<b>26.50%</b>
<b>Total</b>	<b>3,487.60</b>	<b>100%</b>	<b>100%</b>	<b>4,234.60</b>	<b>100%</b>	<b>100%</b>

**An analysis of fund assets, by geography, as at the reporting date of 31 March 2021**

	<b>UK £m</b>	<b>Non-UK £m</b>	<b>Global £m</b>	<b>Total £m</b>
Equities	67	300	1,498	1,865
Bonds	287	-	285	572
Property (direct holdings)	-	-	-	-
Alternatives	362	-	373	735
Cash and cash equivalents	21	35	-	56
Other	-	-	1,002	1,002
<b>Total</b>	<b>737</b>	<b>335</b>	<b>3,158</b>	<b>4,230</b>

**An analysis of investment income accrued during the reporting period 2020/21**

	<b>UK £000</b>	<b>Non-UK £000</b>	<b>Global £000</b>	<b>Total £000</b>
Equities	3,522	565	1,570	5,657
Bonds	2,784	-	10,640	13,424
Property (direct holdings)	-	-	-	-
Alternatives	9,583	-	1,458	11,041
Cash and cash equivalents	1,851	18	-	1,869
Other	-	-	7,098	7,098
<b>Total</b>	<b>17,740</b>	<b>583</b>	<b>20,766</b>	<b>39,089</b>

In the above tables:

'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.

'Global' holdings are those that include an element of both overseas and UK listed assets.

Investments in pooled funds have been allocated to categories based on the nature and domicile of the underlying assets.

## Investment Performance

Actual and benchmark performance for each of the Fund's mandates is provided in the table below, over 12 months 3 years and 5 years<sup>[1]</sup>. Results are considered by the Pension Committee on a quarterly basis and the Fund members on an annual basis as part of this report.

Mandate	1 year			3 year (p.a.)			5 year (p.a.)		
	Fund	Benchmark	Relative*	Fund	Benchmark	Relative*	Fund	Benchmark	Relative*
<b>Access Pool Equities</b>									
Longview – Global	35.50%	38.90%	-3.40%	-	-	-	-	-	-
<b>Access Pool Absolute Return</b>									
Newton Real Return	18.70%	2.90%	15.80%	-	-	-	-	-	-
Ruffer Absolute Return	25.10%	2.90%	22.20%	-	-	-	-	-	-
<b>Access Pool Bonds</b>									
M&G – Corporate	9.80%	8.20%	1.60%	-	-	-	-	-	-
<b>Equities</b>									
UBS – UK Equity	26.40%	26.70%	-0.30%	3.00%	3.20%	-0.20%	-	-	-
UBS – All World Equity	38.80%	39.50%	-0.70%	12.30%	12.50%	-0.20%	-	-	-
<b>Bonds</b>									
UBS - 5yr ILG	0.80%	2.60%	-1.80%	2.90%	3.60%	-0.70%	-	-	-
M&G - Alpha Opportunities	19.30%	3.40%	15.90%	4.30%	3.40%	0.90%	4.80%	2.20%	2.60%
<b>Other Investments</b>									
Schroder – Property	2.70%	2.50%	0.20%	2.10%	2.40%	-0.30%	3.90%	4.20%	-0.30%
M&G – Infrastructure	9.50%	2.70%	6.80%	-	-	-	-	-	-
Pantheon – Infrastructure	0.70%	2.70%	-2.00%	-	-	-	-	-	-
UBS – Infrastructure	-	2.70%	-23.50%	-2.40%	2.80%	-5.20%	0.60%	1.90%	-1.30%
Adams Street - Private Equity	20.80%	36.30%	40.70%	-4.40%	22.30%	14.00%	8.30%	18.90%	14.90%
HarbourVest - Private Equity	9.30%	40.70%	-31.40%	14.80%	14.00%	0.80%	13.70%	14.90%	-1.20%
M&G – Real Estate Debt VI	1.30%	4.40%	-3.10%	-	-	-	-	-	-

\*Relative performance is calculated on a geometric basis as opposed to the simpler arithmetic method the geometric method makes it possible to directly compare long-term relative performance with shorter-term relative performance.

[1] The table shows since inception returns in place of one year, three year and five-year performance for some of the managers, if the mandate has been in place for a shorter period.

## Responsible Investment

Responsible Investment (RI) is an approach to investing that aims to incorporate environmental, social and governance (ESG) factors into investment decisions, to better manage risk and to generate sustainable, long-term returns (according to Principles for Responsible Investment). Stewardship is the responsible allocation and management of capital across the institutional investment community to create sustainable value for beneficiaries, the economy and society.

### Task Force on Climate-related Financial Disclosures (TCFD)

The Financial Stability Board created TCFD to improve and increase reporting of climate-related financial information in 2015. The Fund committed to reporting under TCFD in its Statement of Responsible Investment Principles which was approved in September 2020. TCFD is structured around four thematic areas of Governance, Strategy, Risk Management and metrics and targets.



The Fund support the TCFD recommendations to provide a framework to communicate the steps the Fund is taking to manage climate related risks. Below the Fund try to report against these core elements in its first attempt to report against these disclosure requirements. Where the Fund has gaps in reportable data, this is highlighted in the sections, with a plan on how this will be progressed in future years reporting.

### Governance

East Sussex County Council (ESCC) is the administering authority for the Fund, under the Constitution the Pension Committee has delegated authority to exercise the powers in respect of the management of the Fund. The Fund is neither owned nor controlled by ESCC, Fund assets are earmarked for pension payments and ringfenced from 'Council Money'. There are around 130 employers and more than 78,000 members, whose pension payments are funded by through the assets of the Fund, employer and member contributions and investment returns. The Pension Committee (the Committee), comprising elected councillors, is responsible for fund oversight and policy setting.

The Committee has focused a substantial amount of time to develop its understanding and response to the ESG impacts that it is facing. This work has driven the Fund into codifying its beliefs in this area. The Fund believe that RI supports the purpose of the LGPS and that climate risk does pose a material financial risk to the Fund. Responsible investment is therefore a substantial factor driving returns alongside other investment considerations.

As RI and climate risk is a driving factor in the value of the Fund's assets and long term return expectations in line with the Funds Investment Strategy Statement and Funding Strategy Statement to keep the Fund in surplus, the Committee set out a Statement of Responsible Investment Principles (SRIP) which is published within the Fund's Investment Strategy Statement (ISS) available on the Fund website [www.eastsussexpensionfund.org/resources](http://www.eastsussexpensionfund.org/resources).

The SRIP explains the Funds approach to the oversight and monitoring of the Fund's investment activities from a Responsible Investment (RI) and Stewardship perspective.

The Principles that are set out in detail within the SRIP are:

Principle 1	We will incorporate ESG issues into investment analysis and decision-making processes.
Principle 2	We will be active owners and incorporate ESG issues into our ownership policies and practices.
Principle 3	We will seek appropriate disclosure on ESG issues by the entities in which we invest.
Principle 4	We will promote acceptance and implementation of the Principles within the investment industry.
Principle 5	We will work together to enhance our effectiveness in implementing the Principles.
Principle 6	We will each report on our activities and progress towards implementing the Principles.

In 2019 the Pension Committee set up an ESG working group to take forward research and build up the Funds principles, however in 2020 this working group was absorbed into the Investment Implementation Working group to ensure all investment decisions have ESG and climate risk embedded at the outset, rather than a secondary consideration.

Knowledge and skills of Officers and the Committee are integral to the governance and effective oversight of climate risk within the Fund. As a result, training is provided to the Committee and officers throughout the year and one meeting a year is held to focus on Investment strategy this meeting has a strong emphasis on EGS and climate.

The Committee review and discuss its risk register quarterly where climate risk is a separately identified risk with mitigations through the Funds climate strategy and every agenda has an aspect of ESG for consideration and discussion within the Investment programme workplan.

A priority for the Fund is to ensure our investments can withstand climate risks, including both transition and physical climate risks, and to invest for the future with confidence. As a result of this the Fund has conducted 3 years of carbon foot printing and integrated energy transition plans into a key metric along with annually assessing the ESG impact of each investment manager. In addition, the Fund reviews the exposure to specific Fossil Fuel companies engaging with the Investment managers where these positions are held to understand the engagement activities with those companies and the rationale for positioning those companies in the portfolio. Whilst acknowledging that Fossil Fuel companies have intense carbon emissions, the Fund believe they have a part in the energy transition pathway; also recognising that emissions can be intense in other sectors, and climate change risks effects all sectors and geographical regions. The Fund will be carrying out climate scenario analysis of various warming scenarios in 2021/22 to further understand the climate risks of the investment strategy.

The Fund is guided by the legal principle of fiduciary duty in creation and implementation of the investment strategy and has stated that it recognises climate risk as a material financial risk to the Fund. Guidance on our fiduciary responsibilities is provided by the Scheme Advisory Board, which took legal advice on this matter (<https://lgpsab.scot/fiduciary-duty-guidance/>).

A holistic whole portfolio approach to overall climate risks has been taken by the Fund which is backed up by set of ESG beliefs and robust Statement of Responsible Investment Principles. As well as mitigating risks through the changes to the investment strategy the Fund has also identified that there are also many investment opportunities to be found from new technology and solutions to climate change. In addition, the Fund recognises companies that effectively manage resources and have strong ESG approaches are often well managed high performing companies.

## **Strategy**

Climate risks that the Fund has exposure to will the impact on the Fund's investments most significantly. As a result, the work the Fund has put into understanding climate related risks has been focused on its specific investment strategy. The Fund is also considering how this will impact its liabilities and will form a central part of the work around its next valuation in 2022.

The investment risks identified to date around the climate impacts on the Fund have been around the structure of the Fund's investments, namely the use of passive investments and the transition from a fossil fuel based global economy to a carbon free economy. This conclusion was based on the construction of the Fund's investment strategy and the unconscious exposure to climate risk inherent within its large traditional passive investments. There is limited scope to mitigate this via the Funds implementation method of allocating to traditional market capitalisation, factor based and carbon tilted passive investments.

The analysis also identified that the Fund could benefit from increasing its exposure to sustainable investments designed to benefit from or contribute to the transition from a fossil fuel economy to a carbon free economy. This work helps to solidify the Fund's belief that ESG opportunities may be found in impact funds investing in companies whose profits are derived from providing solutions to some of the World's more serious environmental, sustainability, demographic, and social challenges e.g., cleaner products and processes, renewable energy, health, nutrition, sustainable agriculture, shelter, clean water, and sanitation etc. Where successful, such companies would be expected to exhibit above average long-term growth characteristics.

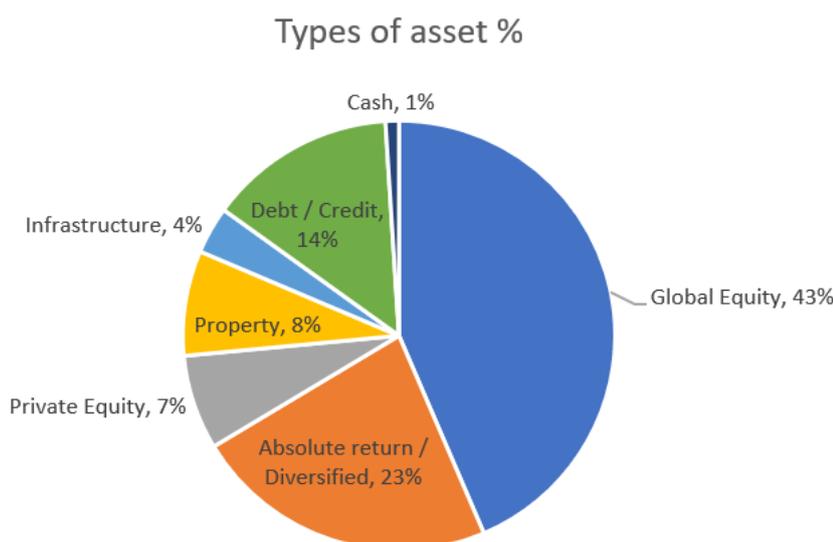
The Fund does not directly invest in any specific company; instead, it invests through a combination of holdings in passive index funds and in pooled funds through active investment managers who take considered choices over the underlying companies it invests in with a looking at the financial resilience and return possibilities as well as the ESG credentials of a company.

### Climate Risk

The Funds investment strategy crosses a wide range of types of investment each of which will have different climate risks. Climate risk to the fund is through both physical risk and transition risk.

Physical Risk	More frequent or severe weather events – flooding, storms, droughts, wildfires, chronic heatwaves, sea level rise
Transition Risk	Changes to less polluting greener economy – loss of asset value in hard to abate industries or as a result of policy constraints on activities of a business, increased costs of business supply chains, loss of access to materials, regulatory tax penalties

The Funds investment strategy showing the types of assets is shown in the chart below.



Climate risk can impact on all these asset types. For example, in the property allocation there may be physical risk with buildings in areas that may have an increased chance of flooding with extreme rainfall or sea level rises; or transition risks through the cost of retrofitting buildings with heat pumps or hydrogen boilers to replace gas heating systems. Or for example, a port within an Infrastructure portfolio would be affected by atmospheric and marine hazards leading to operational shutdowns and subsequent financial losses. A Global equities portfolio for example could include shares in

an agricultural company, a technology company or even an energy provider. Each company would face different climate risks; either to their physical geographical location, to supply chain costs and failures or regulatory or policy risk imposing penalties or restrictions to operations.

As a result of the wide-reaching climate risks, the Fund takes a holistic view of its investments rather than focusing on a single company sector and focuses on the quality and ability of the investment manager teams who carry out the detailed research and selected the underlying companies in the portfolio. To do this the Fund undergo due diligence on the selection of a manager; meet and communicate with managers throughout the year to discuss company holdings, decisions, performance and team structures; carry out annual carbon foot printing which also considers companies energy transition plans; carry out an annual ESG assessment of all Investment managers within the portfolio and we are due to start climate scenario analysis of the portfolio.

The Committee were clear of the inevitability that the transition from a fossil fuel to a carbon free economy will occur and the traditional market capitalisation indexes the Fund was holding are designed to succeed if the old fossil fuel economy persists. The need to be able to access and provide capital to those companies that were looking to benefit to and from the transition was regarded as a priority for the Fund.

To address these risks and opportunities the Fund restructured its equity positions by removing most of its passive investments leaving around 10% in traditional passive market capitalisation indexes. Investing 10% into a Paris aligned smart beta and resource efficient index fund and 13% into more active management by increasing its current active manager to 10% of its investments from 7% and by investing 10% into active impact and sustainability managers investing in energy transition solutions and green revenues.

This restructure took place in the third quarter of 2020/21 and once this transition had been completed the committee agreed to review its remaining passive exposure as there was still concerns around the risks inherent with this method of investment and this will be completed during 2021/22

Also, the Fund consider engagement with companies to align their businesses to aspects such as corporate governance standards, ensure best practice in labour force policies or alignment with the Paris agreement on climate related emissions. A list of the Funds collaborative engagement partners is listed further below and the Fund publishes reports on engagements and voting carried out by managers where we are able to publish this information.

## **Climate Opportunities**

There are also climate opportunities. For example, companies which improve resource efficiency in relation to energy usage, water and waste management can result in better run business with cost savings and competitive advantages. Or investment into innovation in technology can assist the energy transition such as development of electric vehicles, advances in LED technology, geothermal power. Other opportunities can include investment in renewable energy sources such as solar, wind, biofuels as to meet global reduction targets energy generation source needs to move to clean energy sources and away from burning of fossil fuels.

The Fund has taken substantial measures in the past 18 months to better align itself with the challenges of climate change and the energy transition and is considered one of the leaders in this space in its actions. These actions include investing 25% of the equity funds, or £480m, in Impact Managers who select companies whose core products or services achieve a positive impact on the environment or socially, or those companies that provide solutions to sustainability challenges. In addition, the Fund agreed to remove traditional passive index equity exposure (where there is unconscious exposure to fossil fuels) moving half of this to a fossil-free smart beta equity strategy that aims for long-term alignment with the Paris Agreement goals and exhibits lower carbon risk with climate solutions and higher ESG scores than the world index. The other half has been committed to a resource efficient index that focuses on companies that more effectively manage carbon, water and waste while excluding fossil fuel companies.

## **Future actions**

The Fund is looking to further develop its understanding of climate risk and opportunity within the portfolio. During 2021/22 the Fund has committed to developing Climate Scenario stress tests to layer up our understanding of climate risk and allow us to assess our investment strategy against these. Whilst bearing in mind that scenario testing also depends on the quality of the underlying data and this is still evolving.

The Fund has made allocations to deploy future commitments to infrastructure that minimises climate risk whilst taking appropriate investment risk and suitable returns or looking at opportunities from renewable and other new technologies.

The Fund will continue to use engagement as our primary tool to our climate strategy, via membership of PRI, LAPFF, a seat on IIGCC Corporate Programme Advisory Group. The Fund also encourages all its managers to be members of these organisations. The Fund utilise the Transition Pathway Initiative data and third party ESG reports to focus the

engagement with managers. Along with this there will be an annual review of the ESG credentials of our managers to strengthen the understanding of their processes and ensuring these align with the Fund.

## **Risk Management**

Risk management is the process of identifying risks, evaluating their likelihood and potential impact and determining the most effective methods of controlling or responding to them. The Fund's general approach is to manage risk rather than eliminate it entirely. The Fund has a detailed Risk Management process in place which is documented in the Fund's Risk Management Policy. A Risk Register is reported to Pension Committee and Pension Board quarterly for review and consideration, identifying the risk and the mitigations in place.

As part of the risk register the Pension Fund have specifically recognised Climate risk and details the risk and mitigations in place to manage this in the quarterly report. The identified aspects of climate risk are outlined below including mitigations in place. Once climate scenario modelling has been completed by the Fund the risks will be updated with any additional findings.

### Possible triggers of climate risk to the Fund

Uncertainty in energy transition impacts and timing
Risk of stranded assets were invested in fossil fuel companies
Lack of reliable carbon measurement data for investment pooled funds and or underlying holdings of those pooled funds.
Risk of natural disasters on underlying investments
Risk of changes in oil prices
Increased capital costs of underlying investment companies to transition to greener energy solutions or lower carbon emitting supply chain models and production methods
Fines or penalties incurred by underlying holdings by company or sector
Increased global temperature and or erratic climate events causing devastation to underlying holdings
Social consequence on members welfare and longevity within the fund

### Possible consequences of climate risk on the Fund

Unconscious exposure to high carbon emitters or companies without climate considerations
Reputation issues around how the Fund is progressing the move to a decarbonised global economy.
Volatile investment returns
Reputational risk where Climate risks, reporting, mitigations, and strategies are not aligned with member views or poorly communicated
Loss of income to the fund from missed opportunities in oil price rally to accommodate the infrastructure to enable to the world to comply with the energy transition
Loss of market value to the portfolio
Major ecological disaster in the UK could lead to increased mortality quicker than anticipated within the funding models impacting on cash outflows and increased workloads for lump sum payments.
Possible increase to ill health retirement cases leading to a change in cash flows and possible enhancements beyond those anticipated

Mitigations the Fund has put in place to try to reduce impact of the climate risk

Statement of Responsible Investment Principles outline investment beliefs within ESG, implementation of decisions and monitoring of EGS factors and has a strong focus on climate change
Investment Working Group and ESG working group consolidated into a single group to ensure ESG is in the heart of all investment decisions
Restructuring of the equity portfolio to avoid high risk companies and exploit opportunities, including decision to invest in impact fund in September 2020
Trim unconscious exposure to companies with high Carbon emission, poor energy transition plans and or fossil fuel companies, through agreed removal of traditional index funds
Member of Institutional Investors group on climate change
The fund carries out annual carbon foot printing to better understand the carbon exposure and energy transition plans within the portfolio
Signatory to UN PRI with first planned submission in 2022 and commitment to report TCFD's with a first attempt in the Annual Report for 2020/21
The Fund has planned for climate scenario modelling in late 2021 which will help better understand this risk and allow further consider approaches in tackling these risks.
The Fund continue to have some occasional exposure to high carbon emitting or fossil fuel sector companies from a tactical perspective to use its vote to help drive the sector forward through engagement and voting using the power of a collective voice. A number of Fund managers are Climate 100+ engagement partners leading on this work with top emitting companies, while all managers are IIGCC members for collaborate weighting of AUM to influence action
Very small outstanding percentage exposure with fossil fuel companies that extract oil and gas or coal, which if the sector falls to zero value, the impact of the Fund would be negligible in market movement perspectives.

## **Metrics and targets**

The Fund has used a third-party provider Vigeo Eiris to undertake comparative analysis of the Fund's equity and fixed income managers carbon foot printing (carbon footprint is the measure of the volume of carbon dioxide (CO2 eq.) emitted by issuers) and energy transition (the shift from a carbon-based economic model to a green and sustainable one) metrics. For the purpose of the analysis performed by Vigeo Eiris this only take into consideration Scope 1 and 2 emissions not Scope 3 where these are defined as:

Scope 1 covers direct GHG emissions from sources that are owned or controlled by the issuer.

Scope 2 covers indirect GHG emissions caused by the organisation's consumption of electricity, heat, cooling or steam purchased or brought into its reporting boundary.

Scope 3 covers other indirect emissions (not included in scope 2) that occur in the value chain of the reporting company, including both upstream and downstream emissions. The table below details the high-level scores that the Fund's managers achieved.

Manager	Mandate	Carbon footprint			Energy transition		
		2021	2020	Evolution	2021	2020	Evolution
UBS	Climate Aware	x	High	x	x	40	x
UBS	Fundamental Indexation	x	Intense	x	x	40	x
UBS	UK	High	Intense	↘	47	45	↗
UBS	Europe Ex-UK	High	High	↘	53	52	↗
UBS	North America	High	High	↘	37	36	↗
UBS	Rest of World	High	High	↘	32	30	↗
M&G	Absolute Return	High	High	↘	45	42	↗
M&G	Corporate Bonds	High	High	↘	53	51	↗
Newton	Absolute Return	High	High	↗	44	45	↘
Ruffer	Absolute Return	High	Intense	↘	44	42	↗
Longview	Global Equity	Significant	Significant	↗	39	33	↗
Atlas	Infrastructure Fund	High	x	x	41	x	x
Storebrand	Climate Passive	High	x	x	44	x	x
Wheb	Impact Fund	High	x	x	31	x	x
Wellington	Impact Fund	Significant	x	x	38	x	x

The scores have been classified by the bandings in the table below the carbon footprint is calculated using the weighted average carbon footprint (the sum of the portfolio's companies' emissions weighted by their weight in the portfolio) or it can be view as the emissions of an average company in the portfolio. This is used as it is providing a figure that is genuinely comparable between different managers. The energy transition score is a combination of the Vigeo Eiris' scores for each company in a portfolio's energy transition strategy based on specific criteria tied to climate change such as commitments made, information being disclosed and the meeting of commitments. This is a subjective score of issuers' energy transition strategy based on Vigeo Eiris' Research.

Scale	Emissions (t CO2 eq)	Categories	Scale	Energy Transition Score	Categories
A	<100 000	Moderate	++	60-100	Advanced
B	>=100 000 & <1 000 000	Significant	+	50-59	Robust
C	>=1 000 000 & <10 000 000	High	-	30-49	Limited
D	>=10 000 000	Intense	--	0-29	Weak

In addition to these high-level indicators each mandate has its own bespoke to report which also looks the following metrics.

- Total financed emissions
- Financed emissions per £m invested
- Weighted average carbon footprint
- Carbon intensity per sales (millions of £)
- Weighted average carbon intensity
- Energy Transition Strategy score
- Sector allocation effect on performance attribution
- Issuer selection effect on performance attribution

The carbon footprinting report identifies how much each mandate has invested in positive impact factors such as green bonds, green good and green services as well as negative impact factors such as exposure to fossil fuels and coal.

The Fund does recognise that Carbon footprinting does need to be considered with some caveats in that there is no hard and fast method to carry to monitor and assess carbon emissions of underlying investments portfolios, this is a relatively new data source and is measured differently by different suppliers. In addition, carbon footprinting is often reliant on information publicly available provided by the underlying company themselves. Over time as carbon emission data and monitoring improves it may be the position of the Fund looks worse, as a result understanding of the model and quality of data is important when assessing the Fund's portfolio.

Carbon footprint reports take no consideration of engagement activity of investment managers. All of the Funds listed managers are Institutional Investor Group for Climate Change (IIGCC) members and some of the managers have engaged intensively with high carbon emitting companies as part of Climate Action 100+. The Fund believes alongside many of its managers that it is essential as an active investor to influence companies through voting and engagement to drive the energy transition forward.

Unlike the carbon footprint, which is an expression of past performance, the energy transition score looks to express a company's forward-looking strategic approach to mitigate its carbon footprint through visible commitments and concrete measures. A company's ET score is to be put in perspective with its carbon footprint, it would be expected for a high emitting company to consider their energy transition strategy more and would look to have a robust/advanced score in this area, which would show that they have implemented concrete measures towards energy transition, to mitigate their carbon footprint. Some low-emitting companies are less transparent on their transition plans, as they might consider the issue to be less material to them and it is expensive to measure and report on the transition.

## RI implementation

Below we show how the Fund has implemented the RI policies it set itself in the ISS.

Commitment	Progress	Further Action
To continue to measure and report on carbon-equivalent emissions throughout the equity portfolios	The Fund has undertaken an analysis of the Equity and Fixed Income investments with a third-party provider Vigeo Eiris for the second year.	Develop understanding of the different metrics.  Continue using a third-party provider to evaluate carbon emissions of equities and develop other asset classes
To continue our work with IIGCC and Climate Action 100+	The Fund has been an active participant in the IIGCC corporate program.	The Fund is looking for more options within the IIGCC to support further development and implementation of IIGCC research into the Fund's strategy.
To continue to research and support the deployment of new impact capital into projects set to benefit from the transition to a low carbon economy	Invested 10% of the Equity program into impact managers 10% into climate risk passive product.	Looking to work with ACCESS to develop suitable solutions within the Pool
To assess the carbon intensity of all assets (using estimates if necessary) by the end-2022 reporting cycle, supported by external managers and GPs	The Fund has only considered the carbon intensity of the liquid holdings and is working with managers and other advisors in how to calculate this for the alternative space.	The Fund is considering which metrics it wishes to monitor and ensure that this is in line with TCFD reporting requirements. Once established we will be approaching all managers to provide this information.
Using data from the Transition Pathway Initiative (TPI), to engage alongside our collaborative partners to encourage companies to adopt	The Fund considered a passive investment that combined the TPI data to provide exclusions however concerns around the	The Fund has been improving its information on its underlying holdings with the aim to get quarterly information to further

business models and strategies that are in line with the aims of the Paris agreements.	<p>completeness of data and being constrained on future developments lead the Fund to invest in other passive options.</p> <p>The Fund actively review the TPI scoring of underlying holdings to understand positions within managers portfolios and use as a base to challenge external managers.</p>	analyse on different criteria including TPI analysis.
Implement processes that adhere to Taskforce for Climate-related Financial Disclosures (TCFD) recommendations on mandatory reporting and governance requirements related to climate risk as they are expected to apply to the LGPS.	The Fund is using its new resources to get more clarity on its investments at least quarterly, this allows us to better understand the areas that we need to focus our attention to bring us up to the required standard for TCFD reporting.	The Fund is conducting a gap analysis of the current documentation of the Fund to support embedding processes
To report annually in accordance with TCFD recommendations.	The Fund will provide a TCFD section within the 2020/21 Annual Report covering all elements where sufficient data.	We are awaiting the consultation from MHCLG on TCFD reporting to clarify the final requirements and include a fully compliant report within the Annual Report for 2021/22
Signatory to the United Nations Principles for Responsible Investment (PRI)	The Fund has signed up to the PRI as this is the first year of being a signatory it was not requirement to provide information.	During Q4 2021 and Q1 2022 to prepare the necessary information to maintain our signatory status to the PRI
Encourage the Fund's investment managers to provide transparency by reporting relevant and accessible ESG-related information. This includes their commitments to and alignment with the UK Stewardship Code 2020, the TCFD, the PRI and GRESB, where appropriate.	We have been requesting quarterly information from the managers on engagement and voting and have been monitoring the managers commitments. The Fund ensure all new managers are PRI and IIGCC signatories.	We will be maintaining the engagement and voting information capture to allow greater understanding of how this is working with our mangers and in conversations will be pushing the managers to sign up to relevant commitments with TCFD and UK stewardship code 2020 being priorities.
Working collaboratively to increase the reach, efficiency, and effectiveness of RI. We work with a host of like-minded partner funds, service providers and related organisations striving to attain best practice in the industry and to improve industry standards.	<p>ACCESS has set up a ESG task and finish group to improve their ESG guidelines. The Fund has been fully involved in this process.</p> <p>We have been working with the National LGPS Framework on</p>	<p>We shall be looking to continue to explore opportunities with ACCESS to improve the RI opportunities.</p> <p>Increase the involvement in collaborative RI initiatives and look to be signatories to shareholder resolutions.</p>

	<p>the replacement Stewardship framework.</p> <p>We have been engaged with IIGCC and have signed up to some of the initiatives coming from this collaboration.</p>	
<p>Report annually in accordance with the UK Stewardship Code requirements, and we are committed to adhering with the requirements of the new UK Stewardship Code 2020.</p>	<p>The Fund has been establishing the gaps within the current documentation and the requirements for the UK Stewardship code 2020 requirements to enable a complete report.</p>	<p>As the first signatories have been released, we are now able to review those reports that have been accepted to help to assess the Funds responses for submission in April 2022.</p>

## Collaboration

There are limits to the influence that we achieve as a single investor and the resources we can reasonably commit. We recognise that progress can be best achieved on ESG issues through collaboration with other investors and organisations. We're an active member and supporter of several Global and Industry ESG Initiatives



<https://www.unpri.org/>

Principles for Responsible Investment (PRI) We've been a signatory to the PRI since 2020 and are working on our first submission on how we implement the six Principles of Responsible Investment into our everyday work to be good stewards of capital. PRI is an important partner, providing excellent guidance on responsible investment and we work closely with them on the future direction of the organisation



<https://www.iigcc.org>

Institutional Investors Group on Climate Change (IIGCC), has the collective weight of over €35 trillion from 275 members and is leading the way on a global stage for investors to help realise a low carbon future. IIGCC helps shape sustainable finance policy and regulation for key sectors of the economy and supports members in adopting active ownership and better integrated climate risks and opportunities into investment processes. The Fund's Pension Committee Chair is currently a representative on the IIGCC Corporate Programme Advisory Group. The corporate programme focuses on supporting investors to engage with companies to align portfolios with the goal of net zero by 2050. In addition to the Fund's own membership of IIGCC, the Fund asks its managers to also be members providing a double lock on engagement.



[LAPFF | The leading voice for local authority pension funds across the UK \(lapffforum.org\)](https://lapffforum.org)

As a member of LAPFF the Fund works together with the majority of LGPS funds and pools across the UK, through the forum, to promote high corporate governance standards to protect the long-term value of local authority pensions. With member fund assets exceeding £300bn, the forum engages with companies and regulators to deliver reforms advancing

corporate responsibility and responsible investment. In October 2021 the Funds Head of Pensions was appointed to the executive committee as an LAPFF Officer Member.



[Home](#) | [Pensions For Purpose](#)

Pensions For Purpose is a bridge between asset managers, pension funds and advisers, to encourage the flow of capital towards impact investment. Pensions For Purpose provide high quality expertise and training to Funds on ESG issues. The Fund joined as an affiliate member in September 2021 .

DRAFT

## 13. Independent adviser's report

### East Sussex Pension Fund - Independent Advisor's report 2021

The Fund receives formal advice on investment matters from its actuarial and investment consultants. My role as Independent Advisor is primarily to act as a separate source of advice and expertise to Officers and Committee members. Our collective objective is, of course, to invest the Fund's assets to pay members' pensions in full and on time. I am additionally able to provide stakeholders with some independent assurance that the Fund is being appropriately and properly managed.

When I wrote last year's report, the COVID pandemic had just caused authorities to impose the first national lockdown. I said that the future course of markets was unclear, but that investment income was highly likely to decline and good cashflow planning would be increasingly important. I also mentioned two governance reviews in the process of being implemented.

Twelve months later we find ourselves still in a form of lockdown with some uncertainty what the future holds. Massive government response in the form of monetary easing and fiscal support has failed to avert the steepest economic decline in 300 years. However, it has benefited the value of the Fund's assets and, from a financial perspective, the Fund remains in a healthy position with a funding level above 100%.

The Fund has seen significant change in several areas during the year. Officers initiated a major initiative looking at how best to mitigate the financial effects of a transition to a lower carbon economy. It is still work in progress but the first step of moving 20% of the assets from a traditional passive equity strategy to a number of better aligned active ones has been implemented. The immediate impact is to reduce the carbon footprint by about 50% but, in my view, the more important one is that the portfolio is now better positioned for the lower carbon economy which is surely on the way. This in my view justifies the higher costs of actively managed strategies.

This journey the Fund is taking in this respect still has some way to go. Not only are there the remaining passive assets to review, but other asset classes such as private equity and private credit will also need to be considered. All pension funds will quite soon be required to consider different climate change scenarios and LGPS funds will have to comply with new climate change risk disclosure requirements by 2023. I also emphasise that climate change science is evolving rapidly: data in the future may be more reliable, for example by virtue of being audited, and there is always the possibility that it leads to different conclusions to those being drawn today.

The other major change has been in the Fund's actuarial advisor and investment consultant. After a full OJEU procurement process, contracts for both these roles were signed with new service providers. There is always a balance to be struck between the benefits of continuity and those of change, but the investment consultant's role in particular is changing and reducing with the advent of pooling. The new arrangements should save the Fund considerable money as well as providing some fresh input into the investment process.

A degree of economic recovery is almost certain following both the deep falls and also the level of government stimulus provided. Even if the headline data do not yet show it, global indicators such as shipping rates and volumes, and the back-up in bond yields over the past six months, show that it is in progress. China is likely to be first in the queue, while Europe looks like being near the back. The UK may also be a laggard as a result of the extra friction and costs involved with BREXIT.

The prospect of recovery is not bad for equities but it is often the case that they do better in anticipation rather than the actual event. Equity indices may therefore go sideways rather than continuing to rise, particularly if there is a reduction in the valuations of the tech stocks which now comprise so much of the indices.

The Fund has a substantial weighting in alternative investments of various sorts. These have, with the exception of real estate, weathered the pandemic well. The two Diversified Growth Funds provide both some ballast in the place of bonds and also some mitigation of inflation risk, and have performed well, in Ruffer's case spectacularly so. The infrastructure weighting serves a similar purpose, with longer duration but less flexibility, and has been increased during the year. The private equity programme has remained on course and private credit has been more resilient than I had expected after the March 2020 wobble.

Investment income generated by the portfolio declined as companies cut dividends. However, as much of this has historically been reinvested, the impact on the Fund's cashflow has been limited. An exercise in cashflow planning took place during the year and, under the new arrangements, the Fund is able to increase the level of investment received if required. As the Fund matures, pension pay-outs will gradually exceed contributions and investment income will become increasingly important.

In the longer term, an increase in inflation remains a major risk for the Fund. Investing in assets which have some correlation with inflation is the best way of mitigating this. Infrastructure, inflation linked bonds and - to a lesser extent - real estate, equities and diversified growth funds form part of the Fund's defence. I do not believe that it is an immediate risk but it is almost inevitable that inflation will rise eventually.

Turning to administration, the Fund has taken the decision to end the shared service arrangements with Orbis and build back its own dedicated resources in order to provide a better level of service to members. I know this has not been an easy decision to take, but I also see that committee and pension board members are keeping a careful eye on the process to ensure that the Fund is providing good value for money.

My final duty in this report is to provide some assurance as to the overall governance arrangements for the Fund. Over the past two years the Fund has spent considerable time and resources on this area, against a background of ever increasing complexity and regulatory requirements. For example, the Pensions Regulator is reviewing and combining its Codes of Practice, new statutory guidance is expected which will both implement the Scheme Advisory Board's Good Governance recommendations (mentioned last year) and update requirements on pooling, and the Taskforce for Climate Disclosure's recommendations are expected to cover LGPS funds by 2023. On top of that are the administrative complications resulting from a number of legal test cases such as McCloud.

While the Fund can never be complacent against such a changing background, I believe its governance processes and structures are of a good standard, and that the increase in resourcing being planned will allow them to operate as intended. There is every prospect that the Fund will continue to pay pensions on time and in full in accordance with its ultimate purpose. I view that as a tribute to the hard work put in by Officers, Committee and Local Pension Board members past and present over the past two years in particular.

William Bourne

Independent Advisor

8<sup>th</sup> April 2021

DRAFT

## 14. Asset pools

### Background

ACCESS (A Collaboration of Central, Eastern and Southern Shires) is made up of 11 Local Government Pension Schemes (LGPS) Administering Authorities:

- |                   |                     |                   |
|-------------------|---------------------|-------------------|
| 1. Cambridgeshire | 5. Norfolk          | 8. Hertfordshire  |
| 2. Kent           | 6. Essex            | 9. Suffolk        |
| 3. Hampshire      | 7. Northamptonshire | 10. Isle of Wight |
| 4. West Sussex    |                     |                   |

Collectively the pool has assets of £44 billion (of which 49% has been pooled) serving 3,534 employers with over 1.1 million members including 288,248 pensioners.

The ACCESS Administering Authorities are committed to working together to optimise benefits and efficiencies on behalf of their individual and collective stakeholders, operating with a clear set of objectives and principles that drives the decision making process.

### Objectives

1. Enable participating authorities to execute their fiduciary responsibilities to Local Government Pension Scheme (LGPS) stakeholders, including scheme members and employers, as economically as possible.
2. Provide a range of asset types necessary to enable those participating authorities to execute their locally decided investment strategies as far as possible.
3. Enable participating authorities to achieve the benefits of pooling investments, preserve the best aspects of what is currently done locally, and create the desired level of local decision-making and control.

### Principles

Collaborative	Risk management	Objective evidence based decisions
Equitable voice in governance	Professionalism	Equitable cost sharing
No unnecessary complexity	Evolution and innovation	Value for money

### Governance

Strategic oversight and scrutiny responsibilities remain with the Administering Authorities as does all decision making on their individual Funds asset allocation and the timing of transfers of assets from each Fund into the arrangements developed by the ACCESS Pool.

The Joint Committee (JC) has been appointed by the eleven Administering Authorities under s102 of the Local Government Act 1972, to exercise specific functions in relation to the pooling of LGPS assets. The JC's functions include the specification, procurement, recommendation of appointment of pool Operators (for active asset management) and pool-aligned asset providers (for passive asset management), to the Administering Authorities. The Joint Committee also reviews ongoing performance.

The Section 151 Officers of ACCESS Authorities provide advice to the Joint Committee in response to its decisions to ensure appropriate resourcing and support is available to implement the decisions and to run the ACCESS Pool.

The Joint Committee is further supported by the Officer Working Group (OWG) and the ACCESS Support Unit (ASU).

The Officer Working Group consists of officers with specialist LGPS investment skills, identified by each of the Administering Authorities whose role is to provide a central resource for advice, assistance, guidance and support for the Joint Committee.

The ACCESS Support Unit (ASU) provides the day-to-day support for running the ACCESS Pool and has responsibility for programme management, contract management and supplier relationship, administration and technical support

services. 2020/21 saw the approval of two additional roles to increase support capacity of the ASU which is hosted by Essex County

Council. Appointments were made to these positions in March 2021 and July 2021. These roles are also supplemented with additional technical support from Officers within the ACCESS Authorities.

The diagram below is an extract from the ACCESS governance model below:



## The Operator

Appointed in 2018 Link Fund Solutions Ltd (Link) provide the pooled operator service, overseeing an Authorised Contractual scheme for the sole use of ACCESS Authorities. Link are responsible for establishing and operating an authorised contractual scheme along with the creation of a range of investment sub-funds for active listed assets and the appointment of the investment managers to those sub-funds. This is designed to enable Administering Authorities to execute their asset allocation strategies

## Pool Aligned Assets: UBS

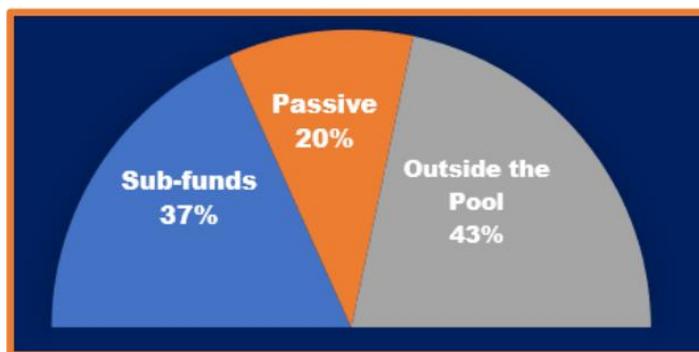
Appointed following a joint procurement in 2017, UBS act as the ACCESS Authorities' investment manager for passive assets.

## Progress

ACCESS submitted its pooling proposal to Government in July 2016 with detailed plans for establishing the pool and moving assets into the pool and regularly submitted progress reports to Government. These are all published on the pool's website ([www.accesspool.org](http://www.accesspool.org)).

Included in the proposal is an indicative timeline of when assets will be pooled and ACCESS has made excellent progress against the first milestone of having £27.2 billion assets pooled with estimated savings of £13.6 million by March 2021. ACCESS has to exceed these milestones with an additional £4 billion of assets pooled and greater savings of £8 million

.As at 31 March 2021, 57% of assets have been pooled:



## Pooled Assets

As at 31 March 2021, ACCESS has pooled the following assets:

	£ billion
Passive investments*	11.1
UK Equity Funds	2.2
Global Equity Funds	14.6
UK Fixed Income	2.1
Diversified Growth	1.5
<b>Total Pooled Investments</b>	<b>31.5</b>

\*The passive investment funds are held on a pool governance basis under one investment manager as these assets are held in life fund policies, which cannot be held within an authorised contractual scheme.

## Key milestones achieved in 2020/21

- Approval and launch of a range of sub-funds reflecting the strategic asset allocation needs of the ACCESS Funds.
- Provision of updates of progress of pooling to Government.
- Appointment of Engine MHP to review and advise in the further development of the Communications Policy.
- Appointment of Minerva to provide advice and guidance to develop Environmental, Social and Governance and Responsible Investment guidelines for ACCESS.
- In conjunction with Link Fund Solutions, held the second investor day for Elected members and officers of the individual Authorities. There were presentations by Link Fund Solutions as the ACS operator and Northern Trust as the depositary.
- Determined an approach to pooling and managing the illiquid assets covering private equity, private debt, infrastructure and property.
- Additional resources appointed to the ASU to support the activities of the ACCESS Pool.

## Objectives for 2021/22

ACCESS is well placed to continue to develop the pool and progress will continue unabated despite the restrictions imposed by the COVID-19 lockdown. Virtual meetings are well established and productive. It is anticipated that 2021/22 will see key activities within the following themes:

- Actively managed listed assets: the completion of pooling active listed assets within the Authorised Contractual Scheme (ACS).
- Alternative / non listed assets: the initial implementation of pooled alternative assets.
- Passively managed assets: ongoing monitoring and engagement with UBS.
- Finalise and implement the Environmental, Social and Governance and Responsible Investment guidelines for ACCESS.
- ACCESS Support Unit (ASU): the size and scope of the ASU will be kept under review

## Financial Management Expected v Actual Costs and Savings

The table below summarises the financial position for 2020/21 along with the cumulative position since the commencement of ACCESS activity in early 2016.

A budget for ongoing operational costs is set by the Joint Committee and is financed equally by each of the 11 Authorities. 2020/21 saw an underspend primarily due to lower than anticipated costs of external advice combined with the establishment of the ACCESS Support Unit reducing the reliance on external project management support.

	2020/21		2020/21	
	Actual	Budget	Actual	Budget
	In Year	In Year	Cumulative to date	Cumulative to date
	£'000	£'000	£'000	£'000
Set Up Costs	-	-	1,824	1,400
Transition Costs	-	-	674	2,499
Ongoing Operational Costs	863	1,079	3,071	3,548
Operator & Depository Costs	3,672	4,077	7,304	6,577
<b>Total Costs</b>	<b>4,535</b>	<b>5,156</b>	<b>12,873</b>	<b>14,024</b>
Pool Fee Savings	(21,747)	(13,600)	(42,262)	(32,050)
<b>Net (Savings Realised)/Costs</b>	<b>(17,212)</b>	<b>(8,444)</b>	<b>(29,389)</b>	<b>(18,026)</b>

Operator and depository fees are payable by each Authority in relation to assets invested within the Authorised Contractual Scheme established by Link Fund Solutions as pool operator.

