WILTSHIRE PENSION FUND COMMITTEE 27 February 2008

#### **WILTSHIRE PENSION FUND – FUNDING STRATEGY STATEMENT**

#### **Purpose of the Report**

1. This report provides Members with an updated Funding Strategy Statement for Wiltshire Pension Fund for consideration and approval.

#### **Background**

- 2. Under the Local Government Pension Scheme Regulations, all funds have a statutory obligation to produce a Funding Strategy Statement (FSS). These are produced in connection with the Triennial Actuarial Valuation.
- 3. This is the second FSS produced for the Wiltshire Pension Fund, the first having been approved by this Committee on 21 February 2005. This new FSS is a refresh of the previous one and there are no new policies within it that Members have not approved before.
- 4. This FSS embodies the principles that have been used in the 2007 Valuation and is consistent with the principles used in determining changes to the Fund's investment strategy in 2006-07.

### **The Funding Strategy Statement Document**

#### Purpose

- 5. The purpose of the Statement is:
  - To establish a clear and transparent fund-specific strategy which will identify how employers' pension liabilities are best met;
  - To support the regulatory requirement to maintain as nearly constant employer contribution rates as possible; and
  - To take a prudent longer-term view of funding liabilities.
- 6. It has been prepared in collaboration with the Fund's Actuary and Investment Advisors. It forms an integral part of the framework within which the Fund's Actuary carry out triennial valuations to set employers' contributions and to provide recommendations on funding decisions.
- 7. The aims of the funding policy are set out on page 3 (2.3), with the primary one being to achieve 100% funding through the maximisation of investment returns based on an appropriate level of risk.

#### Solvency and Target Funding Levels

8. The FSS states how the Common Contribution Rate (CCR) is derived and explains the split of employer contributions between Future Service Rate and Past Service Adjustments (page 4, 3.1) and how the actuary measures the solvency of the fund (page 5, 3.2).

- 9. The principles for calculating employer contribution rates and the reasons why an individual employer's differs from the CCR is explained in 3.4 to 3.7.
- 10. The rules for Admission Bodies that cease are explained in 3.8. This highlights that if an agreement is terminated, a special valuation is carried out by the actuary to determine if there is a funding deficit.
- 11. The policy on early retirement costs (3.9) is that the actuary makes no allowance for non ill health retirements. These costs are met by the employer through additional capital contributions.

#### Links to Investment Strategy

- 12. The FSS describes how funding and investment strategy is inextricably linked and explains the rationale for the investment strategy adopted. The current benchmark is to proportion assets between 52.5% equities, 17.5% bonds, 13% property and 17% in alternatives (page 12, 4.1).
- 13. The document highlights that all employer bodies follow the same strategy, since it was previously established through consultation with employer bodies that the cost-benefit balance of operating different investment strategies for different employers was not justifiable.
- 14. Reference is given on page 13 (4.3) to the need to balance risk and reward. This is explored using Asset-Liability techniques that model solvency, contribution rates and their volatility and was used prior to implementing the current investment strategy.

#### **Key Risks & Controls**

15. The FSS describes the key risks (financial, demographic, regulatory and governance) and highlights the controls in place to mitigate them (page 14-17, 5.1.to 5.5). For example, an illustration of financial risks is the failure of assets to deliver anticipated returns. This is controlled through analysing progress at the three year valuations and inter-valuation monitoring of liabilities relative to assets.

#### **Reasons for Proposals**

16. To fulfil the Wiltshire Pension Fund's statutory obligation to produce a FSS.

#### **Environmental Impact of the Proposals / Risk Assessment**

17. There are no known environmental impacts or risks associated with this proposal.

#### **Proposal**

18. The Committee is asked to approve the draft Wiltshire Pension Fund - Funding Strategy Statement, as attached in the Appendix.

SANDRA SCHOFIELD Chief Financial Officer

Report Author: David Broome

Unpublished documents relied upon in the production of this report:

None

139/2008/WPF/DB

#### 1. Introduction

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

It has been reviewed by the Administering Authority in collaboration with the Fund's Actuary, Hymans Robertson, and after consultation with the Fund's employers and Investment Adviser. This revised version replaces the previous FSS and is effective from 31 March 2008.