The 2020/21 fee savings have been calculated using the CIPFA price variance methodology and based on the average asset values over the year. This approach highlights the combined level of investment fee savings, across all ACCESS Authorities stemming from reduced charges.

In summary, since inception ACCESS has demonstrated excellent value for money, maintaining expenditure broadly in line with the MHCLG submission whilst delivering an enhanced level of savings ahead of the timeline contained in the original proposal.

### Investment management costs split between pooled and non-pooled assets

	ACCESS Pool*		Non-ACCESS Pool		Total
	Direct	Indirect	Direct	Indirect	
<b>Management Fee £000</b>	248	3,711	1,006	6,666	<b>11,631</b>
<b>Transaction Costs £000</b>	64	-	928	-	<b>992</b>
<b>Custody £000</b>	-	-	61	-	<b>61</b>
<b>Other Costs £000</b>	-	-	1,101	-	<b>1,101</b>
<b>Total £000</b>	<b>312</b>	<b>3,711</b>	<b>3,096</b>	<b>6,666</b>	<b>13,785</b>

\* This includes pool aligned assets such as the jointly procured passive manager for ACCESS authorities.

### Environmental, Social and Governance (ESG) and Responsible Investment (RI)

The ACCESS Authorities believe in making long term sustainable investments whilst integrating environmental and social risk considerations, promoting good governance and stewardship.

Whilst the participating authorities have an overriding fiduciary and public law duty to act in the best long-term interests of their LGPS stakeholders to achieve the best possible financial returns, with an appropriate level of risk they also recognise the importance of committing to responsible investment alongside financial factors in the investment decision making process.

ACCESS has reviewed its own ESG/RI guidelines to reflect both the requirements of the Authorities and the expectations associated with this fundamental aspect of institutional investment. Minerva have been appointed as part of this review to provide advice on guidelines and implementing these in a pooling environment.

Minerva will also provide advice on future appropriate reporting requirements to provide transparency to stakeholders, monitor adherence to the Guidelines and inform discussion on ESG/RI matters.

The ACCESS pool has a set of voting guidelines which seeks to protect and enhance the value of its shareholdings by promoting good practice in the corporate governance and management of those companies.

The voting guidelines sets out the principles of good corporate governance and the means by which ACCESS will seek to exercise its influence on companies. During the year ACCESS voted at 868 meetings on 11,351 resolutions.

## 15. Fund account, net assets statement and notes

### a. East Sussex Pension Fund Account

2019/20			2020/21	
£000	£000	Notes	£000	£000
		<b>Dealings with members, employers and others directly involved in the fund</b>		
		Contributions		
(99,018)		From Employers	(100,042)	
(31,403)		From Members	(31,435)	
	(130,421)			(131,477)
	(8,298)	Transfers in from other pension funds		(6,044)
	<b>(138,719)</b>			<b>(137,521)</b>
	125,670	Benefits		128,707
	8,596	Payments to and on account of leavers		5,561
	<b>134,266</b>			<b>134,268</b>
	<b>(4,453)</b>	<b>Net (additions)/withdrawals from dealings with members</b>		<b>(3,253)</b>
	17,333	Management expenses		17,296
	<b>12,880</b>	<b>Net (additions)/withdrawals including fund management expenses</b>		<b>14,043</b>
		<b>Returns on investments</b>		
(26,546)		Investment income		(39,089)
59		Taxes on income		19
166,725		Profit and losses on disposal of investments and changes in the value of investments		(739,914)
	<b>140,238</b>	<b>Net return on investments</b>		<b>(778,984)</b>
	<b>153,118</b>	<b>Net (increase)/decrease in net assets available for benefits during the year</b>		<b>(764,941)</b>
(3,632,212)		Opening net assets of the scheme		(3,479,094)
<b>(3,479,094)</b>		<b>Closing net assets of the scheme</b>		<b>(4,244,035)</b>

## b. Net Assets Statement for the year ended 31 March 2020

31 March 2020 £000		Notes	31 March 2021 £000
3,401,666	Investment assets	14	4,173,990
340	Other Investment balances	21	357
(475)	Investment liabilities	22	(775)
63,715	Cash deposits	14	56,736
<b>3,465,246</b>	<b>Total net investments</b>		<b>4,230,308</b>
16,622	Current assets	21	15,675
(2,774)	Current liabilities	22	(1,948)
<b>3,479,094</b>	<b>Net assets of the fund available to fund benefits at the year end.</b>		<b>4,244,035</b>

The fund's financial statements do not take account of liabilities to pay pensions and other benefits after the period end. The actuarial present value of promised retirement benefits is disclosed at Note 20.

Treasurers Certificate

I certify that the accounts of the East Sussex Pension Fund provide a true and fair view of the Pension Fund at 31 March 2021 and of the movements for the year then ended.

**Ian Gutsell**

Chief Finance Officer (Section 151 Officer)

Business Services Department

18 October 2021

## c. Notes to the East Sussex Pension Fund Accounts for the year ended 31 March 2021

### 1: Description of fund

The East Sussex Pension Fund ("the Fund") is part of the Local Government Pension Scheme and is administered by East Sussex County Council ("the Scheme Manager"). The County Council is the reporting entity for this pension fund.

The following description of the fund is a summary only. For more detail, references should be made to the East Sussex Pension Fund Annual Report 2020/21 and the underlying statutory powers underpinning the scheme, namely the Public Service Pensions Act 2013 and The Local Government Pension Scheme (LGPS) Regulations.

#### a) General

The scheme is governed by the Public Service Pensions Act 2013. The Fund is administered in accordance with the following secondary legislation:

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

The Fund is a contributory defined benefit pension scheme administered by East Sussex County Council to provide pensions and other benefits for pensionable employees of East Sussex County Council, the district councils in East Sussex County and a range of other scheduled and admitted bodies within the county area.

The Fund is also empowered to admit the employees of certain other bodies, town and parish councils, educational establishments, contractors providing services transferred from scheduled bodies and community interest bodies. The Fund does not provide pensions for teachers, for whom separate arrangements exist. Uniformed police and fire staff are also subject to separate pension arrangements.

The Council has delegated its pension functions to the East Sussex Pension Committee. Responsibility for the administration and financial management of the Fund has been delegated to the Chief Finance Officer along with the Head of Pensions. The Scheme Manager is also required to establish and maintain a Pension Board, for the purposes of assisting with the ongoing compliance of the Fund. The role of the Board is to assist the East Sussex Pension Fund in complying with all the legislative requirements making sure the scheme is being effectively and efficiently governed and managed.

Independent investment managers have been appointed to manage the investments of the Fund. The Fund also invests in illiquid investments such as private equity, infrastructure and private debt. The Committee oversees the management of these investments and the Fund and its advisers meet regularly with the investment managers to monitor their performance against agreed benchmarks.

#### b) Membership

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

Organisations participating in the East Sussex Pension Fund include:

- Scheduled bodies, which are local authorities and similar bodies whose staff are automatically entitled to be members of the fund
- Admitted bodies, which are other organisations that participate in the fund under an admission agreement between the fund and the relevant organisation. Admitted bodies include voluntary, charitable and similar bodies or private contractors undertaking a local authority function following outsourcing to the private sector.

There are 127 employer organisations within East Sussex Pension Fund including the County Council itself, as detailed below:

East Sussex Pension Fund	31 March 2020	31 March 2021
Number of employers with active members	128	127
<b>Number of employees</b>		
County Council	7,980	8,163
Other employers	15,855	16,839
<b>Total</b>	<b>23,835</b>	<b>25,002</b>
<b>Number of pensioners</b>		
County Council	9,500	9,805
Other employers	11,835	12,425
<b>Total</b>	<b>21,335</b>	<b>22,230</b>
<b>Deferred pensioners</b>		
County Council	13,860	13,805
Other employers	17,762	17,429
<b>Total</b>	<b>31,622</b>	<b>31,234</b>
<b>Total number of members in pension scheme</b>	<b>76,792</b>	<b>78,466</b>

c) Funding

Benefits are funded by contributions and investment earnings. Contributions are made by active members of the Fund in accordance with The LGPS Regulations 2013 and range from 5.5% to 12.5% of pensionable pay for the financial year ending 31 March 2021. Employee contributions are matched by employers' contributions, which are set, based on triennial actuarial funding valuations. The last such valuation was at 31 March 2019. Currently, employer contribution rates range from 0.0% to 49.2% of pensionable pay.

d) Benefits

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

There are a range of other benefits provided under the scheme including early retirement, disability pensions and death benefits. For more details, please refer to the East Sussex Pension Fund Website.

## 2: Basis of preparation

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

Accounting standards issued but not yet adopted - Under the Code of Practice on Local Authority Accounting in the United Kingdom 2020/21, the Fund is required to disclose information setting out the impact of an accounting change required by a new accounting standard that has been issued on or before 1 January 2020 but not yet adopted by the Code. IFRS 16, introduced on 1 January 2019, is due to be adopted by the Code for accounting periods commencing on or after 1 April 2022. This new accounting standard largely removes the distinction between operating and finance leases by introducing an accounting model that requires lessees to recognise assets and liabilities for all leases with a term of more than 12 months unless the underlying asset is of low value. This will bring assets formerly off-Balance Sheet onto the Balance Sheet of lessees. Implementation of IFRS16 is not expected to have a material impact on the pension fund because it does not hold any assets as a lessee.

There were no amendments for 2020/21 for the accounts of the Pension Fund.

The accounts report on the net assets available to pay pension benefits. They do not take account of obligations to pay pensions and benefits which fall due after the end of the financial year nor do they take into account the actuarial present value of promised retirement benefits. The code gives administering authorities the option to disclose this information in the net asset statement, in the notes to the accounts or appending an actuarial report prepared for this purpose. The Pension Fund has opted to disclose this information in Note 20.

The Pension Fund publishes a number of statutory documents, including an Investment Strategy Statement, a Funding Strategy Statement, Governance and Compliance Policy Statement and Communications Policy Statement. Copies can be obtained by contacting the Council's Pensions team or alternatively are available from <https://www.eastsussexpensionfund.org/>

ACCESS Pool – There is no specific accounting policy for the Pool. The ACCESS Pool is not a legal entity in itself but is governed by the Inter Authority Agreement signed by each Administering Authority. The formal decision-making body

within the ACCESS Pool is the ACCESS Joint Committee, which has let the management of the asset pool to Link Fund Solutions Ltd, appointed to provide a pooled operator service. There is no direct investment in the third party, only a contractual arrangement to provide services, so there is no investment balance to carry forward in the net asset statement.

### 3: Summary of significant accounting policies

#### Fund account – revenue recognition

##### a) Contribution income

Normal contributions are accounted for on an accruals basis as follows:

- Employee contribution rates are set in accordance with LGPS regulations, using common percentage rates for all schemes, which rise according to pensionable pay.
- Employer contributions are set at the percentage rate recommended by the fund actuary for the period to which they relate.

Employer deficit funding contributions are accounted for on the basis advised by the fund actuary in the rates and adjustment certificate issued to the relevant employing body.

Additional employers' contributions in respect early retirements are accounted for in the year the event arose. Any amount due in the year but unpaid will be classed as a current financial asset. Amounts not due until future years are classed as long-term financial assets.

##### b) Transfers to and from other schemes

Transfers in and out relate to members who have either joined or left the fund.

Individual transfers in/out are accounted for when received or paid. Transfers in from members wishing to use the proceeds of their additional voluntary contributions (see below) to purchase scheme benefits are accounted for on a receipts basis and are included in Transfers In (Note 8).

Bulk (group) transfers are accounted for in accordance with the terms of the transfer agreement.

##### c) Investment income

###### i) Interest income

Interest income is recognised in the fund account as it accrues, using the effective interest rate of the financial instrument as at the date of acquisition or origination.

###### ii) Dividend income

Dividend income is recognised on the date the shares are quoted ex-dividend. Any amount not received by the end of the reporting period is disclosed in the net assets statement as a current financial asset.

###### iii) Distributions from pooled funds

Distributions from pooled funds are recognised at the date of issue. Any amount not received by the end of the reporting period is disclosed in the net assets statement as a current financial asset.

###### iv) Movement in the net market value of investments

Changes in the net market value of investments are recognised as income and comprise all realised and unrealised profits/losses during the year.

#### Fund account – expense items

##### d) Benefits payable

Pensions and lump-sum benefits payable include all amounts known to be due as at the end of the financial year. Any amounts due but unpaid are disclosed in the net assets statement as current liabilities.

##### e) Taxation

The Fund is a registered public service scheme under section 1(1) of Schedule 36 of the Finance Act 2004 and as such is exempt from UK income tax on interest received and from capital gains tax on the proceeds of investments sold. Income from overseas investments suffers withholding tax in the country of origin, unless exemption is permitted. Irrecoverable tax is accounted for as a fund expense as it arises.

##### f) Management expenses

The Fund discloses its pension fund management expenses in accordance with the CIPFA guidance Accounting for Local Government Pension Scheme Management Expenses (2016), as shown below. All items of expenditure are charged to the fund on an accruals basis as follows:

i) **Administrative expenses**

All staff costs of the Pensions Administration team are charged direct to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund.

ii) **Oversight and governance costs**

All staff costs associated with governance and oversight are charged direct to the Fund. Associated management, accommodation and other overheads are apportioned to this activity and charged as expenses to the Fund.

iii) **Investment management expenses**

Investment management expenses are charged directly to the Fund as part of management expenses and are not included in, or netted off from, the reported return on investments. Where fees are netted off quarterly valuations by investment managers, these expenses are shown separately in Note 11A and grossed up to increase the change in value of investments.

Fees of the external investment managers and custodian are agreed in the respective mandates governing their appointments. Broadly, these are based on the market value of the investments under their management and therefore increase or reduce as the value of these investments change.

Where an investment manager's fee has not been received by the balance sheet date, an estimate based upon the market value of their mandate as at the end of the year is used for inclusion in the fund account. In 2020/21, £0.8m of fees is based on such estimates (2019/20: £0.3m).

**Net assets statement**

g) **Financial assets**

All investment assets are included in the financial statements on a fair value basis as at the reporting date. A financial asset is recognised in the net assets statement on the date the Fund becomes party to the contractual acquisition of the asset. Any amounts due or payable in respect of trades entered into but not yet complete at 31 March each year are accounted for as financial instruments held at amortised cost and reflected in the reconciliation of movements in investments and derivatives in Note 14a. Any gains or losses on investment sales arising from changes in the fair value of the asset are recognised in the fund account.

The values of investments as shown in the net assets statement have been determined at fair value in accordance with the requirements of the Code and IFRS13 (see Note 16). For the purposes of disclosing levels of fair value hierarchy, the fund has adopted the classification guidelines recommended in Practical Guidance on Investment Disclosures (PRAG/Investment Association, 2016).

h) **Foreign currency transactions**

Dividends, interest and purchases and sales of investments in foreign currencies have been accounted for at the spot market rates at the date of transaction. End-of-year spot market exchange rates are used to value cash balances held in foreign currency bank accounts, market values of overseas investments and purchases and sales outstanding at the end of the reporting period.

i) **Derivatives**

The Fund uses derivative financial instruments to manage its exposure to specific risks arising from its investment activities. The Fund does not hold derivatives for speculative purposes.

j) **Cash and cash equivalents**

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

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

k) **Financial liabilities**

A financial liability is recognised in the net assets statement on the date the fund becomes party to the liability. The fund recognises financial liabilities relating to investment trading at fair value as at the reporting date, and any gains or losses arising from changes in the fair value of the liability between contract date, the year-end date and the eventual settlement date are recognised in the fund account as part of the Change in Value of Investments.

Other financial liabilities classed as amortised costs are carried at amortised cost i.e. the amount carried in the net asset statement are the outstanding principal repayable plus accrued interest. Any interest charged is accounted for on an accruals basis.

#### **l) Actuarial present value of promised retirement benefits**

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

As permitted under the Code, the Fund has opted to disclose the actuarial present value of promised retirement benefits by way of a note to the net assets statement (Note 20).

#### **m) Additional voluntary contributions**

East Sussex Pension Fund provides an additional voluntary contributions (AVC) scheme for its members, the assets of which are invested separately from those of the pension fund. The Fund has appointed Prudential as its AVC provider. AVCs are paid to the AVC provider by employers and are specifically for providing additional benefits for individual contributors. Each AVC contributor receives an annual statement showing the amount held in their account and the movements in the year.

AVCs are not included in the accounts in accordance with Regulation 4(1)(b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 but are disclosed as a note only (Note 23).

#### **n) Contingent assets and contingent liabilities**

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

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

Contingent assets and liabilities are not recognised in the net assets statement but are disclosed by way of narrative in the notes.

### **4: Critical judgements in applying accounting policies**

#### **Unquoted private equity investments**

It is important to recognise the highly subjective nature of determining the fair value of private equity investments. They are inherently based on forward-looking estimates and judgements involving many factors. Unquoted private equities are valued by the investment managers using International Private Equity and Venture Capital Valuation Guidelines 2015. The value of unquoted private equities at 31 March 2021 was £265 million (£229 million at 31 March 2020).

#### **Pension fund liability**

The Pension Fund liability is calculated every three years by the appointed actuary, with annual updates in the intervening years. The methodology used is in line with accepted guidelines and in accordance with IAS 19. Assumptions underpinning the valuations are agreed with the actuary and are summarised in Note 19. This estimate is subject to significant variances based on changes to the underlying assumptions.

#### **Use of Financial Instruments**

The Fund uses financial instruments to manage its exposure to specific risks arising from its investments. In applying the accounting policies set out within the notes that accompany the financial statements the Council has had to make certain judgements about complex transactions or those involving uncertainty about future events. The critical judgements made in the financial statements are based around determining a fair value for the alternative investments shown in the Net Asset Statement. It is important to recognise valuations for these types of investments are highly subjective in nature. They are inherently based on forward-looking estimates and judgements that involve many factors.

### **5: Assumptions made about the future and other major sources of estimation uncertainty**

The preparation of financial statements requires management to make judgements, estimates and assumptions that affect the reported amounts. Estimates and assumptions are made take into account historical experience, current trends and other relevant factors. However, actual outcomes could be different from the assumptions and estimates made. The items in the net asset statement for which there is a significant risk of material adjustment the following year are as follows:

Item	Uncertainties	Effect if actual results differ from assumptions
<b>Actuarial present value of promised retirement benefits (Note 20)</b>	Estimation of the net liability to pay pensions depends on a number of complex judgments relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on pension fund assets. As a result of Coronavirus pandemic there is an increase in the uncertainty around the mortality provisions within the Fund, however it is too early to assess this figure at the current time so has not been included in our calculations. A firm of consulting actuaries is engaged to provide the fund with expert advice about the assumptions to be applied.	The effects on the net pension liability of changes in individual assumptions can be measured. For instance, for the 2019 Valuation the actuary advised that: <ul style="list-style-type: none"> <li>• A 0.2% increase in the discount rate assumption would result in a decrease in the pension liability by approximately £113 million (3%).</li> <li>• A 0.2% increase in benefit increases and CARE revaluation would increase the value of liabilities by approximately £95 million (3%).</li> <li>• A 0.25% change in mortality rates would increase the liability by approximately £25 million (0.7%).</li> </ul>
<b>Private equity</b>	Private equity investments are valued at fair value in accordance with International Private Equity and Venture Capital Valuation Guidelines (2015). Investments are not publicly listed and as such there is a degree of estimation involved in the valuation.	The total private equity investments in the financial statements are £265.0 million. There is a risk that this investment may be under or overstated in the accounts depending on use of estimates applied in the valuation models by the fund managers. The sensitivity of this figure is discussed further in Note 16 and Note 18.
<b>Illiquid investments including Infrastructure and Pooled investments</b>	These investments are valued at fair value utilising market data from comparable debt, Commercial mortgage-backed securities (CMBS) market and sector curves to appropriately benchmark the investments. Due to volatility in the market with COVID-19 CMBS have been excluded at 31 March 2021 due to limited market data being available. This affects investments valued at 31 March 2021 of £42.4m. The total value of the fund assets at 31 March 2021 is £4,244.0m, so this investment type represents just under 1.0% of total assets.	The total pooled investments affected in the financial statements is £42.2 million. There is a risk that this investment may be under or overstated in the accounts due to the use of the estimates applied in the valuation by the fund manager. The sensitivity of this figure is discussed further in Note 16.

## 6: Events after the balance sheet date

There have been no events since 31 March 2021, and up to the date when these accounts were authorised that require any adjustments to these accounts.

## 7: Contributions Receivable

	2019/20 £000	2020/21 £000
<b>By category</b>		
Employee's contributions	31,403	31,435
Employer's contributions		
Normal contributions	80,302	83,643
Deficit recovery contributions	17,662	15,336
Augmentation contributions	1,054	1,063
<b>Total</b>	<b>130,421</b>	<b>131,477</b>
<b>By authority</b>		
Scheduled bodies	83,613	84,803
Admitted bodies	4,303	3,653
Administrative Authority	42,505	43,021

<b>Total</b>	<b>130,421</b>	<b>131,477</b>
--------------	----------------	----------------

#### 8: Transfers in from other pension funds

	2019/20 £000	2020/21 £000
Group transfers	-	-
Individual transfers	8,298	6,044
<b>Total</b>	<b>8,298</b>	<b>6,044</b>

#### 9: Benefits payable

	2019/20 £000	2020/21 £000
<b>By category</b>		
Pensions	104,544	108,927
Commutation and lump sum retirement benefits	18,555	17,194
Lump sum death benefits	2,571	2,586
<b>Total</b>	<b>125,670</b>	<b>128,707</b>
<b>By authority</b>		
Scheduled bodies	73,625	76,492
Admitted bodies	3,690	3,781
Administrative Authority	48,355	48,434
<b>Total</b>	<b>125,670</b>	<b>128,707</b>

#### 10: Payments to and on account of leavers

	2019/20 £000	2020/21 £000
Refunds to members leaving service	389	242
Group transfers	-	-
Individual transfers	8,207	5,319
<b>Total</b>	<b>8,596</b>	<b>5,561</b>

#### 11: Management expenses

	2019/20 £000	2020/21 £000
Administrative costs	1,106	1,680
Investment management expenses	15,019	13,785
Oversight and governance costs	1,208	1,831
<b>Total</b>	<b>17,333</b>	<b>17,296</b>

#### 11a: Investment management expenses

	2020/21	Total £000	Management Fees £000	Performance Related Fees £000	Transaction costs* £000
Bonds		38	14	-	24
Equities		802	113	-	689
<b>Pooled investments</b>					
Fixed Income		1,769	1,769	-	-
Equity		2,872	2,593	-	279
Diversified growth funds		3,373	3,373	-	-
Pooled property investments		1,307	1,307	-	-
Private equity / infrastructure		3,563	3,563	-	-
		<b>13,724</b>	<b>12,732</b>	-	<b>992</b>
<b>Custody</b>		<b>61</b>			

**Total** 13,785

\*In addition to these costs, indirect costs are incurred through the bid-offer spread on investments within pooled investments.

	2019/20	Total £000	Management Fees £000	Performance Related Fees £000	Transaction costs* £000
Bonds		18	18	-	-
Equities		-	-	-	-
Diversified growth		2,131	1,942	-	189
<b>Pooled investments</b>		-	-	-	-
Fixed Income		1,298	1,298	-	-
Equity		1,843	1,843	-	-
Diversified growth funds		2,876	2,846	-	30
Pooled property investments		1,652	1,652	-	-
Private equity / infrastructure		5,147	5,147	-	-
		<u>14,965</u>	<u>14,746</u>	-	<u>219</u>
<b>Custody</b>		<u>54</u>			
<b>Total</b>		<u>15,019</u>			

\*In addition to these costs, indirect costs are incurred through the bid-offer spread on investments within pooled investments.

Investment management expenses are charged directly to the fund as part of management expenses and are not included in, or netted off from, the reported return on investments. Where fees are netted off quarterly valuations by investment managers, these expenses are grossed up.

During the year, the Pension Fund incurred management fees which were deducted at source for 2020/21 of £2.2m (£3.7m in 2019/20) on its private equity investments, fees of £1.1m (£1.3m in 2019/20) on its infrastructure investments, fees of £5.1m (£2.6m in 2019/20) on investments in the ACCESS Pool and fees of £1.9m (£3.0m in 2019/20) on other mandates. These fees are deducted at the individual portfolio level rather than being paid directly by the Pension Fund.

## 12: Investment income

	2019/20 £000	2020/21 £000
Income from bonds	154	122
Income from equities	1,507	654
Private equity/Infrastructure income	1,531	1,458
Pooled property investments	11,972	9,584
Pooled investments - unit trusts and other managed funds	10,705	25,402
Interest on cash deposits	673	1,869
Class Actions	4	-
<b>Total</b>	<u>26,546</u>	<u>39,089</u>

## 13: Other fund account disclosures

### 13a: Taxes on income

	2019/20 £000	2020/21 £000
Withholding tax – equities	(59)	(19)
<b>Total</b>	<u>(59)</u>	<u>(19)</u>

### 13b: External audit costs

	2019/20 £000	2020/21 £000
Payable in respect of external audit for 2018/19	3*	-
Payable in respect of external audit for 2019/20	27	5**
Payable in respect of external audit for 2020/21	-	35
Payable in respect of other services	5	5
<b>Total</b>	<u>35</u>	<u>45</u>

\*The final fee for 2018/19 was agreed after the audit opinion was received for 2018/19.

\*\* The final fee for 2019/20 was agreed after the audit opinion was received for 2019/20

## 14: Investments

	2019/20 £000	2020/21 £000
<b>Investment assets</b>		
Bonds	212,331	128,765
<b>Pooled Investments</b>		
Fixed Income	413,943	485,996
Equity	1,332,597	1,864,834
Diversified growth funds	833,253	1,002,298
Pooled property investments	318,129	319,533
Private equity/infrastructure	291,413	372,564
<b>Derivative contracts:</b>		
Forward Currency Contracts	-	-
	<b>3,401,666</b>	<b>4,173,990</b>
Cash deposits with Custodian	63,715	56,736
Other Investment balances (Note 21)	340	357
<b>Total investment assets</b>	<b>3,465,721</b>	<b>4,231,083</b>
Investment Liabilities (Note 22)	(475)	(775)
<b>Derivative contracts:</b>		
Forward Currency Contracts	-	-
<b>Total Investment Liabilities</b>	<b>(475)</b>	<b>(775)</b>
<b>Net investment assets</b>	<b>3,465,246</b>	<b>4,230,308</b>

### 14a: Reconciliation of movements in investments and derivatives

	Market value 1 April 2020 £000	Purchases during the year and derivative payments £000	Sales during the year and derivative receipts £000	Change in market value during the year £000	Market value 31 March 2021 £000
Bonds	212,331	-	(92,246)	8,680	128,765
Equities	-	618,587	(534,059)	(84,528)	-
Pooled investments	2,579,793	253,354	(246,139)	766,120	3,353,128
Pooled property investments	318,129	11,928	(9,059)	(1,465)	319,533
Private equity/infrastructure	291,413	77,295	(47,943)	51,799	372,564
	<b>3,401,666</b>	<b>961,164</b>	<b>(929,446)</b>	<b>740,606</b>	<b>4,173,990</b>
<b>Derivative contracts</b>					
■ Forward currency contracts	-	575	(162)	(413)	-
	<b>3,401,666</b>	<b>961,739</b>	<b>(929,608)</b>	<b>740,193</b>	<b>4,173,990</b>
<b>Other investment balances:</b>					
■ Cash deposits	63,715			(279)	56,736
■ Other Investment Balances	340				357
■ Investment Liabilities	(475)				(775)
<b>Net investment assets</b>	<b>3,465,246</b>			<b>739,914</b>	<b>4,230,308</b>

	Market value 1 April 2019	Purchases during the year and derivative payments	Sales during the year and derivative receipts	Change in market value during the year	Market value 31 March 2020
	£000	£000	£000	£000	£000
Bonds	499,750	68,143	(379,592)	24,030	212,331
Equities	153,695	81,336	(244,125)	9,094	-
Pooled investments	2,232,435	1,055,608	(493,067)	(215,183)	2,579,793
Pooled property investments	339,442	10,551	(15,342)	(16,522)	318,129
Private equity/infrastructure	245,135	57,631	(41,228)	29,875	291,413
Commodities	6,125	992	(7,925)	808	-
Multi Asset	2,342	6,030	(7,534)	(838)	-
	<b>3,478,924</b>	<b>1,280,291</b>	<b>(1,188,813)</b>	<b>(168,736)</b>	<b>3,401,666</b>
<b>Derivative contracts</b>					
■ Forward currency contracts	(415)	12,995	(12,095)	(485)	-
	<b>3,478,509</b>	<b>1,293,286</b>	<b>(1,200,908)</b>	<b>(169,221)</b>	<b>3,401,666</b>
<b>Other investment balances:</b>					
■ Cash deposits	149,156			2,496	63,715
■ Other Investment Balances	4,937				340
■ Investment Liabilities	(9,392)				(475)
<b>Net investment assets</b>	<b>3,623,210</b>			<b>(166,725)</b>	<b>3,465,246</b>

#### 14b: Investments analysed by fund manager

	Market value 31 March 2020		Market value 31 March 2021	
	£000	£000	£000	%
<b>Investments in the ACCESS Pool</b>				
ACCESS - Global Equity (Longview)	238,840	6.9%	458,786	10.8%
ACCESS - Absolute Return (Ruffer)	418,469	12.1%	510,048	12.1%
ACCESS - Real Return (Newton)	414,784	12.0%	492,250	11.6%
ACCESS - Corporate Debt (M&G)	144,259	4.2%	158,430	3.7%
	<b>1,216,352</b>	<b>35.2%</b>	<b>1,619,514</b>	<b>38.2%</b>
<b>Investments held directly by the Fund</b>				
East Sussex Pension Fund Cash	24,736	0.7%	30,674	0.7%
UBS Infrastructure Fund	16,720	0.5%	37,697	0.9%
Prudential Infracapital	20,676	0.6%	32,707	0.8%
Pantheon	30,109	0.9%	38,120	0.9%
Schroders Property*	343,707	9.9%	344,204	8.1%
Harbourvest Strategies	106,192	3.1%	110,515	2.6%
Adams St Partners	122,874	3.5%	154,497	3.7%
M&G Absolute Return Bonds	239,101	6.9%	285,150	6.7%
UBS Passive Funds	1,305,987	37.6%	557,483	13.3%
M&G Real Estate Debt VI	38,793	1.1%	42,416	1.0%
Atlas Infrastructure	-	-	77,324	1.8%
Storebrand Smart Beta & ESG	-	-	454,529	10.7%
Wellington Active Impact Equity	-	-	222,751	5.3%
WHEB Active Impact Equity	-	-	222,727	5.3%
	<b>2,248,894</b>	<b>64.8%</b>	<b>2,610,794</b>	<b>61.8%</b>
	<b>3,465,246</b>		<b>4,230,308</b>	

\* Schroders mandate is to oversee the East Sussex Pension Fund's investments in a range of underlying property funds this is not a single investment into a Schroders property fund.

The following investments represent more than 5% of the investment assets of the scheme -

Security	Market Value 31 March 2020	% of total fund	Market value 31 March 2021	% of total fund
	£000		£000	
ACCESS - Absolute Return (Ruffer)	418,469	12.1%	510,048	12.1%
ACCESS - Global Equity (Longview)	238,840	6.9%	492,250	11.6%
ACCESS - Real Return (Newton)	414,784	12.0%	458,786	10.8%
Storebrand Smart Beta & ESG Fund	-	-	454,529	10.7%
M&G Absolute Return Bonds	239,101	6.9%	285,150	6.7%
Wellington Active Impact Equity Fund	-	-	222,751	5.3%
WHEBActive Impact Equity Fund	-	-	222,727	5.3%
UBS Over 5 year Index Gilt Linked	212,331	6.1%	128,765	3.0%
UBS UK Equity	221,992	6.4%	66,680	1.6%
UBS Fundamental Index	363,155	10.4%	-	-

**14c: Stock lending**

The East Sussex Pension Fund has not operated a stock lending programme since 13<sup>th</sup> October 2008.

**15: Analysis of derivatives**

**Objectives and policies for holding derivatives**

Derivatives can be used to hedge liabilities or hedge exposures to reduce risk in the Fund. Derivatives maybe used to gain exposure to an asset more efficiently than holding the underlying asset. The use of derivatives is managed in line with the investment management agreement agreed between the Fund and the various investment managers.

**a) Futures**

The scheme's objective is to decrease risk in the portfolio by entering into futures positions to match assets that are already held in the portfolio without disturbing the underlying assets.

**b) Forward foreign currency**

In order to maintain appropriate diversification and to take advantage of overseas investment returns, a significant proportion of the Fund's quoted equity portfolio is in overseas stock markets. The Fund can participate in forward currency contracts in order to reduce the volatility associated with fluctuating currency rates.

**c) Options**

The Fund wants to benefit from the potentially greater returns available from investing in equities but wishes to minimise the risk of loss of value through adverse equity price movements. The Fund buys equity option contracts that protect it from falls in value in the main markets in which the scheme invests.

The East Sussex Pension Fund did not hold any derivatives as at 31<sup>st</sup> March 2021 (nil as at 31 March 2020).

**16: Fair value – basis of valuation**

The basis of the valuation of each class of investment asset is set out below. There has been no change in the valuation techniques used during the year. All assets have been valued using fair value techniques, which represent the highest and best price available at the reporting date

Description of asset	Valuation hierarchy	Basis of valuation	Observable and unobservable inputs	Key sensitivities affecting the valuations provided
Market-quoted investments	Level 1	Published bid market price ruling on the final day of the accounting period	Not Required	Not Required

Description of asset	Valuation hierarchy	Basis of valuation	Observable and unobservable inputs	Key sensitivities affecting the valuations provided
Quoted bonds	Level 1	Fixed interest securities are valued at a market value based on current yields	Not Required	Not Required
Futures and options in UK bonds	Level 1	Published exchange prices at the year-end	Not Required	Not Required
Exchange traded pooled investments	Level 1	Closing bid value on published exchanges	Not Required	Not Required
Unquoted bonds	Level 2	Average of broker prices	Evaluated price feeds	Not Required
Forward foreign exchange derivatives	Level 2	Market forward exchange rates at the year-end	Exchange rate risk	Not Required
Overseas bond options	Level 2	Option pricing model	Annualised volatility of counterparty credit risk	Not Required
Pooled investments – Equity and bonds Funds	Level 2	Closing bid price where bid and offer prices are published Closing single price where single price published	The valuation is undertaken by the investment manager or responsible entity and advised as a unit or security price. Observable inputs are used.  The valuation standards followed in these valuations adhere to industry guidelines or to standards set by the constituent documents of the pool or the management agreement.	Not Required

Description of asset	Valuation hierarchy	Basis of valuation	Observable and unobservable inputs	Key sensitivities affecting the valuations provided
Pooled investments – Property Funds	Level 3	<p>Closing bid price where bid and offer prices are published</p> <p>Closing single price where single price published</p> <p>Investments in unlisted property funds are valued at the net asset value (NAV). The underlying real estate assets values have been derived by independent valuers on a fair value basis and generally in accordance with the Royal Institute of Chartered Surveyors' Valuation Standards.</p>	The significant inputs and assumptions are developed by the respective fund manager.	Valuations could be affected by the frequency of the independent valuations between the funds.
Unquoted equity – Private Equity / Infrastructure	Level 3	Comparable valuation of similar companies in accordance with International Private Equity and Venture Capital Valuation Guidelines (2012)	<p>Observable inputs are subject to judgment by the respective manager, but are applied in accordance with the appropriate industry guidelines.</p> <p>Valuations are audited as at 31 December, and the valuations as at 31 March reflect cash flow transactions since 31 December.</p>	Valuations could be affected by material events occurring between the date of the financial statements provided and the pension fund's own reporting date, by changes to expected cashflows, and by any differences between audited and unaudited accounts

### Sensitivity of assets valued at level 3

Having analysed historical data and current market trends, and consulted with independent investment advisors, the Fund has determined that the valuation methods described above are likely to be accurate to within the following ranges, and has set out below the consequential potential impact on the closing value of investments held at 31 March 2021 and 31 March 2020.

Asset Type	Assessed valuation range (+/-)	Values at 31 March 2021 £000	Value on increase £000	Value on decrease £000
Pooled Investment (a)	9%	42,416	46,233	38,599
Pooled property investments (b)	13%	319,533	361,072	277,994
Private Equity/Infrastructure (c)	25%	372,564	464,960	280,168
<b>Total</b>		<b>734,513</b>	<b>872,265</b>	<b>596,761</b>

Asset Type	Assessed valuation range (+/-)	Values at 31 March 2020 £000	Value on increase £000	Value on decrease £000
Pooled Investment (a)	7%	30,583	32,759	28,407
Pooled property investments (b)	14%	318,129	362,031	274,227
Private Equity/Infrastructure (c)	27%	291,413	370,095	212,731
<b>Total</b>		<b>640,125</b>	<b>764,884</b>	<b>515,366</b>

- (a) All movements in the assessed valuation range derive from changes in the net asset value of the underlying real estate assets, the range in the potential movement of 9% is caused by how this value is measured.
- (b) All movements in the assessed valuation range derive from changes in the net asset value of the underlying real estate assets, the range in the potential movement of 13% is caused by how this value is measured.
- (c) All movements in the assessed valuation range derive from changes in the underlying profitability of component companies, the range in the potential movement of 25% is caused by how this profitability is measured.

### 16a: Fair value hierarchy

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

	Quoted market price	Using observable inputs	With Significant unobservable inputs	Total
	Level 1 £000	Level 2 £000	Level 3 £000	
<b>Values at 31 March 2021</b>				
Financial assets at fair value through profit and loss	357	3,439,477	734,513	4,174,347
Non-financial assets at fair value through profit and loss	-	-	-	-
Financial liabilities at fair value through profit and loss	-	(775)	-	(775)
<b>Net investment assets</b>	<b>357</b>	<b>3,438,702</b>	<b>734,513</b>	<b>4,173,572</b>

	Quoted market price	Using observable inputs	With Significant unobservable inputs	Total
	Level 1 £000	Level 2 £000	Level 3 £000	
<b>Values at 31 March 2020</b>				
Financial assets at fair value through profit and loss	222,079	2,539,802	640,125	3,402,006
Non-financial assets at fair value through profit and loss	-	-	-	-
Financial liabilities at fair value through profit and loss	-	(475)	-	(475)
<b>Net investment assets</b>	<b>222,079</b>	<b>2,539,327</b>	<b>640,125</b>	<b>3,401,531</b>

### 16b: Transfers between levels 1 and 2

During 2020/21 the Fund has transferred 1 financial assets between levels 1 and 2. This was the Fund's UK Passive Fund with UBS (£66.7m) which was moved to level 2 from level 1 as the Fund assessment was that this was more aligned to the Pooled investments – Equity and bonds Fund's category and as the valuation is advised as a unit price.

### 16c: Reconciliation of fair value measurements within level 3

	Market value 1 April 2020	Transfers into Level 3	Transfers out of Level 3	Purchases during the year	Sales during the year	Unrealised gains/(losses)	Realised gains/(losses)	Market value 31 March 2021
Period 2020/21	£000	£000	£000	£000	£000	£000	£000	£000
Pooled investments	30,583	-	-	18,074	(6,715)	474	-	42,416
Pooled property investments	318,129	-	-	11,928	(9,274)	(4,459)	3,209	319,533
Private Equity/Infrastructure	291,413	-	-	77,295	(47,943)	24,207	27,592	372,564
<b>Total</b>	<b>640,125</b>	<b>-</b>	<b>-</b>	<b>107,297</b>	<b>(63,932)</b>	<b>20,222*</b>	<b>30,801*</b>	<b>734,513</b>

\*Reconciliation to Change in market value during the year in Note 14a

Level	Unrealised gains/(losses)	Realised gains/(losses)	Change in market value during the year
1 and 2	566,319	122,572	688,891
3	20,222	30,801	51,023
<b>Total</b>	<b>586,541</b>	<b>153,373</b>	<b>739,914</b>

	Market value 1 April 2019	Transfers into Level 3	Transfers out of Level 3	Purchases during the year	Sales during the year	Unrealised gains/(losses)	Realised gains/(losses)	Market value 31 March 2020
Period 2019/20	£000	£000	£000	£000	£000	£000	£000	£000
Equities	33,670	-	-	4,344	(31,669)	8,716	(15,061)	-
Pooled investments	-	-	-	44,179	(14,239)	643	-	30,583
Pooled property investments	339,442	-	-	10,551	(15,342)	(22,256)	5,734	318,129
Private Equity/Infrastructure	245,135	-	-	57,631	(35,970)	1,863	22,754	291,413
<b>Total</b>	<b>618,247</b>	<b>-</b>	<b>-</b>	<b>116,705</b>	<b>(97,220)</b>	<b>(11,034)*</b>	<b>13,427*</b>	<b>640,125</b>

\*Reconciliation to Change in market value during the year in Note 14a

Level	Unrealised gains/(losses)	Realised gains/(losses)	Change in market value during the year
1 and 2	(269,121)	100,003	(169,118)
3	(11,034)	13,427	2,393
<b>Total</b>	<b>(280,155)</b>	<b>113,430</b>	<b>(166,725)</b>

## 17: Classification of financial instruments

Accounting policies describe how different asset classes of financial instruments are measured, and how income and expenses, including fair value gains and losses, are recognised. The following table analyses the carrying amounts of financial assets and liabilities (including cash) by category and net assets statement heading. No financial assets were reclassified during the accounting period.

31 March 2020			31 March 2021		
Fair value through profit and loss	Assets at amortised cost	Liabilities at amortised cost	Fair value through profit and loss	Assets at amortised cost	Liabilities at amortised cost
£000	£000	£000	£000	£000	£000
<b>Financial Assets</b>					
212,331	-	-	128,765	-	-
-	-	-	-	-	-
2,579,793	-	-	3,353,128	-	-
318,129	-	-	319,533	-	-
291,413	-	-	372,564	-	-
-	-	-	-	-	-
-	63,715	-	-	56,736	-
-	1,746	-	-	1,560	-
340	-	-	357	-	-
-	14,876	-	-	14,115	-
<b>3,402,006</b>	<b>80,337</b>	-	<b>4,174,347</b>	<b>72,411</b>	-
<b>Financial liabilities</b>					
-	-	-	-	-	-
(475)	-	-	(775)	-	-
-	-	-	-	-	-
-	-	(2,774)	-	-	(1,948)
<b>(475)</b>	-	<b>(2,774)</b>	<b>(775)</b>	-	<b>(1,948)</b>
<b>3,401,531</b>	<b>80,337</b>	<b>(2,774)</b>	<b>4,173,572</b>	<b>72,411</b>	<b>(1,948)</b>

\*Reconciliation to Current Assets Note 21

	2019/20	2020/21
	£000	£000
Cash held by ESCC	1,746	1,560
Debtors	14,876	14,115
<b>Current Assets</b>	<b>16,622</b>	<b>15,675</b>

### 17a: Net gains and losses on financial instruments

	31 March 2020	31 March 2021
	£000	£000
<b>Financial assets</b>		
Fair value through profit and loss	(167,355)	740,512
Amortised cost – realised gains on derecognition of assets	-	-
Amortised cost – unrealised gains	665	(598)
<b>Financial liabilities</b>		
Fair value through profit and loss	(35)	-
Amortised cost – realised gains on derecognition of assets	-	-
Amortised cost – unrealised gains	-	-
<b>Total</b>	<b>(166,725)</b>	<b>739,914</b>

**Risk and risk management**

The Fund’s primary long-term risk is that the Fund’s assets will fall short of its liabilities (i.e. promised benefits payable to members). Therefore, the aim of investment risk management is to minimise the risk of an overall reduction in the value of the Fund and to maximise the opportunity for gains across the whole 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 forecast cash flows. The Fund manages these investment risks as part of its overall risk management programme.

Responsibility for the Fund’s risk management strategy rests with the Pension Committee. Risk management policies are established to identify and analyse the risks faced by the Fund’s pensions operations. Policies are reviewed regularly to reflect changes in activity and in the market conditions.

**a) Market risk**

Market risk is the risk of loss from fluctuations in equity and commodity prices, interest and foreign exchange rates and credit spreads. The Fund is exposed to market risk from its investment activities, particularly through its equity holdings. The level of risk exposure depends on market conditions, expectations of future price and yield movements and the asset mix.

The objective of the Fund’s risk management strategy is to identify, manage and control market risk exposure within acceptable parameters, whilst optimising the return on risk.

In general, excessive volatility in market risk is managed through the diversification of the portfolio in terms of geographical and industry sectors and individual securities. To mitigate market risk, the Fund and its investment advisors undertake appropriate monitoring of market conditions and benchmark analysis.

The Fund manages these risks in two ways:

- the exposure of the fund to market risk is monitored through a factor risk analysis, to ensure that risk remains within tolerable levels
- specific risk exposure is limited by applying risk-weighted maximum exposures to individual investments.

Equity futures contracts and exchange traded option contracts on individual securities may also be used to manage market risk on equity investments. It is possible for over-the-counter equity derivative contracts to be used in exceptional circumstances to manage specific aspects of market risk.

**Other price risk**

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

The Fund is exposed to share and derivative price risk. This arises from investments held by the fund for which the future price is uncertain. All securities investments present a risk of loss of capital. Except for shares sold short, the maximum risk resulting from financial instruments is determined by the fair value of the financial instruments. Possible losses from shares sold short is unlimited.

The Fund’s investment managers mitigate this price risk through diversification and the selection of securities and other financial instruments is monitored by the fund to ensure it is within limits specified in the Fund’s investment strategy.

**Other price risk – sensitivity analysis**

Following analysis of historical data and expected investment return movement during the financial year, in consultation with the Fund’s investment advisors, the Fund has determined that the following movements in market price risk are reasonably possible for the 2020/21 reporting period:

<b>Asset Type</b>	<b>Potential Market Movements (+/-)</b>
Index Linked	12%
Other Bonds	5%
UK Equities	20%
Global Equities	21%
Absolute Return	13%
Pooled Property Investments	13%
Private Equity	30%
Infrastructure Funds	12%

The potential price changes disclosed above are broadly consistent with a one-standard deviation movement in the value of the assets. The sensitivities are consistent with the assumptions contained in the investment advisors’ most

recent review. This analysis assumes that all other variables, in particular foreign currency exchange rates and interest rates, remain the same.

Had the market price of the Fund investments increased/decreased in line with the above, the change in the net assets available to pay benefits in the market price would have been as follows.

<b>Asset Type</b>	<b>Values at 31 March 2021 £000</b>	<b>Value on increase £000</b>	<b>Value on decrease £000</b>
Index Linked	128,765	143,573	113,957
Other Bonds	485,996	512,310	459,682
UK Equities	825,342	990,410	660,274
Global Equities	1,039,492	1,257,785	821,199
Absolute Return	1,002,298	1,127,585	877,011
Pooled Property Investments	319,533	361,072	277,994
Private Equity	264,039	343,251	184,827
Infrastructure Funds	108,525	121,548	95,502
Net Derivative Assets	-	-	-
<b>Total assets available to pay benefits</b>	<b>4,173,990</b>	<b>4,857,534</b>	<b>3,490,446</b>

<b>Asset Type</b>	<b>Values at 31 March 2020 £000</b>	<b>Value on increase £000</b>	<b>Value on decrease £000</b>
Index Linked	212,331	231,441	193,221
Other Bonds	413,943	443,397	384,489
UK Equities	221,992	284,150	159,834
Global Equities	1,110,605	1,421,574	799,636
Absolute Return	833,253	949,908	716,598
Pooled Property Investments	318,129	362,031	274,227
Private Equity	228,472	292,444	164,500
Infrastructure Funds	62,941	75,529	50,353
Net Derivative Assets	-	-	-
<b>Total assets available to pay benefits</b>	<b>3,401,666</b>	<b>4,060,474</b>	<b>2,742,858</b>

### **Interest rate risk**

The Fund invests in financial assets for the primary purpose of obtaining a return on investments. These investments are subject to interest rate risks, which represent the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

The Fund's interest rate risk is routinely monitored by the Fund and its investment advisors in accordance with the risk management strategy, including monitoring the exposure to interest rates and assessment of actual interest rates against the relevant benchmarks.

The Fund's direct exposure to interest rate movements as at 31 March 2021 and 31 March 2020 is set out below. These disclosures present interest rate risk based on the underlying financial assets at fair value.

### **Interest rate risk sensitivity analysis**

The Fund recognises that interest rates can vary and can affect both income to the Fund and the value of the net assets available to pay benefits. A 100 basis point (bps) movement in interest rates is consistent with the level of sensitivity applied as part of the Fund's risk management strategy. The Fund's investment adviser has advised that this is consistent with an annual one standard deviation move in interest rates, where interest rates are determined by the prices of fixed interest UK government bonds.

The analysis that follows assumes that all other variables, in particular exchange rates, remain constant, and shows the effect in the year on the net assets available to pay benefits of a +/- 100 bps change in interest rates:

<b>Asset type</b>	<b>Carrying amount as at 31 March 2021</b>	<b>Impact of 1% increase</b>	<b>Impact of 1% decrease</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Cash and cash equivalents	56,736	56,736	56,736
Cash balances	1,560	1,560	1,560
Fixed interest securities	485,996	490,856	481,136
Index linked securities	128,765	128,765	128,765
<b>Total change in assets available</b>	<b>673,057</b>	<b>677,917</b>	<b>668,197</b>

<b>Asset type</b>	<b>Carrying amount as at 31 March 2020</b>	<b>Impact of 1% increase</b>	<b>Impact of 1% decrease</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Cash and cash equivalents	63,715	63,715	63,715
Cash balances	1,746	1,746	1,746
Fixed interest securities	413,943	418,082	409,804
Index linked securities	212,331	212,331	212,331
<b>Total change in assets available</b>	<b>691,735</b>	<b>695,874</b>	<b>687,596</b>

<b>Income Source</b>	<b>Interest receivable 2020/21</b>	<b>Value on 1% increase</b>	<b>Value on 1% decrease</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Cash deposits/cash and cash equivalents	1,869	2,452	1,286
Fixed interest securities	14,072	14,072	14,072
Index linked securities	122	1,410	(1,166)
<b>Total change in assets available</b>	<b>16,063</b>	<b>17,934</b>	<b>14,192</b>

<b>Income Source</b>	<b>Interest receivable 2019/20</b>	<b>Value on 1% increase</b>	<b>Value on 1% decrease</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Cash deposits/cash and cash equivalents	673	1,328	18
Fixed interest securities	6,665	6,665	6,665
Index linked securities	169	2,292	(1,954)
<b>Total change in assets available</b>	<b>7,507</b>	<b>10,285</b>	<b>4,729</b>

This analysis demonstrates that a 1% increase in interest rates will not affect the interest received on fixed interest assets but will reduce their fair value, and vice versa. Changes in interest rates do not impact on the value of cash/cash equivalent balances but they will affect the interest income received on those balances.

### Currency risk

Currency risk represents the risk that future cash flows will fluctuate because of changes in foreign exchange rates. The Fund is exposed to currency risk on any cash balances and investment assets not denominated in pound sterling. Following analysis of historical data in consultation with the Fund investment advisors, the Fund considers the likely volatility associated with foreign exchange rate movements not more than 10%. A 10% strengthening/weakening of the pound against the various currencies in which the Fund holds investments would increase/decrease the net assets available to pay benefits as follows:

<b>Currency exposure - asset type</b>	<b>Values at 31 March 2021</b>	<b>Potential Market movement</b>	<b>Value on increase</b>	<b>Value on decrease</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
Overseas unit trusts	2,326,940	225,713	2,552,653	2,101,227
<b>Total change in assets available</b>	<b>2,326,940</b>	<b>225,713</b>	<b>2,552,653</b>	<b>2,101,227</b>

<b>Currency exposure - asset type</b>	<b>Values at 31 March 2020 £000</b>	<b>Potential Market movement £000</b>	<b>Value on increase £000</b>	<b>Value on decrease £000</b>
Overseas unit trusts	2,182,959	218,296	2,401,255	1,964,663
<b>Total change in assets available</b>	<b>2,182,959</b>	<b>218,296</b>	<b>2,401,255</b>	<b>1,964,663</b>

## b) Credit risk

Credit risk represents the risk that the counterparty to a transaction or a financial instrument will fail to discharge an obligation and cause the Fund to incur a financial loss. The market values of investments generally reflect an assessment of credit in their pricing and consequently the risk of loss is implicitly provided for in the carrying value of the Fund's financial assets and liabilities.

In essence, the Fund's entire investment portfolio is exposed to some form of credit risk, with the exception of the derivatives positions, where the risk equates to the net market value of a positive derivative position. However, the selection of high quality counterparties, brokers and financial institutions minimise credit risk that may occur through the failure to settle a transaction in a timely manner.

Contractual credit risk is represented by the net payment or receipts that remains outstanding, and the cost of replacing the derivative position in the event of a counterparty default. The residual risk is minimal due to the various insurance policies held by the exchanges to cover defaulting counterparties.

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

The Fund believes it has managed its exposure to credit risk, and has had no experience of default or uncollectable deposits in recent years.

<b>Summary</b>	<b>Asset value as at 31 March 2020 £000</b>	<b>Asset value as at 31 March 2021 £000</b>
UK Treasury bills	86	-
Overseas Treasury bills		23,531
<b>Bank current accounts</b>		
NT custody cash accounts	63,629	33,205
<b>Total overseas assets</b>	<b>63,715</b>	<b>56,736</b>

## c) Liquidity risk

Liquidity risk represents the risk that the Fund will not be able to meet its financial obligations as they fall due. The fund therefore takes steps to ensure that the Fund has adequate cash resources to meet its commitments. This will particularly be the case for cash from the cash flow matching mandates from the main investment strategy to meet the pensioner payroll costs; and also cash to meet investment commitments.

The Fund has immediate access to its cash holdings and the Fund also has access to an overdraft facility for short-term cash needs. This facility is only used to meet timing differences on pension payments. As these borrowings are of a limited short-term nature, the Fund's exposure to liquidity risk is considered negligible.

All financial liabilities at 31 March 2021 are due within one year.

## Refinancing risk

The key risk is that the Fund will be bound to replenish a significant proportion of its pension Fund financial instruments at a time of unfavourable interest rates. The Fund does not have any financial instruments that have a refinancing risk as part of its treasury management and investment strategies.

## 19: Funding arrangements

### Introduction

The last full triennial valuation of the East Sussex County Council Pension Fund (the Fund) was carried out as at 31 March 2019 as required under Regulation 62 of the Local Government Pension Scheme Regulations 2013 (the Regulations) and in accordance with the Funding Strategy Statement of the Fund. The results were published in the triennial valuation report dated 31 March 2020.

## Asset value and funding level

The results for the Fund at 31 March 2019 were as follows:

- The market value of the Fund's assets as at 31 March 2019 was £3,633m.
- The Fund had a funding level of 107% i.e. the value of assets for valuation purposes was 107% of the value that they would have needed to be to pay for the benefits accrued to that date, based on the assumptions used. This corresponded to a surplus of £247m.

## Contribution rates

The employer contributions rates, in addition to those paid by the members of the Fund, are set to be sufficient to meet:

- the annual accrual of benefits allowing for future pay increases and increases to pensions in payment when these fall due;
- plus an amount to reflect each participating employer's notional share of the Fund's assets compared with 100% of their liabilities in the Fund, in respect of service to the valuation date.

The primary rate of contribution on a whole Fund level was 18.0% of payroll p.a. The primary rate as defined by Regulation 62(5) is the employer's share of the cost of benefits accruing in each of the three years beginning 1 April 2020.

In addition, each employer pays a secondary contribution as required under Regulation 62(7) that when combined with the primary rate results in the minimum total contributions. This secondary rate is based on their particular circumstances and so individual adjustments are made for each employer.

Details of each employer's contribution rate are contained in the Rates and Adjustments Certificate in Appendix 3 of the triennial valuation report.

## Assumptions

The key assumptions used to value the liabilities at 31 March 2019 are summarised below:

Assumptions	Assumptions used for the 2019 valuation
<b>Financial assumptions</b>	
Market date	31 March 2019
CPI inflation	2.3% p.a.
Long-term salary increases	2.3% p.a.
Discount rate	4.0% p.a.
<b>Demographic assumptions</b>	
Post-retirement mortality	
<i>Base tables</i>	Based on Club Vita analysis
<i>Projection model</i>	CMI 2018
<i>Long-term rate of improvement</i>	1.25% p.a.
<i>Smoothing parameter</i>	7.0
<i>Initial addition to improvements</i>	
<i>Males</i>	0.5% p.a.
<i>Females</i>	0.25% p.a.

Full details of the demographic and other assumptions adopted as well as details of the derivation of the financial assumptions used can be found in the 2019 valuation report.

## Updated position since the 2019 valuation

### Update to funding basis and assumptions

The Fund appointed a new fund actuary with effect from 1 January 2021. For employers commencing participation in the Fund on or after 1 January 2021, the calculated contribution rate will be set to meet a funding target over a specified time horizon. The funding target is set based on a single set of financial assumptions. These assumptions are set so as to achieve broad consistency with the previous fund actuary's approach.

With effect from 1 January 2021, the salary growth assumption was reviewed and salaries are now assumed to increase at CPI plus 1.0% p.a. with no additional promotional salary scale. The derivation of CPI is discussed below.

We have updated the derivation of the CPI inflation assumption to be 0.8% p.a. below the 20 year point on the Bank of England (BoE) implied inflation curve. The assumption adopted at the 2019 valuation was that CPI would be 1.0% p.a.

below the 20 year point on the BoE implied inflation curve. This update was made following the Government's response (on 25 November 2020) to the consultation on the reform of RPI, and the expectation that the UK Statistics Authority will implement the proposed changes to bring RPI in line with CPIH from 2030. This updated approach leads to a small increase in the value of liabilities.

The discount rate assumption is set with reference to the Fund's long term investment strategy and therefore reflects the long term expected return on assets for the Fund. We have included in the discount rate assumption an explicit prudence allowance of 1.1%. This incorporates an allowance for current uncertainties in LGPS benefits (relating to the effects of the McCloud/Sargeant judgement and the cost cap).

### **Liabilities**

The key assumption which has the greatest impact on the valuation of liabilities is the real discount rate (the discount rate relative to CPI inflation) – the higher the real discount rate the lower the value of liabilities. As at 31 March 2021, the real discount rate is estimated to be lower than at the 2019 valuation due to lower future expected returns on assets in excess of CPI inflation.

The update to the CPI assumption mentioned above leads to a small increase in the value of liabilities. The value of liabilities will also have increased due to the accrual of new benefits net of benefits paid.

It is currently unclear what the impact of the COVID-19 pandemic is on the Fund's funding position. It is expected that COVID-related deaths will not have a material impact on the Fund's current funding level, however, impact on future mortality rates may be more significant and we will be reviewing the Fund's mortality assumption as part of the next valuation.

### **Assets**

Returns over the year to 31 March 2021 have been strong, helping to offset the significant fall in asset values at the end of the previous year. As at 31 March 2021, in market value terms, the Fund assets were more than where they were projected to be based on the previous valuation.

### **Overall position**

On balance, we estimate that the funding position (allowing for the revised funding basis) has improved compared to the funding position as at 31 March 2019.

Future investment returns that will be achieved by the Fund in the short term are more uncertain than usual, in particular the return from equities due to actual and potential reductions and suspensions of dividends.

There is also uncertainty around future benefits due to the McCloud/Sargeant cases and the cost cap process.

The Fund could opt to monitor the funding level using LGPS Monitor on a regular basis.

## **20: Actuarial present value of promised retirement benefits**

### **Introduction**

We have been instructed by East Sussex County Council, the administering authority to the East Sussex County Council Pension Fund (the Fund), to undertake pension expense calculations in respect of pension benefits provided by the Local Government Pension Scheme (the LGPS) to members of the Fund as at 31 March 2021. We have taken account of current LGPS Regulations, as amended, as at the date of this report.

This report is addressed to the administering authority and its advisers; in particular, this report is likely to be of relevance to the Fund's auditor.

This is the first accounting period for which the report has been prepared by Barnett Waddingham LLP; previous disclosures were prepared by Hymans Robertson LLP and we have relied on those disclosures as being accurate in the preparation of this report.

These figures are prepared in accordance with our understanding of IAS26. In calculating the disclosed numbers we have adopted methods and assumptions that are consistent with IAS19.

This advice complies with Technical Actuarial Standard 100: Principles for Technical Actuarial Work (TAS 100).

The LGPS is a defined benefit statutory scheme administered in accordance with the Local Government Pension Scheme Regulations 2013 and currently provides benefits based on career average revalued earnings.

An allowance was made for the potential impact of the McCloud & Sargeant judgement in the results provided to the Fund at the last accounting date and therefore is already included in the starting position for this report. This allowance is therefore incorporated in the roll forward approach and is remeasured at the accounting date along with the normal LGPS liabilities.

## Valuation data

### Data sources

In completing our calculations for pension accounting purposes we have used the following items of data, which we received from East Sussex County Council:

- The results of the valuation as at 31 March 2019 which was carried out for funding purposes and the results of the 31 March 2020 IAS26 report which was prepared for accounting purposes;
- Estimated whole Fund income and expenditure items for the period to 31 March 2021;
- Estimated Fund returns based on Fund asset statements provided (or estimated where necessary) as at 31 March 2019, 31 March 2020 and 31 March 2021; and
- Details of any new early retirements for the period to 31 March 2021 that have been paid out on an unreduced basis, which are not anticipated in the normal service cost.

Although some of these data items have been estimated, we do not believe that they are likely to have a material effect on the results of this report. Further, we are not aware of any material changes or events since we received the data. The data has been checked for reasonableness and we are happy that the data is sufficient for the purposes of this advice.

### Fund membership statistics

The table below summarises the membership data, as at 31 March 2019.

Member data summary	Number	Salaries/Pensions £000	Average age
Active members	22,718	414,051	52
Deferred pensions	36,094	43,738	51
Pensioners	20,328	102,766	69

The average ages shown are weighted by liability.

### Early retirements

We requested data on any early retirements in respect of the Fund from the administering authority for the year ending 31 March 2021.

We have been notified of 105 new early retirements during the year which were not allowed for at the previous accounting date. The total annual pension that came into payment was £1,012,200.

### Assets

The return on the Fund (on a bid value to bid value basis) for the year to 31 March 2021 is estimated to be 22.56%. The actual return on Fund assets over the year may be different.

The estimated asset allocation for East Sussex County Council Pension Fund as at 31 March 2021 is as follows:

Asset breakdown	31 Mar 2021		31 Mar 2020	
	£000s	%	£000s	%
Equities	3,227,118	76%	2,460,325	71%
Bonds	627,339	15%	589,092	17%
Property	319,533	8%	346,525	10%
Cash	70,882	2%	69,305	2%
<b>Total</b>	<b>4,244,872</b>	<b>100%</b>	<b>3,465,247</b>	<b>100%</b>

We have estimated the bid values where necessary. The final asset allocation of the Fund assets as at 31 March 2021 may be different from that shown due to estimation techniques.

### Unfunded benefits

We have excluded any unfunded benefits as these are liabilities of employers rather than the Fund.

### Actuarial methods and assumptions

#### Valuation approach

To assess the value of the Fund's liabilities at 31 March 2021, we have rolled forward the value of Fund's liabilities calculated for the funding valuation as at 31 March 2019, using financial assumptions that comply with IAS19.

A full actuarial valuation involved projecting future cashflows to be paid from the Fund and placing a value on them. These cashflows include pensions currently being paid to members of the Fund as well as pensions (and lump sums)

that may be payable in future to members of the Fund or their dependants. These pensions are linked to inflation and will normally be payable on retirement for the life of the member or a dependant following a member's death.

It is not possible to assess the accuracy of the estimated liability as at 31 March 2021 without completing a full valuation. However, we are satisfied that the approach of rolling forward the previous valuation data to 31 March 2021 should not introduce any material distortions in the results provided that the actual experience of the Fund has been broadly in line with the underlying assumptions, and that the structure of the liabilities is substantially the same as at the latest formal valuation. From the information we have received there appears to be no evidence that this approach is inappropriate.

This has been updated since the last accounting date when the results were based on a continuation of the roll forward from the 31 March 2016 funding valuation.

### **Experience items allowed for since the previous accounting date**

Experience items arise due to differences between the assumptions made as part of the roll forward approach and actual experience. This includes (but is not limited to) assumptions made in respect of salary increases, pension increases, mortality, and member transfers. We have allowed for actual pension increase experience for the period from 2019-2021. This assumes that pension increases are in line with the annual pension increases set by HM Treasury Revaluation Order.

As a result of allowing for actual experience, an experience item is observed in the reconciliation to 31 March 2021, as shown in the Asset and benefit obligation reconciliation for the year to 31 March 2021 below.

### **Guaranteed Minimum Pension (GMP) Equalisation**

As a result of the High Court's recent Lloyds ruling on the equalisation of GMPs between genders, a number of pension schemes have made adjustments to accounting disclosures to reflect the effect this ruling has on the value of pension liabilities. It is our understanding that HM Treasury have confirmed that the judgement "does not impact on the current method used to achieve equalisation and indexation in public service pension schemes". More information on the current method of equalisation of public service pension schemes can be found here [Consultation on indexation and equalisation of GMP in public service pension schemes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/equalisation-of-gmp-in-public-service-pension-schemes)

On 22 January 2018, the Government published the outcome to its Indexation and equalisation of GMP in public service pension schemes consultation, concluding that the requirement for public service pension schemes to fully price protect the GMP element of individuals' public service pension would be extended to those individuals reaching State Pension Age (SPA) before 6 April 2021. HM Treasury published a Ministerial Direction on 4 December 2018 to implement this outcome, with effect from 6 April 2016. Details of this outcome and the Ministerial Direction can be found here [Indexation of public service pensions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/indexation-of-public-service-pensions).

The valuation assumption for GMP is that the Fund will pay limited increases for members that have reached SPA by 6 April 2016, with the Government providing the remainder of the inflationary increase. For members that reach SPA after this date, we have assumed that the Fund will be required to pay the entire inflationary increase. Therefore we do not believe we need to make any adjustments to the value placed on the liabilities as a result of the above outcome.

### **Demographic/Statistical assumptions**

We have adopted a set of demographic assumptions that are consistent with those used for the most recent Fund valuation, which was carried out as at 31 March 2019, except for the CMI projection model. The post retirement mortality tables have been constructed based on Club Vita analysis. These base tables are projected using the CMI\_2020 Model, with a long-term rate of improvement of 1.25% p.a., smoothing parameter of 7.0, an initial addition parameter of 0.5% p.a. for males and 0.25% p.a. for females, and a 2020 weighting of 25%.

Although the post retirement mortality tables adopted are consistent with the previous accounting date, the mortality improvement projection has been updated to use the latest version of the Continuous Mortality Investigation's model, CMI\_2020, which was released in March 2021. This update has been made in light of the coronavirus pandemic and reflects the latest information available from the CMI. The new CMI\_2020 Model introduces a "2020 weight parameter" for the mortality data in 2020 so that the exceptional mortality experienced due to the coronavirus pandemic can be incorporated without having a disproportionate impact on results.

Our view is that placing too much weight on the 2020 mortality experience would not be appropriate given the abnormality of the 2020 data, however, the overall outlook for best-estimate future mortality improvements looks less positive as a result of the pandemic. Therefore we have updated to use the CMI\_2020 Model with a 2020 weight parameter of 25%. At the last accounting date, the CMI\_2018 Model was adopted. The effect on the Employer's liabilities of updating to the most recent model is reflected in the Change in demographic assumptions figure in the Asset and benefit obligation reconciliation for the year to 31 March 2021 below, and the effect on the assumed life expectancies is demonstrated in the table below.

The assumed life expectations from age 65 are:

Life expectancy from age 65 (years)	31 Mar 2021 (after CMI 2020 update)	31 Mar 2021 (before CMI 2020 update)
<b>Retiring today</b>		
Males	21.1	21.4
Females	23.7	23.9
<b>Retiring in 20 years</b>		
Males	21.9	22.4
Females	25.0	25.2

We have also assumed that:

- Members will exchange half of their commutable pension in respect of pre-April 2008 service and 75% of their commutable pension in respect of their post 2008 service, for cash at retirement. For every £1 of pension that members commute, they will receive a cash payment of £12 as set out in the Regulations;
- Members retire following the retirement age pattern assumption as specified by the Scheme Advisory Board for preparing Key Performance Indicators.; and
- 1% of active members will take up the option to pay 50% of contributions for 50% of benefits.

### Financial assumptions

The financial assumptions used to calculate the results in the Appendices are as follows:

Year ended	31 Mar 2021 % p.a.	31 Mar 2020 % p.a.
Discount Rate	1.95%	2.30%
Pension Increase Rate	2.85%	1.90%
Salary Increase rate	2.85%	1.90%

These assumptions are set with reference to market conditions at 31 March 2021.

Our estimate of the Fund's past service liability duration is 17 years.

An estimate of the Fund's future cashflows is made using notional cashflows based on the estimated duration above. These estimated cashflows are then used to derive a Single Equivalent Discount Rate (SEDR). The discount rate derived is such that the net present value of the notional cashflows, discounted at this single rate, equates to the net present value of the cashflows, discounted using the annualised Merrill Lynch AA rated corporate bond yield curve (where the spot curve is assumed to be flat beyond the 30 year point). At the previous accounting date a "Hymans Robertson" corporate bond yield curve was constructed based on the constituents of the iBoxx AA corporate bond index.

Similar to the approach used to derive the discount rate, the Retail Prices Index (RPI) increase assumption is set using a Single Equivalent Inflation Rate (SEIR) approach, using the notional cashflows described above. The single inflation rate derived is that which gives the same net present value of the cashflows, discounted using the annualised Merrill Lynch AA rated corporate bond yield curve, as applying the BoE implied inflation curve. As above, the Merrill Lynch AA rated corporate bond yield spot curve is assumed to be flat beyond the 30 year point and the BoE implied inflation spot curve is assumed to be flat beyond the 40 year point. At the previous accounting date cashflow weighted single RPI rates were derived from the market implied inflation curve that recognise the weighted average duration of each corresponding duration category defined in the accounting disclosure.

The BoE implied inflation curve may suggest a higher rate of inflation, over longer terms, than actually expected by market participants due to a willingness to accept a lower return on investments to ensure inflation linked returns. To reflect this, we include an Inflation Risk Premium (IRP) adjustment such that our assumed level of future annual RPI increase is 0.25% p.a. lower than the SEIR calculated using the BoE inflation curve alone. This differs from the previous accounting date. The impact of this change in derivation on the liability value is shown in the Asset and benefit obligation reconciliation for the year to 31 March 2021 below.

As future pension increases are expected to be based on the Consumer Prices Index (CPI) rather than RPI, we have made a further assumption about CPI which is that it will be 0.40% p.a. below RPI i.e. 2.85% p.a. We believe that this is a reasonable estimate for the future differences in the indices, based on the different calculation methods, recent independent forecasts and the duration of the Fund's liabilities. The difference between RPI and CPI is less than assumed at the previous accounting date. This reflects the movement in market implied RPI inflation that occurred following the UK Statistics Authority's proposal to change how RPI is calculated and subsequent announcements from

the Chancellor on the issue. The impact of this change in derivation on the liability value is shown in the Asset and benefit obligation reconciliation for the year to 31 March 2021 below.

Salaries are assumed to increase at 0.0% p.a. above CPI. This is consistent with the approach at the previous accounting date.

## Results and disclosures

We estimate that the net liability as at 31 March 2021 is a liability of £1,364,741,000.

The results of our calculations for the year ended 31 March 2021 are set out below.

The figures presented in this report are prepared only for the purposes of FRS102. In particular, they are not relevant for calculations undertaken for funding purposes or for other statutory purposes under UK pensions legislation.

### Statement of financial position as at 31 March 2021

Net pension asset as at	31 Mar 2021 £000s
Present value of defined benefit obligation	5,609,613
Fair value of Fund assets (bid value)	4,244,872
<b>Deficit / (Surplus)</b>	<b>1,364,741</b>
Present value of unfunded obligation	-
Unrecognised past service cost	-
Impact of asset ceiling	-
<b>Net defined benefit liability / (asset)</b>	<b>1,364,741</b>

\*Present value of funded obligation consists of £5,607,717,000 in respect of vested obligation and £0 in respect of non-vested obligation.

### Asset and benefit obligation reconciliation for the year to 31 March 2021

Reconciliation of opening & closing balances of the present value of the defined benefit obligation	31 Mar 2021 £000s
<b>Opening defined benefit obligation</b>	<b>4,378,000</b>
Current service cost	151,881
Interest cost	99,610
Change in financial assumptions	1,202,783
Change in demographic assumptions	(71,775)
Experience loss/(gain) on defined benefit obligation	(55,900)
Liabilities assumed / (extinguished) on settlements	-
Estimated benefits paid net of transfers in	(128,225)
Past service costs, including curtailments	3,809
Contributions by Scheme participants	29,430
Unfunded pension payments	-
<b>Closing defined benefit obligation</b>	<b>5,609,613</b>

The change in financial assumptions item includes the change in derivation of future assumed RPI and CPI inflation as noted above. These changes have resulted in a gain of £3,382,820,000 on the defined benefit obligation; comprising a gain of £410,211,000 from the change in assumed IRP and a gain of £2,972,609,000 from the change in the assumed gap between RPI and CPI inflation.

Reconciliation of opening & closing balances of the fair value of Fund assets	31 Mar 2021 £000s
<b>Opening fair value of Fund assets</b>	<b>3,465,246</b>
Interest on assets	79,719
Return on assets less interest	701,817
Other actuarial gains/(losses)	-
Administration expenses	(3,496)
Contributions by employer including unfunded	100,381
Contributions by Scheme participants	29,430
Estimated benefits paid plus unfunded net of transfers in	(128,225)
Settlement prices received / (paid)	-
<b>Closing Fair value of Fund assets</b>	<b>4,244,872</b>

The total return on the Fund's assets for the year to 31 March 2021 is £781,536,000.

## Sensitivity Analysis

Sensitivity Analysis	Approximate % increase to liabilities	Approximate monetary amount (£m)
0.5% increase in pensions increase rate		5,609,613
<b>Sensitivity to</b>	<b>+0.1%</b>	<b>-0.1%</b>
Discount rate	5,514,731	5,706,223
Long term salary increase	5,618,061	5,601,211
Pension increases and deferred revaluation	5,696,828	5,523,865
<b>Sensitivity to</b>	<b>+1 Year</b>	<b>- 1 Year</b>
Life expectancy assumptions	5,879,433	5,352,534

## 21: Current assets

	31 March 2020 £000	31 March 2021 £000
<b>Other Investment Balances</b>		
Sales including Currency	-	-
Investment Income Due	193	82
Recoverable Taxes	147	275
<b>Total</b>	<b>340</b>	<b>357</b>

	31 March 2020 £000	31 March 2021 £000
<b>Current Assets</b>		
Contributions receivable from employers and employees	13,436	10,870
Sundry Debtors	1,440	3,245
Cash	1,746	1,560
<b>Total</b>	<b>16,622</b>	<b>15,675</b>

## 22: Current liabilities

	31 March 2020 £000	31 March 2021 £000
<b>Investment Liabilities</b>		
Purchases including currency	-	-
Managers Fees	(475)	(775)
<b>Total</b>	<b>(475)</b>	<b>(775)</b>

	31 March 2020 £000	31 March 2021 £000
<b>Current Liabilities</b>		
Pension Payments (including Lump Sums)	(264)	(184)
Cash	-	-
Professional Fees	(434)	(64)
Administration Recharge	(1,194)	(51)
Sundry Creditors	(882)	(1,649)
<b>Total</b>	<b>(2,774)</b>	<b>(1,948)</b>

## 23: Additional voluntary contributions

	Market value 31 March 2020 £000	Market value 31 March 2021 £000
Prudential	21,221	17,696

The Pension Fund Scheme provides an Additional Voluntary Contribution (AVC) facility for scheme members. In 2020/21 the AVC provider changed some back office systems which have caused them unforeseen complications and have therefore been unable to provide the Pension Fund with a complete statement for the 2020/21 financial year. The AVC provider has released an estimate of the value of the Funds whilst they are ensuring the back office system is operating as expected.

Information relating to the values at the 31 March 2020 are provided here. Some members of the pension scheme paid voluntary contributions and transfers in of £2.277m to Prudential to buy extra pension benefits when they retire. £3.050m was disinvested from the AVC provider in 2019/20. Contributions and benefits to scheme members are made directly between the scheme member and the AVC provider. The AVC funds are not, therefore, included in the Pension Fund Accounts.

## 24: Agency Services

The East Sussex Pension Fund pays discretionary awards to former employees on behalf of some employers in the Fund. The amounts paid are provided as a service and are fully reclaimed from the employer bodies. The sums are disclosed below.

	2019/20 £000	2020/21 £000
East Sussex County Council	4,899	4,793
Brighton & Hove City Council	2,291	2,261
Eastbourne Borough Council	304	308
Magistrates	209	212
Hastings Borough Council	174	175
Wealden District Council	176	174
Rother District Council	115	111
Lewes District Council	73	71
South East Water	35	29
Brighton University	26	24
Mid-Sussex District Council	19	19
Westminster (used to be LPFA)	18	18
East Sussex Fire Authority	17	17
Capita Hartshead	16	14
London Borough of Camden	7	7
London Borough of Southwark	6	6
The Eastbourne Academy	6	6
West Midlands Pension Fund	5	5
West Sussex County Council	4	4
Torfaen Borough Council	4	4
Sussex University	3	3
Varndean College	2	2
London Borough of Ealing	2	2
East Sussex College Group	1	1
Plumpton College	1	1
Eastbourne Homes*	6	-
Newhaven TC	1	-
<b>Total</b>	<b>8,420</b>	<b>8,267</b>

\* Eastbourne Homes liabilities have been included in the Eastbourne Borough Council figures for 2020/21.

## 25: Related party transactions

### East Sussex County Council

The East Sussex Pension Fund is administered by East Sussex County Council. Consequently, there is a strong relationship between the Council and the Pension Fund.

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

The Treasurer of the Pension Fund, and Members of the County Council and the Pension Committee have no material transactions with the Pension Fund.

The Council incurred costs in administering the Fund and charged £1.9m to the Fund in 2020/21 (£1.2m in 2019/20). The Council's contribution to the Fund was £43.0m in 2020/21 (£42.5 in 2019/20). All amounts due to the Fund were paid in the year. At 31 March 2021 the Pension Fund bank account held £1.6m in cash (£1.7m at 31 March 2020). The average throughout the year was £8.4m (£6.0 in 2019/20).

### 25a: Key management personnel

The Chief Finance Officer of East Sussex County Council holds the key position in the financial management of the East Sussex Pension Fund.

	31 March 2020	31 March 2021
	£000	£000
Short-term benefits	18	26
Post-employment benefits	3	5
<b>Total</b>	<b>21</b>	<b>31</b>

## 26: Contingent liabilities and contractual commitments

Outstanding capital commitments (investments) at 31 March 2021 totalled £232.3m (31 March 2020: £322.0m).

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

At 31 March 2021, the unfunded commitment was £122.0m for private equity, £91.6m for infrastructure and £18.7 for private debt. The commitments are paid over the investment timeframe of the underlying partnerships. As these partnerships mature they are due to distribute capital back to investors. Commitments are made in US Dollars or Euros and the figures presented here are based on relevant Sterling exchange rates as at 31 March 2021.

### Exit Payments

There were 6 employers whose contracts were due to end by the 31 March 2021 where an exit credit may need to be paid out. The Fund needs to obtain final information from the employers and then will need to commission the final cessation report from the actuaries to ascertain if an exit payment is due for these employers.

### GMP Reconciliation Project

The Guaranteed Minimum Pension (GMP) Reconciliation project was split into number stages for Local Government Pension Schemes (LGPS). The Fund has completed the discovery and GMP reconciliation phases, which reviewed data inconsistencies, raised issues with HMRC and agreed outcomes. GMP elements of LGPS pension where State Pension Age is prior to 6 April 2016 has not increased in respect of the period 6 April 1978 to 5 April 1988. While the Post 1988 GMP element in respect of the period 6 April 1988 to 5 April 1997 might be increased up to a maximum of 3% p.a. The Government increase the State Pension for the member fully on the Pre 1988 GMP element and for Post 1988 GMP element has only increased if CPI is above 3% p.a.

The effect of LGPS pensions not showing the correct amount of GMP for its members would mean that their pension might be increased incorrectly. This can result in underpayments and overpayments, at a member specific level. The next stage which is GMP Rectification, will amend LGPS pensions in line with the reconciled GMP information. Rectification will also involve a significant member communication exercise to explain the changes taking place.

HMRC have only recently provided the final reports required to complete the reconciliation so this means that the rectification stage has been delayed until now. The contracted provider Mercer are currently commencing the rectification project with the aim of completing the project by the 31st October 2021 at the latest. As such, we are unable to quantify the under/overpayment liability values as at 31 March 2021

## 27: Contingent assets

There are 9 admitted body employers in the Fund that hold insurance bonds to guard against the possibility of them being unable to meet their pension obligations. These bonds are drawn in favour of the pension fund and payment will only be triggered in the event of employer default. In addition to these bonds, pension's obligations in respect of 12 other admitted bodies are covered by:

- 9 guarantees by local authorities participating in the Fund;
- 2 Parent company guarantees;
- 1 deposit held by East Sussex County Council

At 31 March 2021, the Fund has invested £354.5 million in private equity funds managed by Adams Street and HarbourVest. The Fund has also invested £41.3 million in the M&G real estate debt fund VI and £116.8 million in the infrastructure funds managed by UBS, Pantheon and Infracapital.

Following Rulings given by the European Court of Justice, along with a number of other local authority pension funds, the East Sussex Pension Fund is pursuing the recovery of tax paid on certain dividends. If successful, this may be of material benefit to the Fund. The amount, which may be recoverable, is not currently quantifiable.

## 28: Impairment losses

During 2020/21, the fund has not recognised any impairment losses.

## 29: East Sussex Pension Fund – Active Participating Employers

Employer Name	2020/21		2021/22		2022/23	
	Payroll %	Amount £(000)	Payroll %	Amount £(000)	Payroll %	Amount £(000)
<b>Scheduled Bodies - Major Authorities</b>						
Brighton and Hove City Council	20.8	-	20.3	-	19.8	-
East Sussex County Council	17.6	6,141	17.6	5,568	17.6	4,966
East Sussex Fire and Rescue Service	17.9	164	17.9	137	17.9	109
Eastbourne Borough Council	19.9	-	19.4	-	18.9	-
Hastings Borough Council	17.6	538	17.6	508	17.6	476
Lewes District Council	24.1	-	23.6	-	23.1	-
Rother District Council	26.1	-	25.6	-	25.1	-
University of Brighton	18.2	-	17.7	-	17.2	-
Wealden District Council	17.6	576	17.6	538	17.6	499
<b>Other Scheduled Bodies</b>						
Arlington Parish Council	22.1	-	21.6	-	21.1	-
Battle Town Council	22.1	-	21.6	-	21.1	-
Berwick Parish Council	22.1	-	21.6	-	21.1	-
Buxted Parish Council	22.1	-	21.6	-	21.1	-
Camber Parish council	22.1	-	21.6	-	21.1	-
Chailey Parish Council	22.1	-	21.6	-	21.1	-
Chiddingly Parish Council	22.2	-	21.6	-	21.1	-
Conservators of Ashdown Forest	22.1	-	21.6	-	21.1	-
Crowborough Town Council	22.1	-	21.6	-	21.1	-
Danehill Parish Council	22.1	-	21.6	-	21.1	-
Ditchling Parish Council	22.1	-	21.6	-	21.1	-
Fletching Parish Council	22.1	-	21.6	-	21.1	-
Forest Row Parish Council	22.1	-	21.6	-	21.1	-
Frant Parish Council	22.1	-	21.6	-	21.1	-
Hadlow Down Parish Council	22.1	-	21.6	-	21.1	-
Hailsham Town Council	22.1	-	21.6	-	21.1	-
Hartfield Parish Council	22.1	-	21.6	-	21.1	-
Heathfield & Waldron Parish Council	22.1	-	21.6	-	21.1	-
Herstmonceux Parish Council	22.1	-	21.6	-	21.1	-
Hurst Green Parish Council	22.1	-	21.6	-	21.1	-
Icklesham Parish Council	22.1	-	21.6	-	21.1	-
Isfield Parish Council	22.1	-	21.6	-	21.1	-
Lewes Town Council	22.1	-	21.6	-	21.1	-
Maresfield Parish Council	22.1	-	21.6	-	21.1	-

Employer Name	2020/21		2021/22		2022/23	
	Payroll %	Amount £(000)	Payroll %	Amount £(000)	Payroll %	Amount £(000)
Newhaven Town Council	22.1	-	21.6	-	21.1	-
Newick Parish Council	22.1	-	21.6	-	21.1	-
Peacehaven Town Council	22.1	-	21.6	-	21.1	-
Pett Parish Council	22.1	-	21.6	-	21.1	-
Plumpton Parish Council	22.1	-	21.6	-	21.1	-
Ringmer Parish Council	22.1	-	21.6	-	21.1	-
Rye Town Council	22.1	-	21.6	-	21.1	-
Salehurst & Robertsbridge Parish Council	22.1	-	21.6	-	21.1	-
Seaford Town Council	22.1	-	21.6	-	21.1	-
Telscombe Town Council	22.1	-	21.6	-	21.1	-
Uckfield Town Council	22.1	-	21.6	-	21.1	-
Wartling Parish Council	22.1	-	21.6	-	21.1	-
Willingdon and Jevington Parish Council	22.1	-	21.6	-	21.1	-
Wivelsfield Parish Council	22.1	-	21.6	-	21.1	-
<b>Academy Schools</b>						
Anney Catholic Primary Academy	15.5	-	15.0	-	14.5	-
Aquinas Trust	21.0	-	20.5	-	20.0	-
ARK Schools Hastings	20.6	-	20.1	-	19.6	-
Aurora Academies Trust	20.4	-	19.9	-	19.4	-
Beacon Academy	23.0	-	22.5	-	22.0	-
Beckmead Ropemakers Academy	16.3	-	16.3	-	16.3	-
Bexhill Academy	22.9	-	22.4	-	21.9	-
Bilingual Primary School	15.6	-	15.1	-	14.6	-
Breakwater Academy	17.0	-	16.5	-	16.0	-
Burfield Academy (Hailsham Primary)	20.0	-	19.5	-	19.0	-
Cavendish Academy	20.5	-	20.0	-	19.5	-
Diocese of Chichester Academy Trust	24.4	-	23.9	-	23.4	-
Eastbourne Academy	21.2	-	20.7	-	20.2	-
Falmer (Brighton Aldridge Community Academy)	20.0	-	19.5	-	19.0	-
Gildredge House Free School	19.6	-	19.1	-	18.6	-
Glyne Gap Academy	21.4	-	20.9	-	20.4	-
Hailsham Academy	20.0	-	19.5	-	19.0	-
Hawkes Farm Academy	16.4	-	15.9	-	15.4	-
High Cliff Academy	20.0	-	19.5	-	19.0	-
Jarvis Brook Academy	14.5	-	14.0	-	13.5	-
King's Church of England Free School	16.2	-	15.7	-	15.2	-
Langney Primary Academy	13.4	-	12.9	-	12.4	-
Ore Village Academy	18.5	-	18.0	-	17.5	-
Parkland Infant Academy	14.8	-	14.3	-	13.8	-
Parkland Junior Academy	14.4	-	13.9	-	13.4	-
Peacehaven Academy	13.0	-	12.5	-	12.0	-
Pebsham Academy	19.5	-	19.0	-	18.5	-
Phoenix Academy	20.4	-	19.9	-	19.4	-
Portslade Aldridge Community Academy	19.9	-	19.4	-	18.9	-
King's Academy Ringmer	20.8	-	20.3	-	19.8	-
SABDEN Multi Academy Trust	23.6	-	23.1	-	22.6	-
Saxon Shore Academy	22.7	-	22.7	-	22.7	-
Seaford Academy	21.1	-	20.6	-	20.1	-
Seahaven Academy	21.5	-	21.0	-	20.5	-
Shinewater Primary Academy	14.5	-	14.0	-	13.5	-
Sir Henry Fermor Academy	14.8	-	14.3	-	13.8	-
The South Downs Learning Trust	12.2	-	11.7	-	11.2	-
The Southfield Trust	14.4	-	13.9	-	13.4	-

Employer Name	2020/21		2021/22		2022/23	
	Payroll %	Amount £(000)	Payroll %	Amount £(000)	Payroll %	Amount £(000)
Torfield & Saxon Mount Academy Trust	22.6	-	22.1	-	21.6	-
University of Brighton Academies Trust	20.0	-	19.5	-	19.0	-
White House Academy	17.5	-	17.0	-	16.5	-
<b>Colleges</b>						
Bexhill College	21.2	-	21.2	-	21.2	-
Brighton, Hove & Sussex Sixth Form College	19.8	-	19.8	-	19.8	-
East Sussex College Group	20.7	-	20.7	-	20.7	-
Plumpton College	18.9	-	18.9	-	18.9	-
Varndean Sixth Form College	19.8	-	19.8	-	19.8	-
<b>Admission Bodies</b>						
BHCC - Wealden Leisure Ltd	33.0	11	33.0	-	33.0	-
Biffa Muncipal Ltd	28.8	-	28.8	-	28.8	-
Brighton and Hove CAB	0.00	-	0.0	-	0.0	-
Brighton Dome & Festival Limited (Music & Arts Service)	0.0	-	0.0	-	0.0	-
Care Outlook Ltd	0.0	-	0.0	-	0.0	-
Care Quality Commission	49.2	92	49.2	92	49.2	92
Churchill St Leonards	29.7	-	29.7	-	29.7	-
Churchill St Pauls	34.1	-	34.1	-	34.1	-
De La Warr Pavilion Charitable Trust	4.8	-	4.8	-	4.8	-
Eastbourne Homes - SEILL	19.2	-	19.2	-	19.2	-
East Sussex Energy, Infrastructure & Development Ltd (ESEIDL)	29.2	13	29.2	13	29.2	13
EBC - Towner	31.0	7	31.0	7	31.0	7
ESCC - NSL Ltd	3.6	-	3.6	-	3.6	-
Glendale Grounds Management Ltd	29.4	-	29.4	-	29.4	-
Grace Eyre	0.0	-	0.0	-	0.0	-
Halcrow Group Ltd	5.4	-	5.4	-	5.4	-
Just Ask Estates Ltd	32.6	3	32.6	-	32.6	-
Nviro Ltd	35.3	-	35.3	-	35.3	-
Optivo	45.8	920	45.8	920	45.8	920
Royal Pavilion & Museums Trust	17.8	-	17.8	-	17.8	-
Sussex County Sports Partnership	18.2	-	17.7	-	17.2	-
Sussex Housing & Care	0.0	-	0.0	-	0.0	-
Telent Technology Services Ltd	20.8	-	20.8	-	20.8	-
Wave Leisure - Newhaven Fort	0.0	-	0.0	-	0.0	-
Wave Leisure Trust Ltd	0.0	-	0.0	-	0.0	-
WDC - Wealden Leisure Ltd	33.0	-	33.0	-	33.0	-
Wealden Leisure Ltd - Portslade Sports Centre	0.0	-	0.0	-	0.0	-
White Rock Theatres Hastings Ltd	0.0	-	0.0	-	0.0	-

### 30: Investment Performance

The County Council uses an independent Investment performance measurement service, provided by Pensions & Investment Research Consultants Ltd (PIRC), which measures the performance of the Fund compared with 62 other local authority pension funds. Pension Fund investment is a long-term business so as well as showing the annual performance of the Fund, comparison to peers over longer periods is also detailed below.