#### 1.1 Regulatory Framework

Scheme members' accrued benefits are guaranteed by statute. Members' contributions are fixed in the Regulations at a level which covers only part of the cost of accruing benefits. Employers pay the balance of the cost of delivering the benefits to members. The FSS focuses on the pace at which these liabilities are funded and, insofar as is practical, the measures to ensure that employers or pools of employers pay for their own liabilities.

The FSS forms part of a framework which includes:

- the Local Government Pension Scheme Regulations 1997 (regulations 76A and 77 are particularly relevant);
- the Rates and Adjustments Certificate, which can be found appended to the Fund actuary's triennial valuation report;
- actuarial factors for valuing early retirement costs and the cost of buying extra service; and
- the Statement of Investment Principles.

Operating within this framework, the Fund's Actuary carries out triennial valuations to set employers' contributions and provides recommendations to the Administering Authority when other funding decisions are required, for example when employers join or leave the Fund. The FSS applies to all employers participating in the Fund.

#### 1.2 Reviews of FSS

The FSS is reviewed in detail at least every third year (in which triennial valuations are carried out), with the next full valuation due to be finalised by March 2011 based on data at 31 March 2010.

The FSS is a summary of the Fund's approach to funding liabilities. It is not an exhaustive statement of policy on all issues. If you have any queries please contact David Anthony in the first instance at davidanthony@ wiltshire.gov.uk or on 01225 713698.

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### 2. Purpose

#### 2.1 Purpose of FSS

The Office of the Deputy Prime Minister (ODPM) (now the Department for Communities and Local Government (CLG)) stated that the purpose of the FSS is:

- "to establish a clear and transparent fund-specific strategy which will identify how employers' pension liabilities are best met going forward;
- to support the regulatory framework to maintain as nearly constant employer contribution rates as possible; and
- to take a prudent longer-term view of funding those liabilities."

These objectives are desirable individually, but may be mutually conflicting.

This statement sets out how the Administering Authority has balanced the conflicting aims of affordability of contributions, transparency of processes, stability of employers' contributions, and prudence in the funding basis.

### 2.2 Purpose of the Fund

The Fund is a vehicle by which scheme benefits are delivered. The Fund:

- receives contributions, transfer payments and investment income;
- pays scheme benefits, transfer values and administration costs.

One of the key objectives of a funded scheme is to reduce the variability of pension costs over time for employers compared with an unfunded (pay-as-you-go) alternative.

The roles and responsibilities of the key parties involved in the management of the pension scheme are summarised in Annex B.

#### 2.3 Aims of the Funding Policy

The objectives of the Fund's funding policy include the following:

- to achieve a funding level of 100%, both at the whole Fund level and for the share attributable to individual employers, within a timescale that is prudent and affordable;
- to ensure that sufficient liquid funds are available to meet all benefits as they fall due for payment;
- not to restrain unnecessarily the investment strategy of the Fund so that the Administering Authority can seek to maximise investment returns (and hence minimise the cost of the benefits) for an appropriate level of risk;
- to help employers recognise and manage pension liabilities as they accrue;
- to maximise the degree of stability in the level of each employer's contributions to the extent that the Administering Authority (in consultation with the actuary) is able to do so in a prudent and justifiable way;
- to use reasonable measures to reduce the risk to other employers and ultimately to the Council Tax payer from an employer defaulting on its pension obligations;
- to address the different characteristics of the disparate employers or groups of employers to the extent that this is practical and cost-effective.

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### 3. Solvency Issues and Target Funding Levels

#### 3.1 Derivation of Employer Contributions

Employer contributions are normally made up of two elements:

- a) the estimated cost of future benefits being accrued, referred to as the "future service rate"; plus
- b) an adjustment for the funding position (or "solvency") of accrued benefits relative to the Fund's solvency target, "past service adjustment". If there is a surplus there may be a contribution reduction; if a deficit a contribution addition, with the surplus or deficit spread over an appropriate period.

The Fund's actuary is required by the regulations to report the *Common Contribution Rate*<sup>1</sup>, for all employers collectively at each triennial valuation. It combines items (a) and (b) and is expressed as a percentage of pay. For the purpose of calculating the Common Contribution Rate, the surplus or deficit under (b) is currently spread over a period of 20 years.