#### Performance relative to the Fund's strategic benchmark

	1 year (%)	3 years (%p.a.)	5 years (%p.a.)	10 years (%p.a.)
Fund	22.1	7.8	9.0	8.2
Benchmark	19.5	6.5	8.1	7.0
Relative*	2.6	1.3	1.0	1.2

#### Investment performance relative to peer group

	1 year (%)	3 years (%p.a.)	5 years (%p.a.)	10 years (%p.a.)
Fund	22.1	7.8	9.0	8.2
Local Authority Average	22.8	7.6	9.5	8.3
Relative*	(0.6)	0.2	(0.5)	(0.1)

The Fund underperformed the (weighted) average local authority fund over the year by 0.6% (1.3% outperformance 2019/20), ranking the East Sussex Fund in the 69 percentile (48<sup>th</sup> 2019/20) in the local authority universe. Over three years the fund outperformed by 0.2% (inline 2019/20) and was placed in the 56 percentile (55<sup>th</sup> 2019/20). Over five years the fund underperformed by 0.5% (0.1% outperformance in 2019/20) and was placed in the 67 percentile (37<sup>th</sup> 2019/20). Over ten years the fund years, the fund underperformed by 0.1% (0.1% underperformance 2019/20) and was placed in the 54 percentile (45<sup>th</sup> 2019/20).

\*Relative performance is calculated on a geometric basis as follows:

$$((1 + \text{Fund Performance}) / (1 + \text{Benchmark Performance})) - 1$$

As opposed to the simpler arithmetic method, the geometric method makes it possible to directly compare long-term relative performance with shorter-term relative performance.

## 16. External auditor's report

### Independent auditor's report to the members of East Sussex County Council on the pension fund financial statements of East Sussex Pension Fund

#### Opinion

We have audited the financial statements of East Sussex Pension Fund (the 'Pension Fund') administered by East Sussex County Council (the 'Authority') for the year ended 31 March 2021 which comprise the Fund Account, the Net Assets Statement and Notes to the Pension Fund Accounts, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2020/21.

In our opinion, the financial statements:

- give a true and fair view of the financial transactions of the Pension Fund during the year ended 31 March 2021 and of the amount and disposition at that date of the fund's assets and liabilities;
- have been properly prepared in accordance with the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2020/21; and

have been prepared in accordance with the requirements of the Local Audit and Accountability Act 2014.

#### Basis for opinion

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

#### Conclusions relating to going concern

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

In our evaluation of the Chief Finance Officer's conclusions, and in accordance with the expectation set out within the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2020/21 that the Pension Fund's financial statements shall be prepared on a going concern basis, we considered the inherent risks associated with the continuation of services provided by the Pension Fund. In doing so we had regard to the guidance provided in Practice Note 10 Audit of financial statements and regularity of public sector bodies in the United Kingdom (Revised 2020) on the application of ISA (UK) 570 Going Concern to public sector entities. We assessed the reasonableness of the basis of preparation used by the Authority in the Pension Fund financial statements and the disclosures in the Pension Fund financial statements over the going concern period.

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

In auditing the financial statements, we have concluded that the Chief Finance Officer's use of the going concern basis of accounting in the preparation of the Pension Fund financial statements is appropriate.

The responsibilities of the Chief Finance Officer with respect to going concern are described in the 'Responsibilities of the Authority, the Chief Finance Officer and Those Charged with Governance for the financial statements' section of this report.

#### Other information

The Chief Finance Officer is responsible for the other information. The other information comprises the information included in the Statement of Accounts, other than the Pension Fund's financial statements, our auditor's report thereon, and our auditor's report on the Authority's financial statements. Our opinion on the Pension Fund's financial

statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

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

We have nothing to report in this regard.

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

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

#### **Matters on which we are required to report by exception**

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

we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or

we make a written recommendation to the Authority under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or

we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or;

we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or

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

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

#### **Responsibilities of the Authority, the Chief Finance Officer and Those Charged with Governance for the financial statements**

As explained more fully in the Statement of Responsibilities, the Authority is required to make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this authority, that officer is the Chief Finance Officer. The Chief Finance Officer is responsible for the preparation of the Statement of Accounts, which includes the Pension Fund's financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2020/21, for being satisfied that they give a true and fair view, and for such internal control as the Chief Finance Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

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

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

#### **Auditor's responsibilities for the audit of the financial statements**

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

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

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

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

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

We obtained an understanding of the legal and regulatory frameworks that are applicable to the Pension Fund and determined that the most significant, which are directly relevant to specific assertions in the financial statements, are those related to the reporting frameworks (international accounting standards as interpreted and adapted by the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2020/21, The Local Audit and Accountability Act 2014, the Accounts and Audit Regulations 2015, the Public Service Pensions Act 2013, The Local Government Pension Scheme Regulations 2013 and the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016.

We enquired of senior officers and the Audit Committee, concerning the Authority's policies and procedures relating to:

the identification, evaluation and compliance with laws and regulations;

the detection and response to the risks of fraud; and

the establishment of internal controls to mitigate risks related to fraud or non-compliance with laws and regulations.

- We enquired of senior officers, internal audit and the Audit Committee, whether they were aware of any instances of non-compliance with laws and regulations or whether they had any knowledge of actual, suspected or alleged fraud.

We assessed the susceptibility of the Pension Fund's financial statements to material misstatement, including how fraud might occur, by evaluating officers' incentives and opportunities for manipulation of the financial statements. This included the evaluation of the risk: fraudulent revenue and expenditure recognition; management override of controls and the risk of management bias in accounting estimates. We determined that the principal risks were in relation to:

Large and unusual manual journal entries

Material accounting estimates which were subject to significant management judgement, a high level of estimation uncertainty and high sensitivity to small changes in assumptions.

Our audit procedures involved:

evaluation of the design effectiveness of controls that the Chief Finance Officer has in place to prevent and detect fraud;

journal entry testing, with a focus on large and unusual and high risk journals particularly manual journals, made during the year and the accounts production stage

challenging assumptions and judgements made by management in its significant accounting estimates in respect of level 3 investments;

testing the valuation of investments, particularly focussed on Level 3 investments;

testing contributions received, benefits paid and member data changes;

assessing the extent of compliance with the relevant laws and regulations as part of our procedures on the related financial statement item.

These audit procedures were designed to provide reasonable assurance that the financial statements were free from fraud or error. However, detecting irregularities that result from fraud is inherently more difficult than detecting those that result from error, as those irregularities that result from fraud may involve collusion, deliberate concealment, forgery or intentional misrepresentations. Also, the further removed non-compliance with laws and regulations is from events and transactions reflected in the financial statements, the less likely we would become aware of it.

The audit team discussed the risk of the Authority's potential non-compliance with relevant laws and regulations, the potential for fraud in revenue and expenditure recognition, and the significant accounting estimates related to level 3 investments valuations.

Assessment of the appropriateness of the collective competence and capabilities of the engagement team included consideration of the engagement team's.

understanding of, and practical experience with audit engagements of a similar nature and complexity through appropriate training and participation

knowledge of the local government pensions sector

understanding of the legal and regulatory requirements specific to the Pension Fund including:

the provisions of the applicable legislation

guidance issued by CIPFA, LASAAC and SOLACE

the applicable statutory provisions.

In assessing the potential risks of material misstatement, we obtained an understanding of:

the Pension Fund's operations, including the nature of its income and expenditure and its services and of its objectives and strategies to understand the classes of transactions, account balances, expected financial statement disclosures and business risks that may result in risks of material misstatement.

the Authority's control environment, including the policies and procedures implemented by the Authority to ensure compliance with the requirements of the financial reporting framework.

### **Use of our report**

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

Darren Wells

Darren Wells, Key Audit Partner  
for and on behalf of Grant Thornton UK LLP, Local Auditor

London

19 October 2021

## 17. Pensions administration strategy report

The Local Government Pension Scheme Regulation 59(1) of the (Administration) Regulations 2013 covers the requirement for an administering authority to prepare a written statement of policies as it considers appropriate in the form of a Pensions Administration Strategy. The East Sussex Pension Fund Pension Administration Strategy is kept under review and revised to reflect changes to LGPS regulations and Fund policies.

The Pensions Administration Strategy document sets out a framework by way of outlining the policies and performance standards to be achieved when providing a cost-effective inclusive and high quality pensions administration service. In particular it sets out:

- The roles and responsibilities of both the Fund and the employers within the Fund.
- The level of service the Fund and employers will provide to each other
- The performance measures used to evaluate the level of service

The administration strategy statement will be reviewed in line with each valuation cycle, the last revision was approved in September 2020 with the strategy coming into effect 1 January 2021. All scheme employers are be consulted before any changes are made to this document. The latest version of this administration strategy statement is available on the Funds website [www.eastsussexpensionfund.org/resources/](http://www.eastsussexpensionfund.org/resources/)

DRAFT

## Appendix 1. 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 prepared in accordance with Regulation 58 of the Local Government Pension Scheme Regulations 2013, CIPFA guidance and in collaboration with the Fund's actuary, Hymans Robertson LLP, after consultation with the Fund's employers and investment adviser. The FSS 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.

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);
- actuarial factors for valuing individual transfers, early retirement costs and costs of buying added service; and
- the Fund's Investment Strategy Statement

The Funding Strategy Statement was reviewed during the year to reflect funding principles agreed for the 2019 actuarial valuation, with the new version signed off in March 2020. The FSS can be found in full at [www.eastsussex.gov.uk/yourcouncil/pension-fund-policies/](http://www.eastsussex.gov.uk/yourcouncil/pension-fund-policies/). The new funding principles applied to employer contributions payable from 1 April 2020.

Contribution rates payable by participating employers over the year to 31 March 2019 were set at the 2016 valuation in line with the principles summarised in the Funding Strategy Statement dated February 2019. Similarly, the approach used to set asset allocations for new bodies, to calculate the bond requirements for admitted bodies and to determine any cessation debts payable by exiting employers has been in line with that Funding Strategy Statement.

The Fund monitors the change in the funding position at a whole Fund level on a regular basis.

The next review of the Funding Strategy Statement will take place over the 2022/23 year as part of the 2022 valuation exercise.

The FSS that was in place in relation to 2020/21 is included as an appendix to this report.

# East Sussex Pension Fund

Funding Strategy Statement

February 2019

Policy not replicated in this copy

## Appendix 2. Investment Strategy Statement

The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 require administering authorities of pension funds to prepare, maintain and publish a written statement setting out the investment strategy for their Fund.

They must consult with persons they deem appropriate when drawing up their statement. Any material change in investment strategy must be included in a revised Investment Strategy Statement (ISS). The statement must cover:

- The Requirement to invest Fund money is a wide variety of investments
- The Authority's assessment of the suitability of particular investments and types of investments
- The Authority's approach to risk, including the ways in which risks are to be assess and managed
- The Authority's approach to pooling investments, including the use of collect investment vehicles and shared services
- The Authorities policy on how social, environmental and corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments
- The Authorities policy on the exercise of the rights (including voting rights) attaching to investments

The East Sussex Pension Fund ISS was first published in February 2017 when it replaced the Fund's Statement of Investment Principles. The statement is reviewed on a continuous basis to ensure it accurately reflects the Investment Strategy of the Fund (the latest version is available on the website). [www.eastsussexpensionfund.org/resources/](http://www.eastsussexpensionfund.org/resources/)

The Committee of the East Sussex Pension Fund has an overriding statutory and fiduciary duty to ensure it has sufficient funds available to pay pensions. In light of that obligation, and in order to maximise investment return, the Fund has a diverse range of investments and does not restrict investment managers from choosing certain stocks taking into consideration that the Fund's investment strategy is regularly monitored.

### Responsible Investment

Responsible Investment is a fundamental part of the Fund's overarching investment strategy as set out in its ISS as a Statement of Responsible Investment Principles. That is, to maximise returns subject to an acceptable level of risk whilst increasing certainty of cost for employers, and minimising the long term cost of the scheme. The Fund believes that consideration of Environmental, Social and Corporate Governance ("ESG") factors are fundamental to this, particularly where they are likely to impact on the overarching investment objective.

## **Appendix 3. Communications policy statement**

The Local Government Pension Scheme Regulations 2013 (Regulation 61) requires each pension fund administering authority to prepare and publish a policy statement setting out its approach to communicating with scheme members, representatives of members, prospective members and scheme employers.

The East Sussex Pension Fund policy statement sets out our existing communication activities.

This Policy can be seen on the East Sussex County Council Website. [www.eastsussexpensionfund.org/resources/](http://www.eastsussexpensionfund.org/resources/)

## **Appendix 4. Governance policy statement**

EAST SUSSEX PENSION FUND

# **GOVERNANCE AND COMPLIANCE STATEMENT**

**Approved 22 June 2021**

Policy not replicated in this copy

**Report to:** Pension Committee

**Date of meeting:** 25 November 2021

**By:** Chief Finance Officer

**Title:** East Sussex Pension Fund (ESPF) quarterly budget report

**Purpose:** This report provides an update on the forecast 2021/22 Outturn

---

## **RECOMMENDATION**

**The Committee is recommended to note the forecast 2021/22 Q2 outturn position for the East Sussex Pension Fund**

---

### **1. Background**

1.1 Under the Local Government Pension Scheme (LGPS) Regulations, East Sussex County Council is required to maintain a pension fund, known as East Sussex Pension Fund (ESPF or the Fund), for its employees and other scheme employers.

1.2 The business plan and budget sets out the direction of travel, objectives and targets to be achieved in the management of the Fund, and for the Council to be able to perform its role as the administering authority in a structured way. The Pension Committee is charged with meeting the duties of the Council in respect of the Pension Fund.

1.3 At its meeting on the 1 March 2021 the Pension Committee agreed a budget of £7.155m to support the business plan for 2021/22. In the same meeting the Pension Committee approved an additional budget for a permanent Communications Manager to be added to the team structure, at an estimated salary plus on costs of £50,000. The budget presented below includes both the approved budget and additional post totalling £7.205m. The budget estimates do not incorporate any provision for investment fees earned by fund managers where these are deducted at source by asset managers.

### **2. Supporting information**

#### **2021/22 Investment and Administration Expenses Outturn Report**

2.1 The budget requirement for 2021/22 was significantly increased from 2020/21 due to the insourcing of the Pensions Administration Team, which has consequently provided a better understanding of ongoing costs. In addition, some investments were moved from Fund Managers, who deducted fees at source from the asset valuation, into new Fund Managers who will be invoicing fees directly to the Fund, increasing the reportable costs through budget monitoring compared to 2020/21.

2.2 The forecast outturn at the second quarter of 2021/21 is £6,828m, a decrease of £0.377m from the approved budget. The 2021/22 projected outturn against budget line items is shown at Table 2 below. The underspend mostly relates to the current vacancies within

the Fund, that are actively being recruited too. The main movements to the budget are set out in Table 1 below and movements detailed in Paragraphs 2.3 to 2.7.

**Table 1**

	2021/22 Budget	2021/22 Q2 Outturn	Variance from last reported position
Officers – para 2.3	1,756	1,380	(376)
Actuarial Fund Work – para 2.4	250	175	(75)
Legal Fees – para 2.5	165	100	(65)
Investment Advice – para 2.6	192	230	38
Consultancy & Service Providers – Benefits – para 2.7	100	239	139
Other Minor movements	4,742	4,704	(38)
<b>Total</b>	<b>7,205</b>	<b>6,828</b>	<b>(377)</b>

2.3 The budget for staffing was set at £1.756m assuming that no vacancies were being held by the Fund. The current job descriptions are being reviewed for the Pensions Administration team, as many of the team are on historic contracts of employment prior to Transfer of Undertakings (Protection of Employment) Regulations (TUPE) . This may result in increased costs as roles are potentially regraded. Recruitment in some posts has been challenging and where this is the case JD’s and adverts have been reviewed to ensure the jobs are appealing; recruitment is currently underway for the Pensions Accountant, Communications Manager and Administration apprentice. The continued presence of vacancies has resulted in a decrease of £0.376m from the agreed budget.

2.4 The budget set for actuarial fund work costs for 2021/22 was set at £0.250m reduced from the 2020/21 total spend (£0.341m) in the anticipation of the new actuarial contract and reduced reliance on the actuary to provide additional support due to increased office capacity due to the new structure. The evidence from the first 5 months of invoices has demonstrated that the costs for actuarial services from the Fund has been lower than anticipated and a reduction in the charges of £75,000 has been made.

2.5 The budget set for legal costs for 2021/22 was set at £0.165m, reduced from the 2020/21 total spend of £0.285m in the anticipation of the reduced reliance on the external legal advice to provide additional support due to increased office capacity resulting from the new structure. The evidence from the first 5 months of invoices has demonstrated that the costs for legal services incurred by the Fund has been lower than anticipated and a reduction in the charges of £65,000 has been made.

2.6 An initial budget was set for the investment advice of £0.192m, to cover the expected work for the year from the investment consultant and independent advisor. There has been a review of the equity strategy specifically and a whole Fund review in the first 6 months of the year. Both of the reviews have resulted in changes to the strategy, resulting in commissioning additional work that was not initially budgeted. At the Pension Committee in September 2021, a new contract for the independent advisor was agreed increasing the costs for the next 6 months. These changes have resulted in an increase of £38,000.

2.7 The budget set for Consultancy & Service Providers – Benefits for 2021/22 was set at £0.100m, based on the cost incurred from 2020/21. In addition to ongoing projects, a specific piece of work has been commissioned from Aon to undertake a review of annual allowance calculations. Based on the project quote and current experience of additional work required to resolve data issues the anticipated cost of the work has been included at £139,000.

**Table 2 2021/22 Outturn Report**

2020/21 Outturn £000	Item	2021/22 Budget £000	2021/22 Actuals to October £000	2020/21 Forecast Outturn Q2 £000	Variance to Budget £000
	<b>Pension Fund Staff Costs</b>				
592	Fund Officers	1,756	279	1,380	(376)
53	Recruitment costs	12	2	12	-
<b>645</b>	<b>Sub Total</b>	<b>1,768</b>	<b>281</b>	<b>1,392</b>	<b>(376)</b>
	<b>Pension Fund Oversight and Governance</b>				
341	Actuarial Fund Work	250	41	175	(75)
87	Actuarial Employer Work	100	30	70	(30)
(64)	Employer reimbursement	(100)	(8)	(70)	30
2	Training Costs	10	3	10	-
40	External Audit – Grant Thornton	30	(35)	30	-
190	East Sussex County Council	286	2	257	(29)
285	Legal Fees	165	40	100	(65)
157	Subscriptions and Other Expenses	72	31	72	-
<b>1,038</b>	<b>Sub Total</b>	<b>813</b>	<b>104</b>	<b>644</b>	<b>(169)</b>
	<b>Investment activities</b>				
221	Investment Advice	192	112	230	38
37	ESG Advice	25	21	25	-
61	Custodian	75	50	75	-
80	ACCESS	93	129	103	10
2,365	Investment Manager Fee Invoices	3,313	820	3,313	-
<b>2,764</b>	<b>Sub Total</b>	<b>3,698</b>	<b>1,132</b>	<b>3,746</b>	<b>48</b>
	<b>Pension Administration</b>				
894	Orbis Business Operations Support Services				
-	East Sussex County Council	237	52	213	(24)
282	System Services and License	346	156	346	-
90	Consultancy & Service Providers - Benefits	100	45	239	139
-	Operational Support Services	225	9	244	(19)
183	Other Expenses	18	16	9	(9)
-	Other Income	-	(2)	(5)	(5)
<b>1,449</b>	<b>Sub Total</b>	<b>926</b>	<b>278</b>	<b>1,046</b>	<b>82</b>
<b>5,896</b>	<b>Total</b>	<b>7,205</b>	<b>1,795</b>	<b>6,828</b>	<b>(377)</b>

### **3. Conclusion and reasons for recommendation**

3.1 The Committee is recommended to note the Q2 2021/22 outturn position.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Russell Wood, Pensions Manager: Investments and Accounting  
Email: Russell.Wood@eastsussex.gov.uk

<b>Report to:</b>	<b>Pension Committee</b>
<b>Date of meeting:</b>	<b>25 November 2021</b>
<b>By:</b>	<b>Chief Finance Officer</b>
<b>Title:</b>	<b>Training Report</b>
<b>Purpose:</b>	<b>To provide an update on training needs, opportunities undertaken and planned events</b>

---

## **RECOMMENDATIONS**

**The Pension Committee is recommended to:**

- 1) Note the outcome of the self-assessment knowledge and understanding survey;**
  - 2) Note the amount of training undertaken and made available in the past year;**
  - 3) Note the type of events planned for the year ahead; and**
  - 4) Identify areas it would like training on as a priority**
- 

### **1. Background**

1.1 This report is brought to the Pension Committee to provide an update on the outcome of the knowledge and understanding survey, provide details of training undertaken by members of the Pension Board and Committee. It also outlines training plans for the year ahead.

1.2 In May 2021 the East Sussex Pension Fund (ESPF) appointed a Pensions Training Co-ordinator to assist with building an understanding of existing Pension Board and Committee members' knowledge and understanding. This role also covers the sourcing of training opportunities.

### **2. Knowledge and understanding levels**

2.1 Members of the Pension Board have a legal duty to develop and maintain appropriate knowledge and understanding of pension matters to fulfil their role. Whilst this duty does not extend to members of the Pension Committee it has previously been accepted that, being decision makers, Committee members should have an equivalent level of knowledge. This is in line with accepted best practice in the industry.

2.2 On 19 August 2021 members of the Pension Board and Pension Committee were invited to complete a self-assessment of their knowledge and understanding of pension matters. This self-assessment was based on the guidance provided by CIPFA and The Pensions Regulator.

2.3 At the time of writing, responses had been received from one of the six Pension Board members plus the independent Chair and four of the five Pension Committee members.

2.4 Completing the questionnaire has allowed Officers to assess the training needs of both the Board and Committee as a whole and individual members. As such, it has been instrumental in helping define subjects that should be covered by bespoke events, outside of those made available through third party organisations.

2.5 Overall, the Pension Board generally scored well across all the areas of knowledge. However, the low response rate means Officers cannot state that the reported knowledge levels are an accurate reflection of the current knowledge levels of all Pension Board members.

2.6 Pensions Legislation and Guidance has been highlighted as an area where Committee members would benefit from further training. The Pensions Board reported a slightly higher level of knowledge and understanding. An understanding of Pensions Legislations underpins other areas referred to in the questionnaire and was a relatively low scoring topic consistently.

2.7 Pensions governance scored well, with an average score for the Pension Board of 3.7/5 and Pension Committee reporting an average of 3/5. There was a range of results within this topic with a lack of certainty by Committee members about the level of knowledge and understanding required of their role.

2.8 The results of the questionnaire showed that there is generally a reasonable understanding of the Funding Strategy. Within actuarial matters the levels of knowledge and understanding were reduced by lower scores on questions relating to the triennial valuation. Training will be a priority in this area over the next year ahead of the 2022 triennial valuation,

2.9 Pension Administration was highlighted particularly as an area for development. This includes a reported need for additional training on the Additional Voluntary Contribution offering made available to Fund members. Within this topic area there is also significant cross over with the requirement to better understand underlying legislation.

2.10 The Pension Board is not heavily involved in the setting of the investment strategy but reports a good level of understanding in this area. Likewise, members of the Pension Committee are broadly comfortable with this topic. The aspect of investing which is least well understood is the ACCESS pool with Committee members showing a need for further training on the relevant legislation and the limits of the expectation to invest through the pool. A need for greater understanding of pooling was also identified as the key area of Financial Markets which needs to be better understood.

2.11 The final area covered by the questionnaire is pension services, procurement, management and relationship management. This topic further identifies a lower level of knowledge of investment pooling and the legal requirements surrounding procurement processes.

### **3. Training undertaken in the past year**

3.1 In the past year members of the Pension Board and Pension Committee have been offered training opportunities covering a range of topics such as cyber security, employer covenant and the role of the Pension Committee and Pension Board.

3.2 Both the Pension Board and Pension Committee have had changes to their membership in the past year and the new members are in the process of carrying out their induction and initial training.

3.3 The induction training for the new members of both the Pension Board and Committee was particularly well attended by both new and existing members. It was also well received as an introduction to the role. All members of the Pension Board and Committee have also been asked to complete the Public Service Toolkit provided by The Pensions Regulator. To date three Pension Board members, the Pension Board Chair and three Pension Committee members have completed all of the modules in this course.

3.4 Members of both the Pension Board and the Pension Committee have also been recommended to sit a module from the Trustee Toolkit relating to fraudulent activity targeting members. Whilst the Trustee Toolkit is not designed overall to be relevant to Public Service schemes, this module provides insight into the approach that would be taken by the Pension Administration Team when dealing with a request to transfer out.

#### **4. Training plans for the year ahead**

4.1 In the next 12 months ESPF will go through the Triennial Valuation process, when a review of the Fund's assets and liabilities will take place with a view to setting employer contribution rates. The self-assessment questionnaire highlighted this as an area in which training would be required and Officers will look to source training on this topic by the end of the financial year and ahead of the Valuation process.

4.2 The self -assessment process has also identified a need for training to be provided on Pensions Legislation covering both governance and investments. As an understanding of relevant legislation was highlighted in a number of areas Officers will be looking into providing a training event covering this topic as a priority area.

4.3 In addition to these higher priority areas, training needs have also been identified covering the following topics:-

- Pensions Administration and best practice
- Investment pooling
- Procurement process
- Covenant reviews
- The Fund's AVC offerings
- The Communication Policy
- Cessations and Admissions to the Fund
- Cyber security
- The wider pensions landscape and regulators
- Budget setting

4.4 Over the course of the next 12 months Officers will look to source opportunities for the members of the Pension Board and Committee to develop their understanding of these areas. The training is likely to be a mix of external events, internal events led by service providers and Officer led internal events. Where a matter is expected to arise through the work plan, Officers will seek to provide "just in time" training as is anticipated ahead of the Triennial Valuation. It is likely not all items in the list, above, will be covered and items will be prioritised based on the work plan.

4.5 Where training has been provided recently, such as on covenant reviews, Officers will consider what additional information would be useful for members of the Board and Committee. Officers will continue to liaise with chairs to facilitate this decision.

4.6 Where training has previously been discussed but not yet provided, Officers will look to incorporate this into the outlined events. Where there is a specific event, if members of the Pension Board would like to be treated as a priority, they are encouraged to inform Officers so the request can be taken into account.

#### **Conclusion**

5.1 The Pension Committee is recommended to note the results of the research into Pension Board and Committee member training needs.

5.2 There are a variety of areas where further development would be of assistance. Officers will look to prioritise these needs and deliver appropriate events, however, the Pension Committee is invited to raise areas they would like training on where this is seen as a particular priority.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Mike Burton, Pensions Manager Governance and Compliance  
Email: [Michael.Burton@eastsussex.gov.uk](mailto:Michael.Burton@eastsussex.gov.uk)

This page is intentionally left blank

**Report to:** Pension Committee

**Date of meeting:** 25 November 2021

**By:** Chief Finance Officer

**Title:** Pension Fund Risk Register

**Purpose:** To consider the Pension Fund Risk Register

---

**RECOMMENDATIONS: The Pension Committee is recommended to:**

- 1) Note the new International Trade risk;
  - 2) Note climate risk will be considered further once the scenario modelling is underway and producing data; and
  - 3) Inform Officers of any changes to the risk register it believes should be considered
- 

## **1. Background**

1.1 Risk management is the practice of identifying, analysing and controlling in the most effective manner all threats to the achievement of the strategic objectives and operational activities of the Pension Fund. It is not a process for avoiding or eliminating risks. A certain level of risk is inevitable in achieving the Fund objectives, but it must be controlled.

1.2 Effective risk management is an essential part of any governance framework as it identifies risks and the actions required to mitigate their potential impact. For a pension fund, those risks will come from a range of sources, including the funding position, LGPS Pooling, General Data Protection Regulation (GDPR), investment performance, membership changes, benefits administration, costs, communications and financial systems. Good information is important to help ensure the complete and effective identification of significant risks and the ability to monitor those risks.

1.3 Since the last meeting of the Pension Board and Pension Committee officers have continued to review the Risk Register. To ensure all appropriate risks and mitigations have been identified,

## **2. Supporting Information**

2.1 The Risk Register is included at **Appendix 1**.

## **3 Changes to the Risk Register**

3.1 In the meeting on 28 September 2021 the Pension Committee asked Officers to review the existing Brexit risk, which had been recommended for deletion, to update it rather than remove it entirely.

3.2 The previous recommendation to remove the risk had been made on the basis that the risk related to not knowing the likely trade agreement to be put in place between the UK and EU. The terms of that agreement are now known. Members of the Pension Committee asked Officers to consider the risks associated with wider trading issues rather than just focussing on Brexit.

3.3 Risk I2 has been added as a replacement for the previous, Brexit focussed risk. It is identified that changing relationships and agreement beyond those between the UK and EU can impact on the Fund's investments as it has global exposure. Mitigations in place are noted, such as

the regular reporting to the Pension Committee on performance and any concerning trends, the diversification of Fund assets both geographically and across varying asset classes.

#### **4 Climate risk**

4.1 During the Pension Committee meeting on 28 September 2021 there was a discussion around the impact and likelihood around risk 17, Climate change. Officers are committed to keeping this, and all other risks, under review. Further recommendations will be provided after the Climate Modelling Project is underway and producing new data.

#### **5. Conclusion**

5.1 The Pension Committee is recommended to note the continuing steps being taken to mitigate the risks to the Fund and to inform Officers of any new risks they have identified. Officers will advise members of new risks as they arise.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Sian Kunert, Head of Pensions  
Email: Sian.Kunert@EastSussex.gov.uk

Pension Fund Risk Register September 2021

Reference	Risk	Potential Triggers of risk	Consequences of risk	Pre Mitigation			Risk Control / Response	Post Mitigation			Risk Owner	Timescales
				Likelihood	Impact	Risk Score		Impact	Likelihood	Risk Score		
<b>Employer Risk</b>												
E1	<b>Contributions Funding Risk</b> Failure to collect contributions from employers in line with Funding strategy requirements and Rates and Adjustment Certificate	Failure to collect contributions on time Failure to collect contributions in line with Rates and Adjustments certificate Failure to monitor and reconcile contributions Liquidity failures with employers due to business risk or Covid 19 implications Incorrect coding of contributions Employer unable to pay increased contributions on a trigger event New outsourced arrangements made without thought to Pensions implications and contribution costs Poor employer covenant	Inaccurate financial statements Cashflow risk to pay out pensions Funding deficits Failure to track employer cashflows leading to inaccurate FRS17/IAS19 report and Valuation reports Future reduction in funding level Future Increase in employer contributions Employer forced into liquidation Increase in investment risk taken to access higher returns Forced to sell investments to meet cashflow requirements	3	3	9	Monthly Employer contribution monitoring Monitoring of late payments with new Employer engagement team to address breaches for late payment Contributions recorded in Finance system by employer to track all employer cashflows in line with actuarial requirements for Valuation and FRS17/IAS19 reporting requirements. Also enables ability to see trends in contributions collected. New administration strategy in place from January 2021 clearly outlining ability to fine employers for late payment and late receipt of remittance advice or poor quality of data Implementation of I-Connect which is being to be rolled out in 2021 is expected to improve the quality of contribution data received to better aid reconciliation of payments and drill in the accuracy of employers contribution payments New report to be delivered at Pensions Board meetings to highlight any late payment of contributions and Employer engagement actions from February 2021 Covenant review to begin in 2021 - PWC appointed to carry out the work, high risk employers identified and legal advice obtained Triennial valuation process aims to stabilise contribution rates where possible and senior management involved in detailed discussions on funding assumptions Guide to Employers on implications to Pensions on Outsourcing presented at employer forum in November 2020 and document issued to all employers Contribution deferral policy approved by Committee in June 2020. Regular communication with Employers through new Employer engagement team	2	2	4	Head of Pensions	On-going
E2	<b>Employer data Risk</b> Employers fail to provide accurate and timely data to the PAT team	Failure to provide Starter and Leavers information Failure to provide EOY returns on time and to a acceptable data standard Covid 19 has reducing the ability of employers to participate in the data cleansing Inability for Employers to respond to additional data requests for changes in regulations	Risk of financial loss and damage to reputation. Incorrect employer's contribution calculations Delays to triennial actuarial valuations process. Fines and enforcement action by The Pension Regulator Inability to produce ABS in time or accurately to comply with legislation	4	3	12	New Administration Strategy approved in September 2020 and out for consultation with Employers October to November; The new strategy was the focus of the Employer Forum in November 2020 Employing authorities are contacted for outstanding/accurate information; User Guide and Training provided to Employers for outsourcing implications with LGPS November 2020 Regular communication and meeting with administration services regarding service updates and additional data, when required. New employer engagement team established from January 2021 to support employer and provide training where required Issuance of a quarterly employer newsletter to support employers in their understanding of current pensions issues and activity for the Pension Fund A data cleansing plan was completed in June 2020 lead by Hymans. The PAT have been finalising outstanding areas handed over. New Data Improvement plan process to start in 2021 by the PAT BAU team and supported by the DIP working Group Data Improvement (DIP) working group set up to discuss data issues resulting from employers Introduction of I-Connect system will limit employer ability to submit incorrect data Meetings held between senior pensions Management team and employers where there are current or historic data concerns	3	3	9	Head of Pensions	On-going

Pension Fund Risk Register September 2021

Reference	Risk	Potential Triggers of risk	Consequences of risk	Pre Mitigation			Risk Control / Response	Post Mitigation			Risk Owner	Timescales
				Likelihood	Impact	Risk Score		Impact	Likelihood	Risk Score		
E3	Delay in employers agreeing Admission Agreement	Complexity around agreeing contribution rate Negotiations around provision of security Delays in negotiating terms and execution of documentation Late notification of an outsourcing arrangement Failure to understand the regulatory responsibilities on tenderers of new LGPS employers	Inability to recover missed payments in event of employer insolvency event Pension and service benefits are not accrued during the negotiation phase, and could result in retirement or death in service to be delayed for the period of the new employer	3	2	6	New templates being developed - this will speed up the process of agreeing new admission agreements The fund are moving to a template portal which will automatically populate the variable data in the admission agreement ensuring no additional terms are changed and provides assurance from external legal team that the agreements are comprehensive and enforceable Guide to outsourcing has been distributed to all employers in November 2020 and a review of this was covered in the Employer forum in November 2020. This guide directs employers of all the activities and considerations they need to take on any outsourcing arrangement with TUPE staff implications. Officers meet monthly to review status and movement on each in progress admission A new data flow and process map is being written to ensure officers request and communicate all the Admissions in progress are reported quarterly to Board and Committee to ensure awareness of status	2	2	4	Head of Pensions	On-going
<b>Administration</b>												
A1	Pensions service Delivery Risk Inadequate delivery of Pensions Administration	The Scheme is not administered correctly resulting in the wrong benefits being paid or benefits not being paid, including as a result of poor data Paying pension benefits incorrectly Members not provided with required information	Members of the pension scheme not serviced to an adequate standards Damaged reputation Financial hardship to members Employers dissatisfied with service being provided resulting in formal complaint Complaints which progress to the Pensions Ombudsman Financial loss Statutory deadlines not met Active members not aware of delay in employee contributions being paid	3	3	9	The PAT team is currently undergoing a dissolution project to insource pensions administration from Orbis Surrey to an inhouse provision. Annual internal audit report on the administration of pensions including regular reporting and monitoring of recommendations to ensure the service is acting in line with best practice Quarterly Reports to Pension Board and Committee New service level KPI and expectations approved at Pensions Committee in September 2020 for the PAT service within the Administration strategy for when the team is fully in house Awareness of the Pension Regulator Guidance by all team members Programme management by Head of Pensions admin in liaison with Orbis partners to ensure all tasks completed as planned and to a high standard Policies and procedures in place and all activity for members recorded on member records for other teams members to see Constant monitoring / checking by team managers and senior officers for more junior staff members In house risk logs, including for projects SAP / Altair reconciliation monthly to ensure financial records complete and correct Task management systems built into Altair to ensure activity is completed and monitored	2	3	6	Head of Pensions Administration	On-going
A2	Risk resulting from Regulatory Change Risk that new benefit structures can not be set up correctly or in time	GMP reconciliation GMP rectification GMP equalisation McCloud Pensions Dashboard Other changes to legislation or regulatory guides	Members of pensions scheme exposed to financial loss Inaccurate record keeping Damaged reputation Delays due to conflicting deadlines on heavy workloads Penalty applied due to non-compliance	3	3	9	Projects and/or working groups in place to deal with current regulatory benefit changes Attendance at networks and officer groups to stay on top of upcoming changes in regulation Reports to Pension Board and Committee to ensure knowledge is shared to decision makers Oversight via Data Improvement Working Group	2	3	6	Head of Pensions Administration	On-going

Pension Fund Risk Register September 2021

Reference	Risk	Potential Triggers of risk	Consequences of risk	Pre Mitigation			Risk Control / Response	Post Mitigation			Risk Owner	Timescales
				Likelihood	Impact	Risk Score		Impact	Likelihood	Risk Score		
A3	Production of Statutory member returns	Inability to produce all ABS by the statutory deadline Inability to produce Annual Allowance statements by the statutory deadlines Provision of incorrect statements to members Failure to complete event reports in time for HMRC	Reputational risk and complaints Fines and enforcement action by The Pension Regulator Interest charges or fines from HMRC for inaccurate AA statements Breaches occurred	4	3	12	Regular contact with employers to get data. Clear project plan with early communications and planning with milestones to ensure Statements created in time to allow time for distribution to staff. Roll out of I-Connect for employer roll out as monthly interfaces system, to ease year end requirements and correct errors through out the year. Currently many leavers are not being notified until year-end. Restructure of Pensions team to include an Employer Engagement team will support Pensions Administration with end of year returns liaising and supporting employers through the process Breaches policy in place and Breach reporting to Committee and Board quarterly to raise and consider breach reporting levels	3	2	6	Head of Pensions Administration	On-going
A4	Risk on Dissolution of Administration from Orbis to ESCC	Risk that infrastructure will not be in place on time Recruitment risk to support areas in addition to BAU Risk to data transfer and software mapping	Reputational damage Inability to provide pensions administration services one separated Risk to communications with employers and members due to structural changes	4	4	16	Project plan in place, with regulator meetings and project groups for various aspects of the dissolution Specific risk register is in place for this project and all risks currently Green or Amber, project is on track Head of Pensions Administration in place to lead on the dissolution with project updates to S151, COO and Head of Pensions Contracts in place and PID's for various aspects of the workstreams to implement Ongoing support until end of June and handover opportunities with communications and Projects teams where new resourcing is required TUPE of staff is complete and several adverts not out BAU team will be dropping Westminster work which will help in managing the teams workload	2	3	6	Head of Pensions Administration	Ongoing
A5	Failure to comply with CETV anti scam checks	Lack of clear process Process not followed	Reputational damage TPR intervention and penalties Loss to Fund due to requirement to pay compensation	3	2	6	Process in place for making checks required by law and/or recommended by TPR. Appropriate training to be identified and offered to staff to build understanding of risk and appropriate mitigations. Member informed of "red flags" identified Scorpion campaign material provided to members seeking a CETV Quality assurance checks ensure appropriate checks carried out	1	2	2	Head of Pensions Administration	on-going
A6	Major Incident preventing staff access to office	Major weather, technological or illness event	Staff unable to access post/documents Staff unable to issue payment instructions to bank	2	2	4	Administrative team equipped with laptops and can work virtually Officer's able to instruct payment be made to pensioner members	1	2	2	Head of Pensions	on-going

Pension Fund Risk Register September 2021

Reference	Risk	Potential Triggers of risk	Consequences of risk	Pre Mitigation			Risk Control / Response	Post Mitigation			Risk Owner	Timescales
				Likelihood	Impact	Risk Score		Impact	Likelihood	Risk Score		
<b>Governance</b>												
G1	Key Person risk Risk of loss of key / senior staff resulting in lost knowledge and skills within the Pensions Team	Poor management of staff  Failure to provide progression within the team structure  Poor absence management  Higher risk of sickness absence and reduced working hours as a result of Covid-19  Failure to provide an supportive working environment Failure to communicate with staff members in relation to potential service changes Concentration of knowledge in a small number of officers and risk of departure of key and senior staff.	Damaged reputation  Inability to deliver and failure to provide efficient pensions administration service, support to employers, accurate accounts or effective management of investments Disruption and inability to provide a high quality pension service to members. The risk of losing key staff could lead to a breakdown in internal processes and service delivery, causing financial loss and potential risk to reputation.	4	4	16	Diversified staff / team  Attendance at pension officers user groups to network and exchange information  Procedural notes which includes new systems, section meetings / appraisals  Succession planning within team structure, building from within the team  Robust business continuity processes in place around key business processes, including a disaster recovery plan. Knowledge of all tasks shared by at least two team members within PAT and in addition can be covered by senior staff in all areas.  Training requirements are set out in training strategy, job descriptions and reviewed annually with team members through the appraisal process.  New training officer post within team structure to be recruited early 2021 Training strategy in place and regularly reviewed with training log where required	2	2	4	Head of Pensions / Head of Pensions Administration	On-going
G2	Lack of decision making caused by loss of Pension Committee/Pension Board member	Several Committee members lose seats in an election  Members resign posts  Terms of multiple members expire at same time	Committee/Board not quorate and unable to fulfil role  Inability of Pension Board to support Committee due to loss of Knowledge and Understanding  Clear instructions not given to officers  Action taken by TPR for failure meet basic compliance standards	3	3	9	Record kept of terms of Office  Pension Board terms of Office staggered  Deputy Chairs in place to cover chair absence  Officers aware of election cycle	2	3	6	Head of Pensions	On-going
G3	Cyber Security Risk of Loss of data or systems breaches through cyber attacks	Cyber attack on ESCC systems and firewalls  Cyber Security of member data - personal employment and financial data Attempt to infiltrate emails systems and data exchanges Cyber attach on third party systems where ESPF data is stored Cyber attach on third party systems that ESPF require to carry out service requirements and investment functions Covid-19 Cybercrime Spike	ESCC may incur financial penalties for data breaches  Damaged reputation  Legal issues Members of the pension scheme exposed to financial loss / identity theft Members of the pension scheme data lost or compromised  Financial loss resulting from data manipulation  Inability to trade Impact on funding levels  Inability to access key systems, or substantial rebuilding of alternative systems	4	4	16	ICT defence - in-depth approach  Utilising firewalls, passwords and ICT control procedures including system access and account deletion protocols  Email and content scanners  Using anti-malware.  ICT performs penetration and security tests on regular basis  Encryption used on all data transfers  Service level agreement with termination clause Regular reports SAS 70/AAF0106  Industry leaders providing services to the fund with data protection and cyber defence systems  Risk assessment completed with all new contracts with data transfer and new associated systems including penetration testing at outset Pensions Team specific BCP to be developed	2	4	8	Head of Pensions	On-going