The Fund's actuary is also required to adjust the Common Contribution Rate for circumstances which are deemed "peculiar" to an individual employer<sup>2</sup>. It is the adjusted contribution rate which employers are actually required to pay. The sorts of peculiar factors which are considered are discussed in Section 3.5.

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

For some employers it may be agreed to pool contributions, see Section 3.7.3.

Annex A contains a breakdown of each employer's contributions following the 2007 valuation for the financial years 2008/09, 2009/10 and 2010/11. It also identifies which employers' contributions have been pooled with others.

Any costs of early retirements other than on the grounds of ill-health must be paid as lump sum payments at the time of the employer's decision in addition to the contributions described above (or by instalments shortly after the decision).

Employers' contributions are expressed as minima, with employers able to pay regular contributions at a higher rate. Employers should discuss with the Administering Authority before making one-off capital payments.

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<sup>&</sup>lt;sup>1</sup> See Regulation 77(4)

<sup>&</sup>lt;sup>2</sup> See Regulation 77(6)

#### 3.2 Solvency and Target Funding Levels

The Fund's actuary is required to report on the "solvency" of the whole fund at least every three years.

'Solvency" for ongoing employers is defined to be the ratio of the market value of assets to the value placed on accrued benefits on the Fund actuary's *ongoing funding basis*. This quantity is known as a funding level.

The ongoing funding basis is that used for each triennial valuation and the Fund actuary agrees the financial and demographic assumptions to be used for each such valuation with the Administering Authority.

The Fund operates the same target funding level for all ongoing employers of 100% of its accrued liabilities valued on the ongoing basis. Please refer to paragraph 3.8 for the treatment of departing employers.

### 3.3 Ongoing Funding Basis

The demographic assumptions are intended to be best estimates of future experience in the Fund based on past experience of LGPS funds advised by the Fund Actuary. It is acknowledged that future life expectancy and in particular, the allowance for future improvements in mortality, is uncertain. Allowance has been made for improvements in line with the PMA/PFA92 series projections up to calendar year 2017 for pensioners and 2033 for non-pensioners, with age ratings applied to fit past LGPS experience. Employers are aware that their contributions are likely to increase in future if longevity exceeds the funding assumptions.

The approach taken is considered reasonable in light of the long term nature of the Fund and the assumed statutory guarantee underpinning members' benefits. The demographic assumptions vary by type of member and so reflect the different profiles of employers.

The key financial assumption is the anticipated return on the Fund's investments. The investment return assumption makes allowance for anticipated returns from the Fund's assets in excess of gilts. There is, however, no guarantee that the assets will out-perform gilts or even match the return on gilts. The risk is greater when measured over short periods such as the three years between formal actuarial valuations, when the actual returns and assumed returns can deviate sharply.

In light of the statutory requirement for the Actuary to consider the stability of employer contributions, it is therefore normally appropriate to restrict the degree of change to employers' contributions at triennial valuation dates.

Given the very long-term nature of the liabilities, a long term view of prospective returns from equities is taken. For the 2007 valuation, it is assumed that the Fund's equity investments will deliver an average additional return of 1.6% a year in excess of the return available from investing in index-linked government bonds at the time of the valuation.

The same financial assumptions are adopted for all ongoing employers.

#### 3.4 Future Service Contribution Rates

The future service element of the employer contribution rate is calculated on the ongoing valuation basis, with the aim of ensuring that there are sufficient assets built up to meet future benefit payments in respect of future service. The approach used to calculate each employer's future service contribution rate depends on whether or not new entrants are being admitted. Only Admission Bodies have the power not to automatically admit all eligible new staff to the Fund, depending on the terms of their Admission Agreements and employment contracts.

#### 3.4.1 Employers that admit new entrants

The employer's future service rate will be based upon the cost (in excess of members' contributions) of the benefits which employee members earn from their service each year. Technically these rates will be derived using the *Projected Unit Method* of valuation with a one year control period.

If future experience is in line with assumptions, and the employer's membership profile remains stable, this rate should be broadly stable over time. If the membership of employees matures (e.g. because of lower recruitment) the rate would rise.

#### 3.4.2 Employers that do not admit new entrants

Certain Admission Bodies have closed the scheme to new entrants. This is expected to lead to the average age of employee members increasing over time and hence, all other things being equal, the future service rate is expected to increase as the membership ages.

To give more long term stability to such employers' contributions, the *Attained Age* funding method is normally adopted. This will limit the degree of future contribution rises by paying higher rates at the outset.

Both funding methods are described in the Actuary's report on the valuation.

Both future service rates include an allowance for expenses of administration to the extent that they are borne by the Fund and include an allowance for benefits payable on death in service and ill health retirement.

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#### 3.5 Adjustments for Individual Employers

The individual employers do not contribute at the Common Rate of contribution. Rather the Common Rate is amended using employer specific adjustments to produce individual employer contribution rates. These individual employer rates are made up of employer-specific future service contribution rates, and employer-specific deficit adjustments designed to remove their deficit. The deficit and future service rate reflect the following factors:

- the level of past contributions relative to the cost of accruals of benefits;
- different liability profiles of employers (e.g. mix of members by age, gender, parttime/full-time, manual/non manual);
- the effect of any differences in the valuation basis on the value placed on the employer's liabilities;
- any different deficit/surplus spreading periods or phasing of contribution changes;
- the difference between actual and assumed rises in pensionable pay;
- the difference between actual and assumed increases to pensions in payment and deferred pensions;
- the difference between actual and assumed retirements on grounds of ill-health from active status;
- the difference between actual and assumed amounts of pension ceasing on death;
- the additional costs of any non ill-health retirements relative to any extra payments made;

Each of these factors will have an impact - either at the valuation date or over the period between each triennial valuation.

Actual investment returns achieved on the Fund between each valuation are applied across all employers within the unitisation model.

#### 3.6 Asset Share Calculations for Individual Employers

Individual employer asset shares are calculated on a monthly basis by the Administering Authority and passed to the Fund Actuary when required. The system uses monthly income and expenditure amounts split by each employer and is operated by the Administering Authority in accordance with a procedure note, which allows for complications such as intra-fund transfers of liabilities. The system provides a full audit trail of calculations.

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#### 3.7 Stability of Employer Contributions

#### 3.7.1 Deficit Recovery Periods

The Administering Authority instructs the actuary to adopt specific deficit recovery periods for all employers when calculating their contributions.

The Administering Authority normally targets the recovery of any deficit over a period not exceeding 20 years. However, these are subject to the maximum lengths set out in the table below.

Type of Employer	Maximum Length of Deficit Recovery Period
Statutory Bodies with tax raising powers	a period not exceeding 20 years
Community Admission Bodies	a period not exceeding 14 years
	the period from the start of the revised contributions to the end of the employer's contract but not exceeding 20 years

This *maximum* period is used in calculating each employer's *minimum* contributions. Employers may opt to pay higher regular contributions than these minimum rates.

The deficit recovery period starts at the commencement of the revised contribution rate (1 April 2008 for 2007 valuation). The Administering Authority would normally expect the same period to be used at successive triennial valuations, but would reserve the right to propose alternative spreading periods, for example to improve the stability of contributions.

#### 3.7.2 Surplus Spreading Periods

Any employers deemed to be in surplus may be permitted to reduce their contributions below the cost of accruing benefits, by spreading the surplus element over the maximum periods shown above for deficits in calculating their minimum contributions. However, to help meet the stability requirement, employers may prefer not to take such reductions.

#### 3.7.3 Phasing in of Contribution Rises

- Best Value Admission Bodies are not eligible for phasing in of contribution rises.
- Other employers may opt to phase in contribution rises over three years provided that they are starting from a contribution rate (ie. in 2007/08) at or above their future service rate.

service rate.

#### 3.7.4 Phasing in of Contribution Reductions

Any contribution reductions will be phased in over three years for all employers except Best Value Admission Bodies who can take the reduction with immediate effect.