Pension Fund Risk Register September 2021

Reference	Risk	Potential Triggers of risk	Consequences of risk	Pre Mitigation			Risk Control / Response	Post Mitigation			Risk Owner	Timescales
				Likelihood	Impact	Risk Score		Impact	Likelihood	Risk Score		
G4	Inadequate governance arrangements to discharge powers & duties	<p>Pensions Board &amp; Committee members do not have the knowledge &amp; experience to carry out their duties properly</p> <p>In sufficient internal audit review of the fund</p> <p>Lack of advisory services</p> <p>Insufficiently qualified officers</p> <p>Poor level of testing and challenge from external auditors</p>	<p>Poor decision making</p> <p>Breaches occurred</p> <p>Areas of work not completed</p> <p>Unreliable accounting or budgetary information</p>	2	3	6	<p>Training strategy in place which covers Pension Committee, Pensions Board and officers</p> <p>100 days of internal audit commissioned for each calendar year with regular reporting from IA to committee and board</p> <p>External auditor provides audit plan at planning stage for each financial year and this is discussed by Audit committee as well as Pension Committee and Board</p> <p>Investment regulations require proper advice, procurement processes in place to ensure quality within replacement advisers</p> <p>Training coordinator being appointed. This officer will liaise with chair of Pension Board and Committee to identify training needs</p>	1	3	3	Head of Pensions	On-going
G5	Failure to comply with General Data Protection Regulations	<p>Data breaches through failure to encrypt data</p> <p>Poor security on systems</p> <p>Unpublished privacy notice, policy and guidance</p> <p>Lack of knowledge on GDPR rules by staff</p> <p>DPO not identified</p>	<p>Reputational damage</p> <p>Fines and enforcement</p> <p>Breaches by contractors and employers</p> <p>Failure to report breaches within timescales and through correct reporting methods</p>	3	3	9	<p>Contracts with external parties where there is a data role have clear terms and conditions as part of the data processing agreements</p> <p>Data Impact assessment is carried out on all new tenders where data is involved</p> <p>DPO is in place via ESCC</p> <p>Privacy notice is on the website - the privacy statements have been refreshed in August 2021</p> <p>Memorandum of Understanding in place with employers within the fund</p> <p>All staff are required to complete an information governance course on joining the Council and this is refreshed annually</p> <p>Information governance Internal audit completed in Q4 2020/21 with a reasonable assurance level and all recommendations have been completed as at September 2021</p> <p>Pensions Manager for Governance and Compliance completed review on GDPR in Q4 2020/21 resulting in a newly designed webpage, new privacy notices and change to the retention period</p>	2	2	4	Head of Pensions	On-going
<b>Investment/Funding</b>												
I1	Funding risk due to poor investment returns Risk that investment strategy fails to result in performance required to meet the needs of the Funding strategy discount rate	<p>Poor strategic asset allocation resulting in insufficient protection against inflation risk of liabilities</p> <p>Performance consistently under benchmark</p> <p>Inability to rebalance portfolio</p> <p>Failure to take proper advice</p> <p>Unrealistic discount rates in valuation assumptions</p>	<p>Funding Gap</p> <p>Damaged reputation</p> <p>Increase in employer contribution</p> <p>Inability to Pay Pensions</p> <p>Forced to sell investments to meet cashflow requirements</p>	3	3	9	<p>Strategy is supported by expert Investment consultants. Challenge to Consultants through Independent Adviser.</p> <p>Triennial valuation ensures funding position is known and contribution rates are stabilised</p> <p>Quarterly Performance monitoring, investment manager monitoring from consultants and Link for ACCESS sub funds</p> <p>Annual Investment Strategy Review, with interim rebalancing</p> <p>Quarterly Reporting to Pensions Committee, with decisions approved by committee, including Fund Manager performance</p> <p>Training strategy in place to ensure officers and committee members have sufficient knowledge and skills to implement and change the investment strategy</p> <p>Investment decisions are made in compliance with the ISS/FSS</p> <p>Changes to investment strategy are discussed with the actuary to ensure anticipated implications on funding aligned.</p> <p>Revision of the Asset Liability Model to support a viable Strategic Asset Allocation for the new valuation.</p>	2	2	4	Head of Pensions	On-going
I2	Changes to International Trade The changing of Regulations and International Trading relationships along with the trading environment, impact on investments in affected businesses	<p>Inability to access certain investment vehicles</p> <p>Changes to Banking legislation and MIFID II and Basel requirements</p> <p>Falls /instability in markets</p> <p>Currency fluctuations</p> <p>Inability to realise certain assets</p> <p>Increased taxation on certain assets</p>	<p>Financial loss, and/or failure to meet return expectations.</p> <p>Future Increase to employer contribution costs resulting from lower funding positions</p> <p>Changes to the regulatory and legislative framework within which the Fund operates.</p> <p>Changes in employer funding positions causing liquidity risk to employers</p> <p>Unable to sell assets preventing realignment with funding strategy or withdrawal from underperforming fund/asset class</p>	3	3	9	<p>Diversification of the Fund's investments across the world.</p> <p>Regular monitoring of investment performance and reports on potentially problematic trends</p> <p>Diversification of the Fund's investments across multiple asset classes</p> <p>Currency Hedging requirements considered within the investment strategy</p> <p>Officers receive regular briefing material on regulatory changes and attend training seminars and ensure any regulatory changes are implemented</p>	2	2	4	Head of Pensions	On-going

Pension Fund Risk Register September 2021

Reference	Risk	Potential Triggers of risk	Consequences of risk	Pre Mitigation			Risk Control / Response	Post Mitigation			Risk Owner	Timescales
				Likelihood	Impact	Risk Score		Impact	Likelihood	Risk Score		
13	<b>Regulatory risk</b> Failure to comply with regulations, legislation and guidance from an accounting and investment perspective	<p>Failure to comply with CIPFA code of practice for accounting for the pension fund</p> <p>Failure to provide employers with accurate reporting for their financial statements</p> <p>Failure to comply with the LGPS investment regs</p> <p>Failure to Comply with statutory guidance from MHCLG</p> <p>Failure to comply with the Pensions Regulator requirements</p>	<p>Risk of the accounts being qualified by the auditors.</p> <p>Risk to employers of qualified accounts causing reputational damage and potential costs</p> <p>Intervention by the secretary of state in investment strategy</p> <p>Breaches occurred</p>	3	3	9	<p>Pensions Officers are kept up to date with changes to legislative requirements via network meetings, professional press, training and internal communication procedures.</p> <p>Pension Fund financial management and administration processes are maintained in accordance with the CIPFA Code of Practice, International Financial Reporting Standards (IFRS), and the ESSC Financial Regulations.</p> <p>Regular reconciliations are carried out between in-house records and those maintained by the custodian and investment managers.</p> <p>Internal Audits - carried out in line with the Pension Audit strategy.</p> <p>External Audit review the Pension Fund's accounts annually</p> <p>Breaches policy in place to ensure breaches mapped and reported</p>	1	2	2	Head of Pensions	On-going
14	<b>Investment pooling risk</b>	<p>Asset classes not available in line with the funds investment strategy</p> <p>Excessive asset transition costs</p> <p>Poor governance of the ACCESS pool</p> <p>Investment beliefs on ESG issues not shared within the pool</p> <p>Inability to report performance to the fund</p> <p>Inability to manage the investment managers and structure to deal with poor performance</p> <p>Insufficient Capacity in sub funds</p> <p>There is a risk that an investment may not transition to the ACS if Link cannot resolve on-going issues relating to the operating model for the planned Feeder fund structure.</p> <p>ACCESS pool unable to generate cost efficiencies</p>	<p>Increase in investment risk taken to access higher returns</p> <p>Increased costs</p> <p>Poor governance and reputational damage</p> <p>There is a risk that an investment may not transition to the ACS if Link cannot resolve on-going issues relating to the operating model for the planned Feeder fund structure.</p> <p>Asset transition costs are greater than forecast.</p> <p>Failure to control operational risks and transaction costs during the transition process</p> <p>Insufficient risk and return parameters to comply with guidance on pooling and the investment strategy</p> <p>Intervention of the secretary of state in failing to invest in line with the statutory guidance on pooling</p> <p>An increase in the set-up costs for implementing new asset classes and managers</p>	3	3	9	<p>ACCESS Support Unit team provide support to the pool</p> <p>Operator contract provided by Link for assets held within the ACS</p> <p>The ACCESS Contracts Manager will monitor Link's progress closely. If Link cannot resolve issues in a reasonable timeframe then alternative options may be considered, e.g. Funds may continue to hold the sub fund outside the ACS</p> <p>KPI's introduced within revised operator agreements</p> <p>Consultants involved in analysing the creation of sub-funds and transitioning of our current assets into the pool, under a variety of scenarios.</p> <p>Opportunities to transfer securities in 'specie'. Reducing cost on transition</p> <p>Transition manager in place to preserving asset values, managing risk and project managing the transition process to ensure that costs are monitored and controlled.</p> <p>Due Diligence completed by legal advisers to ensure no hidden costs or governance issues not known at time of decision to invest.</p> <p>S151, chair of pension committee and monitoring officer representation on respective committees and working groups to ensure ESPF involved in all decisions and concerns and questions can be raised early in processes</p> <p>Regular meetings between officers and ACCESS pool with officers on a number of working groups to ensure involvement in decision making</p>	2	3	6	Head of Pensions	On-going
15	<b>Funding risk due to higher inflation</b> leading to increased liabilities and a funding gap	<p>Inflation rises faster than the actuarial assumption as a result of Govt. response to COVID-19</p> <p>Bond yields return to much higher levels</p>	<p>Liabilities are higher than expected.</p> <p>Bond-equity correlations rise, and equities also fall in price</p> <p>Fund's solvency level falls</p>	2	2	4	<p>Investment strategy include weighting to index linked gilts, infrastructure and real estate which are all inflation correlated to mitigate increases in liabilities from inflation.</p> <p>Potential to further increase infrastructure weightings</p> <p>Fund monitor portfolio sensitivity to inflation via expert investment consultants</p> <p>Triennial Valuation assumptions include local knowledge of the Administering authority on anticipated pay inflation.</p> <p>Quarterly monitoring of funding position helps identify risk early</p>	1	2	2	Head of Pensions	On-going

Pension Fund Risk Register September 2021

Reference	Risk	Potential Triggers of risk	Consequences of risk	Pre Mitigation			Risk Control / Response	Post Mitigation			Risk Owner	Timescales
				Likelihood	Impact	Risk Score		Impact	Likelihood	Risk Score		
16	<b>Environmental, Social and Governance risks</b> within Investment strategy and implementations on investment decisions	<p>Incorrect assumptions on current exposure , risk profiles and scenarios analysis leading to poor decision making</p> <p>Risk to income yields by restricting the market due to ESG concerns without considering the bigger picture of the investment strategy to compensate</p> <p>Investment environment changes radically, and Fund is slow to respond</p> <p>Risk to wider social and economic risks by focusing on a single issue</p> <p>Poor transparency on underlying investment manager investments decisions on behalf of the fund</p> <p>Failure of fund managers to explain or comply against voting guidelines</p> <p>Poor corporate Governance or corruption in underlying investments</p> <p>Risk of regulatory policy changes resulting in fines to underlying investments</p>	<p>Volatile investment returns</p> <p>Loss of market value</p> <p>Reputational risk where EGS beliefs and strategy are not aligned with expectation of members</p> <p>Increased workload responding to questions and challenges over ESG risks taking officer time away from manging the fund effectively</p> <p>Increase in investment risk taken due to unassessed ESG issues</p> <p>Weaker control leading to poorer governance</p> <p>unconscious exposure to companies in violation of UN policies, human rights violations, poor governance structures</p>	3	2	6	<p>Statement of Responsible Investment Principles outline investment beliefs within ESG, implementation of decisions and monitoring of EGS factors.</p> <p>Investment Working Group and ESG working group consolidated into a single group to ensure ESG is in the heart of all investment decisions</p> <p>Trim unconscious exposure to companies with poor ESG rating through agreed removal of traditional index funds ensuring active managers have a strong conviction in the underlying companies including on ESG matters and less traditional passive indexes / smart beta funds have robust screening processes in place to ensure ESG principkes are taken into account</p> <p>Tracking of the portfolio as underweight in fossil fuel exposure to benchmarks</p> <p>Production of annual reports on the carbon footprint of the Fund and review of managers from EGS perspective including transition pathway of underlying companies</p> <p>Signatory to Stewardship code with commitment to comply with the new 2020 code</p> <p>Challenging managers on their holdings with regard ESG issues</p> <p>Introduction of an ESG assment for all managers reported in July 2021 including improvement actions for each manager on ESG methodology, reporting or collabortaion. This will be updated and reported anually</p> <p>Engaging via managers and investor groups including LAPFF with companies and driving them forward to comply with key ESG concerns using the greater voice by combined investment power</p>	2	2	4	Head of Pensions	On-going

Pension Fund Risk Register September 2021

Reference	Risk	Potential Triggers of risk	Consequences of risk	Pre Mitigation			Risk Control / Response	Post Mitigation			Risk Owner	Timescales
				Likelihood	Impact	Risk Score		Impact	Likelihood	Risk Score		
17	Climate change - risk on assets and liabilities associated with Climate Change	<p>Uncertainty in energy transition impacts and timing</p> <p>Risk of stranded assets where invested in fossil fuel companies</p> <p>Lack of reliable carbon measurement data for investment pooled funds and or underlying holdings of those pooled funds.</p> <p>Risk of natural disasters on underlying investments</p> <p>Risk of changes in oil prices</p> <p>Increased capital costs of underlying investment companies to transition to greener energy solutions or lower carbon emitting supply chain models and production methods</p> <p>Fines or penalties incurred by underlying holdings by company or sector</p> <p>Increased global temperature and or erratic climate events causing devastation to underlying holdings</p> <p>Social consequence on members welfare and longevity within the fund</p>	<p>unconscious exposure to high carbon emitters</p> <p>Reputation issues around how the Fund is progressing the move to a decarbonised global economy.</p> <p>Volatile investment returns</p> <p>Reputational risk where Climate risks, reporting, mitigations and strategies are not aligned with member views or poorly communicated</p> <p>Loss of income to the fund from missed opportunities in oil price rally to accommodate the infrastructure to enable to the world to comply with the energy transition</p> <p>Loss of market value</p> <p>Major ecological disaster in the UK could lead to increased mortality quicker than anticipated within the funding models impacting on cash outflows and increased workloads for lump sum payments.</p> <p>Possible increase to ill health retirement cases leading to a change in cash flows and possible enhancements beyond those anticipated</p>	4	3	12	<p>Statement of Responsible Investment Principles outline investment beliefs within ESG, implementation of decisions and monitoring of EGS factors and has a strong focus on climate change</p> <p>Investment Working Group and ESG working group consolidated into a single group to ensure ESG is in the heart of all investment decisions</p> <p>Restructuring of the equity portfolio to avoid high risk companies and exploit opportunities, including decision to invest in impact fund in September 2020</p> <p>Trim unconscious exposure to companies with high Carbon emission, poor energy transition plans and or fossil fuel companies, through agreed removal of traditional index funds</p> <p>Member of Institutional Investors group on climate change</p> <p>The fund carry out annual carbon footprinting to better understand the carbon exposure and energy transition plans within the portfolio</p> <p>Signatory to UN PRI with first planned submission in 2022 and commitment to report TCFD's with a first attempt in the Annual Report for 2020/21</p> <p>The Fund has planned for climate scenario modelling in late 2021 which will help better understand this risk and allow further consider approaches in tackling these risks.</p> <p>The Fund continue to have some occasional exposure to high carbon emitting or fossil fuel sector companies from a tactical perspective to use its vote to help drive the sector forward through engagement and voting using the power of a collective voice. A number of Fund managers are Climate 100+ engagement partners leading on this work with top emitting companies, while all managers are IIGCC members for collaborate weighting of AUM to influence action</p> <p>Very small outstanding percentage exposure with fossil fuel companies that extract oil and gas or coal, which if the sector fall to zero value, the impact of the Fund would be negligible in market movement perspectives.</p>	2	2	4	Head of Pensions	On-going
18	Insufficient cash to pay benefits as they fall due	<p>Too much investment in illiquid assets</p> <p>Failure to track payments due</p> <p>Large investment commitments not anticipated and planned for</p> <p>Contributions not collected when due</p>	<p>Benefits not paid as they fall due</p> <p>Beneficiary financial hardship</p> <p>Forced sale of investments</p> <p>Reputational risk</p>	2	4	8	<p>Contributions monitored on monthly basis</p> <p>monitoring of members close to retirement</p> <p>Daily cash position monitored.</p> <p>Distributing investments to ensure stream of income from investment activity</p> <p>Income from investments is considered as a key risk in all investment strategy decisions and the income profile managed</p> <p>liaison between administration and investment team on cash requirements</p>	1	4	4	Head of Pensions	on-going
19	Internal fraud	<p>Member of staff has multiple accounts and can self authorise</p> <p>Lack of internal controls and sign off procedures</p> <p>Failure to monitor staff actions</p> <p>Failure to monitor payments from the Fund</p>	<p>Loss of Fund assets</p> <p>Reputational risk</p> <p>Loss of member confidence</p> <p>Loss of Fund assets</p>	2	3	6	<p>Quarterly review of log in credentials</p> <p>Senior officer's have sight of bank account</p> <p>Senior officer's are signatories to bank account</p> <p>Multiple sign off needed to make payment</p>	1	3	3	Head of Pensions	On-going
110	External fraud	<p>Failure to properly authenticate benefit claims</p> <p>Failure to identify deceased members</p>	<p>Reputational risk</p> <p>Loss of member confidence</p>	2	3	6	<p>Monthly mortality checks</p> <p>Regular member tracing exercises</p>	1	3	3	Head of Pensions	On-going

### Risk Register Risk Scores

The risk scores are calculated using the risk matrix below:

90-100%	This week	Very High	LIKELIHOOD	5	5	10	15	20
60-90%	This Month	High		4	4	8	12	16
40-60%	This year	Medium		3	3	6	9	12
10-40%	Next 5 years	Low		2	2	4	6	8
0-10%	Next 10 years	Very Low		1	1	2	3	4
				1	2	3	4	
				IMPACT				
				Negligible No noticeable impact	Minor Minor impact, Some degradation of service	Major Significant impact, disruption to core services	Critical Disastrous impact, Catastrophic failure	
SERVICE DELIVERY				Handled within normal day-today routines.	Management action required to overcome short-term difficulties.	Key targets missed. Some services compromised.	Prolonged interruption to core service. Failure of key Strategic Project	
FINANCAL				Little loss anticipated.	Some costs incurred. Handled within management responsibilities.	Significant costs incurred. Service level budgets exceeded.	Severe costs incurred. Statutory intervention triggered.	
REPUTATION				Little or no publicity. Little staff comments.	Limited local publicity. Mainly within local government community. Causes staff concern.	Local media interest. Comment from external inspection agencies. Noticeable impact on public opinion.	National media interest seriously affecting public opinion	

This page is intentionally left blank

**Report to:** Pension Committee

**Date of meeting:** 25 November 2021

**By:** Chief Finance Officer

**Title:** Work Programme

**Purpose:** To agree the Committee work programme

---

## **RECOMMENDATION**

**The Committee is recommended to agree its work programme.**

---

### **1 Background & Supporting information**

1.1 The work programme contains the proposed agenda items for future Pension Board and Pension Committee meetings over the next year and beyond. It is included on the agenda for each Committee meeting.

1.2 The work programme also provides an update on other work going on outside the Board and Committee's main meetings, including working groups, upcoming training and a list of any information requested by the Board or Committee that is circulated via email.

1.3 This item also provides an opportunity for Members to reflect on any training they have attended since the last meeting.

### **2 Conclusion and reasons for recommendations**

2.1 The work programme sets out the Committee's work both during formal meetings and outside of them. The Committee is recommended to consider and agree the updated work programme including consideration the regularity of agenda items to ensure effective governance of the Fund at the scheduled meetings.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Sian Kunert, Head of Pensions

Email: Sian.Kunert@EastSussex.gov.uk

This page is intentionally left blank

## Pension Board and Committee – Work Programme

Future Pension Board Agenda		
Item	Description	Author
<b>Standing items (items that appear on each agenda)</b>		
Pension Board Updates	Verbal updates on training events or conferences attended by Members of the Board	N/A
Pension Committee Agenda	A consideration of the draft agenda of the Pension Committee.	Head of Pensions
Governance Report	A report on governance issues effecting the fund, developments in the LGPS, policy amendments and McCloud working group update	Pensions Manger – Governance and Compliance
Employer Engagement and Contributions Report	A report on Employer Engagement matters to note, Employer Contributions update, Communications from the Fund and Communications working group update	Pensions Manger – Employer Engagement
Pensions Administration report	An update on the performance of the Pensions Administration Team.	Head of Pensions Administration

Internal Audit reports	All internal audit reports on the ESPF are reported to the Board	Head of Internal Audit
East Sussex Pension Fund (ESPF) Quarterly budget report	An update on the ESPF's budget. This is reported in Q2-4 only.	Head of Pensions
East Sussex Pension Fund (ESPF) Risk Register	A report on the ESPF's Risk Register	Head of Pensions
Work programme	A report on the Board and Committee's work programme	Head of Pensions
East Sussex Pension Fund (ESPF) Breaches Log	A report on the ESPF breaches log	Head of Pensions
Employer Admissions and Cessations	A report on the admission and cessation of employers to the ESPF.	Head of Pensions
<b>5 November 2021</b>		
Employer Forum Agenda	Discussion on Pension Fund Employer Forum Agenda topics	Pensions Manger – Employer Engagement
Independent Auditors Report on the Pension Fund Account and Annual Report and Accounts 2020/21	A report on the External Audit findings of the Pension Fund financial Statements and the complete 2020/21 Annual Report and Accounts.	Head of Pensions

Annual Training Plan	Report on Training completed in the year and training recommendations for the up-coming year	Head of Pensions
<b>10 February 2022</b>		
Business Plan and Budget 2022/23	Report to set the Budget for the Pension Fund for the Financial Year 2022/23 including the Business Plan with key deliverables for the year.	Head of Pensions
Good Governance Decision making matrix	Report to outline the revise the decision-making matrix for the Pension Fund, delegations and representations in line with SAB Good Governance project	Head of Pensions
Communications Policy	Revision to the Communications Policy	Head of Pensions
Covenant Review Report	Report from PWC on the covenant review project – project expected to complete late 2021	Head of Pensions
External Audit Plan for the East Sussex Pension Fund 2021/22	Draft External Audit Plan for 2021/22 Pension Fund Financial Statements	Head of Pensions
Additional Voluntary Contributions (AVC) review	Paper reviewing the AVC provision to members	Head of Pensions
<b>1 June 2022</b>		
Internal Audit Strategy and Plan	Draft internal audit Pension Fund Strategy and Audit Plan 2022/23	Internal Audit

Governance and Compliance Statement	Annual Review of Governance and Compliance Statement	Governance and Compliance Pensions Manager
Annual Report of the Pension Board	Annual report of the Pension Board to the Scheme manager outlining the work throughout the year	Head of Pensions with the Chair of the Board
Training Policy	Biannual review of the training Strategy	Governance and Compliance Pensions Manager
<b>9 September 2022</b>		
Independent Auditors Report on the Pension Fund Account and Annual Report and Accounts 2021/22	A report on the External Audit findings of the Pension Fund financial Statements and the complete 2021/22 Annual Report and Accounts.	Head of Pensions
2022 Actuarial Valuation and Funding Strategy Statement	Report from the Fund Actuary on the March 2022 triennial valuation process, methodology and assumptions with a draft Funding Strategy Statement for approval prior to consultation	Head of Pensions
<b>15 November 2022</b>		
Employer Forum Agenda	Discussion on Pension Fund Employer Forum Agenda topics	Pensions Manger – Employer Engagement
Annual Training Plan	Report on Training completed in the year and training recommendations for the up-coming year	Head of Pensions
<b>8 February 2023</b>		

Business Plan and Budget 2023/24	Report to set the Budget for the Pension Fund for the Financial Year 2023/24 including the Business Plan with key deliverables for the year.	Head of Pensions
External Audit Plan for the East Sussex Pension Fund 2022/23	Draft External Audit Plan for 2021/22 Pension Fund Financial Statements	Head of Pensions
2022 Valuation report and results and Final Funding Strategy Statement (FSS)	Final report and results from the Fund Actuary of the 31 March 2022 triennial valuation with the final FSS for approval post consultation.	Head of Pensions

## Actions requested by the Pensions Board

Subject Area	Detail	Status
Internal Audit reports	The Board requested that internal audit consider an audit of the common data sets provided to the Pensions Regulator	TBC
Scheme administration	The Board requested a report on potential recommendations from the Scheme Advisory Board (SAB) that the Scheme Manager role is removed from local authority control.	Ongoing discussions
Scheme administration	The Board requested a future report on how the ESPF KPIs for pension administration compare with those of other local government pension schemes.	To be provided when new KPI tool implemented
Decision making	To revise the decision-making matrix (including a RACI model) and to circulate it for information.	To be provided February 2022
ABS	Request that details of the ABS performance be circulated to the Board by email	Circulated 16/09/2021

## Future Pension Committee Agenda

Item	Description	Author
<b>Standing items (items that appear on each agenda)</b>		
Investment Report	A Quarterly performance report of the investment managers	Head of Pensions and Investment Consultant
Governance Report	A report on governance issues effecting the fund, developments in the LGPS, approval of policy amendments and McCloud working group update	Pensions Manger – Governance and Compliance
Employer Engagement and Contributions Report	A report on Employer Engagement matters to note, Employer Contributions update, Communications from the Fund and Communications working group update	Pensions Manger – Employer Engagement
Pensions Administration report	An update on the performance of the Pensions Administration Team.	Head of Pensions Administration
Internal Audit reports	Internal audit reports on the ESPF and annual audit plan.	Head of Internal Audit
East Sussex Pension Fund (ESPF) Quarterly budget report	An update on the ESPF's budget - <i>reported Q2-4 only</i>	Head of Pensions
East Sussex Pension Fund (ESPF) Risk Register	A report on the ESPF's Risk Register	Head of Pensions

Work programme	A report on the Board and Committee's work programme	Head of Pensions
East Sussex Pension Fund (ESPF) Breaches Log	A report on the ESPF breaches log – <i>reported only when a new breach is recognised, or status changed. Report goes quarterly to Board.</i>	Head of Pensions
Employer Admissions and Cessations	A report on the admission and cessation of employers to the ESPF - <i>reported only when outstanding admissions or cessations.</i>	Head of Pensions
<b>25 November 2021</b>		
Annual Report and Accounts 2020/21	2020/21 Annual Report and Accounts for approval including external audit confirmation of consistency of the report to the published Accounts.	Head of Pensions
Annual Training Plan	Report on Training completed in the year and training recommendations for the up-coming year	Head of Pensions
<b>24 February 2022</b>		
2020 Stewardship Code	Report outlining the Funds compliance with the 2020 Stewardship Code	Head of Pensions
Business Plan and Budget 2022/23	Report to set the Budget for the Pension Fund for the Financial Year 2022/23 including the Business Plan with key deliverables for the year.	Head of Pensions
External Audit Plan for the East Sussex Pension Fund 2021/22	Draft External Audit Plan for 2021/22 Pension Fund Financial Statements	Head of Pensions

Covenant Review Report	Report from PWC on the covenant review project	Head of Pensions
Additional Voluntary Contributions (AVC) review	Paper reviewing the AVC provision to members	Head of Pensions
Communications Policy	Revision to the Communications Policy	Head of Pensions
<b>17 June 2022</b>		
Internal Audit Strategy and Plan	Draft internal audit Pension Fund Strategy and Audit Plan 2022/23	Internal Audit
Governance and Compliance Statement	Annual Review of Governance and Compliance Statement	Governance and Compliance Pensions Manager
Annual Report of the Pension Board	Annual report of the Pension Board to the Scheme manager outlining the work throughout the year	Head of Pensions with the Chair of the Board
Carbon Footprinting	A report on the carbon footprint of the portfolio of ESPF including whether investments are in line with transition pathways.	Head of Pensions
Training Policy	Biannual review of the training Strategy	Governance and Compliance Pensions Manager
<b>20 July 2022 (no standing items)</b>		

Independent Auditors Report on the Pension Fund Accounts 2021/22	A report on the External Audit findings of the Pension Fund financial Statements for 2021/22	Head of Pensions
Training / Focus of choice	Time for specific training or to focus on a specific topic	Head of Pensions
<b>27 September 2022</b>		
Pension Fund Annual Report and Accounts 2021/22	2020/21 Annual Report and Accounts for approval	Head of Pensions
2022 Actuarial Valuation and Funding Strategy Statement	Report from the Fund Actuary on the March 2022 triennial valuation process, methodology and assumptions with a draft Funding Strategy Statement for approval prior to consultation	Head of Pensions
<b>30 November 2022</b>		
Employer Forum Agenda	Discussion on Pension Fund Employer Forum Agenda topics	Pensions Manger – Employer Engagement
Annual Training Plan	Report on Training completed in the year and training recommendations for the up-coming year	Head of Pensions
<b>22 February 2023</b>		
Business Plan and Budget 2023/24	Report to set the Budget for the Pension Fund for the Financial Year 2023/24 including the Business Plan with key deliverables for the year.	Head of Pensions
External Audit Plan for the East Sussex Pension Fund 2022/23	Draft External Audit Plan for 2021/22 Pension Fund Financial Statements	Head of Pensions

2022 Valuation report and results and Final Funding Strategy Statement (FSS)	Final report and results from the Fund Actuary of the 31 March 2022 triennial valuation with the final FSS for approval post consultation.	Head of Pensions
--	--	------------------

<b>Actions requested by the Committee</b>		
<b>Subject Area</b>	<b>Detail</b>	<b>Status</b>
Fossil Fuel engagement Report	At its meeting on 11 July 2021 Committee requested a report setting out the specific oil and gas company holdings held by the Fund's absolute return managers (Newton and Ruffer), identifying any of those companies still actively seeking new oil fields; the engagement activity undertaken by these managers, including what escalation measures they have in place if engagement does not work; and the potential cost to the Fund of full divestment over five years.	Scheduled for November committee (due to accounts audit commitments of the team leading to September meeting)

<b>Current working groups</b>		
<b>Title of working group</b>	<b>Detail and meetings since last Pensions Board and Committee meetings</b>	<b>Membership</b>
Investment Implementation Working Group (IIWG)	<p>The Investment Working Group and ESG working group have been amalgamated, as agreed at Pensions Committee 21 September 2020.</p> <p>The IIWG has an advisory role to over oversee the implementation of decisions by the Pension Committee in relation to investment decisions and carry out detailed research and analysis for Pensions Committee.</p> <p>Recent meetings</p> <ul style="list-style-type: none"> <li>• 2 June 2021</li> <li>• 18 June 2021</li> <li>• 02 September 2021</li> </ul>	<p>William Bourne, Russell Wood, Sian Kunert, Representative from Investment Consultant</p> <p>Cllr Fox or substitute committee member is invited to attend</p>
Data Improvement and ABS Working Group	<p>Recent meetings</p> <ul style="list-style-type: none"> <li>• 29 July 2021</li> <li>• 12 October 2021</li> </ul> <p>Scheduled</p> <ul style="list-style-type: none"> <li>• 2 December 2021</li> </ul>	<p>Cllr Fox, Ray Martin, Diana Pogson, Stephen Osborne, Paul Punter, Sian Kunert, Ian Gutsell</p>

<p>McCloud Working Group</p>	<p>The McCloud Working Group has been established to oversee the implementation of the McCloud ruling within a prescribed timeframe and addressing any gaps and barriers preventing progress and ultimately delivery of the project.</p> <p>A high-level impact assessment has been completed to identify those members of the scheme that will be affected by this ruling.</p> <p>The Group have acknowledged there are many data requests of employers and this project needs to be managed carefully with other demands on employers time.</p> <p>Recent meetings</p> <ul style="list-style-type: none"> <li>• 22 April 2021 – supported by Hymans</li> </ul>	<p>Cllr Fox, Stephen Osborn, Lynda Walker, Paul Punter, Sian Kunert, Dave Kellond</p>
<p>Communications Working Group</p>	<p>The Communications Working Group was established by the Pensions Board in February 2021 to drive forward improvements in communications with stakeholders with support from employee and employer representatives.</p> <p>Recent meetings</p> <ul style="list-style-type: none"> <li>• 2 June 2021</li> <li>• 20 July 2021</li> <li>• 14 September 2021</li> </ul>	<p>All Board members invited</p> <p>Sian Kunert, Tim Hillman, Izzy Widdowson</p>

## Training and Development - recent and future events

Title of Training/Briefing	Detail	Date	Attended
PLSA Annual conference	The PLSA Annual Conference we'll be asking what the road to economic recovery looks like, analysing the hurdles for pensions and revealing the opportunities to lead the race. <ul style="list-style-type: none"> <li>o Retirement Living Standards</li> <li>o ESG Guidance</li> <li>o Guided Retirement Income Choices</li> <li>o UK pension climate regulation and investment</li> <li>o DB Funding code</li> </ul>	12-14 October	Ray Martin, Cllr Hilton
ATLAS Infrastructure - Investment Overview	Overview of infrastructure manager mandate and methodology including ESG overlay with climate modelling	6 October 2021	Cllr Fox, Cllr Hilton, Cllr Hollidge
Title of Training/Briefing	Detail	Proposed Date	Invited
Overview of the Local Government Pension Scheme	Overview of the Local Government Pension Scheme for new Committee or Board members or as a refresher. Webinar hosted by Barnet Waddingham.	28 October	Committee Members and Board members
Cryptocurrency	Training on Cryptocurrency investment provided by Ruffer as requested by Committee on 1 March 2021	TBC	Committee Members
Infrastructure training part 2 - ESG	Continuation of inhouse training item on Infrastructure to understand how ESG is integrated into the Pantheon strategy	TBC	Committee Members
LGA Fundamentals	3 day Fundamentals training day for Members new to Pensions Committee or Board	Oct, Nov, Dec	Committee Members and Board members

**Report to:** Pension Committee

**Date:** 25 November 2021

**By:** Chief Financial Officer

**Title:** Investment Report

**Purpose:** This report provides Pension Committee with an update on the investment activities undertaken by the East Sussex Pension Fund.

---

## **RECOMMENDATION**

The Pension Committee is recommended to:

- 1) note the Investment Workplan (appendix 1);
  - 2) note the Quarterly Investment Report from the Investment Advisor, Isio (appendix 2)
- 

### **1. Background**

1.1 Under the Local Government Pension Scheme (LGPS) Regulations, the Council is required to maintain a Pension Fund for its employees and other 'scheduled bodies' as defined in the Regulations. The Pension Committee is required to maintain an Investment Strategy Statement (ISS) to govern the Funds' investments and receives a quarterly investment monitoring report, from its investment consultant, Isio.

1.2 The ACCESS Joint Committee has been established as a result of the changes implemented in the 2016 LGPS Investment regulations to facilitate the arrangements relating to the collective investment vehicles, to allow the administering authorities to pool their respective investments. The ACCESS Joint Committee meets quarterly.

### **2. Action Log and Investment Workplan**

2.1 Appendix 1 shows a Workplan which will act as a reference point of all actions agreed at Pension Committee meetings. Unless otherwise stated, items in the workplan are to be considered by the Committee or a comment provided explaining why the item is not to be covered at this time.

2.2 The Investment Workplan details the areas of work that are anticipated over the next 12 months.

2.3 The main focus over the next 12 months is the undertaking of climate modelling scenario analysis for the Fund and implementation of the revised investment strategy, where investment opportunities are possible, as agreed at the 12 July 2021 Pension Committee meeting.

### **3. Quarterly Performance Report**

3.1 The Quarterly Performance Report is attached as Appendix 2. Since the last quarter, the valuation of the Fund increased from £4.5bn as at 30 June 2021 to £4.6bn as at 30 September 2021 (an increase of £0.1bn). A positive absolute return of 2.4% over the quarter, outperforming its respective benchmark by 0.8%.

3.2 Over the period, the private equity mandates (Harbourvest and Adam Street) were the standout performers in both absolute and relative terms. Benefitting from lagged portfolio valuations continuing to catch up with public market counterparts. Pantheon – Infrastructure was a further high relative performer and was underpinned by strong market demand for assets, driving increased valuations for the majority of the portfolio. As at the end of June 2021 (there is a 3 month lag in reporting), the highest IRR in the portfolio belonged to European firm IFT (42.8%), with the majority of the rest of the fund also performing strongly.

3.3 Two of the main detractors to relative performance over the period was the UBS Infrastructure and Newton – absolute return investments. UBS's underperformance continues to be driven by Fund I, with the large holding in Southern Water (SW) particularly weighing on returns. The parent company of SW reached an agreement post quarter end with Macquarie, for the manager to inject an additional £1,073m of new capital into the company in order to recapitalise. Following the latest capital raise, and in light of a recent significant fine from the Environmental Agency, the UBS holding in Southern Water was marked down 33%.

3.4 Within Newtons 'return-seeking core', the equities detracted from performance with Chinese equities in particular falling in value due to the government's heightened regulatory agenda and the Evergrande credit event. The Fund's 'stabilising layer' was also negative in Q3 as it is structured to protect against more extreme market tail risks than that experienced over September in order to manage costs.

#### **4. Conclusion and reasons for recommendation**

4.1 Investments are regularly monitored to ensure that the Fund's strategic asset allocation set out in the Fund's Investment Strategy Statement (ISS) is being complied with and to keep the Committee informed of any significant concerns with the investment managers, retained to implement the Fund's strategic asset allocation.

4.2 The Pension Committee is recommended to note the report.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Sian Kunert, Head of Pensions

Email: [Sian.kunert@eastsussex.gov.uk](mailto:Sian.kunert@eastsussex.gov.uk)

# 12 month workplan

25 November 2021

- Q3 2021 monitoring report
- Climate scenario modelling update
- Infrastructure implementation update
- TCFD report
- MHCLG consultation on climate reporting

17 June 2022

- Q1 2022 monitoring report
- Carbon Footprinting report
- ESG impact assessment
- Infrastructure implementation update

27 September 2022

- Q2 2022 monitoring report
- ESG implementation statement
- TBC

Page 189

Dec 2021

Mar 2022

Jun 2022

Jul 2022

Sep 2022

Dec 2022

24 February 2022

- Q4 2021 monitoring report
- Climate scenario modelling update
- Stewardship Code submission
- Fixed Income implementation update
- PRI submission

20 July 2021  
Strategy / Training

November 2022

- Q3 2022 monitoring report
- TCFD report

Appendix 1

This page is intentionally left blank

# East Sussex Pension Fund

Page 191

Investment Performance  
Quarter to 30 September 2021

Isio Investment Advisory

**isio.**



Appendix 2

# Contents

## Highlights

Executive Summary  
Performance Summary  
Looking Forward

4

## Market Background

Market Background

8

## Strategy Overview

Asset Allocation

11

## Investment Managers

Performance Summary  
UBS Global Equity  
Longview Global Equity  
WHEB Sustainability Equity  
Wellington Sustainable Equity  
Storebrand Sustainable Equity  
Baillie Gifford Global Equity

13

Harbourvest Private Equity  
Adams Street Private Equity  
Newton Absolute Return  
Ruffer Absolute Return  
Schroders Property  
UBS Infrastructure  
Pantheon Infrastructure  
M&G Infrastructure  
ATLAS Listed Infrastructure  
M&G Real Estate Debt  
M&G Diversified Credit  
M&G Corporate Bonds  
UBS – Over 5 Year Index-linked Gilts

## Appendices

34

Appendix 1: Market Background: Global Equity, Absolute Return,  
Real Assets, Credit & Yields  
Appendix 2: Explanation of Market Background  
Appendix 3: Disclaimers

# Highlights

# Executive Summary – 30 September 2021

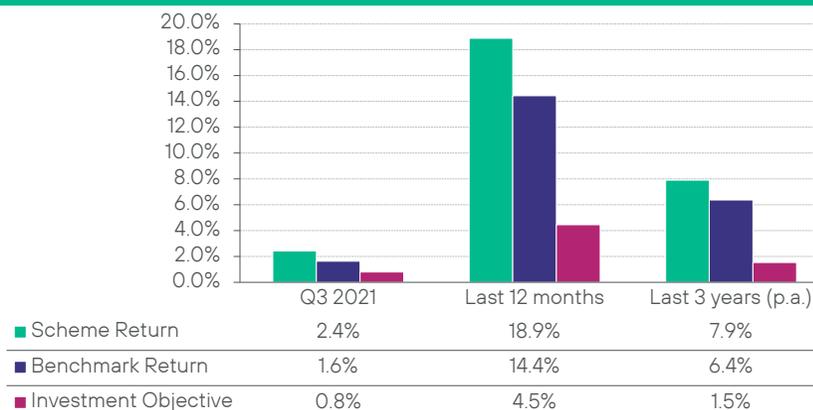
The Fund's assets delivered a positive return of 2.4% over the quarter, outperforming its respective benchmark by 0.8%.

Over the quarter, performance across the Fund's mandates was mixed, with the private equity funds posting the strongest returns, and concerns around inflation and the potential removal of supportive monetary policy dampened credit returns over September.

The Fund inceptioned the holding in the Baillie Gifford Global Alpha Fund over the quarter, funded from the UBS passive regional equity mandates.

Access Pool	Fund	Q3 2021 Performance			Value at quarter end	
		Fund	Benchmark	Relative	30-June-21	30-Sept-21
Yes	UBS - UK Equity	2.2%	2.2%	0.0%	£70.8m	£36.2m
Yes	UBS - Global Equity	0.6%	0.6%	-0.1%	£386.6m	£194.4m
Yes	Longview - Global Equity	3.6%	2.5%	+1.1%	£485.8m	£503.1m
No	WHEB - Sustainable Equity	4.0%	2.6%	+1.5%	£236.9m	£246.4m
No	Wellington - Sustainable Equity	1.4%	2.5%	-1.0%	£242.7m	£246.2m
No	Storebrand - Sustainable Equity	2.3%	2.6%	-0.2%	£488.5m	£500.1m
Yes	Baillie Gifford - Global Equity	-1.5%	0.0%	-1.5%	-	£225.8m
No	Harbourvest - Private Equity <sup>1,2</sup>	11.0%	1.7%	+9.3%	£151.3m	£163.3m
No	Adams Street - Private Equity <sup>1,2</sup>	15.9%	1.7%	+14.2%	£166.4m	£187.2m
Yes	Newton - Absolute Return	-0.9%	0.6%	-1.5%	£504.5m	£500.1m
Yes	Ruffer - Absolute Return	0.3%	0.6%	-0.3%	£510.7m	£512.4m
No	Schroders - Property	4.7%	4.5%	+0.2%	£358.1m	£371.9m
No	UBS - Infrastructure <sup>2</sup>	-0.4%	1.5%	-1.9%	£28.1m	£35.3m
No	Pantheon - Infrastructure <sup>2</sup>	7.5%	1.5%	+6.0%	£43.9m	£58.1m
No	M&G - Infrastructure <sup>2</sup>	1.6%	1.5%	+0.1%	£35.0m	£38.9m
No	ATLAS - Listed Infrastructure	6.0%	3.2%	+2.8%	£78.8m	£83.6m
No	M&G - Real Estate Debt <sup>2</sup>	1.6%	1.0%	+0.6%	£40.2m	£37.4m
No	M&G - Diversified Credit	0.5%	0.8%	-0.3%	£289.7m	£291.0m
Yes	M&G - Corporate Bonds	-1.5%	-1.6%	0.0%	£162.5m	£160.0m
Yes	UBS - Over 5 Year Index-linked Gilts	2.3%	2.3%	0.0%	£133.7m	£136.8m
<b>Total Assets</b>		<b>2.4%</b>	<b>1.6%</b>	<b>0.8%</b>	<b>£4,466m</b>	<b>£4,575m</b>

## Period returns – to 30 September 2021



## Commentary

- The Fund's assets delivered an absolute return of 2.4% over the quarter, outperforming the benchmark by 0.8%. The majority of mandates returned positive absolute performance; however returns across assets classes were somewhat dampened by growing inflationary concerns in September.
- The Fund's private equity mandates both produced the strongest returns, as lagged portfolio valuations begin continued to catch up with public market counterparts.
- The property and infrastructure mandates generally performed well in the inflationary environment, with many assets having revenue streams linked to inflation.
- Returns across the Fund's credit mandates were relatively mixed, as rising bond yields in September negatively impacted valuations of many fixed income assets.
- Longer term returns at fund level remain strong, with the Fund's significant allocation to equity markets being particularly beneficial for performance.