#### 3.7.5 The Effect of Opting for Longer Spreading or Phasing-In

Employers which are permitted and elect to use a longer deficit spreading period than was used at the 2004 valuation or to phase-in contribution changes will be assumed to incur a greater loss of investment returns on the deficit by opting to defer repayment. Thus, deferring paying contributions will lead to higher contributions in the long-term.

However any adjustment is expressed for different employers the overriding principle is that the discounted value of the contribution adjustment adopted for each employer will be equivalent to the employer's deficit.

#### 3.7.6 Pooled Contributions

#### 3.7.6.1 Smaller Employers

The Administering Authority allows smaller employers of similar types to pool their contributions as a way of sharing experience and smoothing out the effects of costly but relatively rare events such as ill-health retirements or deaths in service. The maximum number of active members to participate in a pool is set at 50 employees.

Community Admission Bodies that are deemed by the Administering Authority to have closed to new entrants are not permitted to participate in a pool. Best Value Admission Bodies are also ineligible for pooling.

For both the 2004 and 2007 valuations, a separate pool was operated for Town and Parish Councils

#### 3.7.6.2 Other Contribution Pools

Schools are also pooled with their funding Council.

Those employers that have been pooled are identified in Annex A.

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#### 3.8 Admission Bodies ceasing

Admission Agreements for Best Value contractors are assumed to expire at the end of the contract.

Admission Agreements for other employers are generally assumed to be open-ended and to continue until the last pensioner dies. Contributions, expressed as capital payments, can continue to be levied after all the employees have retired or left. These Admission Agreements can however be terminated at any point.

If an Admission Body's admission agreement is terminated, the Administering Authority instructs the Fund actuary to carry out a special valuation under Regulation 78 to determine whether there is any deficit.

The assumptions adopted to value the departing employer's liabilities for this valuation will depend upon the circumstances. For example:

- (a) For Best Value Admission Bodies, the assumptions would usually be those used for an ongoing valuation to be consistent with those used to calculate the initial transfer of assets to accompany the active member liabilities transferred.
- (b) For non Best Value Admission Bodies that elect to voluntarily terminate their participation, the Administering Authority must look to protect the interests of other ongoing employers and will require the Actuary to adopt valuation assumptions which, to the extent reasonably practicable, protect the other employers from the likelihood of any material loss emerging in future. This could give rise to significant payments being required.
- (c) For Admission Bodies with guarantors, it is possible that any deficit could be transferred to the guarantor in which case it may be possible to simply transfer the former Admission Bodies members and assets to the guarantor, without needing to crystallise any deficit.

Under (a) and (b), any shortfall would be levied on the departing Admission Body (normally) as a capital payment.

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#### 3.9 Early Retirement Costs

#### 3.9.1 Non III Health retirements

The actuary's funding basis makes no allowance for premature retirement except on grounds of ill-health. All employers, irrespective of whether or not they are pooled, are required to pay additional contributions whenever an employee retires "early" (see below) with no reduction to their benefit or receives an enhanced pension on retirement. Advice and guidance on the costs of these are specified by the Fund's actuary from time to time.

It is assumed that members' benefits on age retirement are payable from the earliest age that the employee could retire without incurring a reduction to their benefit and without requiring their employer's consent to retire. Members receiving their pension unreduced before this age other than on ill-health grounds are deemed to have retired "early".

The additional costs of premature retirement are calculated by reference to these ages.

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### 4. Links to Investment Strategy

Funding and investment strategy are inextricably linked. Investment strategy is set by the Administering Authority, after consultation with the employers and after taking investment advice.

### 4.1 Investment Strategy

The investment strategy currently being pursued is described in the Fund's Statement of Investment Principles.

The investment strategy is set for the long-term, but is reviewed from time to time, normally every three years, to ensure that it remains appropriate to the Fund's liability profile. The Administering Authority has adopted a benchmark, which sets the proportion of assets to be invested in key asset classes such as equities, bonds and property. As at 31 December 2007 the benchmark for the Fund's assets was 52.5% in equities, 17.5% in bonds, 13% in property and 17% in alternatives.

The investment strategy of lowest risk – but not necessarily the most cost-effective in the long-term – would be one which provides cashflows which replicate the expected benefit cashflows (i.e. the liabilities). Equity investment would not be consistent with this.

The Fund's benchmark includes a significant holding in equities in the pursuit of long-term higher returns than from a liability matching strategy. The Administering Authority's strategy recognises the relatively immature liabilities of the Fund, the security of member's benefits and the secure nature of most employers' covenants.

The same investment strategy is currently followed for all employers. The Administering Authority does not currently have the facility to operate different investment strategies for different employers. This had been considered as part of the 2004 Actuarial Valuation in the context of reducing the volatility of employers' contribution rates, but at present the cost-benefit balance of such an arrangement does not make it justifiable. However, it will be kept under review.

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#### 4.2 Consistency with Funding Basis

The funding basis adopts an asset outperformance assumption of 1.6% per annum over and above the redemption yield on index-linked gilts. Both the Fund's Actuary and its Investment Adviser consider that the funding basis does conform to the requirement to take a "prudent longer-term" approach to funding.

The Administering Authority is aware that in the short term – such as the three yearly assessments at formal valuations – the proportion of the Fund invested in equities brings the possibility of considerable volatility and there is a material chance that in the short-term and even medium term, asset returns will fall short of the outperformance target. The stability measures described in Section 3 will damp down, but not remove, the effect on employers' contributions.

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

#### 4.3 Balance between risk and reward

When deciding its current investment strategy in 2006, the Administering Authority considered the balance between risk and reward by altering the level of investment in potentially higher return asset classes like equities. This process was informed by the use of Asset-Liability techniques to model the range of potential future solvency levels and contribution rates.

In the light of the sensitivity of employers' contributions to changes in investment returns, in 2004 the Administering Authority reviewed whether its single strategy should be refined, in consultation with the employer bodies. However, the results showed that whilst all employers' contributions were significantly volatile, there are only a very few smaller employers whose volatility profile is significantly different to the average. Therefore, given the cost of establishing and administering multiple investment strategies, it was decided that they could not be justified for the present. However, the situation will be kept under review (see paragraph 4.4).

#### 4.4 Inter-valuation Monitoring of Funding Position

The Administering Authority intends to monitor investment performance relative to the growth in the liabilities by means of quarterly inter-valuation monitoring reports. It will report back to employers if and when this monitoring suggests that changes to investment or contribution strategy should be considered (see paragraph 4.3).

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### 5. Key Risks & Controls

### 5.1 Types of Risk

The Administering Authority's has an active risk management programme in place. The measures that the Administering Authority has in place to control key risks are summarised below under the following headings:

- financial;
- demographic;
- regulatory; and
- governance.

#### 5.2 Financial Risks

Risk	Summary of Control Mechanisms
Fund assets fail to deliver returns in line with the anticipated returns underpinning valuation of liabilities over the long-term	Only anticipate long-term return on a relatively prudent basis to reduce risk of under-performing.  Commission a quarterly funding update for the Fund as a whole, on an approximate basis.  Analyse progress at three yearly valuations for all employers.  Inter-valuation monitoring of liabilities relative to assets between formal valuations at individual employer level on a six monthly basis
Inappropriate long-term investment strategy	Set Fund-specific benchmark, informed by Asset-Liability modelling of liabilities.  Continue to review feasibility of allowing some form of employer-specific investment strategy.  Inter-valuation monitoring, as above.
Fall in risk-free returns on Government bonds, leading to rise in value placed on liabilities	Inter-valuation monitoring, as above.  Some investment in bonds helps to mitigate this risk.
Active investment manager under- performance relative to benchmark	Short term (quarterly) and long-term (3-5 years) investment monitoring analyses market performance and active managers relative to their index bendmark.

ne focus of the actuarial valuation process is on real urns on assets, net of price and pay increases.
ter-valuation monitoring, as above, gives early
nne inwestment in index-linked bonds also helps to tigate this risk.
imployers pay for their own salary awards and are ninded of the geared effect on pension liabilities of any is in pensionable pay rises towards longer-serving uployees.
itigate impact through deficit spreading and phasing- of contribution rises. ter-caluation monitoring (as above) will flag up any portunities to switch money into bonds to reduce the latility of contributions.
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### 5.3 Demographic Risks