**Notes:** Totals may not sum precisely due to rounding. All returns are net of fees. Unless stated otherwise, all performance figures and objectives provided by Northern Trust as at 30 September 2021. Fund Total value includes cash held with Northern Trust. <sup>1</sup> Valuation and performance information as at 30 June 2021. <sup>2</sup> Valuations shown are either 3m or 6m lagged and adjusted for distributions / drawdowns and currency movements.

**Source:** Investment Managers, Northern Trust, Isio calculations.

# Manager Performance – 30 September 2021

The Table shows manager performance over the short medium and long-term.

The UBS Infrastructure Fund continues to materially underperform its respective benchmark across all time periods and should continue to be monitored closely.

The Schroders property fund has also underperformed its benchmark since inception but to a lesser degree.

If the equity mandates, Longview and WHEB have underperformed their objectives since inception.

Fund	Q3 2021 Performance			1 Year Performance			3 Year Performance			Since Inception performance		
	Fund	Objective	Relative	Fund	Objective	Relative	Fund	Objective	Relative	Fund	Objective	Relative
UBS - UK Equity	2.2%	2.2%	0.0%	28.5%	27.9%	+0.6%	3.1%	3.1%	+0.0%	2.7%	2.7%	+0.0%
UBS – Global Equity	0.6%	0.6%	-0.1%	20.5%	21.1%	-0.6%	10.8%	11.1%	-0.3%	11.4%	11.6%	-0.2%
Longview - Global Equity	3.6%	2.5%	+1.1%	28.4%	22.2%	+6.2%	-	-	-	11.0%	15.5%	-4.5%
WHEB - Sustainable Equity	4.0%	2.6%	+1.5%	-	-	-	-	-	-	12.6%	16.0%	-3.4%
Wellington – Sustainable Equity	1.4%	2.5%	-1.0%	-	-	-	-	-	-	14.0%	15.1%	-1.1%
Storebrand – Sustainable Equity	2.3%	2.6%	-0.2%	-	-	-	-	-	-	16.1%	16.7%	-0.6%
Baillie Gifford – Global Equity	-1.5%	0.0%	-1.5%	-	-	-	-	-	-	-1.5%	0.0%	-1.5%
Harbourvest – Private Equity <sup>1</sup>	11.0%	1.7%	+9.3%	60.6%	23.7%	+36.9%	25.2%	12.8%	+12.4%	9.9%	11.4%	-1.6%
Adams Street – Private Equity <sup>1</sup>	15.9%	1.7%	+14.2%	64.5%	23.7%	+40.7%	26.8%	12.8%	+13.9%	12.1%	10.9%	+1.2%
Newton – Absolute Return	-0.9%	0.6%	-1.5%	8.0%	2.6%	+5.5%	-	-	-	4.7%	2.9%	+1.9%
Ruffer - Absolute Return	0.3%	0.6%	-0.3%	16.0%	2.6%	+13.4%	-	-	-	14.5%	2.9%	+11.6%
Schroders – Property	4.7%	4.5%	+0.2%	13.1%	13.2%	-0.1%	3.6%	4.0%	-0.4%	7.1%	8.4%	-1.3%
UBS – Infrastructure	-0.4%	1.5%	-1.9%	-5.4%	5.0%	-10.4%	-4.8%	3.8%	-8.6%	4.2%	1.7%	+2.5%
Pantheon – Infrastructure <sup>1</sup>	7.5%	1.5%	+6.0%	25.7%	5.0%	+20.6%	6.9%	3.8%	+3.1%	7.3%	3.9%	+3.4%
M&G – Infrastructure	1.6%	1.5%	+0.1%	19.4%	5.0%	+14.4%	-	-	-	8.1%	3.8%	+4.2%
ATLAS – Listed Infrastructure	6.0%	3.2%	+2.8%	-	-	-	-	-	-	5.2%	6.0%	-0.8%
M&G – Real Estate Debt	1.6%	1.0%	+0.6%	7.4%	4.1%	+3.3%	-	-	-	2.1%	4.5%	-2.5%
M&G – Diversified Credit	0.5%	0.8%	-0.3%	8.4%	3.1%	+5.3%	5.3%	3.7%	+1.7%	4.1%	1.4%	+2.6%
M&G - Corporate Bonds	-1.5%	-1.6%	0.0%	-1.0%	-1.5%	+0.5%	-	-	-	1.7%	0.3%	+1.4%
UBS - Over 5 Year Index-linked Gilts	2.3%	2.3%	0.0%	-1.7%	0.2%	-2.0%	6.0%	6.6%	-0.6%	5.6%	6.1%	-0.5%
<b>Total Assets</b>	<b>2.4%</b>	<b>1.6%</b>	<b>0.8%</b>	<b>18.9%</b>	<b>14.4%</b>	<b>4.5%</b>	<b>7.9%</b>	<b>6.4%</b>	<b>1.5%</b>			

**Notes:** Totals may not sum precisely due to rounding. All returns are net of fees. Unless stated otherwise, all performance figures and objectives provided by Northern Trust as at 30 September 2021. <sup>1</sup> Valuation and performance information as at 30 June 2021.

**Source:** Investment Managers, Northern Trust, Isio calculations.

# Looking Forward

## Summary

This page sets out the main action / discussion points.

Page 196

## Status key

- Action
- Decision
- Discussion
- Information only

Key issues		
Item	Action points / Considerations	Status
Overall Investment Strategy	<b>Infrastructure Allocation Implementation</b> <ul style="list-style-type: none"> <li>Isio has prepared a paper detailing the proposed approach for selection of the manager(s) to manage the agreed increased allocation to infrastructure. This paper puts forward the proposed allocation and key considerations, a proposed timeline and method for manager selection and implementation, as well as an evaluation criteria with which to assess the prospective managers. The paper will be presented at the Q4 Committee meeting.</li> </ul>	<span style="color: teal;">●</span>
	<b>Fixed Income Allocation Implementation</b> <ul style="list-style-type: none"> <li>Isio will prepare a paper outlining a proposed approach for the fixed income allocation, provisionally expected to be presented at the March Committee meeting. It is hoped that further information around the rollout of various funds on the Access pool will be available at this point, allowing for agreement of a more definitive selection and implementation timeline.</li> </ul>	<span style="color: teal;">●</span>
	<b>Osmosis Resource Efficiency Allocation</b> <ul style="list-style-type: none"> <li>The implementation of the agreed allocation to the Osmosis Resource Efficiency Fund continues to be progressed with a target timeframe for inception of late Q4 2021 / early Q1 2022.</li> </ul>	<span style="color: teal;">●</span>
	<b>Climate Scenario Modelling</b> <ul style="list-style-type: none"> <li>A key consideration of investment strategy and portfolio composition going forward is the impact of climate change. In order to understand this better the Committee has agreed to further analysis to model various climate scenarios for the Fund's portfolio. This is due to be discussed further at the Q4 Committee meeting ahead of agreeing a preferred route forward.</li> </ul>	<span style="color: teal;">●</span>
Investment Managers	<ul style="list-style-type: none"> <li>We have no immediate concerns regarding the investment managers at this time.</li> <li>We suggest to continue monitoring the Longview Global Equity Fund given recent team changes and propose the Fund conduct a formal review of the position in early 2022.</li> <li>Given weak UBS infrastructure performance since inception, we propose this fund continues to be monitored closely.</li> </ul>	<span style="color: orange;">●</span> <span style="color: orange;">●</span>

# Market Background

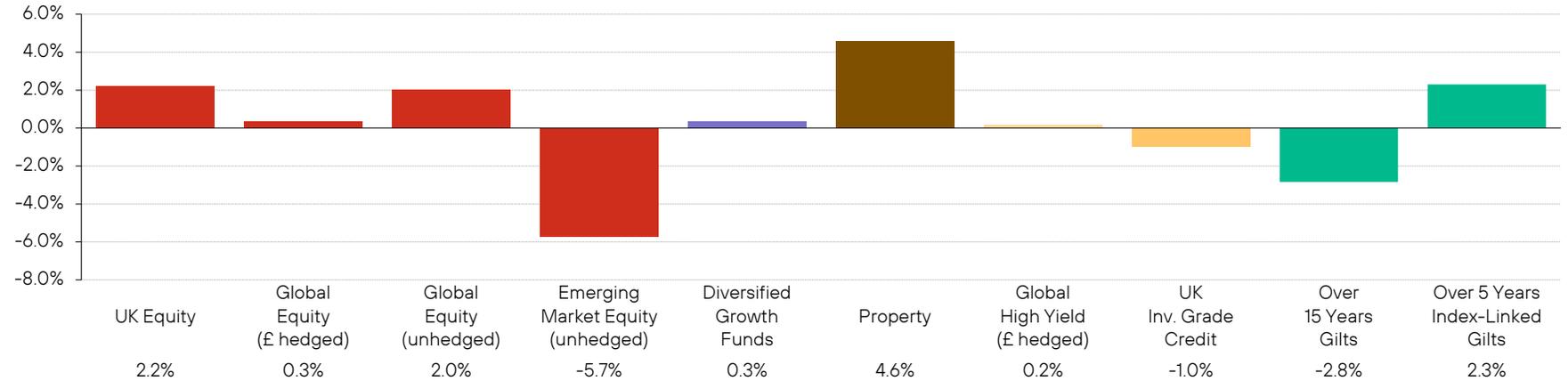
# Market Background – Overview Q3 2021

## Summary

Global equity markets were mixed over Q3 whilst Emerging Market equities sold-off due to China applying tighter regulations to a number of industries.

Nominal Gilt yields increased over the quarter as inflation expectations increased, causing a rotation to floating-rate assets. This led to real gilt yields falling over Q3 with increased expectations that central banks may raise interest rates sooner than expected.

## Returns by Asset Class – Q3 2020



## Key Upcoming Events

- The dates for the Bank of England's Monetary Policy Committee (MPC) announcements in Q4 2021 are 4 November (despite inflation concerns and continued economic recovery from Covid, UK base rate held firm at this stage, and the MPC voted to continue the bond purchasing programme) and 16 December.
- The dates for the US Federal Reserve's Federal Open Market Committee (FOMC) announcements in Q4 2021 are 3 November (US base rate held steady, however announced the decision to begin to taper bond purchases) and 15 December.

## Commentary

- Global equity markets delivered marginal positive returns over Q3. UK equities outperformed global markets, due to energy and financial sectors, both performing well. Emerging Market equities significantly underperformed over Q3 as a result of the sell-off in China, caused by the Chinese government applying tighter restrictions to a number of industries.
- UK IG credit performance was negative over Q3. There were concerns that rising inflation may be more permanent than initial expectations, leading to central banks potentially increasing interest rates earlier than previously expected.
- Nominal Gilts fell in value over Q3 as inflation expectations led to investors rotating away towards floating rate assets. The increase in inflation expectations however led to index-linked gilts performing positively over the quarter.

**Note:** Please see Appendix 2 for details of the returns representing each asset class.

**Source:** Refinitiv, DGF investment managers, Isio calculations.

# Market Background – Yields Q3 2021

## Summary

These charts show yield movements at the 20-year tenor over the past year.

### Gilt Yield Changes:

#### 20-year Real gilt Yield

July	-0.29%
August	0.01%
September	0.21%
<b>Quarter</b>	<b>-0.06%</b>

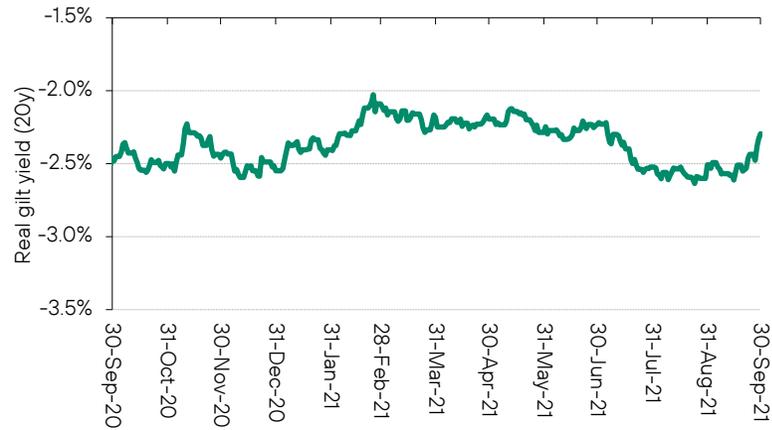
#### 20-year Nominal gilt Yield

July	-0.25%
August	0.08%
September	0.33%
<b>Quarter</b>	<b>0.17%</b>

#### 20-year gilt-Implied Inflation

July	0.06%
August	0.07%
September	0.11%
<b>Quarter</b>	<b>0.23%</b>

## Real Gilt Yields – Last 12 months



## Gilt-implied RPI Inflation – Last 12 months



## Nominal Gilt Yields – Last 12 months



**Note:** Please see Appendix 2 for details of the example liabilities. Monthly yield changes may not sum to quarterly changes, due to rounding.  
**Source:** Bank of England, Isio calculations.

# Strategy Overview

# Asset Allocation – at 30 September 2021

## Summary

As at September 2021, the Fund's asset allocation was somewhat off benchmark following strategic changes agreed to the Fund's asset allocation at the July Committee meeting.

Allocations will be brought more closely in-line to the revised benchmark as managers for the new mandates are agreed and implemented.

Page 201

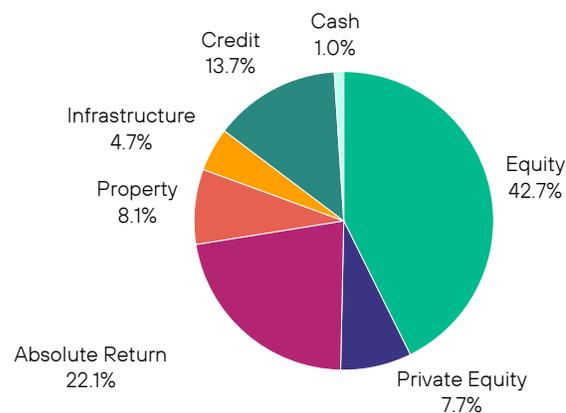
## Total Assets

Start of quarter	£4,466m
End of quarter	£4,575m

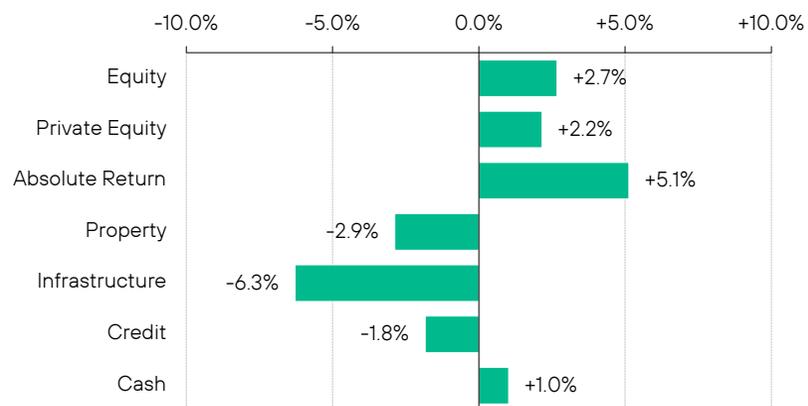
## Agreed Target Allocation

Equity	40.0%
Private Equity	5.5%
Absolute Return	17.0%
Balanced Property	7.0%
Inflation-Linked Property	4.0%
Infrastructure	11.0%
Private Credit	5.0%
Diversified Credit	10.5%

## Asset Allocation – 30 September 2021



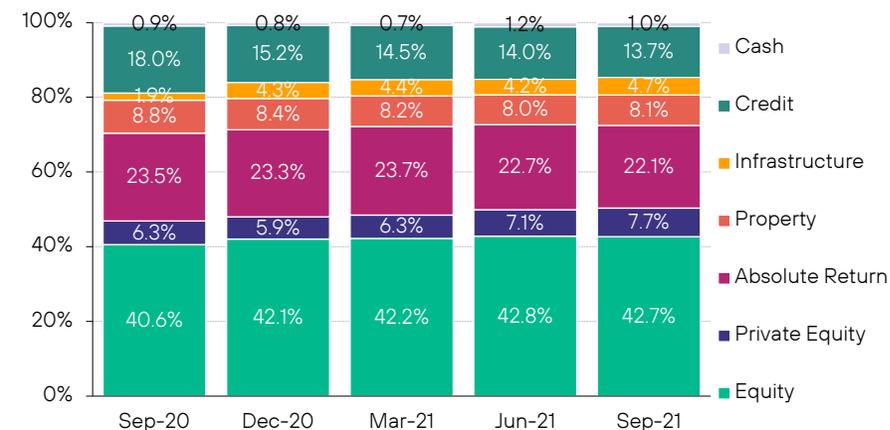
## Assets Relative to Benchmark – 30 September 2021



Note: Totals may not sum due to rounding.

Source: Investment managers, Isio calculations.

## Asset Allocation Changes Since 30 September 2020



## Commentary

- As at September 2021, the Fund's asset allocation was relatively off-benchmark following the strategic changes agreed at the July Committee meeting. These changes are outlined below:
  - Reduce: absolute return from 20% to 17%; balanced property from 10% to 7%. corporate bonds and index-linked gilts to 0%.
  - Increase: inflation-linked property allocation to 4% (new allocation); infrastructure equity from 8% to 11%; private credit from 3% to 5%; and diversified credit from 7% to 10.5%.
- In light of these changes, the absolute return allocation is now materially overweight, while the property, infrastructure and credit allocations are underweight.
- Equity and private equity are also overweight, following strong performance over the medium term, relative to other risk asset classes.
- The allocations will be brought more closely in line with the strategic benchmark as the new mandates are agreed and implemented over 2022.

# Investment Managers

# Performance Summary – to 30 September 2021

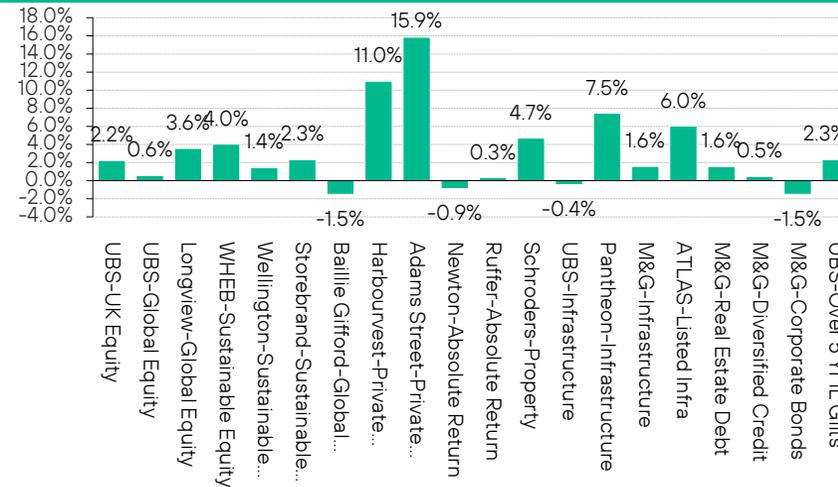
## Summary

The majority of the Fund's assets delivered positive absolute performance over the quarter with the exception of Newton, UBS Infrastructure and M&G Corporate Bonds.

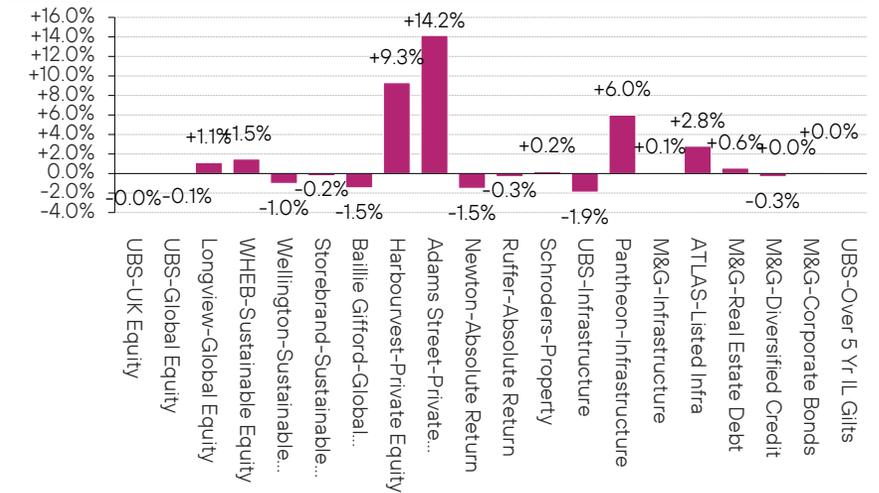
The Fund's private equity mandates posted the strongest absolute returns over the quarter these mandates continue to perform very strongly.

Relative performance over the quarter was relatively mixed with c. half of the Fund's managers producing marginal underperformance relative to their performance objective. The strongest relative performers were the Private Equity funds and Pantheon Infrastructure whilst the weakest performance was UBS Infrastructure.

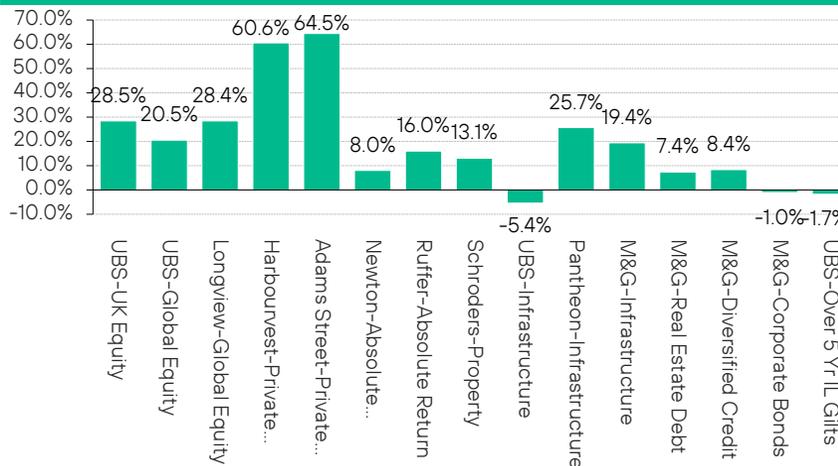
### Absolute Return – Q3 2021



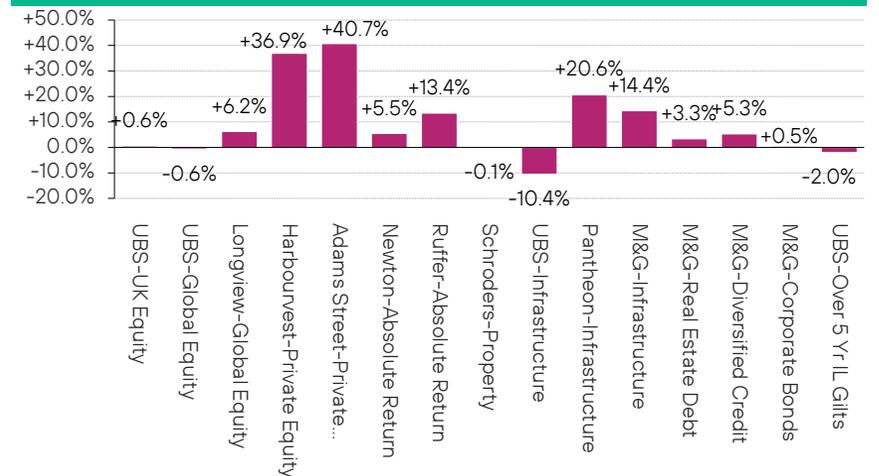
### Relative Return – Q3 2021



### Absolute Return – 12 months



### Relative Return – 12 months



**Note:** Returns net of fees. 12 month relative and absolute returns are not available for the WHEB, Wellington, Storebrand, ATLAS, and Baillie Gifford mandates as they were incepted post 30 September 2020.  
**Source:** Investment Managers, Northern Trust, Isio calculations.

# UBS – Global Equity

**Mandate:** Passive Equities

**Current Value:** £230.6m

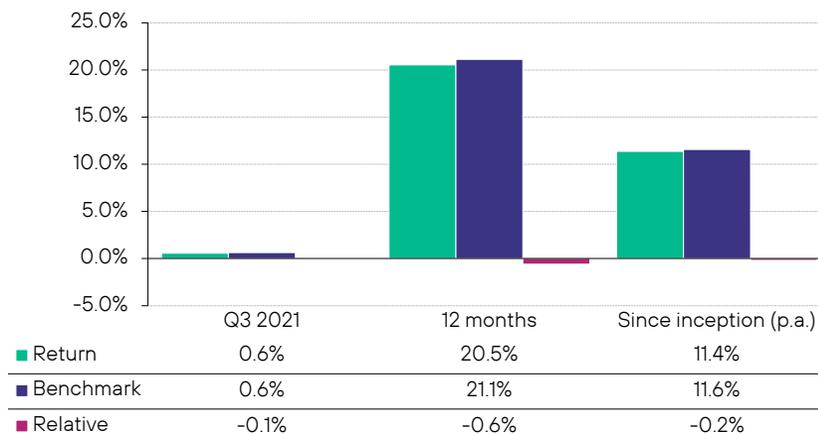
**Current Weighting:** 5.0%

**Inception:** UK Equities – 31 December 2017 & Global Equities 31 January 2018

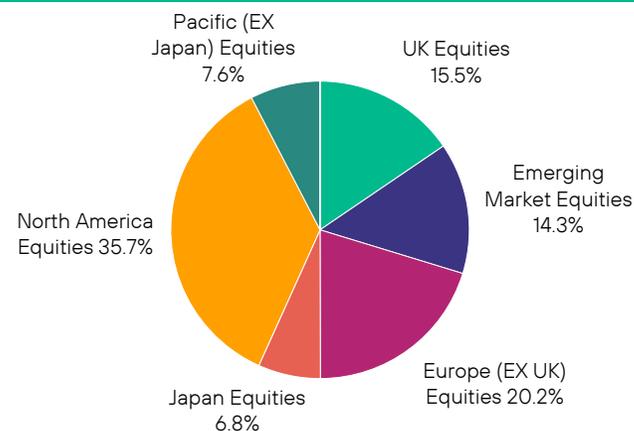
**Objective:** To track their respective underlying respective regional equity benchmarks

Page 204

## Global Performance to 30 September 2021

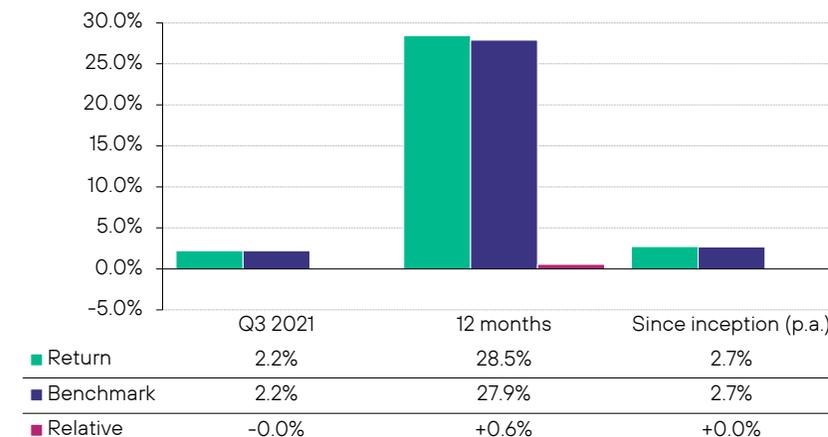


## Geographic Exposure as at 30 September 2021



**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## UK Equities Performance to 30 September 2021



## Commentary

- Both UBS equity mandates delivered positive performance, in line with their respective benchmarks, over the period.
- Equity markets experienced some volatility over the quarter, as investor concerns around future inflation increases, and ensuing tightening monetary policy, weighed on sentiment in September, offsetting gains made over the first half of the period.
- The US was the strongest regional contributor, despite a shift in tone from the Federal Reserve, with a relatively strong series of corporate earnings announcements underpinning returns. UK markets also performed well over the three months, with energy and financial firms benefitting from an environment of rising inflation and interest rate expectations.
- Within emerging markets, Chinese equities delivered negative performance following concerns around the wider impact of the Evergrande credit event. Additionally, regulatory developments negatively impacted technology and education firms.
- These holding were significantly reduced over the quarter with assets reallocated to an active equity approach with Baillie Gifford.

# Longview - Global Equity

**Mandate:** Active Global Equities

**Current Value:** £503.1m

**Current Weighting:** 11.0%

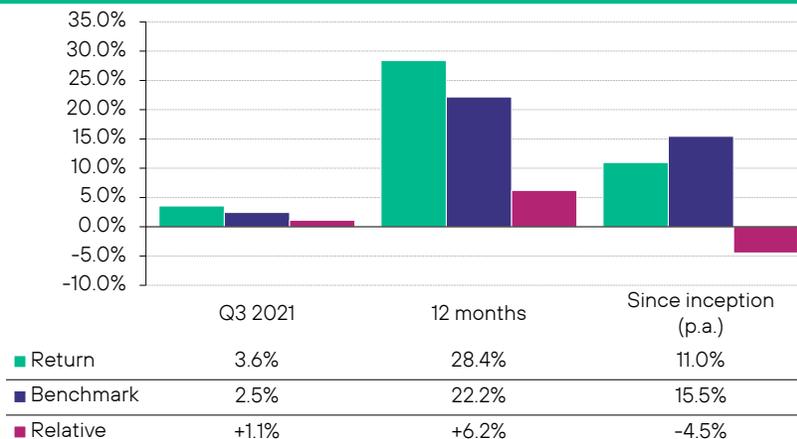
**Inception:** 4 February 2019

**Objective:** Outperform benchmark by 3% (gross) p.a. over rolling 3 year periods.

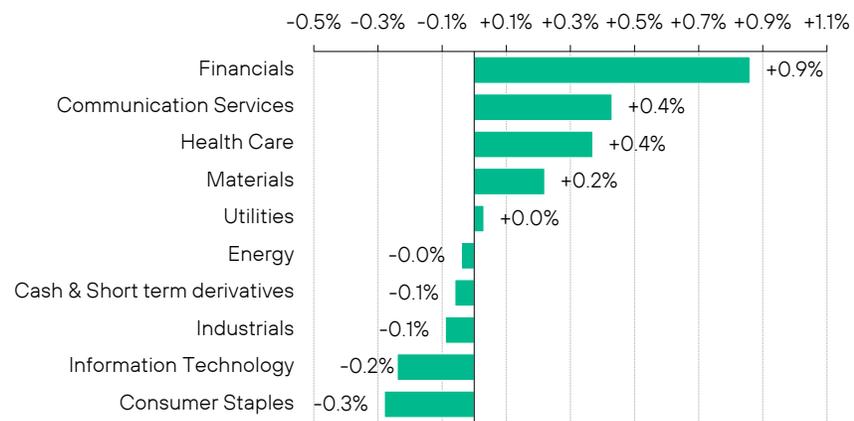
**Benchmark:** MSCI ACWI

Page 205

## Longview Global Equity Performance to 30 September 2021

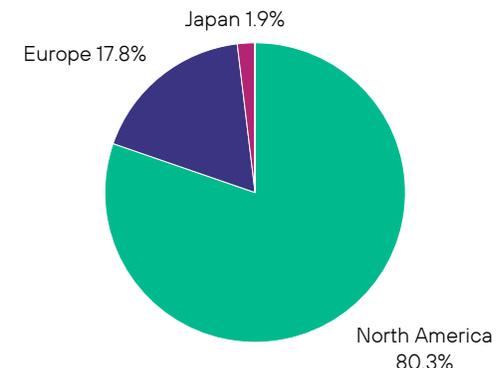


## Performance Attribution as at 30 September 2021



**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## Geographic Allocation at 30 September 2021



## Commentary

- The fund delivered a positive absolute return over the quarter and outperformed the benchmark by 1.1%; however performance remains behind benchmark since inception.
- Relative performance was aided by both stock selection and sector allocation over Q3 – with the former being the most important indicator of success, given the Fund's 'bottom-up' approach. Most notably, stock selection in financials added significant value, with Aon a standout performer, as the cancellation of the firm's proposed merger with Willis Towers Watson signalled an end to a period of uncertainty.
- As a reminder, Longview continue to emphasise the importance of focussing on companies whose strong market position offers pricing power, to guard against macroeconomic shocks.
- The Fund seeks to generate outperformance through investing in a concentrated portfolio of global companies, focusing on a 'bottom-up' approach. As at 30 September 2021 there were 33 stocks held within the portfolio, with underweight positions in cyclical sectors such as energy and consumer discretionary and a large overweight to North America.

# WHEB – Sustainable Equity

**Mandate:** ESG focused Global Equity

**Current Value:** £246.4m

**Current Weighting:** 5.4%

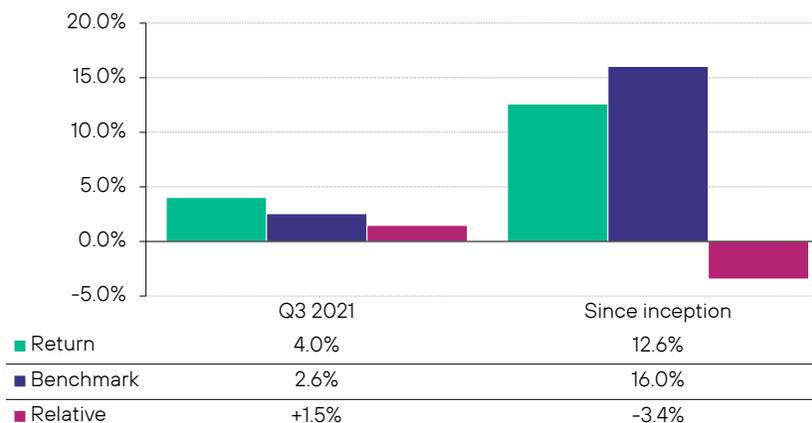
**Inception:** 1 December 2020

**Benchmark:** MSCI World Total Return Net GBP

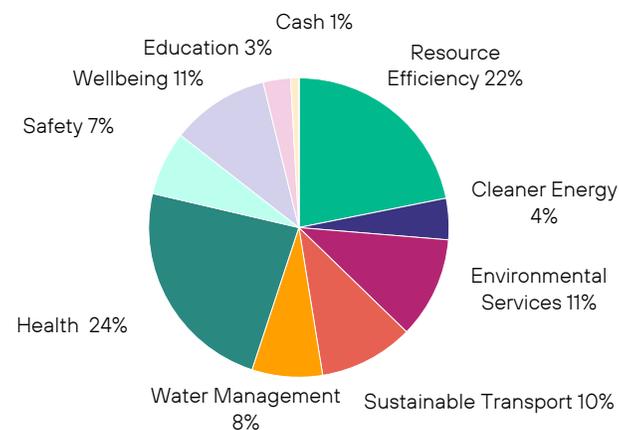
**Objective:** To achieve capital growth over the medium to longer term.

Page 206

## WHEB – Sustainability Fund Performance to 30 September 2021

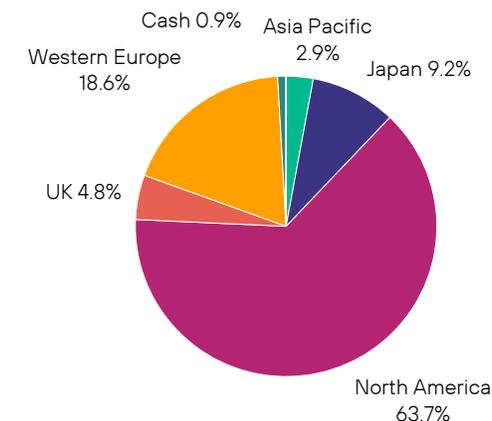


## Impact Positioning at 30 September 2021



**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## Geographic Allocation at 30 September 2021



## Commentary

- The fund produced positive absolute performance of 4.0% over the quarter, outperforming the benchmark by 1.5%. Material swings in relative performance are to be expected for this fund, given its high active share relative to the benchmark and differentiated approach.
- Outperformance was driven by strong performance across the Health and Environmental Services themes. Within Health, life sciences tools companies such as Thermo Fisher and Agilent added value. The manager notes that the change in market dynamics driven by the pandemic have improved the future growth prospects for these firms. DSM (manufacturer) and Arcadis (consultant) were notable performers within environmental sciences, with both companies benefitting from the continued importance placed on environmental solutions.
- Safety and Clean Energy themes both detracted from performance, as the inflationary backdrop, namely rising energy and raw materials prices, was detrimental to returns.
- WHEB purchased LHC Group, a homecare and hospice operator, with the team noting that the firm's quality and size position it well in a changing regulatory environment.

# Wellington – Sustainable Equity

**Mandate:** Global Impact Equities

**Current Value:** £246.2m

**Current Weighting:** 5.4%

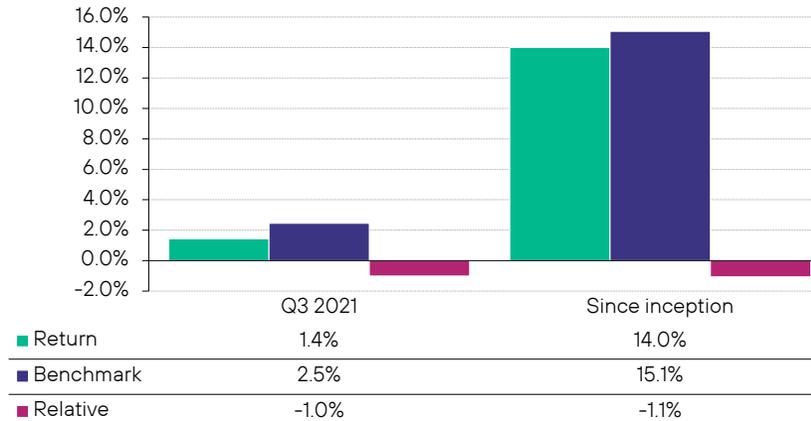
**Inception:** 2 December 2020

**Benchmark:** MSCI AC World

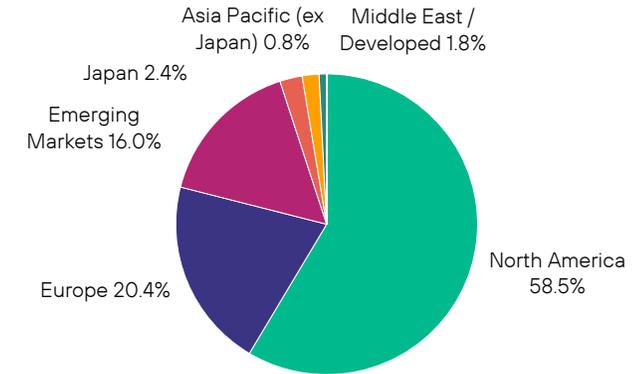
**Objective:** To outperform the MSCI All Country World Index over the long-term.

Page 207

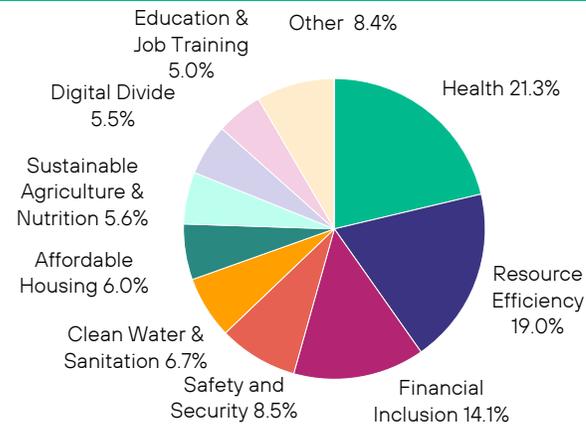
## Performance to 30 September 2021



## Geographic Allocation at 30 September 2021



## ESG Theme Distribution at 30 September 2021



**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## Commentary

- Stock selection within Materials, Industrials and Real Estate aided performance over Q3; however, firms within Healthcare and IT weighed on relative returns. Being underweight to oil and gas (which is to be expected given the Fund's style) also detracted, as commodity prices rose.
- A notable contributor to relative performance was Mimecast, a company which fits into the Fund's cyber security theme. The firm benefitted from accelerating growth and increasing customer numbers. StoneCo Ltd was the largest detractor, as the transaction volumes for payment processing companies have been impacted by Covid. Additionally, the company has encountered issues in its expansion into lending.
- Pharmaceutical firm Zoetis was sold, in light of the non-impact side of the business (pet care) growing to more than 50% of revenue. As a result, the Fund divested on impact materiality grounds. During Q3, the team added positions in Darling Ingredients (added to the resource efficiency theme) and Duolingo (which was subsequently sold following the strong performance of its shares post-Initial Public Offering).

# Storebrand – Sustainable Equity

**Mandate:** ESG Focused Global Equities

**Current Value:** £500.1m

**Current Weighting:** 10.9%

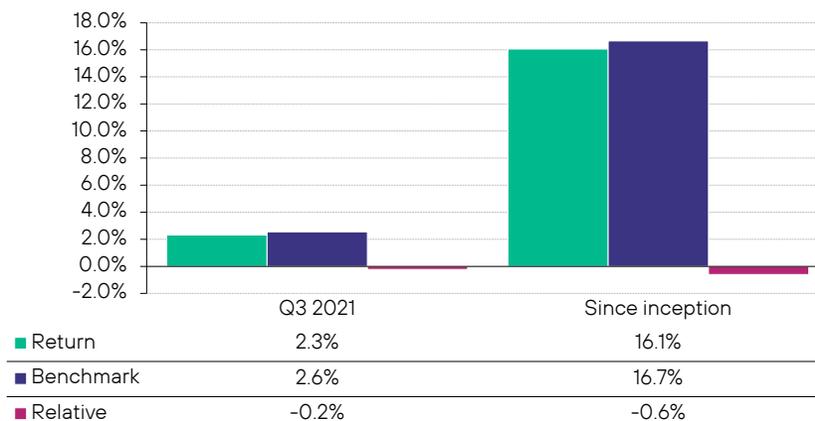
**Inception:** 3 December 2020

**Benchmark:** MSCI World NR

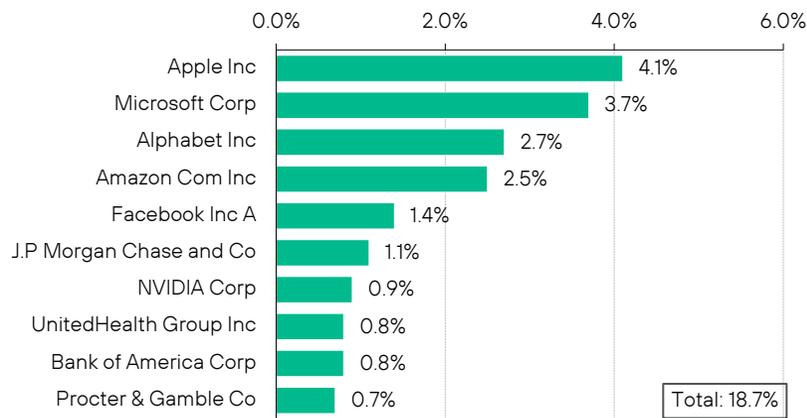
**Objective:** Reproduce risk-return profile of the MSCI World Index

Page 208

## Performance to 30 September 2021

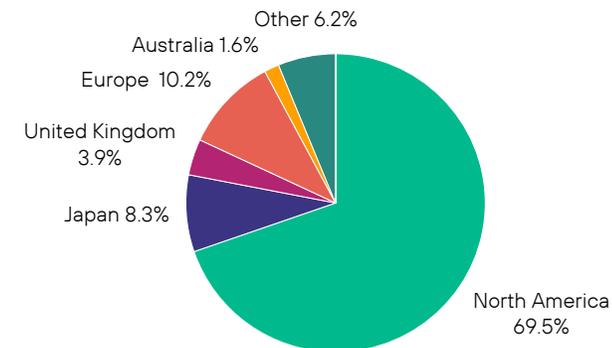


## Top 10 Holdings as at 30 September 2021



**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## Geographic Allocation at 30 September 2021



## Commentary

- The fund delivered absolute performance of 2.3%, marginally lagging the benchmark. Underperformance over Q3 is unsurprising given rising oil prices, and the subsequent strong performance from the energy sector (to which the fund has no exposure by design). The small magnitude of the underperformance comes as a result of the fund's highly risk-controlled process, with relatively little active risk versus the benchmark.
- In terms of exclusion categories, investment screens (the 'Storebrand Standard' group-wide exclusions list) were the strongest contributor to performance. By contrast, exclusions attributable to ISS/Sustainalytics weighed on relative returns.
- Within the climate solutions segment of performance, renewable energy continued to detract from performance, as clean technologies underperformed the MSCI and Energy sector significantly.
- Storebrand's outlook remains optimistic, with the manager noting the fund's transition-oriented lifecycle approach, as key to achieving the fund's goal, highlighting a c.60% Co2 intensity reduction relative to the benchmark MSCI World index.

# Baillie Gifford – Global Equity

**Mandate:** Global Equities

**Current Value:** £225.8m

**Current Weighting:** 4.9%

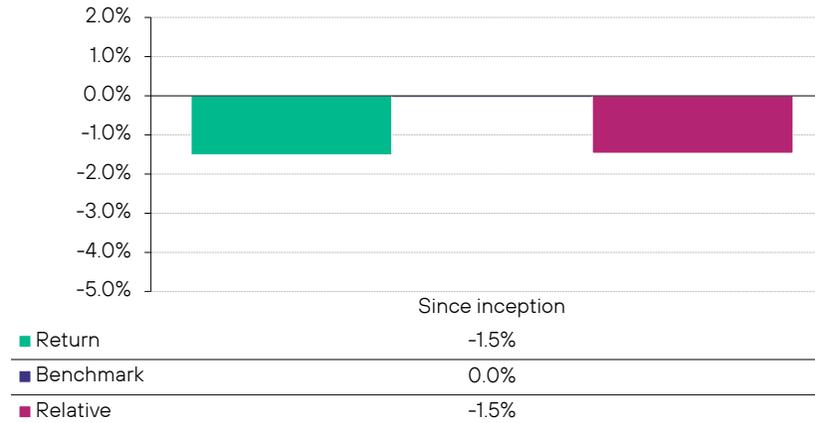
**Inception:** 11 August 2021

**Benchmark:** MSCI AC World Index (GBP)

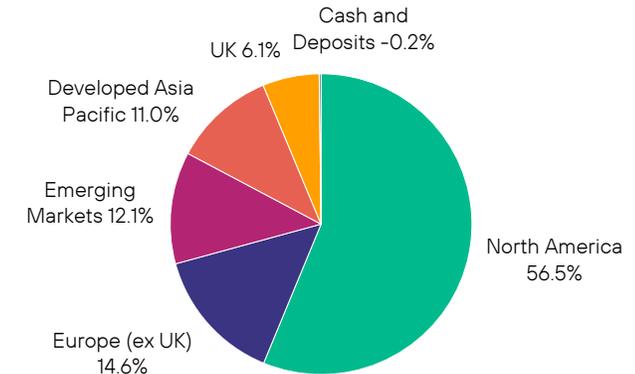
**Objective:** Outperform benchmark by 2.0% p.a. (net of fees) over rolling 5-year periods

Page 209

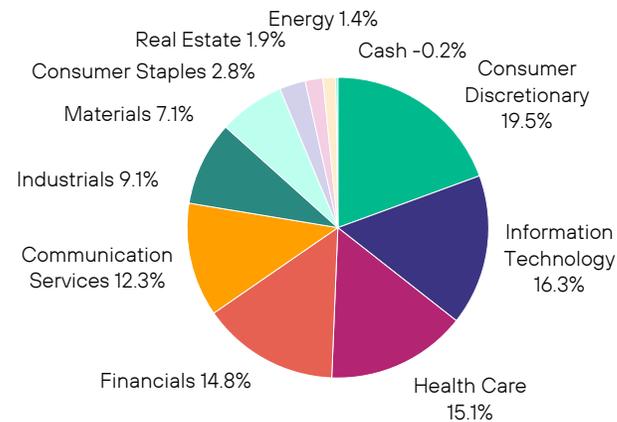
## Performance to 30 September 2021



## Geographic Allocation at 30 September 2021



## Sector Allocation as at 30 September 2021



## Commentary

- Q3 and since inception underperformance can be primarily attributed to the impact of China's recent regulatory crackdown, which negatively affected holdings such as Alibaba and Naspers. The largest detractor from performance was Naspers, which has a large stake in Chinese technology firm, Tencent. Investor sentiment suffered due to the impact of new legislation which seeks to restrict the amount of time that young people can spend on gaming platforms. Despite this, Baillie Gifford remain confident in the stock, noting that this demographic accounts for a small proportion of total gaming revenues, and also that the firm is investing in other high growth areas such as cloud computing.
- During the quarter the team initiated three new positions and exited four. A notable exit was the Fund's position in EOG Resources, which operates in the Oil and Gas sector. This position was primarily sold due to Baillie Gifford's negative view on the long-term future for the fossil fuel industry.
- Baillie Gifford continue to focus on investing in companies with strong fundamentals and believe they are well positioned to deliver outperformance over the long term.

**Note:** Totals may not sum due to rounding. Performance quoted net of fees. Performance shown since inception of the Fund's investment on 11 August 2021.  
**Source:** Investment manager, Northern Trust, Isio calculations.

# Harbourvest – Private Equity

**Mandate:** Private Equity

**Current Value:** £163.3m

**Current Weighting:** 3.6%

**Inception:** 31 January 2003

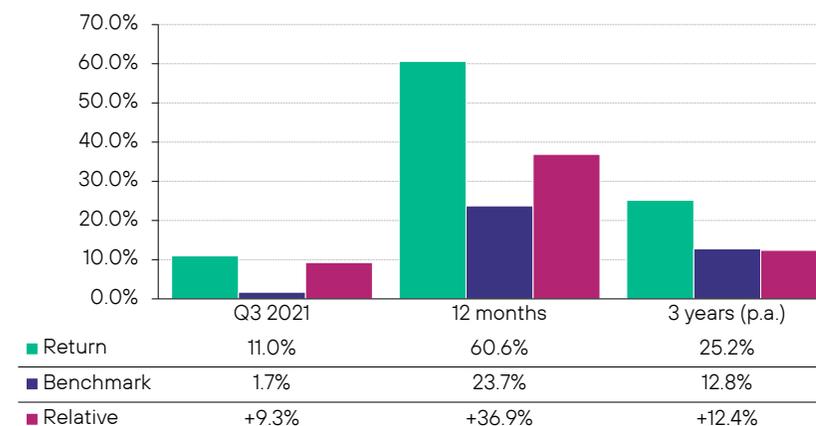
**Benchmark:** MSCI World +1.5%

**Objective:** MSCI World +3.0%

Page 210

Harbourvest	Market Value at start (£m)	Drawdowns over quarter (£m)	Distributions over quarter (£m)	Market Value at end (£m)
HIPEP IV SUPPLEMENTAL EUROPEAN COMPANIONFUND	0.1	-	-	0.1
HARBOURVEST PTRS VIII - CAYMAN VENTURE FUND	1.9	-	0.2	1.9
HARBOURVEST INTL PEP V - CAYMAN PSHP FD	2.2	-	0.7	1.5
HARBOURVEST PTRS VIII - CAYMAN BUYOUT FUND	1.5	-	0.2	1.5
HARBOURVEST PARTNERS IX- CAYMAN BUYOUT FUND	13.4	-	1.1	14.3
HARBOURVEST PARTNERS XI AIF	18.8	1.4	-	20.7
HARBOURVEST INTL PEP VI - CAYMAN PSHP FUND	19.5	-	2.2	18.7
HIPEP VII (AIF) PARTNERSHIP FUND LP	16.5	0.1	1.4	17.3
HIPEP VIII (AIF) PARTNERSHIP FUND LP	16.2	1.7	-	20.5
HARBOURVEST PARTNERS CAYMAN CLEANTECH FUND I	18.1	-	1.8	16.7
HARBOURVEST PARTNERS CAYMAN CLEANTECH FUND II	26.5	0.4	1.3	30.0
DEFAULT ISSUER HARBOURVEST PTNS VII CAYMAN BUYOUT FD LP	0.2	-	0.2	0.0
HARBOURVEST PTRS VIII - CAYMAN MEZZANINEAND DISTRESSED DEBT FD	0.1	-	0.0	0.1
HARBOURVEST PTRS VII - CAYMAN VENTURE FUND	0.6	-	0.3	0.4
HARBOURVEST PARTNERS VII - CAYMAN MEZZANINE FUND	0.0	-	-	0.0
HARBOURVEST PARTNERS IX CAYMAN VENTURE FUND	13.5	-	1.5	14.4
HARBOURVEST PARTNERS IX CAYMAN CREDIT OPPORTUNITIES FUND	1.4	-	-	1.6

## Performance to 30 September 2021



## Commentary – 3 Month Lagged

- The HarbourVest portfolio performed strongly, as private equity valuations continued to trend upwards. Valuations have remained robust, with the combination of a supportive macro-economic environment and a record supply of dry powder available to be deployed maintaining an attractive supply/demand dynamic for sellers.
- Distribution activity remained healthy across the portfolio, with a number of the Fund's holdings in the 'wind down' phase. At a market level, exit activity has been ahead of its long term average over recent quarters, having somewhat paused over Covid-19, with managers seeking to take advantage of attractively priced public markets, as well as an abundance of demand from other private market managers.
- The HarbourVest mandate has added significant value for the Fund, with long term performance ahead of the Isio return assumption for the asset class (Gilts + 6.5% p.a.).
- The suitability of current and future commitments to the mandate was last considered in early 2021.

# Adams Street – Private Equity

**Mandate:** Private Equity

**Current Value:** £187.2m

**Current Weighting:** 4.1%

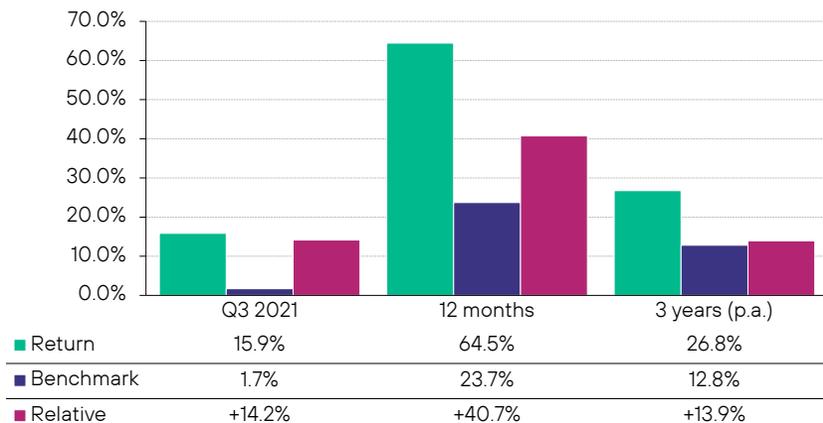
**Inception:** 31 March 2003

**Benchmark:** MSCI World +1.5%

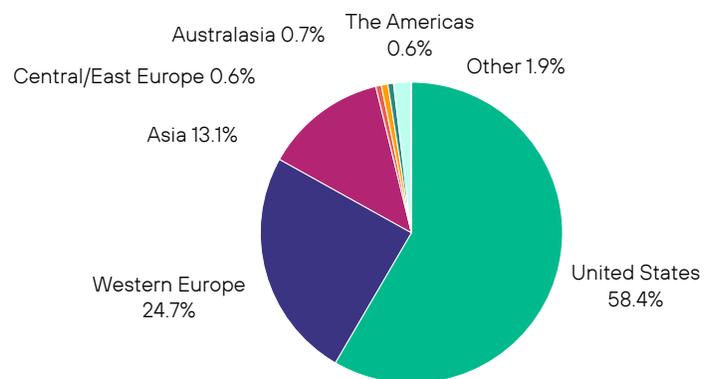
**Objective:** MSCI World +3.0%

Page 211

## Performance to 30 September 2021



## Geographical Exposure as at 31 March 2021



**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

Adams Street	Market Value at start (£m)	Drawdowns over quarter (£m)	Distributions over quarter (£m)	Market Value at end (£m)
Adams Street Feeder Funds (Global 2014-2019)	80.6	2.1	2.7	94.5
Adams Street Feeder Funds (Regional 2013)	26.8	0.1	1.8	29.4
Adams Street Offshore Co. Ltd Funds (Co-Investment)	1.8	-	-	1.9
Adams Street Offshore Co. Ltd Funds (Direct 2007-2011)	5.4	-	-	5.6
Adams Street Offshore Co. Ltd Funds (US 2003-2011)	23.9	-	2.9	24.3
Adams Street Offshore Co. Ltd Funds (non-US 2003-2011)	27.9	0.0	1.6	29.9

## Commentary – 3 Month Lagged

- The Adams Street portfolio has added significant value over the short and medium term, which is in line with expectations given the strength of performance from the broad private equity and venture capital markets.
- In line with the portfolio's investment guidelines, there were several new investments made over the quarter, across primary and direct investments, as well as co-investments. The portfolio remains relatively well diversified between buyout and venture capital deals, and also by geography (albeit with material exposure to the US). Given the current elevated pricing environment, we note that selective deal sourcing and in depth due diligence remains vital for private equity managers.
- The Adams Street mandate has added significant value for the Fund, with long term performance ahead of the Isio return assumption for the asset class (Gilts + 6.5% p.a.).
- The suitability of current and future commitments to the mandate was last considered in early 2021.

# Newton – Absolute Return

**Mandate:** Diversified Growth Fund

**Current Value:** £500.1m

**Current Weighting:** 10.9%

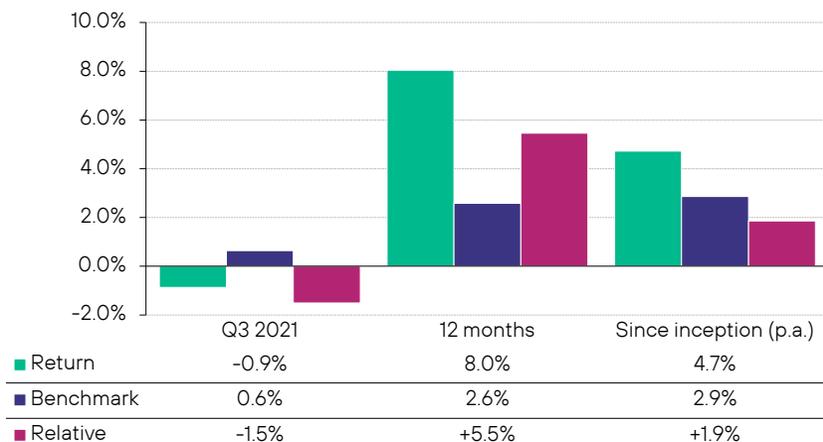
**Inception:** 21 January 2020

**Benchmark:** 3 Month LIBOR+2.5%

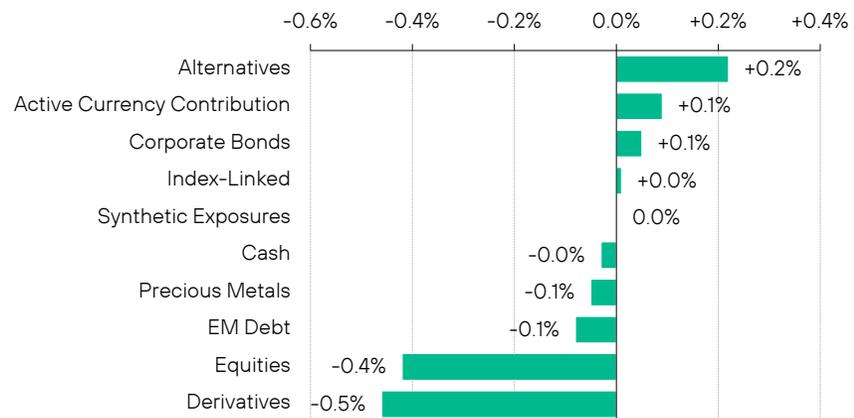
**Objective:** 3-month LIBOR + 4% p.a. (gross) over rolling 5 years

Page 212

## Performance to 30 September 2021



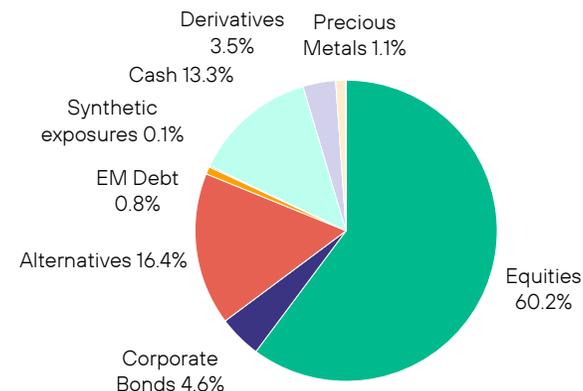
## Contributors to Performance to 30 September 2021



**Note:** Totals may not sum due to rounding. Performance quoted net of fees. Cash contribution includes currency hedging.

**Source:** Investment manager, Northern Trust, Isio calculations.

## Sector Allocation at 30 September 2021



## Commentary

- The fund underperformed over the quarter, as September sell-offs dampened broad market returns. However, over the longer term the Fund continues to outperform its benchmark and perform in line with peers.
- Within the 'return-seeking core', equities detracted from performance with Chinese equities in particular falling in value due to the government's heightened regulatory agenda and the Evergrande credit event. The Fund's 'stabilising layer' was also negative in Q3 as it is structured to protect against more extreme market tail risks than that experienced over September in order to manage costs.
- The Fund increased its equity exposure, particularly in the banking sector (a beneficiary of the rising bond yield environment). Exposure to energy was increased given supply/demand dynamics, while gold exposure was reduced, with Newton noting rising yields and USD strength as limiting the efficacy of gold as a hedge.
- Newton believe there are near-term inflationary challenges from rising energy prices, pent-up consumer demand and inventory restocking. These factors justify a skew towards growth assets at this point in the business cycle.

# Ruffer – Absolute Return

**Mandate:** Diversified Growth Fund

**Current Value:** £512.4m

**Current Weighting:** 11.2%

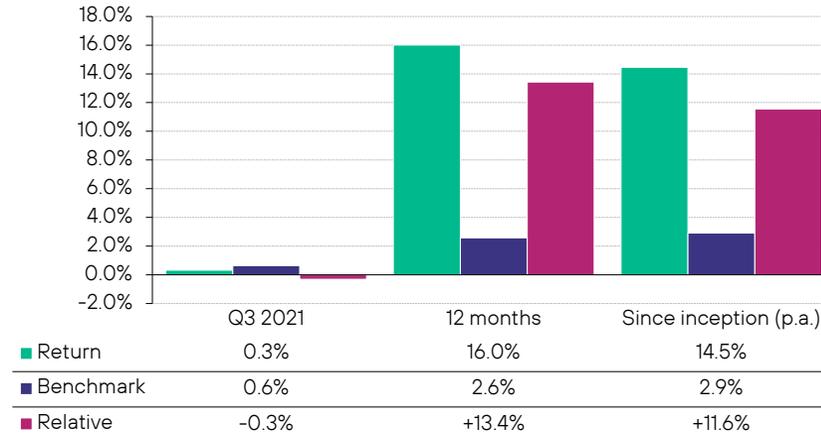
**Inception:** 4 December 2019

**Benchmark:** 3-month LIBOR + 2.5%

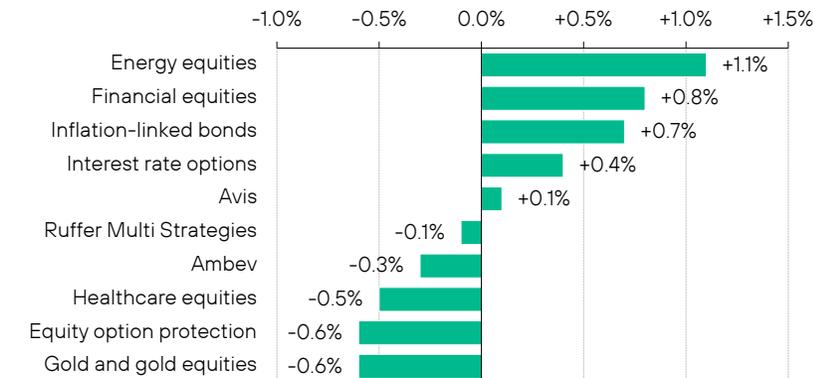
**Objective:** 3-month LIBOR + 4% p.a. (gross) over rolling 5 years

Page 213 Ruffer has recently announced a number of senior departures at a business level which will not impact the ongoing management of the Fund. These appear to be for unrelated reasons and Ruffer is planning to fill these roles with existing members of the team, therefore we do not have any immediate concerns. We will continue to monitor the situation.

## Performance to 30 September 2021

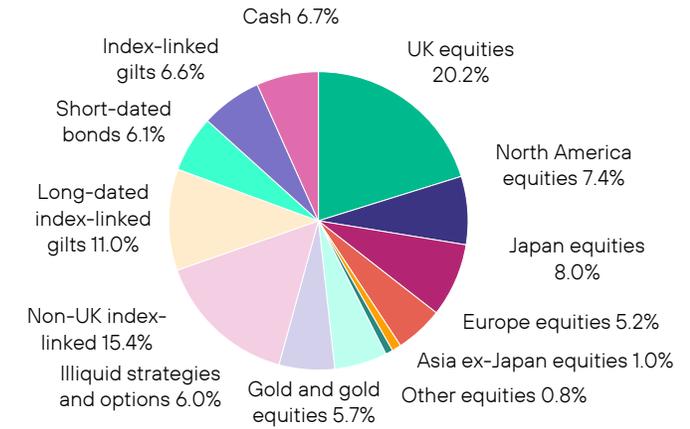


## Contributors to Performance at 30 September 2021<sup>1</sup>



**Note:** Totals may not sum due to rounding. Performance quoted net of fees. <sup>1</sup> Chart shows the top 5 and bottom 5 contributors to performance.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## Asset Allocation at 30 September 2021



## Commentary

- Despite marginally underperforming over Q3, longer term performance remains strong in absolute terms and relative to peers. The largest contribution to positive performance came from equities, most notably energy stocks as September saw rising oil and gas prices which led to higher share prices. The largest detractor was gold, as fears over central bank tightening and a strengthening dollar impacted gold negatively.
- Over Q3 Ruffer further tilted the portfolio's equity exposure towards energy and financials stocks based on their view that these are most likely to benefit from economic recovery. Ruffer continue to invest in strategies which provide protection against falls in the broader equity markets as well as using currency positions to offer protection against an equity fall.
- Ruffer maintain their belief that a combination of lower interest rates and fiscal support from governments will lead to higher inflation, and therefore continue to hold assets which offer inflation protection such as inflation-linked bonds and gold.

# Schroders - Property

**Mandate:** Balanced Property

**Current Value:** £371.9m

**Current Weighting:** 8.1%

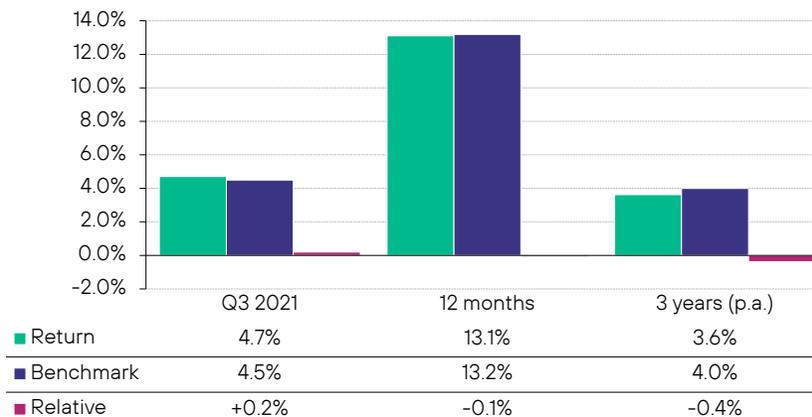
**Inception:** 31 December 2009

**Benchmark:** IPD All Balanced Fund Index

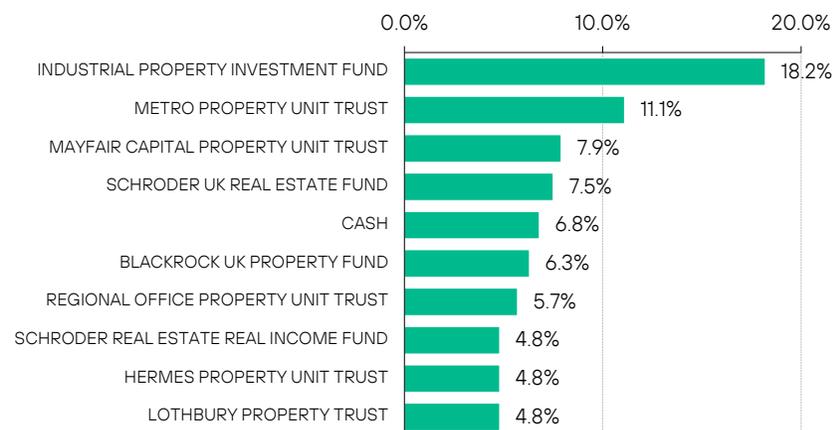
**Objective:** Outperform benchmark by 0.75% p.a. (net) over rolling 3 years

Page 214

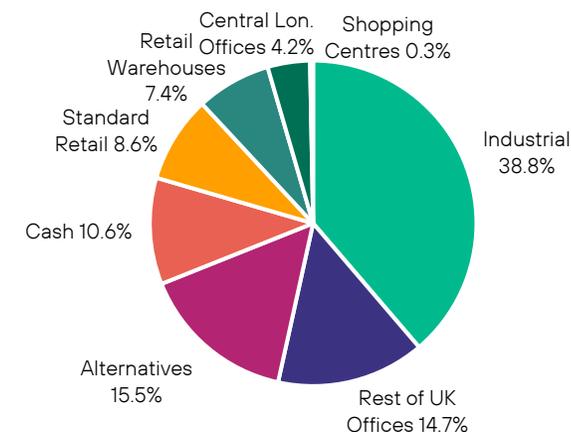
## Performance to 30 September 2021



## Top 10 Holdings as at 30 September 2021



## Sector Allocation at 30 September 2021



## Commentary

- The fund delivered a strong absolute return of 4.7% over the quarter, outperforming its benchmark by 0.2%, reflective of positive sentiments in the broader market.
- The team were active over the quarter making several transactions with c. £19m of acquisitions and £11m of sales. The Fund acquired units in: Local Retail Fund (c. £3m), Multi-Let Industrial Property Unit Trust (c. £4m), Metro Property Unit Trust (c. £2m) and Regional Office Property Unit Trust (c. £2m). There was also a sale of £11 million of units in the Legal and General Managed Property Fund.
- Schroders note that prime industrial yields are now relatively low (at 3.25%-3.75%), having come down over recent periods of strong performance. The team believe that significant positive news is already priced in, and that it is unlikely industrial yields will fall much further. Accordingly, the team believe that, while the industrial sector will continue to be one of the best performing parts of the market, and this remains their largest exposure, the performance margin over offices and retail parks is likely to narrow significantly.

**Note:** Totals may not sum due to rounding. Performance quoted net of fees. Within the portfolio sector allocation, cash also includes cash held within the underlying funds.  
**Source:** Investment manager, Northern Trust, Isio calculations.

# UBS - Infrastructure

**Mandate:** Infrastructure

**Current Value:** £35.3m

**Current Weighting:** 0.8%

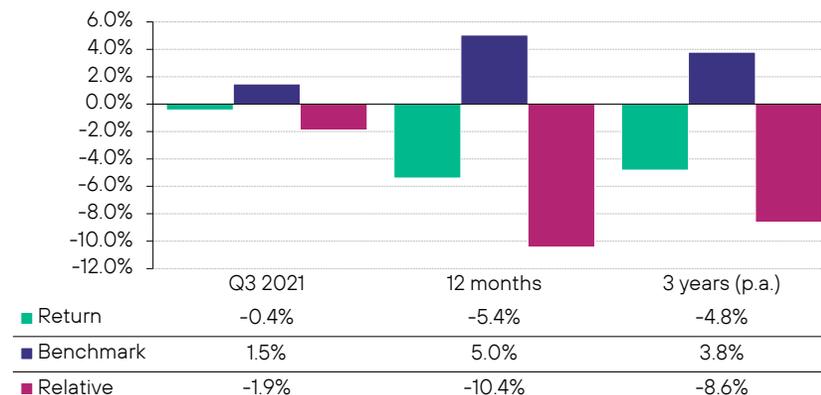
**Inception:** 31 January 2008

**Benchmark:** CPI + 2.0%

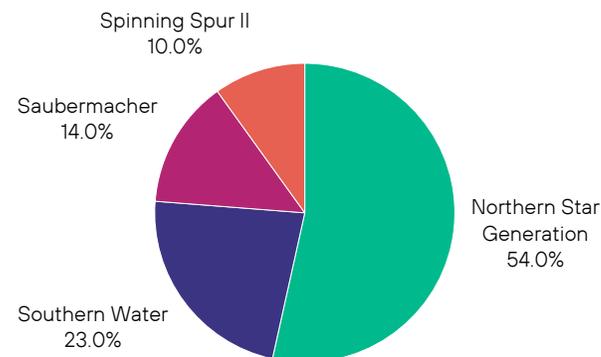
**Objective:** CPI + 3%

Page 215

## Performance to 30 September 2021



## Underlying Asset Split as at 30 June 2021



## Commitments and Distributions to 30 June 2021<sup>1</sup>

UBS	Fund I	Fund III
Total Commitment (\$m)	35.0	50.0
Commitment Drawn (\$m)	33.3	22.3
Distributions (\$m)	23.9	13.1
Outstanding Commitment (\$m)	1.7	27.7
Estimated Market Value (£m) <sup>2</sup>	10.6	24.7

## Commentary – 3 Month Lagged

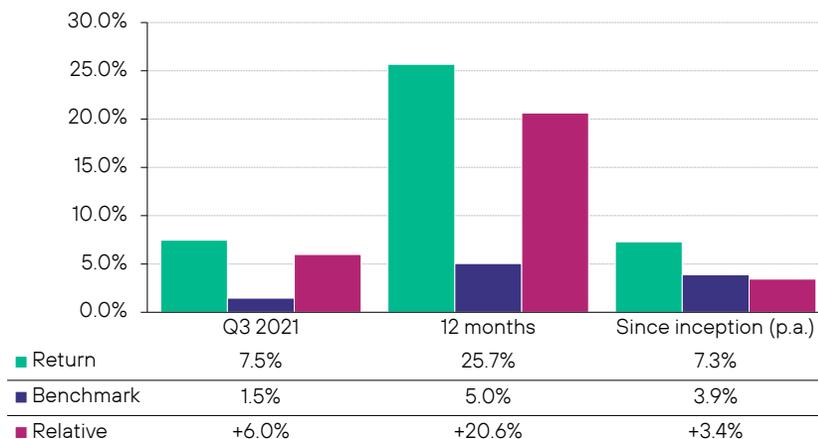
- Over the quarter the portfolio returned -0.4%, underperforming the CPI linked benchmark by 1.9%.
- Fund I remains in the value realisation phase and is paying capital back to investors, whilst Fund III is in its investment phase and continues to draw capital for investment.
- Underperformance continues to be driven by Fund I, with the large holding in Southern Water (SW) particularly weighing on returns. The parent company of SW reached an agreement post quarter end with Macquarie, for the manager to inject an additional £1,073m of new capital into the company in order to recapitalise. Following the latest capital raise, and in light of a recent significant fine from the Environmental Agency, the UBS holding in Southern Water was marked down 33%.
- Fund III continues to see strong deal flow, targeting small-to-middle market deals across digital infrastructure, energy transition, utilities and transportation in Europe, whilst focusing on energy storage and telecom opportunities within the Americas. It remains too early in the lifecycle of Fund III to make a proper assessment.

# Pantheon – Infrastructure

**Mandate:** Infrastructure  
**Current Value:** £58.1m  
**Current Weighting:** 1.3%  
**Inception:** 4 May 2018  
**Benchmark:** CPI + 2.5%  
**Objective:** CPI + 3%

Page 216

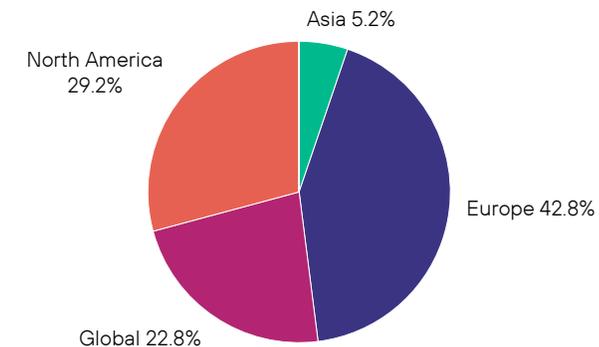
## Performance to 30 September 2021



## Commitments and Distributions to 30 June 2021

Pantheon	
Total Commitment (\$m)	117.0
Commitment Drawn (\$m)	57.9
Distributions (\$m)	5.9
Outstanding Commitment (\$m)	59.1
Market Value (£m)	58.1

## Geographical Allocation at 30 June 2021



## Commentary - 3 Month Lagged

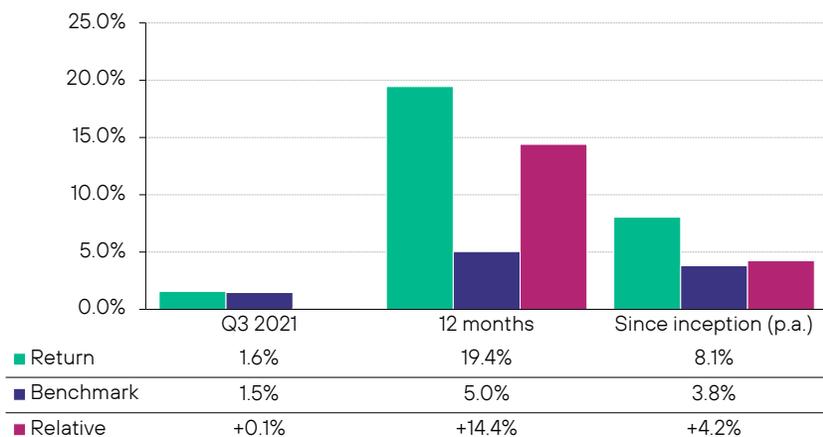
- The fund delivered a positive absolute return of 7.5% over the quarter, outperforming the benchmark by 6.0%.
- Performance was underpinned by strong market demand for assets, driving increased valuations for the majority of the portfolio. As at the end of June, the highest IRR in the portfolio belonged to European firm IFT (42.8%), with the majority of the rest of the fund also performing strongly.
- New investments included a AUD\$59million commitment to Kinetic, an operator of bus fleets and depots in Australia and New Zealand, as well as a €21million commitment to Teemo, Telecom Italia's copper and fibre-to-the-cabinet network in Italy.
- The most material change was in Telxius, a co-investment completed in October 2020 alongside KKR, which increased in value by 135%. The valuation change was driven by the announced sale of assets in the portfolio. Telxius is a leading provider of telecommunication infrastructure services in Europe and the Americas.
- Pantheon continue to see strong deal flow and continue to exceed their performance objective since inception.

# M&G – Infrastructure

**Mandate:** Infrastructure  
**Current Value:** £38.9m  
**Current Weighting:** 0.8%  
**Inception:** 31 October 2018  
**Benchmark:** CPI + 2.5%  
**Objective:** CPI + 3%

Page 217

## Performance to 30 September 2021

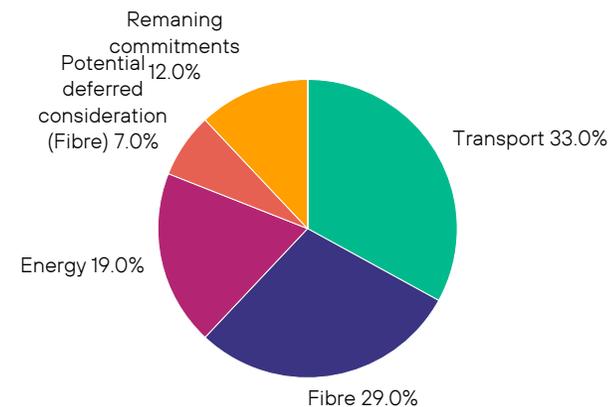


## Commitments and Distributions to 30 September 2021

M&G – Infracapital	Brownfield III	Greenfield II
Total Commitment (£m)	42.0	20.0
Commitment Drawn (£m)	33.9	-
Distributions (£m)	4.4	-
Outstanding Commitment (£m)	8.1	-
Market Value (£m)	38.9	-

**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## Brownfield Sector Exposure to 30 September 2021



## Commentary

- The fund delivered positive performance over Q3, marginally outperforming its benchmark. Performance continues to be solely driven by the Brownfield III Fund as the Greenfield fund remains undrawn. The gross IRR of the Brownfield fund currently stands at a strong 14.4% and continues to draw capital.
- Q3 performance was driven by valuation uplifts across the portfolio. Notable strong performers included the Infracapital Germany holding - with the valuation uplift supported by a strengthening of the team and a company rebrand - and the investment in GB Railfreight, whose operating performance has been above budget.
- The Fund has now successfully acquired BCTN, a leading European inland terminal operator which provides end-to-end logistics solutions. The Fund acquired 100% ownership for c. €90m.
- Greenfield II has a pipeline of potential investments of >90% of its capital commitment target and M&G expect drawdowns to commence in 2022.

# ATLAS – Listed Infrastructure

**Mandate:** Global Infrastructure Equity

**Current Value:** £83.6m

**Current Weighting:** 1.8%

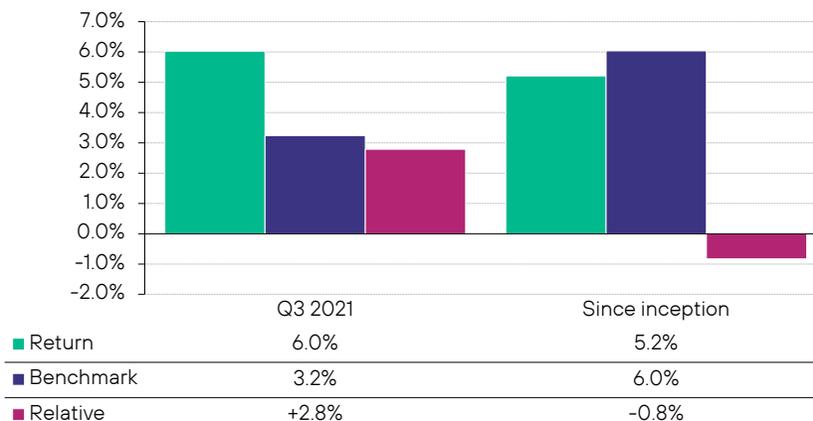
**Inception:** 2 December 2020

**Benchmark:** FTSE Developed Core 50/50 Infrastructure Index

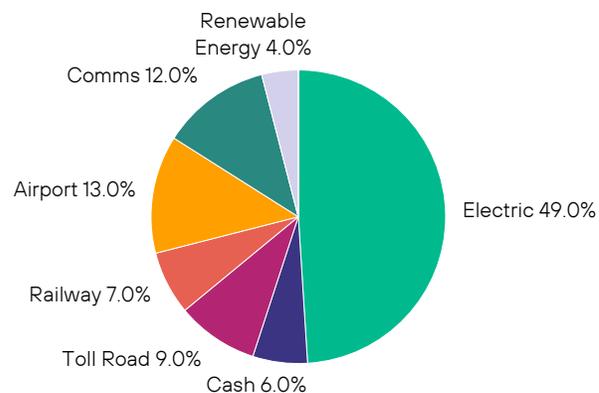
**Objective:** CPI + 5%

Page 218

## Performance to 30 September 2021

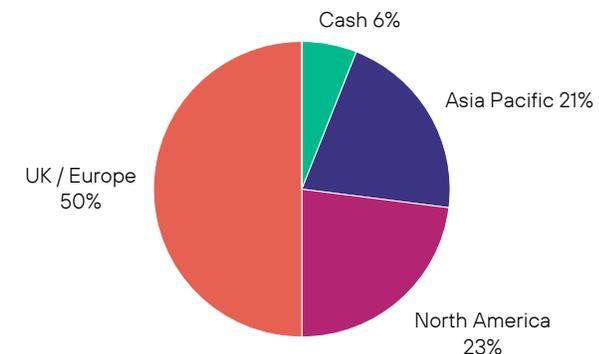


## Sector Allocations at 30 September 2021



**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## Geographic Allocation at 30 September 2021



## Commentary

- The Fund delivered a return of 6.0% over the quarter, outperforming its benchmark by 2.8%. The benchmark itself outperformed broad equities over the period, as investor sentiment towards listed infrastructure remained positive off the back of rising inflation expectations.
- The Fund's outperformance was underpinned by a number of factors, with absolute returns varying materially by region and sector, and largely driven by stock-specific events. At a stock level, AusNet Services Limited and Spark Infrastructure Group were the top contributors to relative performance. While strong returns from the Asia Pacific region were aided by the impact of takeover bids for Sydney Airport and AusNet on their share prices. American electric companies including ALLETE, Pinnacle West Capita, and Avangrid, were the biggest detractors over the period.
- The team added one new position over Q3: Transurban (Australian Toll roads). This deal was funded the sale of Severn Trent, with the team's sale case based on strong recent share price performance (and lower future expected returns as a result).
- The portfolio retains its strong bias to UK and Europe.

# M&G – Real Estate Debt

**Mandate:** Private Debt

**Current Value:** £37.4m

**Current Weighting:** 0.8%

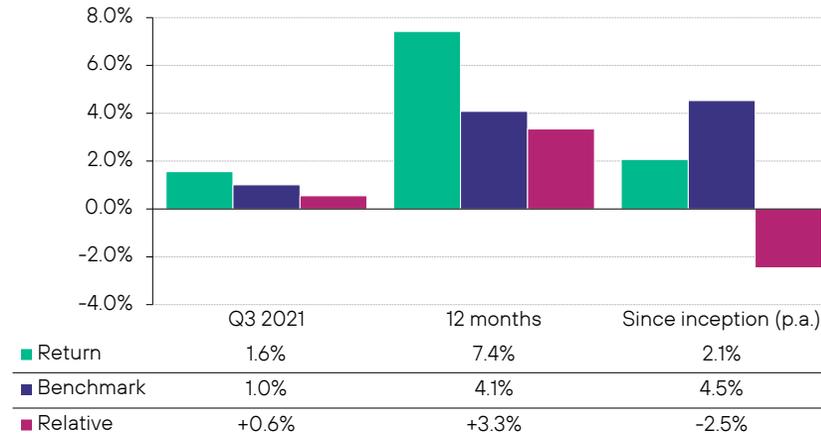
**Inception:** 11 April 2019

**Benchmark:** Benchmark: 3m LIBOR +4%

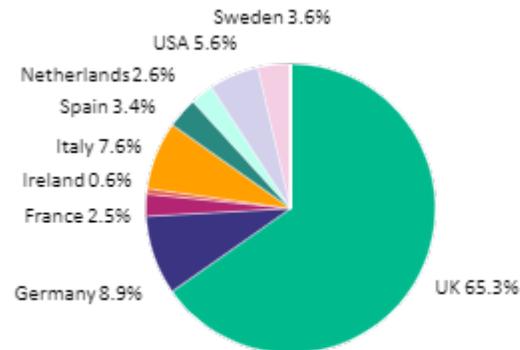
**Objective:** Objective: 3m LIBOR +5%

Page 219  
 We downgraded the Funds to 'partially meets criteria' following the resignation of four senior members within M&G's Real Estate Debt business in April. This led to the Funds' investment period being temporarily suspended, however a new Investment Committee was approved over Q2, allowing the reinvestment period to be reinstated and further capital to be recycled.