Risk	Summary of Control Mechanisms
Pensioners living longer.	Set mortality assumptions with some allowance for future increases in life expectancy.
	Sensitivity analysis in triennial valuation calculations helps employers understand the potential impact of life expectancy.
	Fund actuary monitors combined experience of around 50 LGPS funds to look for early warnings of lower pension amounts ceasing than assumed in funding.
	Administering Authority encourages any employers concerned at costs to promote later retirement culture. Each 1 year rise in the average age at retirement would save roughly 5% of pension costs.
Deteriorating patterns of early retirements	Employers are charged the extra capital cost of non ill health retirements following each individual decision.
	Employer ill health retirement experience is monitored.

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#### 5.4 Regulatory

Risk	Summary of Control Mechanisms
Changes to regulations, e.g. more favourable benefits package, potential new entrants to scheme, e.g. part-time employees	The Administering Authority is alert to the potential creation of additional liabilities and administrative difficulties for employers and itself.  It considers all consultation papers issued by the
Changes to national pension requirements and/or HM Revenue & Customs rules e.g. effect of abolition of earnings cap for post 1989 entrants from April 2006	ODPM and comments where appropriate.  The Administering Authority will consult employers where it considers that it is appropriate.

#### 5.5 Governance

Risk	Summary of Control Mechanisms
Administering Authority unaware of structural changes in an employer's membership (e.g. large fall in employee members, large number of retirements).  Administering Authority not advised of an employer closing to new entrants.	The Administering Authority monitors membership movements on an annual basis, via a report from the administrator.  The Actuary may be instructed to consider revising the Rates and Adjustments certificate to increase an employer's contributions (under Regulation 78) between triennial valuations  Deficit contributions are expressed as monetary amounts in most cases (see Annex A).
Administering Authority failing to commission the Fund Actuary to carry out a termination valuation for a departing Admission Body and losing the opportunity to call in a debt.	In addition to the Administering Authority monitoring membership movements on a quarterly basis, it requires employers with Best Value contractors to inform it of forthcoming changes.  It also operates a diary system to alert it to the forthcoming termination of Best Value Admission Agreements.

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An employer ceasing to exist with insufficient funding or adequacy of a bond.

The Administering Authority believes that it would normally be too late to address the position if it was left to the time of departure.

The risk is mitigated by:

- Seeking a funding guarantee from another scheme employer, or external body, where-ever possible.
- A lerting the prospective employer to its obligations and encouraging it to take independent actuarial advice.
- V etting prospective employers before admission.
- Where permitted under the regulations requiring a bond to protect the scheme from the extra cost of early retirements on redundancy if the employer failed.

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### Annex A – Employers' Contributions, Spreading and Phasing Periods

Following the 2007 valuation, the minimum employer contributions shown in the Rates and Adjustment certificate attached to the 2007 valuation report are based on the deficit recovery periods and phasing periods shown in the table below. The table also shows the individual adjustments under Regulation 77(6) to each employer's contributions from the 'Common Contribution Rate'.

[Table to be inserted after the final Rates & Adjustments Certificate is signed]

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### Annex B – Responsibilities of Key Parties

#### The Administering Authority should:-

- collect employer and employee contributions;
- invest surplus monies in accordance with the regulations;
- ensure that cash is available to meet liabilities as and when they fall due;
- manage the valuation process in consultation with the fund's actuary;
- prepare and maintain and FSS and a SIP, both after proper consultation with interested parties; and
- monitor all aspects of the fund's performance and funding and amend FSS/SIP

#### The Individual Employer should:-

- deduct contributions from employees' pay correctly;
- pay all contributions, including their own as determined by the actuary, promptly by the due date;
- exercise discretions within the regulatory framework;
- make additional contributions in accordance with agreed arrangements in respect of, for example, augmentation of scheme benefits, early retirement strain; excess ill health early retirements if appropriate; and
- notify the administering authorities promptly of all changes to membership or, as may be proposed, which affect future funding.

#### The Fund Actuary should:-

- prepare valuations including the setting of employers' contribution rates after agreeing assumptions with the Administering Authority and having regard to the FSS; and
- prepare advice and calculations in connection with bulk transfers and individual benefitrelated matters.

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