## Performance to 30 September 2021



## Average Invested Capital by Geography Across the Portfolio



**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## Commitments and Distributions to 30 September 2021

### M&G – Real Estate Debt Fund

Total Commitment (£m)	60.0
Commitment Drawn (£m)	35.1
Distributions (£m)	-
Outstanding Commitment (£m)	24.9
Market Value (£m)	37.7

## Commentary – 3 month lag

- The portfolios are largely fully invested and are performing in line with expectations. The temporary suspension of the investment period due to the resignation of senior team members largely prohibited investment over Q2, however one new deal in the REDF IV portfolio had been signed off prior to this. This was a senior loan for a portfolio of 16 industrial and logistics assets based in Sweden, which was finalised over Q2.
- Project Genesis remains a watchlist position; while it re-opened to the public over Q2 as lockdown restrictions eased, footfall and rental income remain c.40% lower than pre-COVID levels. M&G are focusing on stabilising the asset through value add opportunities, and have provided c.£5m of funds available for capex initiatives.
- M&G have a strong pipeline of opportunities to recycle capital into, however they have advised that covenants on new deals remain competitive. Positively, M&G aren't willing to compromise on their terms and take on additional risk to deploy more capital.

# M&G – Diversified Credit

**Mandate:** Multi Asset Credit

**Current Value:** £291.0m

**Current Weighting:** 6.4%

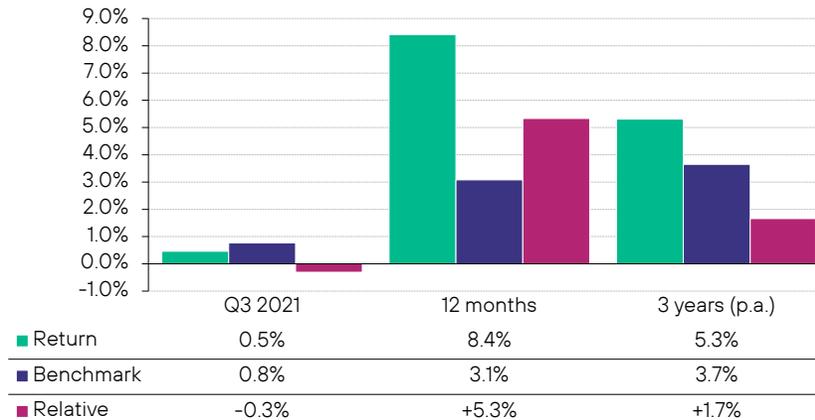
**Inception:** 30 November 2009

**Benchmark:** 3 Month Libor +3%

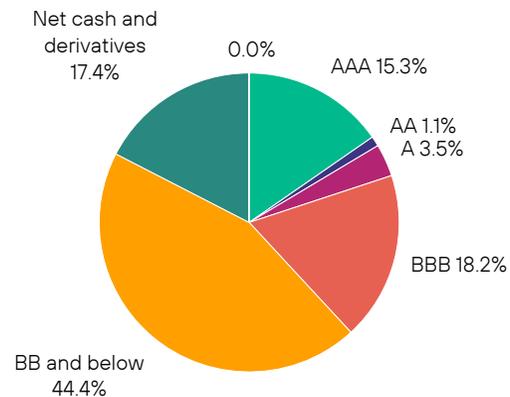
**Objective:** 3 Month Libor +5% (gross)

Page 220

## Performance to 30 September 2021

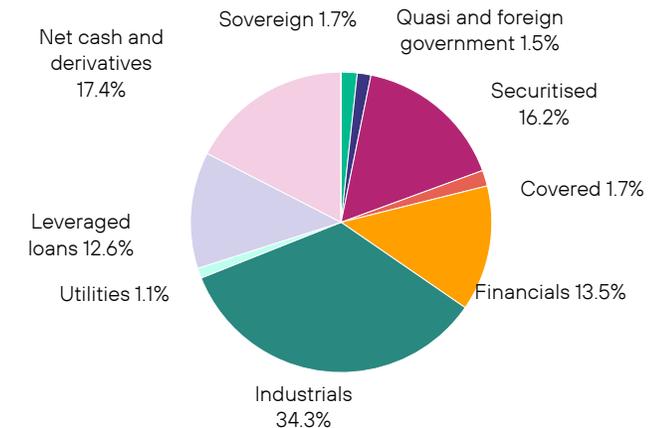


## Credit Ratings as at 30 September 2021



**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## Sector Allocation as at 30 September 2021



## Commentary

- The Fund marginally underperformed its objective as credit spreads remained largely stable over the quarter. However, the Fund benefitted from its low interest rate exposure relative to peers over Q3 as nominal gilt yields increased.
- Market performance was similar across the areas the Fund invests. As such, relative performance contribution was driven by the allocation to each area. Industrial corporate bonds was the main contributor given the bias towards this area. The other main exposures (financials, loans and structured credit) also contributed positively.
- M&G acknowledge that spreads are currently tighter than January 2020 levels and believe that credit selection will drive returns going forward. They see value in downgraded bonds which have the potential to be upgraded back to investment grade. The Fund has also pivoted towards a 'barbell' strategy by increasing both its defensive assets and short-dated high yield allocation to maintain income generation.

# M&G – Corporate Bonds

**Mandate:** Corporate Bonds

**Current Value:** £160.0m

**Current Weighting:** 3.5%

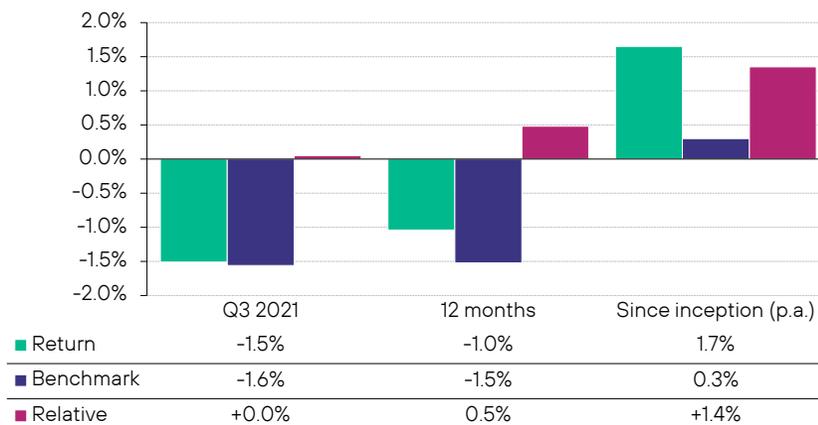
**Inception:** 26 February 2020

**Benchmark:** Benchmark: - 50%  
iBoxx Non-Gilts Over 15Y - 50%  
iBoxx Non-Gilts

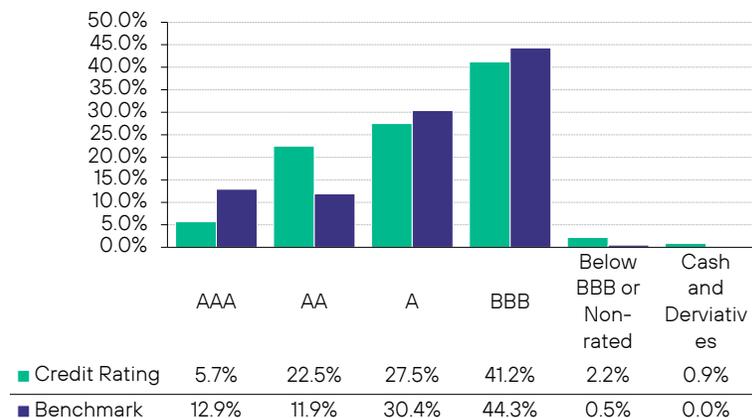
**Objective:** Outperform benchmark  
by 0.8% p.a. (gross)

Page 221

## Performance to 30 September 2021

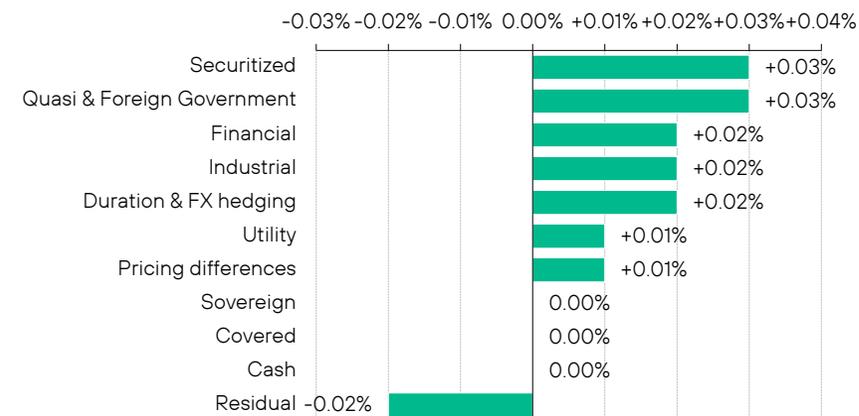


## Fund Credit Ratings to Benchmark at 30 September 2021



**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## Performance Attribution as at 30 September 2021



## Commentary

- The Fund returned -1.5% over the quarter, performing in line with its benchmark. Negative absolute returns were driven by the slight rise in nominal gilt yields experienced over the period – as credit spreads remained broadly unchanged.
- UK Corporate bonds fared poorly against US and European equivalents. The latter received a double boost from improving economic fundamentals and lower COVID-19 rates/increasing vaccine numbers (meaning more economies could reopen).
- The manager continued to de-risk the fund and retain an underweight position in credit spread duration and corporate risk relative to the benchmark. The manager also continued to reduce the fund's exposure to strong performing assets and took profits on Industrial names such as Shell, The AA and WPP Finance.
- M&G continue to believe that valuations across much of the credit market look overstretched, and are therefore relatively defensively positioned at present. This view was reflected in market wide performance over the quarter.

# UBS – Over 5 Year Index-linked Gilts

**Mandate:** Index Linked Gilts

**Current Value:** £136.8m

**Current Weighting:** 3.0%

**Inception:** 28 August 2017

**Benchmark:** FTSE Index- Linked Gilts Over 5 Years

**Objective:** Match benchmark

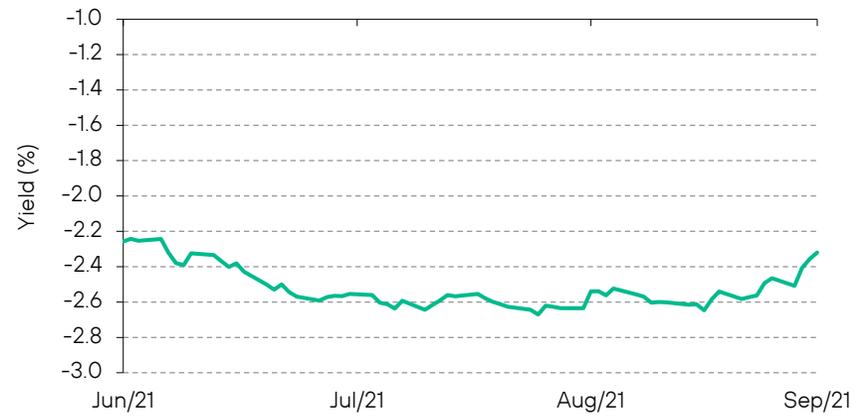
Page 222

## Performance to 30 September 2021



Return	2.3%	-1.7%	5.6%
Benchmark	2.3%	0.2%	6.1%
Relative	+0.0%	-2.0%	-0.5%

## Real Gilt Yields – Q3 2021



**Note:** Totals may not sum due to rounding. Performance quoted net of fees.  
**Source:** Investment manager, Northern Trust, Isio calculations.

## Commentary

- The Fund returned 2.3% over the quarter, in line with its benchmark, which is expected given the passive approach.
- Real gilt yields fell marginally over the quarter, as long term inflationary expectations increased by a greater extent than the increase in nominal yields.
- This allocation has defensive characteristics, providing the Fund with protection against the impact of both interest rates and inflation expectations on the value placed on the liabilities.
- Although the fund is passively managed, aiming to track its benchmark, there has been a degree of longer term underperformance. We propose this is investigated further with both UBS and Northern Trust.

# Appendices

A1: Market Background: Global Equity, Absolute Return, Real Assets, Credit & Yields

A2: Explanation of Market Background

A3: Disclaimers

# Market Background – Global Equity

## Summary

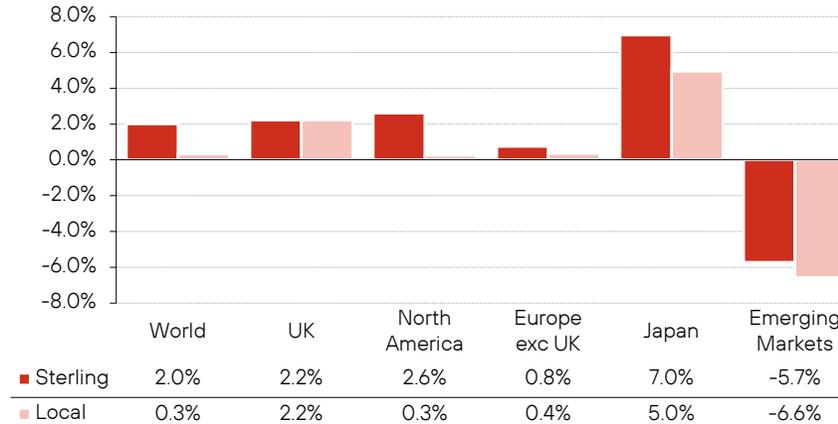
Global equities delivered marginal positive performance following the continued economic recovery from the Covid-19 pandemic.

Emerging Markets significantly underperformed primarily due to the regulatory crackdowns in China.

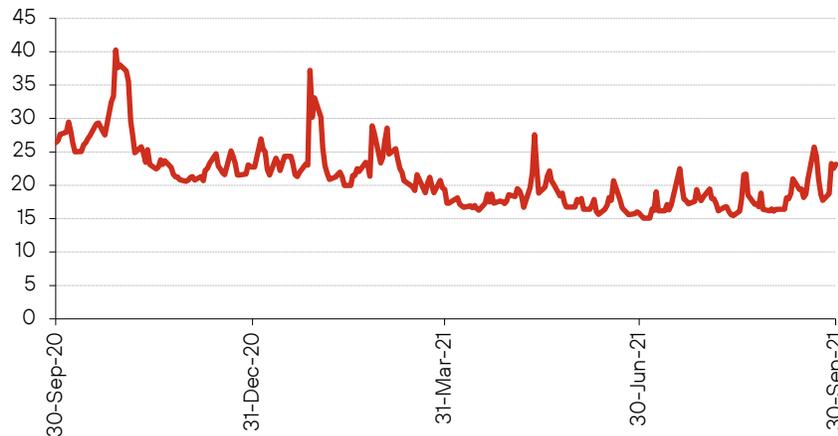
Japanese equities was the strongest performer due to increased market optimism on the prospect of a major stimulus package being announced in the coming weeks.

Page 224

## Regional Returns – Q3 2021

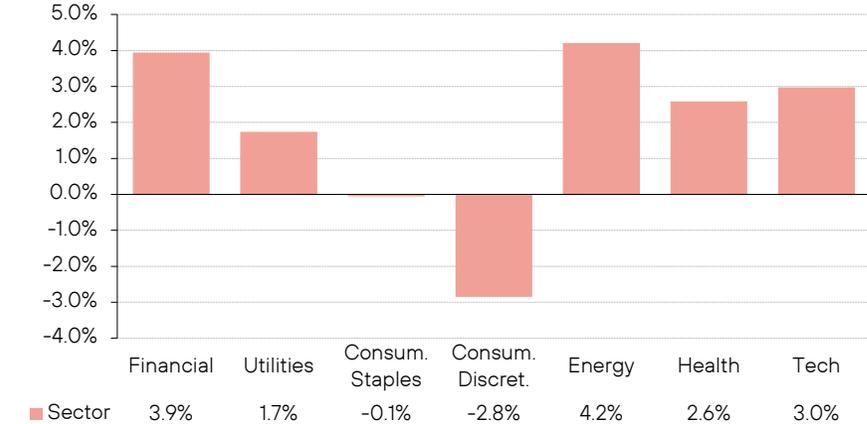


## VIX Volatility Index – Last 12 months



Note: Please see Appendix 2 for further information.  
Source: Datastream, Isio calculations.

## Sector Returns – Q3 2021



## Commentary

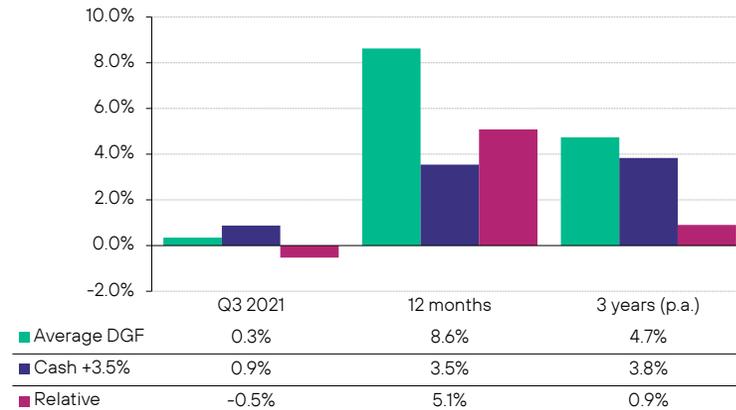
- Global equity markets delivered marginal positive returns over Q3 following the ongoing economic recovery from the pandemic. However, rising inflation concerns increased volatility over Q3.
- US equities provided small positive returns over Q3, despite investor sentiment weakening in September due to the prospect of lower economic growth combined with inflationary pressures. UK equities posted positive performance over the quarter driven by the energy sector following the recovery in crude oil prices.
- Emerging market equities significantly underperformed over the quarter which was primarily due to the market sell off in Chinese stocks. China's announcement of regulatory action in certain sectors drove initial market weakness, which was later compounded by supply chain disruptions and the return of Covid-19 lockdown measures. Further concerns were driven by the impact of the potential collapse of Evergrande (a large Chinese property developer) which contributed to the negative market sentiment.

# Market Background – Absolute Return

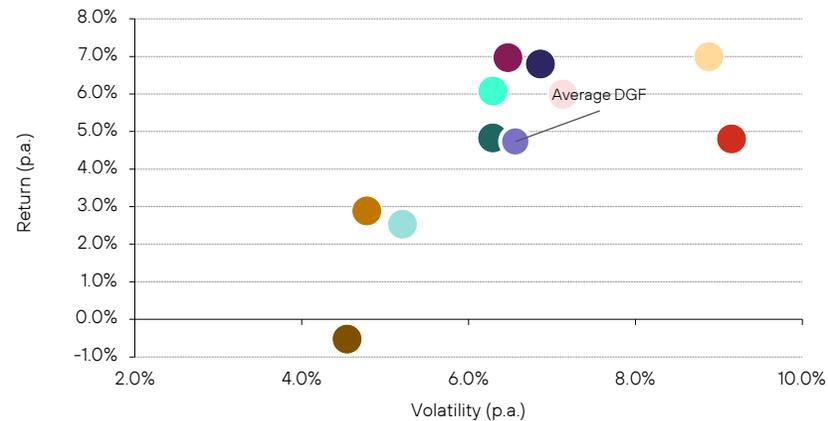
## Summary

Within our sample of managers we have incorporated the performance of ten DGFs with various manager styles, aiming to give a balanced view of the market.

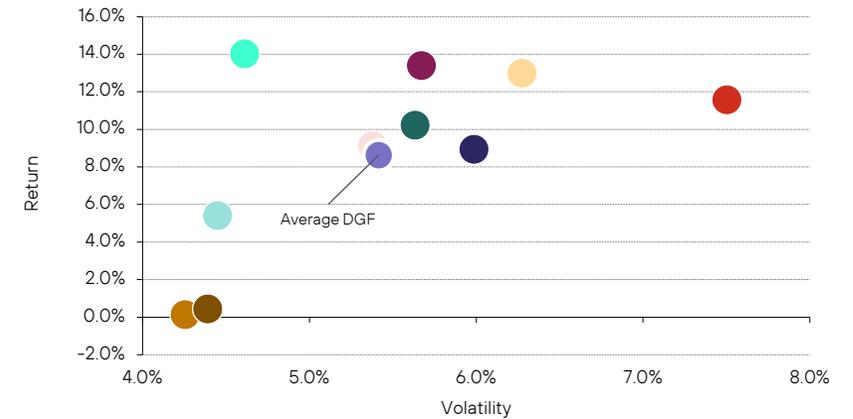
### Sample Manager Average Returns – Q3 2021



### Sample Manager Returns and Volatility – 3 years (p.a.)



### Sample Manager Returns and Volatility – 12 months



### Commentary

- Over Q3 2021 the average DGF delivered marginal positive performance, despite equities seeing a retracement in September which erased a large portion of gains. Performance was however supported by the rise in energy commodities as natural gas prices rose. Returns from other asset classes were also relatively subdued, with a rise in gilt yields in the latter part of September causing a headwind for fixed income allocations.
- Over the 1 and 3 year time periods, equity allocations have been the strongest contributor to returns with the asset class aided by actions from governments and central banks. With managers being rewarded for owning higher risk assets over the longer time period, the strongest performing managers have been those who typically have portfolios with the highest exposure to broad market movements.
- The majority of DGF managers maintain a positive outlook, however they remain aware of the prospect of monetary and fiscal policy tightening, in response to stronger growth and inflation.

**Note:** Please see Appendix 2 for further information. All returns are quoted net of management fee.  
**Source:** Investment Managers, Isio calculations.

# Market Background – Real Assets

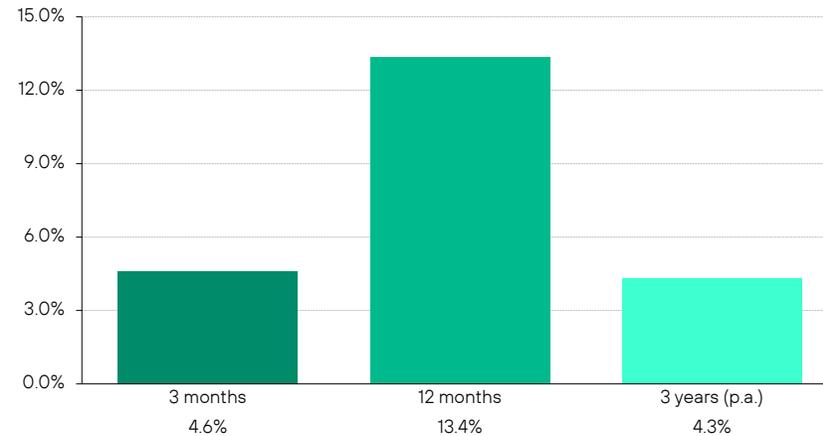
## Summary

Both Core and Long Lease Property returned strong positive performance over the quarter, due to a recovering UK economy driving improved capital values across some sectors.

Industrials continue to be in high demand and have displayed a strong level of rental growth. Retail remains an area for recovery, despite the re-opening of non-essential shops, as many businesses explore opportunities to use e-commerce. Office spaces remain uncertain as companies determine their long-term plans for their workforces along with the ESG regulation on the sector.

With a risk of a resurgence in Covid-19 infections over the winter and a chance that labour, fuel and materials shortages becomes a more permanent feature of the economy, leading to higher inflation levels and thus higher interest rates, could lead to downward pressure on capital values in the future.

## Core UK Property Returns



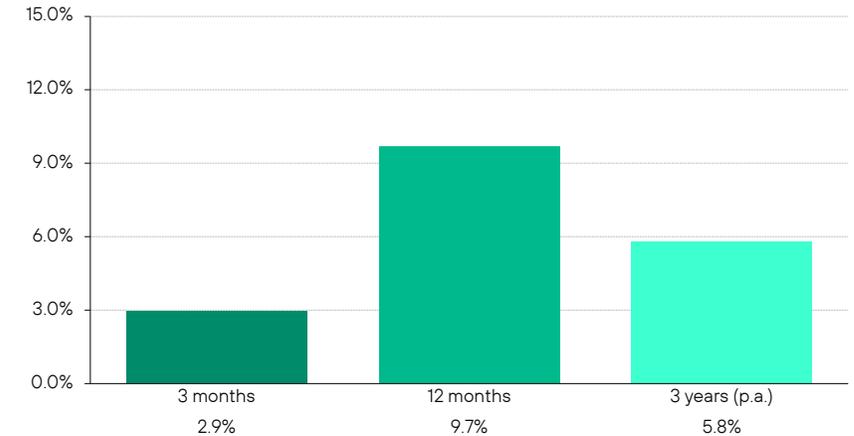
## Commentary – Core UK Property

- Core UK property delivered very strong positive returns over the quarter as consumer spending continued to drive the economic recovery from Covid-19. Moving to winter does highlight the potential for a spike in infections alongside inflationary pressures which could trigger interest rate rises, both of which place downward pressure on property values.
- The industrial sector continues to be the key driver of performance, with rental growth at c.5% p.a., its fastest rate since 2017. Longevity of industrial performance is a consideration given strong rental growth is squeezing tenants' profit margins.
- Retail remains an area for recovery, as the footfall in town centres is still 20-25% below pre-Covid levels, despite the re-opening of non-essential shops. The major factor is the growth in on-line retail sales from 19% of total sales in 2019, to 27% post lockdown.
- By comparison, food stores and "bulky goods" retail parks have been fairly resilient through the pandemic, while office space demand is polarised by office grade. Secondary offices have seen a drop in demand, with general office take-up in the first half of 2021 45% below the average between 2015-2019.

**Note:** Please see Appendix 2 for further information.

**Source:** AREF / IPD and Investment Managers.

## Long Lease UK Property Returns



## Commentary – Long Lease UK Property

- Long Lease Property delivered strong positive returns over the period, largely driven by strong capital growth, particularly in the supermarket and office sectors.
- Rent collection levels improved over the quarter with most long lease funds at or near 100% rent collection levels, and deferred rents now being repaid. This strong position reflects a bias towards less economically sensitive, high-quality tenants, who have been less impacted by lockdown restrictions in the UK.
- Yield compression is still evident across all sectors, according to the MSCI Monthly Index. However, yields in the office sector were muted as the long-term impact of flexible working on office occupation remains unclear and the additional risks around the impact of sustainability legislation and the path to net zero carbon creates additional uncertainties around the sector.
- Transaction activity in the UK property market, as measured by investment volumes, dipped over the quarter. Nevertheless, the year-to-date figure of c.£34.3bn is an increase on both the corresponding 2019 (£32.5bn) and 2020 (£25.4bn) levels and in line with the five-year average.

# Market Background – Credit

## Summary

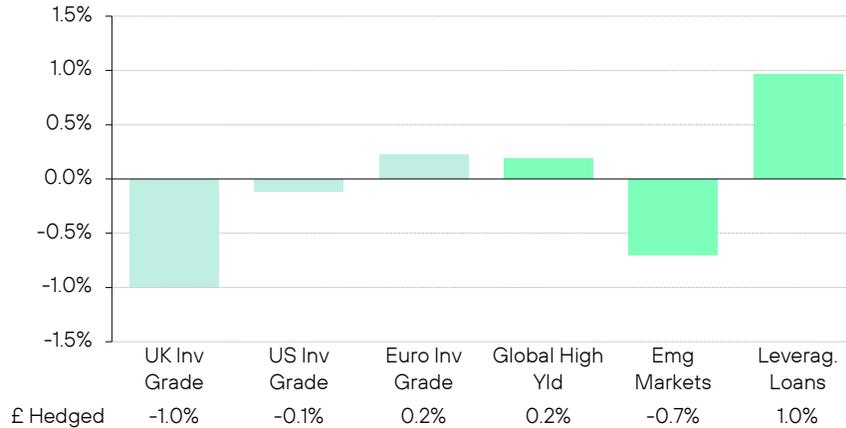
Rising government bond yields provided the backdrop for credit markets over Q3, particularly in the UK, as investors increasingly questioned the extent to which any inflation increases will be transitory.

Central bank messaging shifted during Q3, with both the US Federal Reserve and Bank of England signalling possible future interest rate hikes to combat rising inflation fears.

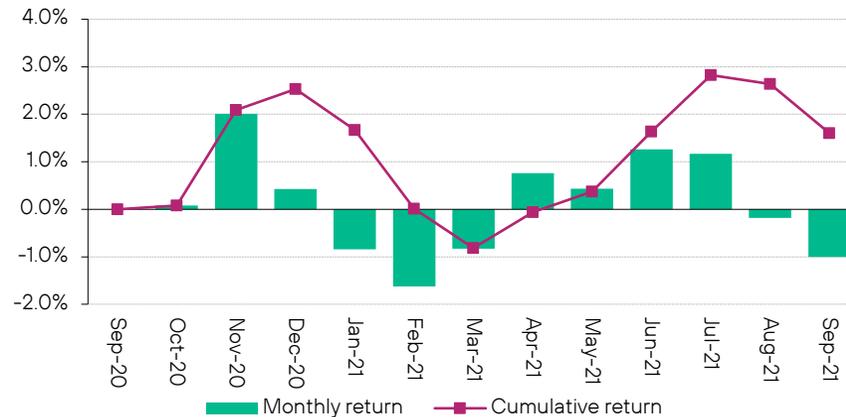
While many HY companies reported better than expected Q2 earnings, news of labour shortages, supply chain bottlenecks and uncertainty surrounding the Chinese property sector, led to a widening of spreads in this area.

Emerging market debt was similarly impacted by Chinese property sector concerns. In addition, EM currencies broadly fell in value against the US Dollar, hindering 'hard currency' USD denominated debt and making it more expensive to repay in local currency terms.

## Credit Market Returns – Q3 2021

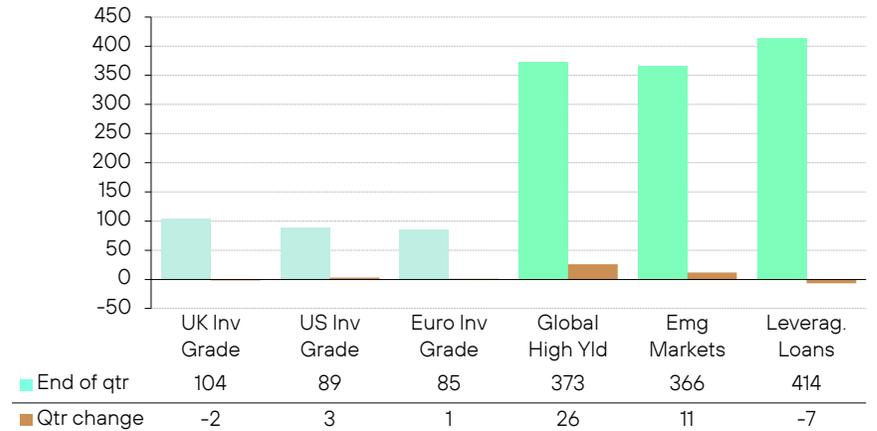


## Global Broad Credit Market Return – Last 12 Months



**Note:** Please see Appendix 2 for further information. Credit spreads are shown in basis points (100 bp = 1%).  
**Source:** Investment Managers, Isio calculations, Eikon

## Credit Spreads – Q3 2021



## Commentary

Global credit market performance was mixed across sub-asset classes over Q3, with fixed rate underperforming floating rate assets, as inflationary pressure and fears of possible monetary policy tightening increased, leading to rising UK government bond yields.

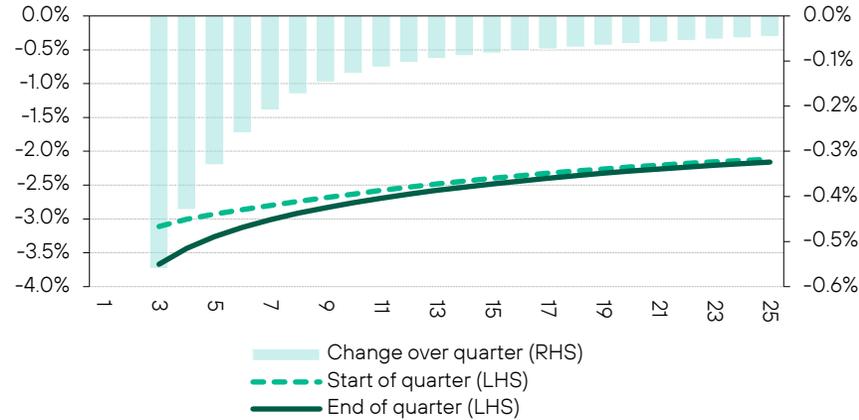
- **Investment grade** ('IG') bond performance was largely flat over Q3; with the exception of UK IG, which delivered negative returns, reflecting greater government bond yield increases in the UK relative to the US and Europe. This was due to fears that rising inflation may be more permanent than previously thought, and suggestions by Bank of England policymakers that interest rates rises may be needed over Q4 2021.
- **High yield** ('HY') bonds delivered marginally positive returns over the quarter as ongoing interest income was enough to offset capital value volatility from widening credit spreads. HY underperformed leveraged loans however, which experienced inflows as investors moved towards floating rate assets.
- **Emerging market** ('EM') debt performed negatively as investor uncertainty increased due to the possible default of China's second largest property developer, Evergrande, and the implications this might have on China and other emerging market economies.

# Market Background – Yields

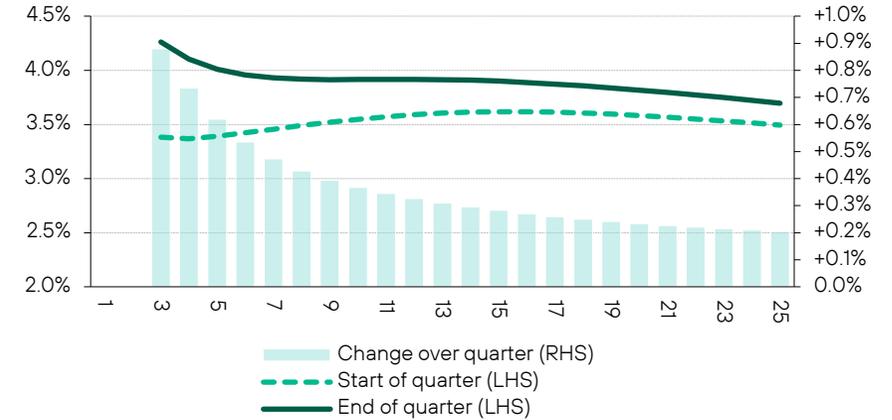
## Summary

These curves show gilt yields and inflation expectations at varying time horizons. The horizontal axis represents the number of years.

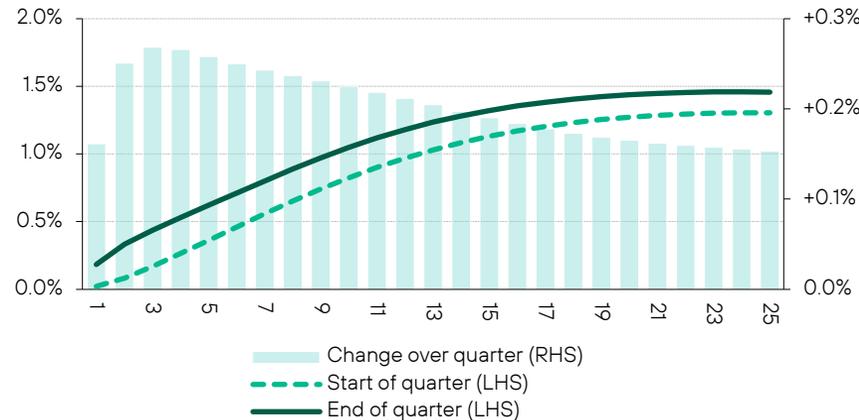
### Real Gilt Yields – Q3 2021



### Gilt-Implied Inflation – Q3 2021



### Nominal Gilt Yields – Q3 2021



### Commentary

- Long-dated (20-year) yields at the quarter-end were:
  - Real gilt yield: -2.3%
  - Nominal gilt yield: 1.4%
  - Gilt-implied inflation expectation: 3.8%

**Note:** Please see Appendix 2 for further information.  
**Source:** Bank of England, Isio Calculations

# Explanation of Market Background

This glossary explains the components of the Market Background charts in Appendix 1.

All returns are in Sterling terms, unhedged, unless otherwise stated. Where “hedged” returns are quoted, these are local currency returns (i.e. any costs and imprecisions in hedging are assumed to be negligible).

## Market Background – Overview

- Returns by Asset Class – The market indices underlying this chart are as follows:
  - UK Equity: FTSE All-Share
  - Global Equity: FTSE World (Unhedged and Hedged)
  - Emerging Market Equity: MSCI Emerging Markets
  - Diversified Growth Funds: mean of a sample of DGF managers
  - Property: IPD Monthly UK
  - Global High Yield: BoAML Global High Yield (GBP Hedged)
  - UK Inv. Grade Credit: BoAML Sterling Non-Gilt
  - Over 15 Years Gilts: FTSE Over 15 Year Gilt
  - Over 5 Years Index-Linked Gilts: FTSE Over 5 Year Index-Linked Gilt
  - Example Liabilities: a simplified calculation illustrating how a typical pension scheme’s past-service liabilities may have moved

## Market Background – Global Equity

- Regional Returns – The market indices underlying this chart are as follows:
  - World: FTSE World
  - UK: FTSE All Share
  - North America: FTSE North America
  - Europe ex UK: FTSE Europe ex UK
  - Japan: FTSE Japan
  - Emg Mkts: MSCI Emerging Markets
- Sector Returns – The market indices underlying this chart are the relevant sectors from the MSCI All-Countries index.
- VIX Volatility Index – This is a forward-looking indicator. It represents the expected range of movement (in percentage terms) in the S&P 500 index (i.e. US equities in dollar terms) over the next year, at a 68% confidence level. It is calculated using options prices over a 30-day horizon.

# Explanation of Market Background (cont.)

This glossary explains the components of the Market Background charts in Appendix 1.

All returns are in Sterling terms, unhedged, unless otherwise stated. Where “hedged” returns are quoted, these are local currency returns (i.e. any costs and imprecisions in hedging are assumed to be negligible).

Page 230

## Market Background – Absolute Return

- **Diversified Growth Funds (“DGFs”)** – Due to the lack of a market index for DGFs, we illustrate the performance of this by showing the returns of 10 of the largest funds by assets under management. Specifically:
  - Aberdeen Standard Global Absolute Return Strategies
  - Aviva Multi-Strategy Target Return
  - Baillie Gifford Diversified Growth
  - BlackRock Dynamic Diversified Growth
  - Invesco Perpetual Global Targeted Returns
  - L&G Diversified
  - Newton Real Return
  - Nordea Stable Return
  - Ruffer Absolute Return
  - Schroder Diversified Growth
- The ‘Average DGF’ performance is an equally-weighted average of the sample of 10 managers’ performance figures.
- Returns are shown net of each manager’s standard fee. While every effort has been taken to select vehicles with institutional/clean fee structures, the impact may not necessarily reflect any particular client’s fee arrangements.
- Volatility is calculated by annualising the volatility of daily returns.
- As clients have specific selection criteria, the managers listed here may not meet any given client’s criteria.
- DGFs encompass a range of investment approaches, return targets, and risk profiles. Consequently, different managers’ returns are not necessarily a like-for-like comparison.

## Market Background – Real Assets

- Real Assets – The market indices underlying these charts are:
  - Core UK Property: IPD Monthly UK Index
  - Long Lease UK Property: IPD Long Income Property Fund Index

# Explanation of Market Background (cont.)

This glossary explains the components of the Market Background charts in Appendix 1.

All returns are in Sterling terms, unhedged, unless otherwise stated. Where "hedged" returns are quoted, these are local currency returns (i.e. any costs and imprecisions in hedging are assumed to be negligible).

## Market Background – Credit

- Sector Returns and Credit Spreads – The market indices underlying this chart are as follows:
  - UK Inv Grade: BoAML Sterling Non-Gilt
  - US Inv Grade: BoAML US Corporate (GBP Hedged)
  - Euro Inv Grade: BoAML Euro Corporate (GBP Hedged)
  - Global High Yield: BoAML Global High Yield (GBP Hedged)
  - Emerging Markets: JP Morgan EMBI Global (GBP Hedged)
  - Leveraged Loans: S&P/LSTA US Leveraged Loan Equity (GBP Hedged)
- Global broad credit market return – The market index underlying this chart is the BoAML Global Broad Market Corporate Index (GBP Hedged):
  - The Global Broad Market Index tracks the performance of investment grade public debt issued in the major domestic and eurobond markets, including 'global' bonds.
  - Qualifying bonds must have at least one year remaining term to maturity and a fixed coupon schedule. Bonds must be rated investment grade and be domiciled in a country having an investment grade foreign currency long-term debt rating (based on a composite of Moody's and S&P).

## Market Background – Yields

- Yields – Yields shown are annual yields (i.e. they have been converted from the "continuously compounded" basis quoted by the Bank of England).
- Example Liabilities – This illustrates how a typical scheme's past-service liabilities may have moved.
  - It is based on a simplified calculation assuming a scheme with duration 20 years and liabilities split 70% inflation-linked and 30% fixed.
  - Liability movement is calculated using yield changes and unwinding (short-term interest rate with no premium) only, with no accrual, outgo, or inflation experience.
  - A rise in yields equates to a fall in the calculated value of the liabilities (due to the higher discount rate at which the future cashflows are valued); conversely, a fall in yields means a rise in liabilities.

# Disclaimers

This report has been prepared for the sole benefit of East Sussex County Council as Administering Authority of the East Sussex Pension Fund

Page 232

## Performance, Opinions, and Estimated Liabilities

- This report sets out the past performance of various asset classes and fund managers. It should be noted that past performance is not a guide to the future.
- Our opinions (and comparison vs criteria) of the investment managers stated in this report are based on Isio's research and are not a guarantee of future performance. These are valid at the time of this report but may change over time.
- Our opinions of investment products are based on information provided by the investment management firms and other sources. This report does not imply any guarantee as to the accuracy of that information and Isio cannot be held responsible for any inaccuracies therein. The opinions contained in this report do not constitute any guarantees as to the future stability of investment managers which may have an effect on the performance of funds.
- Funds that make use of derivatives are exposed to additional forms of risk and can result in losses greater than the amount of invested capital.
- The estimated liabilities (where quoted) have been "rolled forward" from the last actuarial valuation and/or funding update, by taking current bond yields and inflation expectations into account. The methodology underlying the actuarial assumptions (e.g. discount-rate premium, mortality, real salary growth etc.) is assumed to remain constant for this estimate. Due to the approximate nature of the calculations, the Fund's actual experience and changes in future valuation assumptions may mean that the liabilities and funding position calculated at the next actuarial valuation (or funding update) could be significantly different from the quoted estimate.

## Addressee and Isio Relationships

- This report has been prepared for the sole benefit of the East Sussex County Council as Administering Authority of the East Sussex Pension Fund and based on their specific facts and circumstances and pursuant to the terms of Isio Group/Isio Services Ltd's Services Contract. It should not be relied upon by any other person. Any person who chooses to rely on this report does so at their own risk. To the fullest extent permitted by law, Isio Group/Isio Services Ltd accepts no responsibility or liability to that party in connection with the Services.
- In the United Kingdom, this Report is intended solely for distribution to Professional Clients as defined by the Financial Conduct Authority's Conduct of Business Sourcebook. This report has not therefore been approved as a financial promotion under Section 21 of the Financial Services and Markets Act 2000 by an authorized person.
- The information contained within the report is available only to relevant persons, and any invitation, offer or agreement to purchase or otherwise acquire investments referred to within the report will be engaged in only with relevant persons. Any other person to whom this communication is directed, must not act upon it.
- Isio Services Limited is authorised and regulated by the Financial Conduct Authority FRN 922376.

# Contacts

**David O'Hara**  
Partner  
T: +44 141 739 9133  
E: david.ohara@isio.com

**Andrew Singh**  
Principal Consultant  
T: +44 131 202 3916  
E: andrew.singh@isio.com

**Doug Sayers**  
Executive Consultant  
T: ++44 141 739 9139  
E: douglas.sayers@isio.com

**Charles Pringle**  
Consultant  
T: +44 131 378 1726  
E: charles.pringle@isio.com

**Georgia Lewis**  
Assistant Consultant  
T: +44 207 046 7984  
E: georgia.lewis@isio.com

**Scott Henderson**  
Assistant Consultant  
T: +44 131 202 3920  
E: scott.henderson@isio.com

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank