

2012-13

Annual Report



The Nottinghamshire
Local Government Pension Scheme



administered by



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Chair's Foreword

In my first year as Chair of the Nottinghamshire Pension Fund Committee, I would like to express my gratitude to Cllr Mike Cox for all his efforts on behalf of the pension fund over the past 4 years as Chair and many more years as a member of the Pension Fund Committees.

The Fund now has nearly 103,000 members but has again seen a reduction in active members together with an increase in deferred and pensioner members as the current economic climate continues to affect fund employers.

Over the past year the outlook for the global economy has shown signs of recovery, particularly in the developed world, with investors having greater confidence in equity investments. As a consequence, towards the end of 2012/13, stock markets in the developed world began to return to pre-crisis levels. The developing world presents a diverse picture with many now beginning to experience economic challenges. The Pension Fund has a high exposure to equities and as a result has seen an increase in assets of over £400m to stand at just under £3.5 billion, a return of nearly 14%.

This performance will greatly assist the triennial valuation currently underway which will determine employers' contributions for the next three years. Keeping pension contributions relatively stable helps employers to set their budgets. The valuation will also take into account the new Local Government Pension Scheme (LGPS) which will commence in 2014. Much work has already been done by the Pension's Office to prepare for this and details of the changes will continue to be communicated to members by the Fund's newsletter, Nest Egg, as well as via the dedicated pension fund website (www.nottspf.org.uk).

Further changes to the structure of the LGPS are also being discussed. The Nottinghamshire Fund already has strong governance and accountability to taxpayers and other interested parties. Our investment management costs are kept low by a combination of in-house management and a limited number of external managers. Our administration costs are benchmarked against other authorities and consistently show good value.

The Fund takes a long term responsible approach to its investments, actively voting its equity holdings and engaging with companies through its investment managers and membership of the Local Authority Pension Fund Forum. In order to increase the transparency of how the Fund operates, we now publish all investment holdings each quarter on the Fund website along with summary details of the voting record for each quarter.

In today's uncertain economic climate LGPS members can be confident that their pensions are safeguarded and that the LGPS will continue to provide attractive benefits beyond 2014.

Cllr Stella Smedley MBE JP

Chair of the Nottinghamshire Pension Fund Committee

Management and Financial Performance

Governance

Nottinghamshire County Council is the administering authority for the Local Government Pension Scheme within Nottinghamshire for which it invests and administers funds with over 100 contributing employers and nearly 38,000 contributing members. The operation of the Fund is governed by a number of published policy statements.

The Governance Compliance Statement (page 41) sets out the governance arrangements of the pension fund and covers:

- the delegation of authority to the Pensions Committee supported by two sub-committees
- the functions and responsibilities of these committees
- the representation of members, employers and trade unions
- stakeholder engagement
- compliance with best practice.

The Nottinghamshire Pension Fund Committee separately approves four further policy statements. The Funding Strategy Statement (page 46) sets out the aims and purpose of the pension fund and the responsibilities of the administering authority as regards funding the scheme. Its purpose is:

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

The Statement of Investment Principles (page 53) sets out more detailed responsibilities relating to the overall investment policy of the fund including the proposed asset allocation, restrictions on investment types, the type of investment management used and performance monitoring. It also states the fund's approach to responsible investment and corporate governance issues.

The Communications Strategy Statement (page 66) details the overall strategy for involving stakeholders in the pension fund. A key part of this strategy is a dedicated pension fund website. This is available at www.nottspf.org.uk and includes all of the policy statements as well as a great deal more information about the investments and benefits of the pension fund.

The Pension Fund's Risk Management Strategy (page 70) is to:

- a) identify key risks to the achievement of the Fund's aims
- b) assess the risks for likelihood and impact
- c) identify mitigating controls
- d) allocate responsibility for the mitigating controls
- e) maintain a risk register detailing the risk features in a)-d) above
- f) review and update the risk register on an annual basis
- g) report the outcome of the review to the Pensions Committee annually.

The latest approved risk register is on page 72.

Management of the Fund

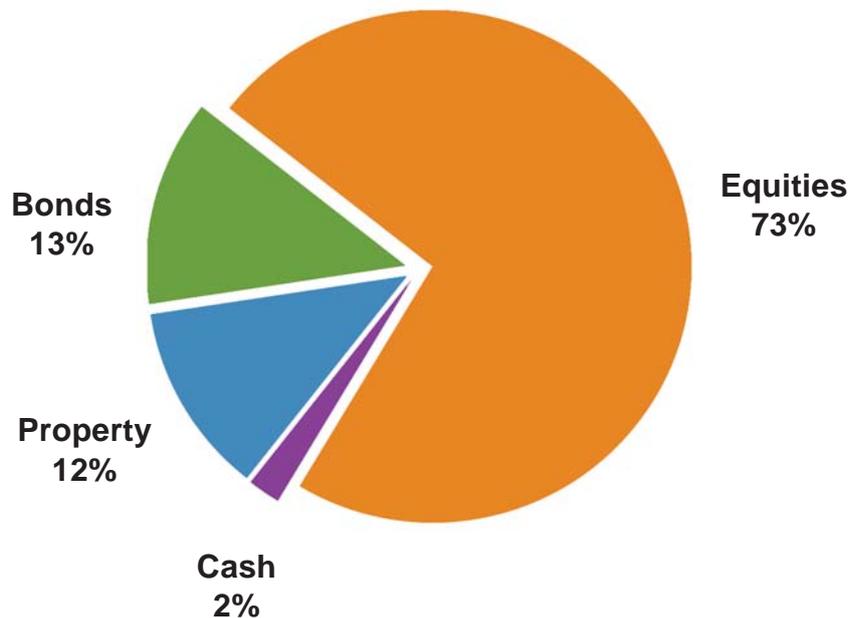
The aims of the fund are to:

- enable employer contribution rates to be kept as nearly constant as possible and at reasonable cost to the taxpayers, scheduled, resolution and admitted bodies
- manage employers' liabilities effectively
- ensure that sufficient resources are available to meet all liabilities as they fall due
- maximise the returns from investments within reasonable risk parameters.

The long term funding objective is for the fund to achieve and then maintain sufficient assets to cover 100% of projected accrued liabilities. The Nottinghamshire Pension Fund Committee is responsible for deciding the overall investment strategy and asset allocation of the fund in order to try to achieve this target. The agreed asset allocation ranges are below.

| | |
|-----------------|-------------------|
| Equities | 55% to 75% |
| Property | 5% to 25% |
| Bonds | 10% to 25% |
| Cash | 0% to 10% |

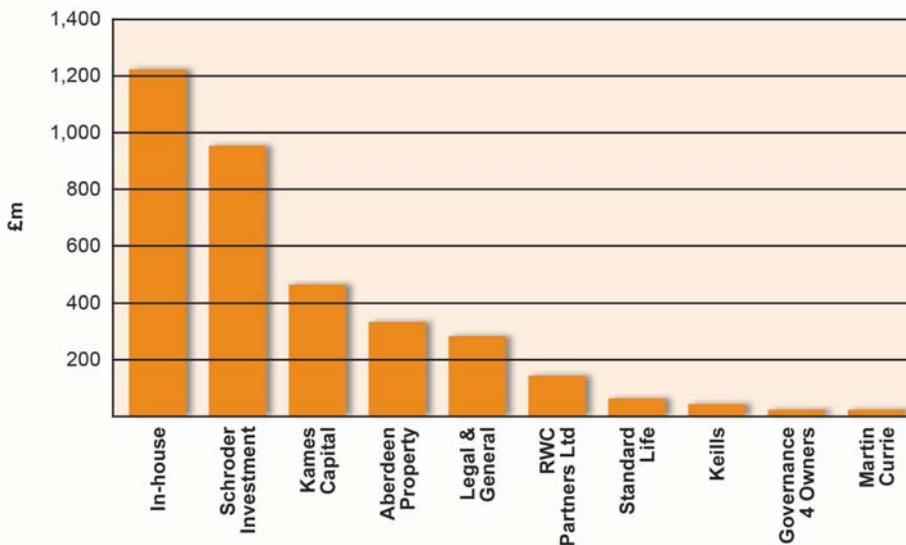
At the end of the financial year 2012/13 the actual asset allocation was:



The Committee also determines the investment management arrangements to implement the strategy as outlined in the Statement of Investment Principles. The value of funds managed under these arrangements at 31 March 2013 were:

The in-house portfolios are managed by a small team of six, led by the Senior Accountant (Pensions and Treasury Management). This team also records and accounts for all the pension fund investments, producing quarterly valuations for the Pensions Investment Subcommittee as well as the annual report and accounts.

MANAGEMENT OF FUNDS 2012 / 13



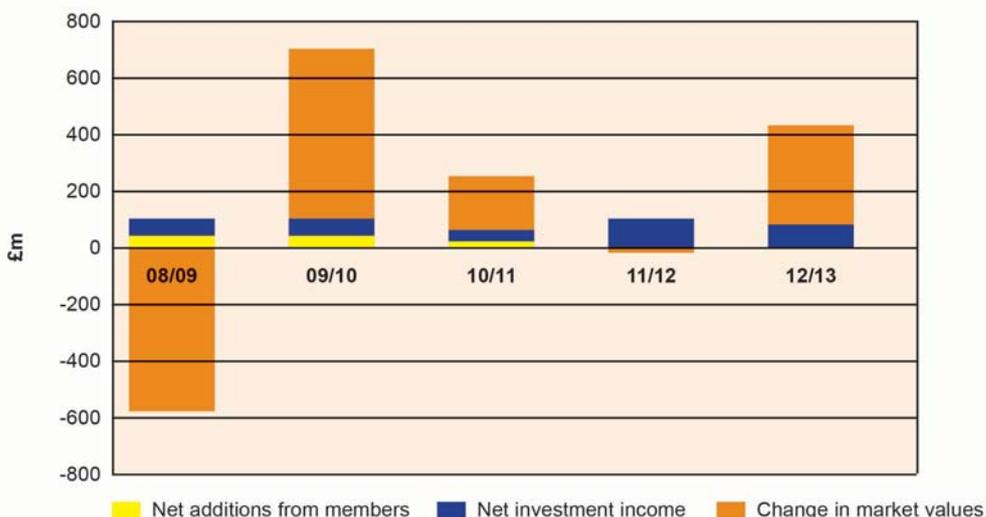
Financial Performance

The pension fund accounts are shown in detail on pages 16 to 40.

The Fund Account shows positive cash inflow of £5m from net dealings with members. This is down by £12m compared to last year due mainly as a result of higher transfers out to other pension funds and

lower employer strain payments. Investment income for the year was £88m, a slight increase from the previous year, but the main contribution to the bottom line has been the £335m increase in market value. The chart below shows how the 3 main components have contributed to the Fund's value over the last five years. Overall, the value of the fund has increased by £424m over the year to stand at £3,496m.

CHANGE IN MARKET VALUE OF THE FUND



Investment Performance

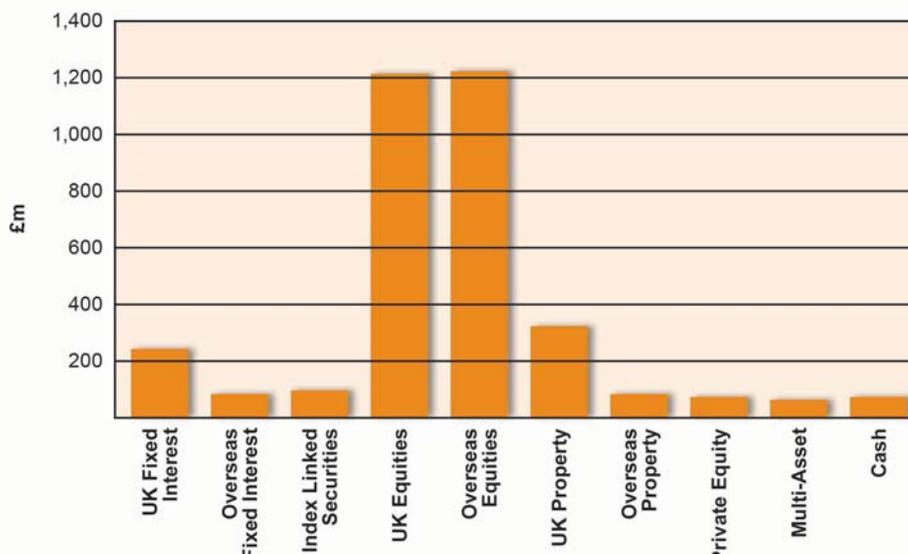
Investment Policy

The Fund's investment policy is set out in its Statement of Investment Principles:

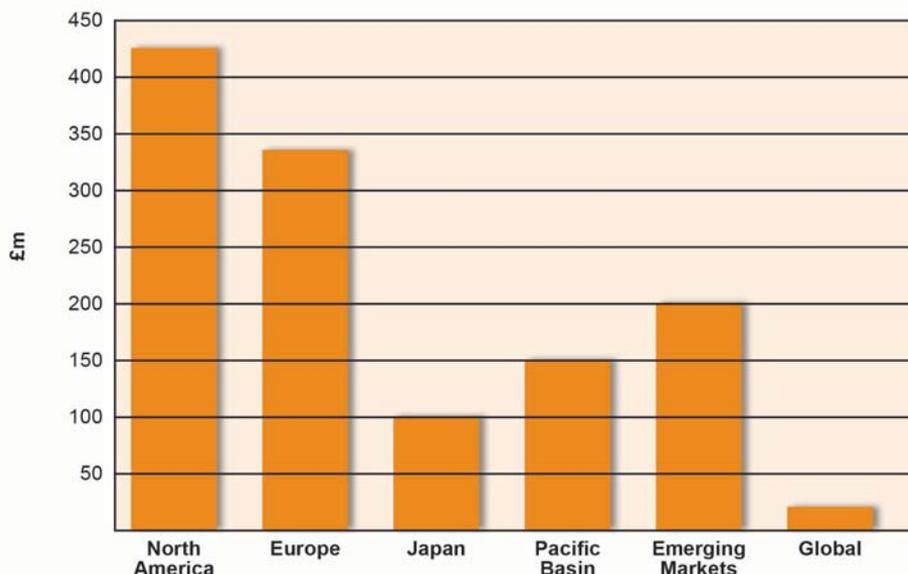
- the Fund will aim to be sufficient to meet all their obligations on a continuing basis.
- the Fund will be invested in a diversified range of assets.
- independent advice on the suitability of types of investment will be obtained on a regular basis.
- members recognise their full responsibility for the oversight of the Fund, and operate to a Code of Conduct.

The members of the Nottinghamshire Pension Fund Committee are drawn from the county council, and they have responsibility for determining the investment strategy, asset allocation and management arrangements. The agreed asset allocation ranges are aimed at achieving best returns whilst minimising overall variability in the future employers' contribution rates. The policy of the Fund is to treat the equity allocation as a block aimed at maximising the financial returns to the funds while remaining within an acceptable level of risk. Bonds, property and cash are treated as a separate block, aimed at lowering overall risk (at the cost of anticipated lower return).

ASSET ALLOCATION OF THE FUND 31 MARCH 2013



BREAKDOWN OF OVERSEAS EQUITIES



Investment Performance

In 2012/13, the Fund achieved an overall return from its investments of 13.9% compared with a target of 12.5% benchmark return. Equities provided a return of 17.7% compared to around 12% for bonds as investors gained more confidence in the global economic recovery. Property struggled to make headway with UK property returning 1.8%. Over five

years the Fund has returned 6.3% per annum, in line with its benchmark and over 10 years the Fund has achieved a return of 9%, 0.6% below the benchmark.

The Fund's main investment managers (Schroders and Kames) exceeded their benchmarks over the year by up to 0.6%. The in-house global equity portfolio was 0.3% below its benchmark for the year.

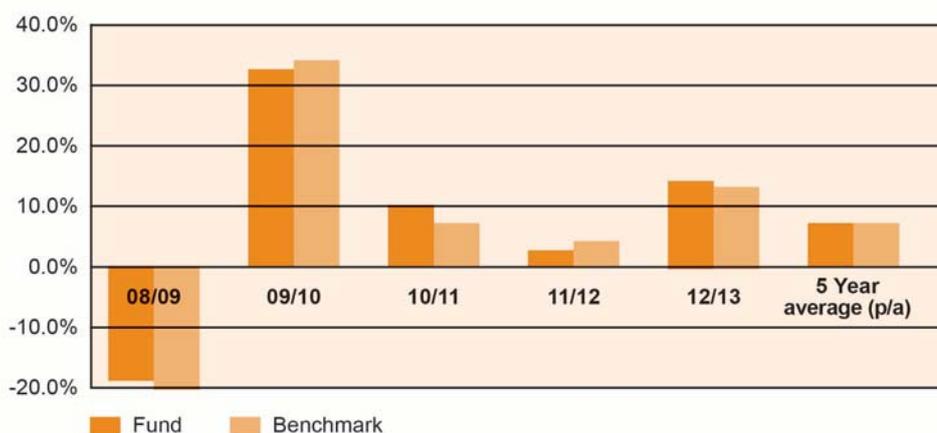
Detailed performance figures are shown below.

Fund returns achieved over 1, 3 and 5 years by asset class.

| To 31 March | 1yr %pa | 3yrs %pa | 5yrs %pa |
|------------------------|-------------|-------------|-------------|
| Equities | 17.7 | 9.3 | 7.9 |
| Bonds - UK | 10.7 | 9.2 | 8.4 |
| Bonds - Overseas | 11.9 | 4.9 | 9.8 |
| Bonds - Indexed Linked | 12.4 | 12.3 | 9.3 |
| Alternatives | 9.1 | - | - |
| Property - UK | 1.8 | 5.5 | -0.1 |
| Property - Overseas | -0.2 | - | - |
| Total Fund | 13.9 | 8.2 | 6.3 |

Information on returns is provided by State Street.

THE INVESTMENT PERFORMANCE OF THE FUND OVER LAST 5 YEARS

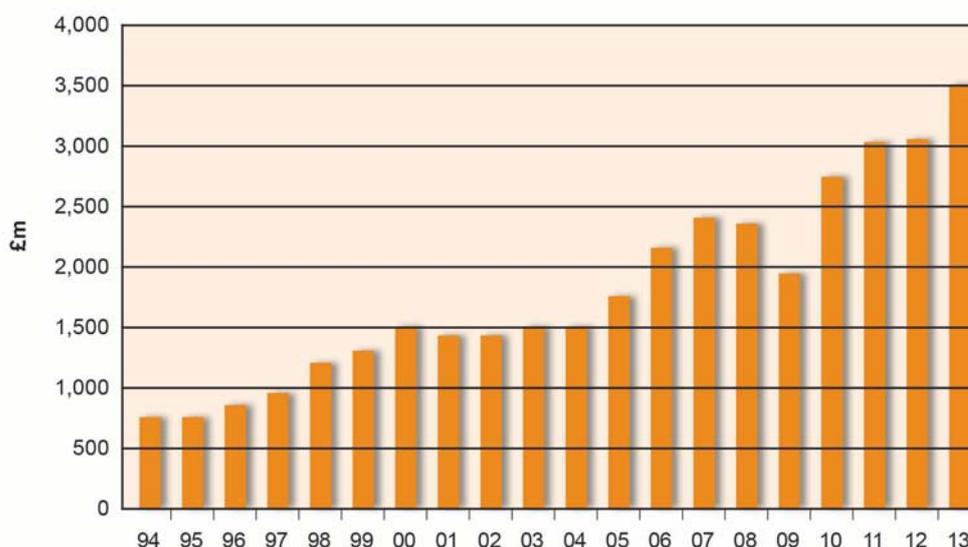


TOP 20 HOLDINGS AT 31 MARCH 2013

| Holding | Market Value £M | Fund Percentage Of Fund |
|--|-----------------|-------------------------|
| SGST Schroder North American Equity Fund | 135.4 | 3.9% |
| Legal & General Asia Pacific Ex Japan Dev Eqty Index | 101.4 | 2.9% |
| HSBC Holdings Plc Ord US \$0.50 | 66.0 | 1.9% |
| Royal Dutch Shell Eur0.07 'B' (Uk) | 65.6 | 1.9% |
| Legal & General Japan Equity Index | 64.5 | 1.9% |
| Kames Inflation Linked Fund Class B (Acc) Oeic | 62.7 | 1.8% |
| RWC Specialist Uk Focus Fund | 59.5 | 1.7% |
| Vodafone Group Ord US \$0.11428571 | 57.4 | 1.6% |
| Schroder Instl Dev Mkts Fund A Units | 55.4 | 1.6% |
| Legal & General Global Emerging Mkts Index | 54.6 | 1.6% |
| Schroder Ut Ltd Instit Pacific Fund Inc | 50.5 | 1.5% |
| RWC European Focus Fund | 49.3 | 1.4% |
| Glaxosmithkline Plc Ord 25P | 48.7 | 1.4% |
| BP Plc Ord US \$0.25 | 42.9 | 1.2% |
| Aberdeen Dynamic European Property Fof Class A (1) | 35.3 | 1.0% |
| Rio Tinto Plc Ord 10P | 34.5 | 1.0% |
| BG Group Plc Ord 10P | 33.5 | 1.0% |
| Astrazeneca Group US \$0.25 | 32.4 | 0.9% |
| Rolls Royce Holdings Plc Com Stk GBP 0.20 | 31.6 | 0.9% |
| Prudential Plc Ord 5P | 28.2 | 0.8% |
| Total | 1,109.4 | 31.9% |

Index Tracker
 Equity
 Equity Fund
 Property Fund
 Mixed Fund

FUND VALUATION OVER LAST 20 YEARS



Administration Arrangements

The Pensions Office

The Pensions Office is the part of the Nottinghamshire Pension Fund responsible for the administration of the Nottinghamshire Local Government Pension Scheme (LGPS), including the Councillors' LGPS. The Pensions Office undertakes the 'nuts and bolts' of pensions work from setting up a new member to continuously updating their record to finally making payment of their benefits. In addition, the office also undertakes some of the employer related work of the LGPS for Nottinghamshire County Council.

The office is currently separated into the following areas of work:

- Pensions Administration
- Systems Administration
- Technical/Communications
- Client Liaison
- Technical/Performance (Support)

Pensions Administration System

The Pensions Office primarily administers the Nottinghamshire LGPS through the Pensions Administration System using up to date modules such as task management, document imaging and workflow procedures. All member documentation received in the office is scanned and indexed on to the system. The system allows an officer to be allocated to a group of work, for example processing of retirement benefits, and to view relevant scanned documents. It also enables the officer to place appropriate notes on the member record relating to the stage of the procedure reached, thereby allowing another pensions officer to be allocated this work in the future and complete it as required.

Benchmarking

The Pensions Office, as part of measuring its administration cost and performance against other Administering Authorities, belongs to the Pensions Administration Benchmarking Club. This Club is run by the Chartered Institute of Public Finance Limited and we have been a member of it since 2000. Our

performance in terms of cost per member has always been lower than the national average, and we continue to remain one of the cheaper cost-per-member authorities for administration in the country.

Communications

Benefit Statements

The Pensions Office has sent annual benefits statements to members of the Nottinghamshire LGPS (actives, deferred and councillors) since 2005. The statement informs the scheme member of not just their present or future values of benefits, but also, in brief, how they have been calculated.

Nest Egg

The bright and informative newsletter, Nest Egg, is produced twice a year. It is accessible to members on the Fund's website or via an e-mail link, although paper copies are available for those who request one. The publication informs the scheme member, in plain English, of issues related to the pension scheme, for instance complex regulation, fund performance, meeting dates/times etc.

Website Development

Launched in July 2007, the website of the Nottinghamshire Pension Fund (www.nottspf.org.uk) covers all aspects of the LGPS and has information for all different types of stakeholders including active members, councillor members, deferred members, pensioners, their dependants and employers. There is also a section on fund information which gives details on the investment performance of the fund and other matters.

A separate micro-site was launched in June 2009 which provides guidance for employing organisations who participate in the Nottinghamshire Pension Fund. The aim of the site is to make the content relevant and accessible and to assist with the administration procedures and interpretation of the LGPS regulations.

Client Liaison

The Pensions Office's Client Liaison function liaises with scheme employers on a range of LGPS

matters, including: the organisation of events for scheme members; the development of improved communication methods between the Pensions Office and its members/employers; the provision of support and training for employers; and the review and improvement of information and administrative systems. The Client Liaison Team has undertaken a number of events including:

- roadshows and stands
- employer meetings
- induction and pre-retirement courses
- presentations.

An important factor in the design and delivery of pension roadshows/events at employer venues is that they are tailored to meet the needs of the individual employer and their employees. The team also works in partnership with the Fund's AVC providers, Prudential and Scottish Widows, who attend most organised pension events.

A range of communication methods have been used during the events. They include:

- a) PowerPoint presentations to members with Question & Answer sessions
- b) DVD showing at roadshows/events of the LGPS to members
- c) meetings with employers to inform of the important aspects of the LGPS
- d) workshops with employers to train representatives on the administrative requirements of the LGPS. An employer guide and an end of year procedure guide have been developed to assist the employer in undertaking their responsibilities
- e) stands at staff conferences to discuss issues with members/prospective members of the LGPS
- f) one-to-one sessions with members at roadshows, where they can discuss issues relating to their membership, but also view their records, and have a retirement estimate calculated and printed for their information
- g) LGPS slot on induction courses across the county at employer venues to inform new employees of the LGPS.

A range of promotional material and literature has been produced for members, which are also used at the different pension events and roadshows, for example, specific guides and fact sheets on how the LGPS works. All the material contains clear information about the LGPS and advertises the Pensions Office telephone helpline number and website address, and is available online at www.nottspf.org.uk/welcome/members/membersguides/.

Employers

The Pensions Office arranges regular employer meetings. The opportunity is taken to discuss LGPS issues such as end of financial year procedures and responsibilities for new employers, with a view to driving the pensions agenda forward by giving clear guidance, direction and advice.

The Client Liaison team have continued to run a series of training events for employers, with the aim of improving the quality and timeliness of information received from them.

Membership

All new employees with a contract of at least three months are brought into the pension scheme automatically, unless a positive election not to participate is received from the employee. The membership of the fund over the past three years has been:

| | 31/03/11 | 31/03/12 | 31/03/13 |
|-------------------|---------------|----------------|----------------|
| Contributors | 39,914 | 38,383 | 37,840 |
| Deferred Benefits | 32,100 | 33,838 | 35,187 |
| Pensioners | 26,722 | 28,475 | 29,797 |
| Total | 98,736 | 100,696 | 102,824 |

Fund Employers

Scheduled & Other Bodies

A1 Housing Bassetlaw Ltd
Alderman White School
Arnold & Carlton College
Arnold Hill Foundation Trust
Ashfield District Council
Ashfield Homes Ltd
Ashfield School
Aslockton Parish Council
Balderton Parish Council
Barnby Road Trust
Basford Hall College
Bassetlaw District Council
Bestwood Community School
Bilborough College
Bingham Town Council
Blessed Robert Widmerpool Academy
Blidworth Parish Council
Bluecoat Academy
Brackenhurst College
Bramcote Crematorium Joint Committee
Broxtowe Borough Council
Broxtowe College
Bulwell Academy
Calverton Parish Council
Carlton Academy -Redhill Trust
Carlton Le Willows Academy
Castle College Nottingham
Central College Nottingham
Chetwynd Primary Academy
Christ The King Catholic Academy
Clarendon College
Colwick Parish Council
Cotgrave Candleby Lane School
Cotgrave Town Council
Cropwell Bishop Parish Council
Diverse Acad. Trust - Tuxford
Djanogly City Academy Nottingham
Djanogly Northgate Academy
East Leake Academy
East Midlands Airport Joint Committee
Eastwood Town Council
Edna G Olds Academy
Edwinstowe Parish Council
Farndon Parish Council
Fernwood Academy Trust
Fernwood Parish Council
Foxwood Academy
Foxwood Grant Maintained School
Gedling Borough Council
George Spencer Academy Trust
George Spencer G M School
Greasley Parish Council
Greenwood Dale G M School
Guideline Career Services Ltd
Harworth And Bircotes Parish Council
High Pavement College
Holy Cross Primary Catholic Academy
Huntingdon Academy
Keyworth Parish Council
Kimberley School
Kingston Park Academy
Kirkby College
Laneham Internal Drainage Brd
Langar Cum Barnstone Parish Council
Leverton CE Academy School
Lowdham Parish Council
Manor Academy Trust
Mansfield & District Crematorium Joint Committee
Mansfield District Council
Mansfield Primary Academy
Meden School 'A Torch Academy'
Milford Academy
National CE Academy Trust
National College For Leadership
Nethergate School
New College Nottingham
Newark & Sherwood College
Newark & Sherwood District Council
Newark And Sherwood Homes Ltd
Newark Internal Drainage Board
Newark Town Council
Norbridge Academy
North Muskham Parish Council
North Nottinghamshire College Of Further Education
Nottingham City Council
Nottingham City Homes
Nottingham City Transport Ltd
Nottinghamshire County Council
Nottingham Academy - Greenwood At
Nottingham Girls School - Greenwood At
Nottingham University Samworth Academy
Nottinghamshire County Council
Nottinghamshire Combined Fire Authority
Nottinghamshire Fire & Rescue (Trading) Ltd
Nottinghamshire Magistrates Court Committee
Nottinghamshire Police Authority
Nottinghamshire Probation Trust
Nuthall Parish Council
Old Basford School

Ollerton & Boughton Town Council
Our Lady & St Edwards Voluntary Academy
Our Lady Of Perpetual Succour Catholic Primary School
Outwood Academy Portland
Outwood Academy Valley
Peoples College Of Tertiary Education
Police & Crime Commissioner
Priory Catholic Voluntary Academy
Quarrydale Academy
Queen Elizabeth's Academy
Radcliffe On Trent Parish Council
Rainworth Parish Council
Ravensdale Middle School
Ravenshead Parish Council
Redhill Academy
Retford Oaks Academy
Ruddington Parish Council
Rushcliffe Borough Council
Rushcliffe School Academy
Sacred Heart Primary Catholic Academy
Samworth Church Academy
Scape System Build Ltd
School Partnership Trust - Serlby Pk
Selston Parish Council
Sherwood E-Act Academy
Sneinton St Stephen's Primary
South Nottingham C.A.T. - Becket
South Nottingham C.A.T. - St E Campion
South Nottingham College Academy Trust
South Wolds Academy
Southwark Primary
Southwell Town Council
St Ann's Well Academy
St Margaret Clitherow C.A.T. Academy
St Mary's Catholic Primary School
St Teresa's Catholic Primary School
Stapleford Town Council
Stone Soup Academy
Sutton Community Academy
Sycamore Academy
The Bramcote School
The Brunts Academy
The Dukeries Academy
The Elizabethan Academy Trust
The Good Shepherd C.A.T. Academy
The Joseph Whitaker School
The Newark Academy
The Nottingham Trent University
The Trinity Catholic School

The Trinity School
The West Bridgford School
Tollerton Parish Council
Toot Hill School
Top Valley Academy
Trent Polytechnic Pre 1-4-89
Trowell Parish Council
Upton Parish Council
Valuation Tribunal Service
Wainwright Primary Academy
Warren Hill Academy Trust
Warsop Parish Council
West Nottinghamshire College Of Further Education
Whitemoor Academy
Windmill Lead Academy

Admitted Bodies

Abbey And Kilton B C
Advance Housing & Support Ltd
Alcoholic Advisory Council
Ashfield Citizens Advice Bureau
Ashfield Women's Centre
Barnsley Premier Leisure Ltd
Bassetlaw Citizens Advice Bureau
Beeston Citizens Advice Bureau
Bestwood Advice Centre
Bestwood Partnership Forum
Bookworms/Bookstart Project
Broxtowe Partnership Trust Ltd
Bulwell Vision Ltd
C.L.A.S.P.
Capita It Services (Bsf) Ltd
Carers Federation Nottingham
Carillion Services Limited
Castle Cavendish Foundation
Child Migrants Trust
Citizens Advice Broxtowe
City Arts
City Of Nottingham Scout District
Clifton Advice Centre
Creswell Craggs Heritage Trust
Creswell Groundwork Trust
Disabilities Living Centre
East Midlands Area Museum Service
East Midlands Further Education Council
East Midlands Regional Exams Board
East Midlands Arts Board
East Midlands Airport (Post 1987)
East Midlands Screen Commission
Eastwood Voluntary Bureau

Em Media Company Ltd
Enviroenergy Ltd
Experience Nottingham Limited
Faith In Families
Family Care
First Data (Training) Ltd
Gedling Homes
Greater Nottingham Partnership
Greenfields Centre Limited
Groundwork Ashfield & Mansfield
Groundwork Greater Nottingham
Guideline Careers Service Ltd
Hint
Hist Pensions-Pre 1-4-74
Hyson Green Boy Club
Independent Cleaning Services Ltd
Institute Of Cemetery & Crematorium
Intermedia Film And Video
Jesse Boot Sports Trust Ltd
Mansfield Citizens Advice Bureau
Mansfield Council For Voluntary Service
Mansfield District Leisure Trust
Mansfield Information Technology Centre
Mansfield Rd Baptist Housing
Mansfield Society For Deaf People
Mary Ward College
Meadows Advice Group
Meadows Partnership Trust
Meden Valley Making Places Ltd
Meden Valley Partnership
Mellors Csl (Rushcliffe)
Mellors Csl (Southwark)
Metropolitan Housing Trust
Mind (Central Nottinghamshire Health)
Mla East Midlands
Monty Hind Boys Club
Museum Of Law Trust Company
N.E.C.T.A. Ltd
Newark Emmaus Trust Limited
Newark Youth Enterprise Org
Nottingham & District Racial Equal Council
Nottingham And Nottinghamshire Futures Ltd
Nottingham Citizens Advice Bureau
Nottingham Community Housing Association
Nottingham Contemporary
Nottingham Development Enterprise
Nottingham Ice Centre Limited
Nottingham Independant Venture
Nottingham Information Technology Centre
Nottingham Reg Soc For Autistic C/A

Nottingham Regeneration Ltd.
Nottingham Trent Students Union
Nottinghamshire Age Concern
Nottinghamshire Association Of Local Councils
Nottinghamshire County Scout Association
Nottinghamshire Deaf Society
Ollerton & District Citizens Advice Bureau
Pearson Centre For Young People
Provision Catering & Facilities
R.A.C.O.F.E.E.M.
Regeneration East Midlands
Renewal Trust
Royal Society Mencap
Rural Community Action Nottinghamshire
Rushcliffe Homes Ltd
Russell Youth Club
Southern Electric Contracting
Southwell Leisure Centre
Sports & Leisure Management
Sprou & Associates Limited
St Hugh's College
Stonham Housing Association
Tech Aid For Nottingham Communities
The Kirkby Trust
The Partnership Council
Thera East Midlands
United Response
Upp (Nottingham) Ltd
Voluntary Organisations Skill Exchange
Wastenottinghamshire (Reclamation) Ltd
Wastenottinghamshire Ltd
Webb Support Services Limited
William Olds Boys Club

Statement by the Actuary

Introduction

The last full triennial valuation of the Nottinghamshire County Council Pension Fund ("the Fund") was carried out by ourselves as at 31 March 2010. The results were published in our report dated March 2011.

2010 Valuation

The 2010 valuation certified a common contribution rate of 18.0% of pensionable pay to be paid by each employing body participating in the Fund. In addition to this each employing body has to pay an individual adjustment to reflect its own particular circumstances and funding position within the Fund. Details of each employer's contribution rate are contained in the Statement to the Rates and Adjustment Certificate in the triennial valuation report.

Employer Contribution Rates

Employers' contributions rates, in addition to those paid by the members of the Fund, are set to be sufficient to meet

- The ongoing annual accrual of benefits for active members in respect of each employer that build up each year within the Fund, allowing for future pay increases and increases to pension in payment when these fall due
- Plus an amount to fund the difference between each participating employer's notional share of the Fund's assets compared with 100% of their liabilities in the Fund.

Asset Value and Funding Level

The value of the Fund's assets as at 31 March 2010 for valuation purposes was £2,637m which represented 84% of the accrued liabilities at that date allowing for future increases in pay and pensions in payment.

The contribution rates were calculated using the Projected Unit Method.

The liabilities were valued allowing for expected future investment returns and increases to benefits as determined by market levels at the valuation date as follows:

- Rate of return on investments
6.8% per annum
- Rate of increases in pay
5.0% per annum
- Rate of Increases to pensions in payment
3.0% per annum

The funding plan underlying the certified levels of contribution assume that each employer's funding position will be restored to 100% over a period not exceeding 20 years depending on each employer's circumstances.

The next actuarial valuation is due as at 31 March 2013 and results will be reported during 2013/14. We will however monitor the financial position of the Fund until then.



Graeme D Muir FFA
Partner
28 September 2011

The Pension Fund Accounts

Nottinghamshire County Council is the administering authority for the Local Government Pension Scheme (LGPS) within Nottinghamshire. The LGPS is a statutory scheme administered by individual pension funds. The benefits within the scheme are determined by regulation and are guaranteed by statute. The pension fund exists to help defray the cost of paying the pension benefits. Members make contributions to the Fund as specified in the regulations and employers make contributions as determined by the Fund's actuary as part of the triennial valuation of the Fund. All new employees are brought into the scheme automatically, unless a positive election not to participate is received from the employee.

The County Council administers the pension fund for over 100 participating employers and over 100,000 members. The employers include the County Council, the City Council, District Councils and organisations which used to be part of local government (such as Nottingham Trent University, Colleges and Police civilian staff). They also include organisations which satisfy the conditions to participate in the LGPS and have been admitted to the Fund by the County Council. In general, these organisations are non-profit making, or are undertaking a service which was, or could be, carried out by the local authority.

The operation of the Fund is set out in a number of published policy statements. Under the Governance Compliance Statement, the functions as administering authority of the Fund are delegated to the Nottinghamshire Pension Fund Committee supported by two advisory sub-committees.

The Funding Strategy Statement sets out the aims and purpose of the Fund and details the responsibilities of the administering authority as regards funding the scheme.

The Statement of Investment Principles sets out more detailed responsibilities relating to the overall investment strategy of the Fund including the proposed asset allocation, restrictions on investment types, the type of investment management used and performance monitoring. It also states the Fund's approach to responsible investment and corporate governance issues.

The Communications Strategy Statement details the overall strategy for involving stakeholders in the Fund. A key part of this strategy is a dedicated Fund website which is available at: www.nottspf.org.uk.

A separate annual report for the Fund is also produced and this, along with previous years' reports, will be accessible via the the pension fund website. The annual report includes the accounts and the published policies as well as information on the investment performance of the fund.

The accounts of the fund are set out over the following pages. The CIPFA Code of Practice on Local Authority Accounting in the United Kingdom 2012/13 requires:

- a fund account showing the changes in net assets available for benefits;
- a net assets statement showing the assets available at the year end to meet benefits;
- supporting notes.

FUND ACCOUNT FOR YEAR ENDED 31 March 2013

| | Notes | 2011/12 £000 | 2012/13 £000 |
|---|----------|------------------|------------------|
| Contributions | 4 | | |
| Employer contributions | | (134,907) | (127,132) |
| Member contributions | | (42,242) | (42,829) |
| | | (177,149) | (169,961) |
| Transfers in from other pension funds | | (10,197) | (11,535) |
| Benefits | 5 | | |
| Pensions | | 117,060 | 127,078 |
| Commutation of pensions and lump sum retirement benefits | | 37,467 | 28,187 |
| Lump sum death benefits | | 3,588 | 3,714 |
| | | 158,115 | 158,979 |
| Payments to and on account of leavers | | 10,738 | 16,048 |
| Administration Expenses | 6 | 1,301 | 1,409 |
| Net additions from dealings with members | | (17,192) | (5,060) |
| Investment Income | 7 | (84,830) | (88,307) |
| Profits & losses on disposal of investments & changes in value | | 32,988 | (334,869) |
| Taxes on income | | 674 | 580 |
| Investment management expenses | 8 | 3,871 | 3,506 |
| Net Returns on Investments | | (47,297) | (419,090) |
| Net (increase)/decrease in net assets available for benefits during the year | | (64,489) | (424,150) |
| Opening net assets of the Fund | | 3,007,807 | 3,072,296 |
| Net assets available to fund benefits | | 3,072,296 | 3,496,446 |

NET ASSETS STATEMENT FOR THE YEAR ENDED 31 March 2013

| | Notes | 31 March 2012 £000 | 31 March 2013 £000 |
|---|-------------------|-----------------------|-----------------------|
| Investment Assets | 9 & 13 | | |
| Fixed Interest Securities | | 288,011 | 323,555 |
| Index Linked Securities | | 75,344 | 80,738 |
| Equities | | 1,439,871 | 1,675,534 |
| Pooled Investment Vehicles | | 854,489 | 1,028,119 |
| Property | | 266,603 | 288,075 |
| Forward Foreign Exchange | | - | 621 |
| Cash deposits | | 137,382 | 81,269 |
| Other Investment Balances | 11 | 14,316 | 16,360 |
| Investment liabilities | 11 | (3,232) | (3,157) |
| | | 3,072,784 | 3,491,114 |
| Current assets | 12 | 14,994 | 18,481 |
| Current liabilities | 12 | (15,482) | (13,149) |
| | | (488) | 5,332 |
| Net assets of the fund available to pay benefits at the year end | | 3,072,296 | 3,496,446 |

The actuarial present value of promised retirement benefits, as required by IAS 26, is shown at note 2.

Notes to the Accounts

1 ACCOUNTING POLICIES

a) Basis of Preparation

The Pension Fund accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2012/13 (the Code). On issues where there is no clear guidance in the Code, reference has been made under the hierarchy of standards to Financial Reports of Pension Schemes: a Statement of Recommended Practice 2007 (the Pensions SORP) or to individual International Accounting Standards (IAS).

Disclosures in the Pension Fund accounts have been limited to those required by the Code.

b) Debtors and Creditors

The accruals concept is applied to these accounts in compliance with the Code.

c) Investments

Pension fund investments are carried at fair value in accordance with the Code. Fair value is defined as 'the amount for which an asset could be exchanged or a liability settled, between knowledgeable, willing parties in an arm's-length transaction'. Where an active market exists, the quoted market price is used. Where there is no active market, fair value is established by using valuation techniques.

Specific details on the valuation methods for particular classess of assets are listed below:

- i) Equities traded through a stock exchange are valued at the latest quoted price. Where more than one price is quoted the 'bid' price is used.
- ii) Unit Trusts and managed funds are valued at the closing single price or the bid price where applicable. These reflect the market value of the underlying investments.
- iii) Unquoted securities and pooled private equity investments are valued at fair value by the fund managers at the year end in accordance with industry accepted guidelines.
- iv) The market value of fixed interest investments is based on the 'clean price', i.e. excludes income accrued at 31 March but not yet due for payment.

- v) Property investments are stated at open market value based on a quarterly independent valuation at the Net Assets Statement date.

Acquisition costs are included in the purchase cost of investments.

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

Forward foreign exchange contracts are over the counter contracts under which two parties agree to exchange two currencies on a specified future date at an agreed rate of exchange. These are used to manage the economic exposure to bond markets and hedge against foreign currency movements. These contracts are included at fair value by determining the gain or loss that would arise from closing out the contract at the Net Assets Statement date by entering into an equal and opposite contract at that date. The movements on these contracts during the year are shown in the reconciliation of opening and closing balances of investments at note 9(b).

d) Investments Income

Income is accounted for on an accruals basis for the following:

- i) interest on cash deposits and fixed interest securities are accrued on a daily basis;
- ii) dividends from equities are accrued when the stock is quoted ex-dividend;
- iii) rents from property are accrued in accordance with the terms of the lease.

e) Taxes on Income

UK equity dividends are quoted and accounted for at the net rate. The tax credit, which the Fund is unable to recover, is not recognised (in accordance with the Pensions SORP). Overseas equity dividends are accounted for gross of withholding tax, where this is deducted at source. Partial reclaims of withholding tax, where allowed, are adjusted at the year end by outstanding claims.

f) Foreign Currencies

Where forward exchange contracts are in place in respect of assets and liabilities in foreign currencies, the contract rate is used. Other assets and liabilities in foreign currencies are expressed in sterling at the rates of exchange ruling at the year-end. Income from overseas investments is translated into sterling at the rate ruling on the date of the transaction. Surpluses and deficits arising on conversion or translation are dealt with as part of the change in market value of investments.

g) Contributions

Normal contributions, both from the members and from employers, are accounted for in the payroll month to which they relate at rates as specified in the rates and adjustments certificate. Additional contributions from the employer are accounted for on an accruals basis.

h) Benefits Payable

Under the rules of the Scheme, members can receive a lump sum retirement grant in addition to their annual pension. Lump sum retirement grants are accounted for from the date of retirement. Where a member can choose whether to take a greater retirement grant in return for a reduced pension these lump sums are accounted for on an accruals basis from the date the option is exercised. Other benefits are accounted for on the date the member leaves the Scheme or on death.

i) Transfers to and from Other Schemes

Transfer values represent the capital sums either receivable (in respect of members from other pension schemes of previous employers) or payable (to the pension schemes of new employers for members who have left the Scheme). They take account of transfers where the trustees (or administering authority) of the receiving scheme have agreed to accept the liabilities in respect of the transferring members before the year end, and where the amount of the transfer can be determined with reasonable certainty.

j) Other Expenses

Administration and investment management expenses are accounted for on an accruals basis. Expenses are recognised net of any recoverable VAT. Nottinghamshire County Council charges the Fund with the costs it incurs in administering the scheme and the Fund.

2 OPERATION OF THE FUND

a) Contributions and Solvency

With effect from 1 April 2008 The Local Government Pension Scheme (Benefits, Membership and Contributions) Regulations 2007 were introduced. The principal changes from the 1997 regulations were: the replacement, for future service, of the existing benefits structure (based on a pension of 1/80th of pensionable pay for each year of pensionable service plus an automatic lump sum of three times this amount) by one based on 1/60th of pensionable pay for each year of pensionable service and no automatic lump sum.

Employees are required by the current Regulations to make percentage contributions by deduction from earnings at a rate between 5.5% and 7.5% depending on salary. Employers are required to make such balancing contributions, determined by the Actuary, as will maintain the fund in a state of solvency, having regard to existing and prospective liabilities.

From 1 April 2014 the new Local Government Pension Scheme will be introduced for service accruing after that date. This will be a career average revalued earnings (CARE) scheme with an accrual rate of 1/49th of pensionable pay and a retirement age linked to the state retirement age. Contribution rates will increase for employees earning over £21,000, up to 12.5% for those earning more than £150,000.

b) Actuarial Valuations

As required by the Regulations an Actuarial Valuation of the Fund was carried out as at 31 March 2010.

The market value of the Fund's assets at the valuation date was £2,732 million. The Actuary has estimated that the value of the Fund was sufficient to meet 84% of its expected future liabilities in respect of service completed to 31 March 2010. The certified contribution rates are expected to improve this to 100% within a period of 20 years.

The Actuarial Valuation was carried out using the projected unit method and the assumptions used within the valuation were as follows:

| | March 2010 | |
|--------------------------------|------------|-----------|
| | % pa | Real % pa |
| Investment return: | | |
| Equities/absolute return funds | 7.5% | 4.0% |
| Gilts | 4.5% | 1.0% |
| Bonds & Property | 5.6% | 2.1% |
| Discount Rate | 6.9% | 3.4% |
| Risk Adjusted Discount Rate | 6.8% | 3.3% |
| Pay Increases | 5.0% | 1.5% |
| Price Inflation | 3.5% | - |
| Pension Increases | 3.0% | (0.5%) |

The full actuarial valuation report is available on the Fund's website at: www.nottspf.org.uk

The employers' contribution rates to be paid in years 2011/12 to 2013/14 were set by the latest valuation carried out as at 31 March 2010. At that valuation, the Actuaries certified a common rate of contribution of 18.0% of pensionable payroll with individual adjustments for certain employers. The following list shows the rates payable by the main employers:

| 2011/12 to 2013/14 | |
|--------------------------------------|-------|
| Percentages of Pensionable Pay | % |
| Nottinghamshire County Council | 18.3% |
| Nottingham City Council | 18.0% |
| Ashfield District Council | 22.4% |
| Bassetlaw District Council | 22.1% |
| Broxtowe Borough Council | 18.7% |
| Gedling Borough Council | 18.2% |
| Mansfield District Council | 20.5% |
| Newark and Sherwood District Council | 21.9% |
| Rushcliffe Borough Council | 19.5% |

c) Actuarial Present Value of Promised Retirement Benefits

The actuarial present value of promised retirement benefits has been calculated by the Fund's actuaries in accordance with IAS 19. To do this, the actuaries rolled forward the value of the Employers' liabilities calculated for the Triennial valuation as at 31 March 2010 allowing for the different financial assumptions required under IAS19. The assumptions used for the purposes of the IAS 19 calculations are as follows:

| | 31 March 11 | | 31 March 12 | | 31 March 13 | |
|-------------------|-------------|-----------|-------------|-----------|-------------|-----------|
| | % pa | Real % pa | % pa | Real % pa | % pa | Real % pa |
| RPI Increases | 3.5% | - | 3.3% | - | 3.4% | - |
| CPI increases | 2.7% | (0.8%) | 2.5% | (0.8%) | 2.6% | (0.8%) |
| Salary Increases | 5.0% | 1.5% | 4.7% | 1.4% | 4.8% | 1.4% |
| Pension Increases | 2.7% | (0.8%) | 2.5% | (0.8%) | 2.6% | (0.8%) |
| Discount Rate | 5.5% | 1.9% | 4.6% | 1.3% | 4.5% | 1.1% |

The net liability under IAS 19 is shown below.

| | 31 March 2011 | 31 March 2012 | 31 March 2013 |
|------------------------------------|------------------|------------------|------------------|
| | £000 | £000 | £000 |
| Present value of funded obligation | 4,057,629 | 4,966,881 | 5,476,127 |
| Fair value of scheme assets | 2,957,085 | 3,061,212 | 3,477,023 |
| Net Liability | 1,100,544 | 1,905,669 | 1,999,104 |

The present value of funded obligation consists of £4,307,303,000 in respect of Vested Obligation and £1,168,824,000 in respect of Non-Vested Obligation.

These figures are presented only for the purposes of IAS 19. In particular, they are not relevant for calculations undertaken for funding purposes or for other statutory purposes under UK pensions legislation.

d) Investment Strategy

The Nottinghamshire Pension Fund Committee, advised by the Pensions Investment Sub-Committee, is responsible for determining the investment strategy of the Fund and the type of investment management to be used.

The investment strategy of the Fund is designed to maximise growth within acceptable risk parameters to help meet the future liabilities. The powers of investment are governed by the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009. Strategic decisions on investment policy are made by the Pensions Committee, advised by a Pensions Sub-Committee. The policy is set out in the Fund's Statement of Investment Principles, a copy of which is available on the pension fund website (www.nottspf.org.uk).

The Sub-Committee consists of nine elected County Councillors, three representatives of Nottingham City Council, two representatives of the District

Councils, two representatives of the trade unions and a representative elected by the other scheduled and admitted bodies. Meetings are also attended by an independent adviser and representatives of the Chief Financial Officer.

The investments are managed by officers of the County Council or by organisations specialising in the management of pension fund assets. The Investments Sub-Committee is responsible for monitoring performance of the fund and meets on a quarterly basis to review managers and investments.

e) External Audit

A separate fee is payable to KPMG LLP for audit of the pension fund. All fees have been included in the accounts for the period to which they relate. The fee for 2012/13 is £29,926 (for 2011/12 the fee of £44,460 was paid to the Audit Commission).

3 CONTRIBUTORS AND PENSIONERS

Members at 31 March 2013

| | County Council | City Council | District Councils | Others | Total |
|------------------------|----------------|--------------|-------------------|--------|----------------|
| Contributors | 15,162 | 8,084 | 3,285 | 11,309 | 37,840 |
| Deferred Beneficiaries | 16,319 | 7,831 | 3,409 | 7,628 | 35,187 |
| Pensioners | 14,276 | 5,874 | 4,421 | 5,226 | 29,797 |
| | | | | | 102,824 |

Members at 31 March 2012

| | County Council | City Council | District Councils | Others | Total |
|------------------------|----------------|--------------|-------------------|--------|----------------|
| Contributors | 16,587 | 8,681 | 3,569 | 9,546 | 38,383 |
| Deferred Beneficiaries | 15,863 | 7,719 | 3,307 | 6,949 | 33,838 |
| Pensioners | 13,720 | 5,601 | 4,307 | 4,847 | 28,475 |
| | | | | | 100,696 |

4 ANALYSIS OF CONTRIBUTIONS

| | Employers | | Members | | Total | |
|------------------|----------------|----------------|---------------|---------------|----------------|----------------|
| | 2011/12 | 2012/13 | 2011/12 | 2012/13 | 2011/12 | 2012/13 |
| | £000 | £000 | £000 | £000 | £000 | £000 |
| County Council | 51,062 | 41,794 | 15,352 | 13,612 | 66,414 | 55,406 |
| Scheduled Bodies | 78,216 | 81,371 | 25,469 | 27,832 | 103,685 | 109,203 |
| Admitted Bodies | 5,629 | 3,967 | 1,421 | 1,385 | 7,050 | 5,352 |
| | 134,907 | 127,132 | 42,242 | 42,829 | 177,149 | 169,961 |

5 ANALYSIS OF BENEFITS

| | 2011/12 | 2012/13 |
|--------------------------|----------------|----------------|
| | £000 | £000 |
| Pensions | 117,060 | 127,078 |
| Commutation and lump sum | 37,467 | 28,187 |
| Lump sum death benefits | 3,588 | 3,714 |
| | 158,115 | 158,979 |
| Comprising of: | | |
| County Council | 64,797 | 64,206 |
| Scheduled Bodies | 88,686 | 90,511 |
| Admitted Bodies | 4,632 | 4,262 |
| | 158,115 | 158,979 |

6 ADMINISTRATION EXPENSES

| | 2011/12 £000 | 2012/13 £000 |
|-----------------------------------|-----------------|-----------------|
| Printing & stationery | 41 | 37 |
| Subscriptions and membership fees | 3 | 6 |
| Actuarial fees | 9 | 5 |
| Audit fees | - | 15 |
| Other external fees | 112 | 121 |
| Administering Authority Costs | 1,136 | 1,225 |
| | 1,301 | 1,409 |

7 INVESTMENT INCOME

| | 2011/12 £000 | 2012/13 £000 |
|---|-----------------|-----------------|
| Interest from fixed interest securities | (11,598) | (12,575) |
| Income from index-linked securities | (1,487) | (1,304) |
| Dividends from equities | (49,585) | (51,357) |
| Income from pooled investment vehicles | (6,118) | (5,099) |
| Income from property pooled vehicles | (445) | (1,531) |
| Net rents from property | (13,838) | (14,683) |
| Interest on cash deposits | (818) | (1,088) |
| Other | (941) | (670) |
| | (84,830) | (88,307) |
| Directly held property | | |
| Rental income | (16,789) | (17,623) |
| Less operating expenses | 2,951 | 2,940 |
| Net rents from property | (13,838) | (14,683) |

8 INVESTMENT MANAGEMENT EXPENSES

| | 2011/12 | 2012/13 |
|-----------------------------------|--------------|--------------|
| | £000 | £000 |
| Training & conferences | 7 | 5 |
| Printing & stationery | 10 | - |
| Subscriptions and membership fees | 23 | 19 |
| Actuarial fees | 2 | - |
| Audit fee | 44 | 15 |
| Custody fees | 240 | 263 |
| Investment management fees | 3,001 | 2,589 |
| Other external fees | 238 | 249 |
| Administering Authority Costs | 306 | 366 |
| | 3,871 | 3,506 |

9 INVESTMENTS

| | 31 March 2012 £000 | 31 March 2013 £000 |
|---|-----------------------|-----------------------|
| Fixed Interest Securities | | |
| UK Public Sector | 123,086 | 118,757 |
| UK Other | 110,864 | 119,028 |
| Overseas Public Sector | 43,629 | 69,666 |
| Overseas Other | 10,432 | 16,104 |
| Index Linked Securities | | |
| Public Sector | 48,164 | 50,140 |
| Other | 27,180 | 30,599 |
| Equities | | |
| UK | 962,695 | 1,101,770 |
| Overseas | 475,032 | 571,770 |
| Unlisted | 2,145 | 1,994 |
| Pooled Investment Vehicles | | |
| Unit Trusts | 338,670 | 324,988 |
| Other Managed Funds | 394,426 | 581,176 |
| Pooled Vehicles Invested in Property | | |
| Property Unit Trusts | 31,365 | 26,551 |
| Other Managed Funds | 90,028 | 95,404 |
| Property | 266,603 | 288,075 |
| Forward Foreign Exchange | - | 250 |
| Cash and Currency | 137,382 | 81,269 |
| Total Investments | 3,061,701 | 3,477,541 |

The original values of investments are based on purchase cost plus expenses. If any investments have been held since 1 April 1974 (when the County Council was given the responsibility for the Fund) these are included at the market value as at that date.

| | 31 March 2012 £000 | 31 March 2013 £000 |
|--|-------------------------------------|-------------------------------------|
| Market Value | 3,061,701 | 3,477,541 |
| Original Value | 2,575,895 | 2,600,107 |
| Excess/(Deficit) of Market Value over Original Value | 485,806 | 877,434 |

At 31 March 2013 the fund held no investment representing over 5% of the value of the fund (31 March 2012 also nil).

b) Reconciliation of Opening and Closing Values of Investments 2012/13

| | Value at 1 April 2012 £000 | Purchases at Cost £000 | Proceeds of Sales £000 | Change in Market value £000 | Value at 31 March 2013 £000 |
|----------------------------|---|---|---|--|--|
| Fixed Interest Securities | 288,011 | 272,909 | (254,623) | 17,258 | 323,555 |
| Index Linked Securities | 75,344 | 25,440 | (27,402) | 7,357 | 80,739 |
| Equities | 1,439,872 | 228,930 | (196,257) | 202,989 | 1,675,534 |
| Pooled Investment Vehicles | 733,096 | 64,318 | (12,649) | 121,399 | 906,164 |
| Property Pooled Vehicles | 121,393 | 1,284 | - | (722) | 121,955 |
| Property | 266,603 | 34,340 | - | (12,868) | 288,075 |
| | 2,924,319 | 627,221 | (490,931) | 335,413 | 3,396,022 |
| Forward Foreign Exchange | - | 158,842 | (158,048) | (544) | 250 |
| | 2,924,319 | 786,063 | (648,979) | 334,869 | 3,396,272 |
| Cash deposits | 137,382 | | | | 81,269 |
| | 3,061,701 | | | | 3,477,541 |

Reconciliation of Opening and Closing Values of Investments 2011/12

Reconciliation of Opening and Closing Values of Investments 2011/12

| | Value at 1 April 2011 £000 | Purchases at Cost £000 | Proceeds of Sales £000 | Change in Market value £000 | Value at 31 March 2012 £000 |
|----------------------------|----------------------------------|------------------------------|------------------------------|-----------------------------------|-----------------------------------|
| Fixed Interest Securities | 266,901 | 227,091 | (226,015) | 20,034 | 288,011 |
| Index Linked Securities | 62,471 | 21,205 | (15,861) | 7,529 | 75,344 |
| Equities | 1,470,613 | 162,035 | (135,803) | (56,973) | 1,439,872 |
| Pooled Investment Vehicles | 663,107 | 84,521 | (23,074) | 8,542 | 733,096 |
| Property Pooled Vehicles | 122,737 | 8,801 | (401) | (9,744) | 121,393 |
| Property | 272,017 | 28,500 | (32,003) | (1,911) | 266,603 |
| | 2,857,846 | 532,153 | (433,157) | (32,523) | 2,924,319 |
| Forward Foreign Exchange | - | 27,113 | (26,648) | (465) | - |
| | 2,857,846 | 559,266 | (459,805) | (32,988) | 2,924,319 |
| Cash deposits | 132,186 | | | | 137,382 |
| | 2,990,032 | | | | 3,061,701 |

For Forward Foreign Exchange contracts, the purchase cost and sale proceeds represent the sterling value of the currency purchases and sales at the settlement dates specified in the contracts.

Transaction costs are included in the cost of purchases and sale proceeds. The costs charged directly to the fund, such as fees, commissions and stamp duty, amounted to £1,844,156 in 2012/13 (£1,601,583 in 2011/12). In addition, indirect costs are incurred through the bid-offer spread on investments. This amount is not separately provided.

c) Management Arrangements

An analysis of the investment management arrangements as at the Net Assets Statement date is shown below:

| | 31 March 2012 | | 31 March 2013 | |
|--------------------------------|------------------|---------------|------------------|---------------|
| | £000 | % | £000 | % |
| In-house | 1,118,010 | 36.5% | 1,216,945 | 35.0% |
| Schroder Investment Management | 785,415 | 25.7% | 950,260 | 27.3% |
| Kames Capital | 420,908 | 13.7% | 467,034 | 13.4% |
| Aberdeen Property Investors | 302,748 | 9.9% | 323,414 | 9.3% |
| Legal & General | 213,230 | 7.0% | 268,870 | 7.7% |
| RWC Partners Ltd | 116,522 | 3.8% | 141,751 | 4.1% |
| Standard Life | 52,828 | 1.7% | 52,019 | 1.5% |
| Keills | 25,222 | 0.8% | 26,551 | 0.8% |
| Governance 4 Owners | 12,305 | 0.4% | 13,247 | 0.4% |
| Martin Currie | 14,513 | 0.5% | 17,450 | 0.5% |
| Total | 3,061,701 | 100.0% | 3,477,541 | 100.0% |

(Note: RWC Partners Ltd was formerly Hermes Asset Management)

d) Asset Allocation

The asset allocation of the Fund as at the Net Assets Statement date is shown below:

| | 31 March 2012 | | 31 March 2013 | |
|--------------------------|------------------|---------------|------------------|---------------|
| | £000 | % | £000 | % |
| UK Fixed Interest | 233,950 | 7.6% | 237,785 | 6.8% |
| Overseas Fixed Interest | 54,061 | 1.7% | 85,770 | 2.5% |
| Index Linked Securities | 75,344 | 2.5% | 80,738 | 2.3% |
| UK Equities | 1,048,940 | 34.3% | 1,211,834 | 34.8% |
| Overseas Equities: | | | | |
| US | 358,487 | 11.7% | 423,694 | 12.2% |
| Europe | 272,702 | 8.9% | 337,287 | 9.7% |
| Japan | 97,805 | 3.2% | 102,688 | 3.0% |
| Pacific Basin | 125,443 | 4.1% | 151,890 | 4.4% |
| Emerging Markets | 130,544 | 4.2% | 198,907 | 5.7% |
| Global | 14,513 | 0.5% | 17,450 | 0.5% |
| UK Property | 299,023 | 9.8% | 322,672 | 9.3% |
| Overseas Property | 88,974 | 2.9% | 87,358 | 2.5% |
| Private Equity | 66,979 | 2.2% | 75,209 | 2.2% |
| Multi-Asset | 57,554 | 1.9% | 62,740 | 1.8% |
| Forward Foreign Exchange | - | - | 250 | - |
| Cash | 137,382 | 4.5% | 81,269 | 2.3% |
| Total | 3,061,701 | 100.0% | 3,477,541 | 100.0% |

e) Property

Direct property is shown at open market value (as defined by the International Valuation Standards Committee) as determined by Savills Commercial Limited. The analysis of property is:

| | 31 March 2012 £000 | 31 March 2013 £000 |
|------------------------------|-----------------------|-----------------------|
| Freehold | 259,653 | 268,375 |
| Leasehold more than 50 years | 6,950 | 19,700 |
| | 266,603 | 288,075 |
| Original Value | 279,458 | 313,798 |

f) Analysis of Pooled Investment Vehicles

The underlying economic exposure of pooled investment vehicles is shown below:

| | 31 March 2012 £000 | 31 March 2013 £000 |
|--------------------|-----------------------|-----------------------|
| UK Equities | 110,453 | 134,421 |
| Overseas Equities: | | |
| US | 138,762 | 158,177 |
| Japan | 62,074 | 62,525 |
| Europe | 53,127 | 71,198 |
| Pacific Basin | 125,443 | 151,890 |
| Emerging Markets | 106,336 | 172,554 |
| Global | 14,513 | 17,450 |
| UK Property | 32,420 | 34,597 |
| Overseas Property | 88,974 | 87,358 |
| Private Equity | 64,834 | 75,209 |
| Multi-Asset | 57,553 | 62,740 |
| Total | 854,489 | 1,028,119 |

g) Private Equity Funds

The Fund has made commitments to a number of private equity funds. The original commitment amounts are shown below in the fund currencies.

| Funds | Currency | Commitment millions |
|---|-----------------|--------------------------------|
| Wilton Private Equity Fund LLC | USD | 14 |
| Pantheon Europe Fund III | EUR | 10 |
| East Midlands Regional Venture Capital Fund | GBP | 5 |
| Coller International Partners IV | USD | 10 |
| Schroders Private Equity Fund of Funds III | EUR | 22 |
| DCM Private Equity Fund II | USD | 18 |
| Pantheon Europe Fund V | EUR | 15 |
| Coller International Partners V | USD | 18 |
| Catapult Growth Fund LP | GBP | 4 |
| Altius Associates Private Equity Fund | USD | 10 |
| Partners Group Secondary 2008 | EUR | 13 |
| DCM Private Equity Fund III | USD | 16 |
| Coller International Partners VI | USD | 16 |
| Altius Associates Private Equity Fund II | USD | 15 |
| Partners Group Global Infrastructure | EUR | 12 |

These commitments are drawn by the funds over time as investments are made in underlying companies. The undrawn commitment as at 31 March 2013 was £53.1 million (£21.2 million at 31 March 2012). From the funds above, the following were new commitments made during 2012/13:

| Funds | Currency | Commitment millions |
|--|-----------------|--------------------------------|
| DCM Private Equity Fund III | USD | 16 |
| Coller International Partners VI | USD | 16 |
| Altius Associates Private Equity Fund II | USD | 15 |
| Partners Group Global Infrastructure | EUR | 12 |

h) Analysis of derivatives

Open Forward Foreign Exchange contracts.

| Settlement | Currency Bought | Local Value £000 | Currency Sold | Local Value £000 | Asset Value £000 | Liability Value £000 |
|--|-----------------|---------------------|---------------|---------------------|---------------------|-------------------------|
| Up to one month | GBP | 10,500 | USD | (15,946) | - | (2) |
| Up to one month | GBP | 13,436 | USD | (20,000) | 263 | - |
| Up to one month | GBP | 9,661 | EUR | (11,000) | 358 | - |
| Up to one month | USD | 31,325 | GBP | (21,000) | - | (368) |
| | | | | | 621 | (371) |
| Net forward foreign exchange contracts at 31 March 2013 | | | | | | 250 |

There were no open forward foreign exchange contracts at 31 March 2012.

10 INVESTMENTS

The fund has 15 private equity funds which have undrawn commitments as at 31 March 2013 of £53.1m (£21.3m at 31 March 2012).

11 OTHER INVESTMENT BALANCES AND LIABILITIES

| | 31 March 2012 £000 | 31 March 2013 £000 |
|-------------------------------------|-----------------------|-----------------------|
| Other investment balances | | |
| Outstanding investment transactions | 42 | 1,760 |
| Investment income | 14,274 | 14,600 |
| | 14,316 | 16,360 |
| Investment Liabilities | | |
| Outstanding investment transactions | (310) | (536) |
| Investment income | (2,922) | (2,621) |
| | (3,232) | (3,157) |

12 CURRENT ASSETS AND LIABILITIES

| | 31 March 2012 | 31 March 2013 |
|----------------------------------|-----------------|-----------------|
| | £000 | £000 |
| Current Assets | | |
| Contributions due from employers | 11,814 | 17,297 |
| Other | 3,180 | 1,184 |
| | 14,994 | 18,481 |
| Current Liabilities | | |
| Payments in advance | (4,651) | (3,261) |
| Sundry creditors | (926) | (1,455) |
| Other | (9,905) | (8,433) |
| | (15,482) | (13,149) |

13 FINANCIAL INSTRUMENTS

a) The various financial instruments held by the Fund are valued at fair value. The following tables analyse the fair value of financial assets and liabilities by asset class.

31 March 2013

| | Designated at Fair Value through profit and loss £000 | Loans and Receivables £000 | Financial liabilities at amortised cost £000 | Totals £000 |
|------------------------------|---|----------------------------------|--|------------------|
| Financial Assets | | | | |
| Fixed Interest Securities | 323,555 | - | - | 323,555 |
| Index Linked Securities | 80,739 | - | - | 80,739 |
| Equities | 1,675,534 | - | - | 1,675,534 |
| Pooled Investment Vehicles | 906,164 | - | - | 906,164 |
| Property Pooled Vehicles | 121,955 | - | - | 121,955 |
| Forward Foreign Exchange | 621 | - | - | 621 |
| Cash deposits | - | 81,269 | - | 81,269 |
| Other investment balances | - | 16,360 | - | 16,360 |
| Current Assets | - | 18,481 | - | 18,481 |
| | 3,108,568 | 116,110 | - | 3,224,678 |
| Financial Liabilities | | | | |
| Investment Liabilities | - | - | (3,157) | (3,157) |
| Current Liabilities | - | - | (13,149) | (13,149) |
| | - | - | (16,306) | (16,306) |
| | 3,108,568 | 116,110 | (16,306) | 3,208,372 |

31 March 2012

| | Designated at Fair Value through profit and loss £000 | Loans and Receivables £000 | Financial liabilities at amortised cost £000 | Totals £000 |
|------------------------------|---|--------------------------------------|---|--------------------|
| Financial Assets | | | | |
| Fixed Interest Securities | 288,011 | - | - | 288,011 |
| Index Linked Securities | 75,344 | - | - | 75,344 |
| Equities | 1,439,872 | - | - | 1,439,872 |
| Pooled Investment Vehicles | 733,095 | - | - | 733,095 |
| Property Pooled Vehicles | 121,393 | - | - | 121,393 |
| Cash deposits | - | 137,382 | - | 137,382 |
| Other investment balances | - | 14,316 | - | 14,316 |
| Current Assets | - | 14,994 | - | 14,994 |
| | 2,657,715 | 166,692 | - | 2,824,407 |
| Financial Liabilities | | | | |
| Investment Liabilities | - | - | (3,232) | (3,232) |
| Current Liabilities | - | - | (15,482) | (15,482) |
| | - | - | (18,714) | (18,714) |
| | 2,657,715 | 166,692 | (18,714) | 2,805,693 |

No financial assets were reclassified during the accounting period.

b) Valuation of financial instruments carried at fair value

The valuation of financial instruments has been classified into three levels according to the quality and reliability of information used to determine fair values.

- Level 1** Fair values derived from quoted market price.
- this includes all quoted equity, fixed interest and index linked instruments.
- Level 2** Fair values derived from valuation techniques based significantly on observable inputs.
- this includes all pooled property investments.
- Level 3** Fair values derived from valuation techniques where at least one significant input is not based on observable market data.
- this includes unlisted shares and investments in private equity funds.

| As at 31 March 2013 | Level 1 £000 | Level 2 £000 | Level 3 £000 | Total £000 |
|------------------------------------|------------------|-----------------|-----------------|------------------|
| Financial Assets | | | | |
| Fair value through profit and loss | 2,909,408 | 121,955 | 77,205 | 3,108,568 |
| Loans and receivables | 116,110 | | | 116,110 |
| Total | 3,025,518 | 121,955 | 77,205 | 3,224,678 |
| Financial Liabilities | | | | |
| Fair value through profit and loss | - | - | - | - |
| Financial liabilities | (16,306) | - | - | (16,306) |
| Total | (16,306) | - | - | (16,306) |
| Net | 3,009,212 | 121,955 | 77,205 | 3,208,372 |

| As at 31 March 2012 | Level 1 £000 | Level 2 £000 | Level 3 £000 | Total £000 |
|------------------------------------|------------------|-----------------|-----------------|------------------|
| Financial Assets | | | | |
| Fair value through profit and loss | 2,469,342 | 121,394 | 66,979 | 2,657,715 |
| Loans and receivables | 166,692 | - | - | 166,692 |
| Total | 2,636,034 | 121,394 | 66,979 | 2,824,407 |
| Financial Liabilities | | | | |
| Fair value through profit and loss | - | - | - | - |
| Financial liabilities | (18,714) | - | - | (18,714) |
| Total | (18,714) | - | - | (18,714) |
| Net | 2,617,320 | 121,394 | 66,979 | 2,805,693 |

c) Nature and extent of risks arising from financial instruments

The aims of the Fund are to:

- manage employers' liabilities effectively
- ensure that sufficient resources are available to meet all liabilities as they fall due
- maximise the returns from investments within reasonable risk parameters
- enable employer contribution rates to be kept as nearly constant as possible and at reasonable cost to the taxpayers, scheduled, resolution and admitted bodies.

The key risks to the achievement of these aims, as well as measures to mitigate those risks, are set out in the various Fund policies (available at www.nottspf.org.uk) including:

- Statement of Investment Principles
- Funding Strategy Statement
- Governance Compliance Statement
- Risk Management Strategy and Risk Register.

The Risk Register identifies the highest risks as arising from:

- Significant variations from assumptions used in the actuarial valuation
- Fund assets assessed as insufficient to meet long term liabilities.

The Fund's primary risk is therefore that its assets fall short of its long term liabilities. The Funding Strategy Statement aims:

- 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 requirement to maintain as nearly constant employer contribution rates as possible
- to take a prudent longer-term view of funding those liabilities.

The most significant effect on the funding level arises from changes in the discount rate used by the actuaries. The sensitivity analysis below shows the impact of a movement of 0.1% in the discount rate.

| Adjustment to discount rate | 0.1% | 0.0% | (0.1%) |
|---|------------------|------------------|------------------|
| Present Value of Total Obligation (£000) | 5,351,569 | 5,476,127 | 5,604,384 |

The Fund deficit at the last triennial valuation was £520 million. With no other change in assumptions, an increase in the discount rate of just over 0.4% would reduce the deficit to nil.

As contribution income currently exceeds benefit payments and the Fund receives significant investment income, it is unlikely that assets will have to be realised in order to meet pension benefits. This allows the Fund to implement a long term investment strategy and minimise the impact of short term fluctuations in investment and currency markets. The strategy, and the assumptions that underpin it, are reviewed on a regular basis and cash flows are monitored closely to ensure there is sufficient liquidity to meet forecast cash flows.

The investment strategy is aimed at achieving best returns in line with the requirements of the triennial valuation whilst minimising risk and overall variability in future employers' contribution rates. A key part of managing the investment risk is by ensuring an adequate number of suitably qualified investment managers and by requiring managers to hold a diversified spread of assets. The level of risk in the equities block is managed by a balance between passive and active management.

Policies are reviewed regularly to reflect changes in activity and in market conditions. Responsibility for reviewing and revising the policies rests with the Nottinghamshire Pension Fund Committee.

14 MEMBERS ADDITIONAL VOLUNTARY CONTRIBUTIONS

The Nottinghamshire Fund provides an additional voluntary contribution (AVC) scheme to enable members to purchase additional benefits. Contributions are paid over to, and invested separately by, the two scheme providers, Prudential and Scottish Widows. The contributions are not included in the Fund's accounts in accordance with regulation 4(2)(b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009. The value of the separately invested AVCs is shown below:

| | 31 March 2012 | 31 March 2013 |
|-----------------|---------------|---------------|
| | £000 | £000 |
| Prudential | 27,289 | 25,611 |
| Scottish Widows | 3,058 | 3,254 |
| | 30,347 | 28,865 |

15 RELATED PARTY TRANSACTIONS

Under IAS 24, a party is related to an entity if:

- the party is a member of the key management personnel;
- the party is a post-employment benefit plan for the benefit of employees of the entity.

The purpose of related party disclosures is to provide information on transactions and balances that could have an effect on the operations or financial position of an entity. For example, related parties may enter into transactions that unrelated parties would not and transactions between related parties may not be made at the same amounts as between unrelated parties.

Disclosures are required for:

- the nature of the related party relationship
- key management personnel compensation
- information about the transactions and outstanding balances necessary for an understanding of the potential effect of the relationship on the financial statements.

Nottinghamshire County Council is the administering authority for the Local Government Pension Scheme (LGPS) within Nottinghamshire and is one of the major employers within the scheme. Information regarding key management personnel is provided within the main accounts of Nottinghamshire County Council. Members and officers of the Council involved in managing the Fund are allowed to be members of the LGPS. All transactions between Nottinghamshire County Council and the Fund and all benefit payments from the Fund are in accordance with the regulations governing the LGPS. There are no transactions therefore that are made on a different basis from those with non-related parties.

Governance Compliance Statement

1. Introduction

- 1.1 This is the governance compliance statement of the Nottinghamshire pension fund which is part of the Local Government Pension Scheme and administered by Nottinghamshire County Council (the council). The statement has been prepared as required by the Local Government Pension Scheme (Administration) Regulations 2008.

2. Governance Arrangements

- 2.1 Under the terms of the council's constitution, the functions of the council as administering authority of the pension fund are delegated to the Nottinghamshire Pension Fund Committee. This is in line with guidance from the Chartered Institute of Public Finance & Accountancy (CIPFA).
- 2.2 The Nottinghamshire Pension Fund Committee meets four times a year and its members act in a quasi-trustee capacity. Under the constitution, it is responsible for Administering the Nottinghamshire Pension Fund, including investments by and management of pension funds.
- 2.3 The Pensions Investment Sub-Committee has responsibility for investment performance management of the Fund Managers and making appropriate recommendations to the Nottinghamshire Pension Fund Committee. Meetings are held four times a year. The sub-committee may appoint a working party to consider future policy & development.
- 2.4 The Pensions Sub-Committee has responsibility for making recommendations to the Nottinghamshire Pension Fund Committee on matters relating to the administration and investment of the Pension Fund. Meetings are held four times a year.
- 2.5 The number of voting members of the Nottinghamshire Pension Fund Committee is determined by the Council at its annual meeting. The number of voting members of

the sub-committees is determined by the Nottinghamshire Pension Fund Committee on the basis of the council's constitution.

3. Functions and Responsibilities

- 3.1 The Nottinghamshire Pension Fund Committee separately approves the pension fund's Funding Strategy Statement, Statement of Investment Principles, Risk Management Strategy and Communications Strategy Statement.
- 3.2 The Funding Strategy Statement sets out the aims and purpose of the pension funds and the responsibilities of the administering authority as regards funding the scheme. Funding is the making of advance provision to meet the cost of accruing benefit promises and the long term objective is to achieve and then maintain assets equal to 100% of projected accrued liabilities. These responsibilities are delegated to the Nottinghamshire Pension Fund Committee, advised by the two Sub-Committees.
- 3.3 The Statement of Investment Principles sets out more detailed responsibilities relating to the overall investment strategy of the funds including the proposed asset allocation, restrictions on investment types, the type of investment management used and performance monitoring. It also covers the funds' policy on trustee training and expenses and states the funds' approach to socially responsible investment and corporate governance issues. These responsibilities are delegated to the Nottinghamshire Pension Fund Committee, advised by the two Sub-Committees.
- 3.4 Financial Regulations specify that the Service Director (Finance) is responsible for arranging the investment of the Pension Fund. Operational matters falling under this responsibility are exercised by the Senior Accountant (Pensions & Treasury Management).

3.5 The Risk Management Strategy aims to reduce or eliminate risks which may jeopardise the achievement of the Fund's key objectives. It includes a risk register that identifies and prioritises the main risks to the operation of the fund. Responsibility for the Risk Management Strategy is delegated to the Nottinghamshire Pension Fund Committee, advised by the two Sub-Committees.

3.6 The Communications Strategy Statement details the overall strategy for involving stakeholders in the pension funds. The stakeholders identified are:

- trustees
- current and prospective scheme members
- scheme employers
- administration staff
- other bodies.

Responsibility for the communications strategy is delegated to the Nottinghamshire Pension Fund Committee, advised by the Pensions Sub-Committee.

4. Representation

4.1 The Nottinghamshire Pension Fund Committee has 9 members all of whom are current county councillors. The political make-up of the committee is in line with the current council and the chair is normally appointed by Council. All members have full voting rights.

4.2 The Pensions Investment Sub-Committee has 17 members consisting of the following representatives:

- County Councillors (9)
- Nottingham City Council (3)
- Nottinghamshire Local Authorities' Association (2)
- scheduled and admitted bodies (1)
- trade unions (2)

4.3 The Pensions Sub-Committee has 19 members consisting of the following representatives:

- County Councillors (9)
- Nottingham City Council (3)
- Nottinghamshire Local Authorities' Association (2)
- scheduled and admitted bodies (1)
- trade unions (2)
- pensioners (2)

4.4 All members on both sub-committees have voting rights where allowed by relevant regulation.

4.5 Meetings of the Sub-Committees are also attended by officers of the County Council and an independent adviser. This ensures the Sub-Committee has access to "proper advice" as required by the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009. Proper advice is defined as the advice of a person who is reasonably believed to be qualified by their ability in and practical experience of financial matters. This includes any such person who is an officer of the administering authority.

5. Stakeholder Engagement

5.1 An annual meeting of the pension funds is held in October to which all employer representatives and scheme members are welcome. The purpose of the meeting is to report on investment performance and current issues of concern to the pension funds.

5.2 A number of other initiatives to involve stakeholders are currently in place including:

- regular employers meetings
- meetings between employers and actuaries
- Nottinghamshire Finance Officers meetings
- the annual report for the pension funds
- Nest Egg magazine for all members

- Pensions road shows at various venues around the County
- dedicated pension fund web site.

6. Review and Compliance with Best Practice

- 6.1 This statement will be kept under review and will be revised and published following any material change in the governance arrangements of the pension funds.
- 6.2 The regulations require a statement as to the extent to which the governance arrangements comply with guidance issued by the Secretary of State. The guidance contains best practice principles and these are shown below with the assessment of compliance.

| Ref. | Principles | Compliance and Comments |
|-------------|---|--|
| A | Structure | |
| a. | The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council. | Fully compliant |
| b. | That representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee. | Fully compliant |
| c. | That where a secondary committee or panel has been established, the structure ensures effective communication across both levels. | Fully compliant |
| d. | That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel. | Fully compliant |
| B | Representation | |
| a. | That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include: <ul style="list-style-type: none"> i) employing authorities (including non-scheme employers, eg, admitted bodies); ii) scheme members (including deferred and pensioner scheme members), iii) independent professional observers, and iv) expert advisors (on an ad-hoc basis). | Fully compliant The sub-committees include representatives from employing authorities, scheduled and admitted bodies and scheme members. An independent advisor attends the investment sub-committee |
| b. | That where lay members sit on a main or secondary committee, they are treated equally in terms of access to papers and meetings, training and are given full opportunity to contribute to the decision making process, with or without voting rights. | Fully compliant |
| C | Selection and role of lay members | |
| a. | That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee. | Fully compliant All members of the Nottinghamshire Pension Fund Committee and its sub-committees are aware of their responsibilities for the oversight of the funds. |
| D | Voting | |
| a. | The policy of individual administering authorities on voting rights is clear and transparent, including the justification for not extending voting rights to each body or group represented on LGPS main committees. | Fully compliant |

| | | |
|----------|--|---|
| E | Training/facility time/expenses | |
| a. | That in relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process. | Fully compliant Members are encouraged to receive suitable training to help them discharge their responsibilities and have a defined budget to attend training courses, conferences and meetings. Travel and subsistence arrangements are those which prevail for the County Council. |
| b. | That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum. | Fully compliant |
| F | Meetings (frequency/quorum) | |
| a. | That an administering authority's main committee or committees meet at least quarterly. | Fully compliant The Nottinghamshire Pension Fund Committee meets 4 times a year. |
| b. | That an administering authority's secondary committee or panel meet at least twice a year and is synchronised with the dates when the main committee sits. | Fully compliant The Pensions Sub-committee meets 4 times a year. The Investment Sub-Committee meets 8 times a year. |
| c. | That administering authorities who do not include lay members in their formal governance arrangements, provide a forum outside of those arrangements by which the interests of key stakeholders can be represented. | Fully compliant |
| G | Access | |
| a. | That subject to any rules in the councils constitution, all members of main and secondary committees or panels have equal access to committee papers, documents and advice that falls to be considered at meetings of the main committee. | Fully compliant |
| H | Scope | |
| a. | That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements. | Fully compliant Scheme issues are decided by the Nottinghamshire Pension Fund Committee after consideration at the Administration Sub-committee. |
| I | Publicity | |
| a. | That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the scheme is governed, can express an interest in wanting to be part of those arrangements. | Fully compliant The governance statement is published on the pension fund website and is included with the relevant committee report (available on the County Council website). |

Funding Strategy Statement

This Statement has been prepared by Nottinghamshire County Council (the Administering Authority) to set out the funding strategy for the Nottinghamshire County Council Pension Fund (the Scheme), in accordance with Regulation 35 of the Local Government Pension Scheme (Administration) Regulations 2007 (as amended) and the guidance paper issued in March 2004 by the Chartered Institute of Public Finance and Accountancy (CIPFA) Pensions Panel.

1. Introduction

1.1 The Local Government Pension Scheme Regulations 2007, as amended (“the Regulations”), provide the statutory framework under which the Administering Authority is required to prepare a Funding Strategy Statement (FSS). The key requirements for preparing the FSS can be summarised as follows:

- In preparing the FSS, the Administering Authority must:
 - have regard to the guidance issued by CIPFA for this purpose and the Statement of Investment Principles (SIP) for the Scheme published under Regulation 9A of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 1998 (as amended)
 - consult such persons as it considers appropriate.
- The FSS must be revised and published whenever there is a material change in either the policy on the matters set out in the FSS or the Statement of Investment Principles.

1.2 Benefits payable under the Scheme are guaranteed by statute and thereby the pensions promise is secure. The FSS addresses the issue of managing the need to fund those benefits over the long term, whilst at the same time facilitating scrutiny and accountability through improved transparency and disclosure. The Scheme is a defined benefit final salary scheme under which the benefits are specified in the Regulations. The required levels of employee contributions are also specified in the Regulations.

1.3 Employer contributions are determined in accordance with the Regulations (principally Regulation 36) which require that an actuarial valuation is completed every three years by the actuary, including provision of a rates and adjustments certificate. Contributions to each Scheme should be set so as to “secure its solvency”, whilst the actuary must also have regard to the desirability of maintaining as nearly constant a rate of contribution as possible. The actuary must have regard to the FSS in carrying out the valuation.

2. Purpose of the FSS in Policy Terms

2.1 Funding is the making of advance provision to meet the cost of accruing benefit promises. Decisions taken regarding the approach to funding will therefore determine the rate of pace at which this advance provision is made. Although the Regulations specify the fundamental principles on which funding contributions should be assessed, implementation of the funding strategy is the responsibility of the Administering Authority, acting on the professional advice provided by the actuary.

2.2 The purpose of this Funding Strategy Statement 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 requirement to maintain as nearly constant employer contribution rates as possible

- to take a prudent longer-term view of funding those liabilities

The intention is for this strategy to be both cohesive and comprehensive for the Scheme as a whole, recognising that there will be conflicting objectives which need to be balanced and reconciled. Whilst the position of individual employers must be reflected in the statement, it must remain a single strategy for the Administering Authority to implement and maintain.

3. Aims and Purpose of the Pension Funds

3.1 The aims of the funds are to:

- enable employer contribution rates to be kept as nearly constant as possible and at reasonable cost to the taxpayers, scheduled, resolution and admitted bodies
- manage employers' liabilities effectively
- ensure that sufficient resources are available to meet all liabilities as they fall due
- maximise the returns from investments within reasonable risk parameters.

3.2 The purpose of the funds is to:

- receive monies in respect of contributions, transfer values and investment income
- pay out monies in respect of scheme benefits, transfer values, costs, charges and expenses as defined in the Local Government Pension Scheme Regulations 2007 (as amended) and in the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 (as amended).

4. Responsibilities of the Key Parties

4.1 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 actuary
- prepare and maintain an FSS and SIP, both after due consultation with interested parties
- monitor all aspects of the Scheme's performance and funding and amend FSS/SIP.

4.2 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 and early retirement strain
- notify the Administering Authority promptly of all changes to membership, actual or proposed which may affect future funding.

4.3 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
- prepare advice and calculations in connection with bulk transfers and individual benefit-related matters
- advise on the preparation of the FSS.

5. Solvency Issues and Target Funding Levels

- 5.1 To meet the requirements of the Regulations, the Administering Authority's long term funding objective is for the Funds to achieve and then maintain sufficient assets to cover 100% of projected accrued liabilities (the "funding target") assessed on an ongoing basis including allowance for projected final pay.
- 5.2 The principal method and assumptions to be used in the calculation of the funding target are set out in Appendix A. Underlying these assumptions are the following two tenets:
 - that the Scheme and the major employers are expected to continue for the foreseeable future; and
 - favourable investment performance can play a valuable role in achieving adequate funding over the longer term.
- 5.3 As part of each valuation separate employer contribution rates are assessed by the actuary for each participating employer or group of employers. These rates are assessed taking into account the experience and circumstances of each employer (or employer grouping), following a principle of no cross-subsidy between the various employers in each of the Scheme.
- 5.4 In attributing the overall investment performances obtained on the assets of the Scheme to each employer, a pro-rata principle is adopted. This approach is effectively one of applying a notional individual employer investment strategy identical to that adopted for the Scheme as a whole. However, under exceptional circumstances the Administering Authority may agree an alternative approach with a particular employer.
- 5.5 The Administering Authority, following consultation with the participating employers, has adopted the following objectives for setting the individual employer contribution rates:
 - a. Employer groupings will be adopted for certain employers with small numbers of members in the Fund, specifically Small Scheduled Bodies and the Grouped Admission Bodies.
 - b. A maximum deficit recovery period of 20 years will apply. Employers will have the freedom to adopt a recovery plan on the basis of a shorter period if they so wish. A shorter period may be applied in respect of particular employers where the Administering Authority considers this to be warranted (see Deficit Recovery Plan below).
 - c. Any significant increases in employer contributions following an actuarial valuation may be phased in over an agreed period depending upon each employer's circumstances.
 - d. The Administering Authority may agree an alternative pattern of contribution rates in a particular case, where appropriate to the employer in question.
 - e. Nottinghamshire County Council is responsible for surpluses and deficits arising in respect of the former employees of certain bodies in the Admission Agreement Etc Fund. The treatment of such surpluses and deficits is agreed between the Administering Authority and the Fund actuary at each triennial valuation.
 - f. On the cessation of an employer's participation in the Scheme, the actuary will be asked to make a termination assessment. Any deficit in the Scheme in respect of the employer will be due to the Scheme as a termination contribution, unless it is agreed by the Administering Authority and the other parties involved that the assets and liabilities relating to the employer will transfer within the Scheme to another participating employer. In assessing the deficit on termination, the actuary may adopt a discount rate based on

gilt yields and adopt different assumptions from those used at the previous valuation to protect the other employers in the Fund from having to fund any future deficits from the liabilities that will remain in the Fund.

- 5.6 In determining the above objectives the Administering Authority has had regard to:
- relevant guidance issued by the CIPFA Pensions Panel
 - the need to balance a desire to attain the target as soon as possible against the short-term cash requirements which a shorter period would impose
 - the Government's aims as regards increases in local authority pension costs
 - the Administering Authority's views on the strength of the participating employers' covenants in achieving the objective.
- 5.7 If the assets within the appropriate scheme relating to a particular employer are less than the funding target at the effective date of any actuarial valuation, a recovery plan will be put in place, which requires additional contributions from the employer to meet the shortfall. Additional contributions will be expressed as a level percentage of pensionable payroll, unless arrangements are made otherwise in relation to any particular employer(s).
- 5.8 In determining the actual recovery period to apply for any particular employer or employer grouping, the Administering Authority may take into account some or all of the following factors:
- the size of the funding shortfall
 - the business plans of the employer
 - the assessment of the financial covenant of the Employer
 - any contingent security available to the Fund or offered by the Employer such as guarantor or bond arrangements, charge over assets, etc.

- 5.9 In addition to any contributions required to rectify a shortfall of assets below the funding target contributions will be required to meet the cost of future accrual of benefits for members after the valuation date. The method and assumptions for assessing these contributions are also set out in Appendix A.
- 5.10 All costs in relation to non-ill health early retirement costs will be funded as they occur. Employers may however meet the cost of the early payment strain element in three payments over a two year period from the date of retirement. These costs will be assessed on the basis of the actuary's advice.

6. Link to Investment Policy

- 6.1 The investment policy of the funds is set out in the Statement of Investment Principles (SIP). In assessing the value of the Scheme's liabilities in the valuation, the funding basis sets the discount rate to value the liabilities as the expected investment return from the agreed investment strategy taking into account the investment strategy adopted by the Scheme, as set out in the SIP.
- 6.2 The results of the 2010 valuation in respect of the Nottinghamshire County Council Pension Fund show the liabilities to be 84% covered by the current assets, with the funding deficit of 16% being covered by future deficit contributions.

The current benchmark investment strategy, as set out in the SIP, is:

| | |
|----------|-----------|
| Equities | 55% - 75% |
| Property | 5% - 25% |
| Bonds | 10% - 20% |
| Cash | 0% - 10% |

- 6.3 The Fund will be invested on a core/satellite approach, with approximately 40% of the fund managed in-house on an enhanced index-tracking basis, and the balance with specialist managers who are given targets for out-performance against benchmarks.

7. Identification of Risks and Counter-measures

7.1 The funding of defined benefits is by its nature uncertain. Funding of the Scheme is based on both financial and demographic assumptions. These assumptions are specified in the actuarial valuation report. When actual experience is not in line with the assumptions adopted a surplus or shortfall will emerge at the next actuarial assessment and will require a subsequent contribution adjustment to bring the funding back into line with the target.

7.2 Financial Risks

- Investment markets fail to perform in line with expectations
- Market yields move at variance with assumptions
- Investment Fund Managers fail to achieve performance targets in the longer term
- Asset re-allocations in volatile markets may lock in past losses
- Pay and price inflation significantly more or less than anticipated
- Effect of possible increase in employer's contribution rate on service delivery and admitted/scheduled bodies

7.3 Demographic Risks

- Longevity horizon continues to expand
- Deteriorating pattern of early retirements

7.4 Regulatory Risk

- Changes to Regulations, e.g. more favourable benefits package, potential new entrants to the Scheme, e.g. part-time employees
- Changes to national pension requirements and/or Inland Revenue rules

7.5 Governance Risks

- Administering Authority unaware of structural changes in employer's membership (e.g. large fall in employee numbers, large number of retirements)

- Administering Authority not advised of an employer closing to new entrants
- An employer ceasing to exist with insufficient funding or adequacy of a bond
- Meetings by the Administering Authority taking place infrequently
- Insufficient training being provided to members
- Inadequate procedures for taking and recording decisions
- Lack of continuity of membership of the Pensions Committee and its Sub-Committees

8. Monitoring and Review

8.1 The Administering Authority has taken advice from the actuary in preparing this Statement.

8.2 A full review of this Statement will occur no less frequently than every three years, to coincide with the full actuarial valuation. Any review will take account of the then current economic conditions and will also reflect any legislative changes.

8.3 The Administering Authority will monitor the progress of the funding strategy between full actuarial valuations. If considered appropriate, the funding strategy will be reviewed (other than as part of the triennial valuation process), for example:

- if there has been a significant change in market conditions, and/or deviation in the progress of the funding strategy
- if there have been significant changes to the Scheme's membership, or LGPS benefits
- if there have been changes to the circumstances of any of the employing authorities to such an extent that they impact on or warrant a change in the funding strategy
- if there have been any significant special contributions paid into the Scheme.

Actuarial Valuation as at March 2010

Appendix A

Method and assumptions used in calculating the funding target and recovery plan

Method

The actuarial method to be used in the calculation of the funding target is the Projected Unit method, under which the salary increases assumed for each member are projected until that member is assumed to leave active service by death, retirement or withdrawal from service. This method implicitly allows for new entrants to the Scheme on the basis that the overall age profile of the active membership will remain stable. As a result, for those employers which are closed to new entrants, an alternative method is adopted (the Attained Age method), which makes advance allowance for the anticipated future ageing and decline of the current closed membership group.

Financial assumptions

Investment return (discount rate)

The discount rate adopted at the 2010 valuation represented the expected investment return from the agreed investment strategy. In nominal terms this resulted in a discount rate of 6.9% per annum. Further details can be found in the 2010 valuation report.

Inflation (Retail Prices Index)

The inflation assumption will be taken to be the investment market's expectation for inflation, adjusted to reflect possible distortion in the UK government index-linked gilt market arising from supply/demand issues. This is derived by taking the difference between yields derived from market instruments, principally conventional and index-linked UK Government gilts as at the valuation date, reflecting the profile and duration of the Scheme's accrued liabilities, and reducing it by 0.25% p.a. The assumption adopted was 3.5% per annum.

Salary increases

The assumption for real salary increases (salary increases in excess of price inflation) will be determined by an allowance of 1.5% p.a. over the inflation assumption as described above. An additional allowance has been made for promotional increases. However in anticipation of Government policy it has been assumed that there will be a short term "pay freeze" for two years for those earning over £21,000 per annum.

Pension increases

Previously, pension increases were assumed to be in line with retail price increases. The 2010 Emergency Budget announced that in future, the pension increase orders will be linked to the CPI rather than RPI. It was assumed that pension increases will be 0.5% less than the price inflation assumption. i.e. 3.0% per annum.

Mortality

The mortality assumptions will be based on the most up-to-date information published by the Continuous Mortality Investigation Bureau, making allowance for future improvements in longevity and the experience of the Scheme. The mortality tables used are S1PA Heavy tables allowing for medium cohort projection, with a minimum 1% improvement and a multiplier of 105%.

Members who retire on the grounds of ill health are assumed to exhibit average mortality equivalent to that for a good health retiree at an age five years older.

Commutation

It has been assumed that members on retirement will commute pension to provide a lump sum of 50% of the standard lump sum and the maximum allowed at a rate of £12 cash for each £1 p.a. of pension given up.

Summary of key whole Fund assumptions used for calculating funding target, recovery plan and cost of future accrual (the “normal cost”) for the 2007 actuarial valuation

| Long-term gilt yields and price inflation | |
|--|--|
| Fixed interest | 4.4% p.a. |
| Index linked | 1.3% p.a. |
| Market implied RPI price inflation | 3.1% p.a. |
| Assumed long-term price inflation | 2.8% p.a. |
| Past service funding target and recovery plan financial assumptions | |
| Investment return pre-retirement | 7.15% p.a. |
| Investment return post-retirement | 5.40% p.a. |
| Salary increases | 4.30% p.a. |
| Pension increases | 2.80% p.a. |
| Future service accrual financial assumptions | |
| Investment return | 6.50% p.a. |
| Salary increases | 4.30% p.a. |
| Pension increases | 2.80% p.a. |
| Demographic assumptions | |
| Non-retired members' mortality | <i>Nottinghamshire County Council Pension Fund:</i> PA92 MC YoB tables + 2 year (males) +1 year (females) <i>Nottinghamshire Admission Agreement Etc Pension Fund:</i> PA92 MC YoB tables + 1 year (males and females) (+ additional 5 years for retirements in ill health in each case) |
| Retired members' mortality | <i>Nottinghamshire County Council Pension Fund:</i> PA92 MC YoB tables + 2 year (males) +1 year (females) <i>Nottinghamshire Admission Agreement Etc Pension Fund:</i> PA92 MC YoB tables + 1 year (males and females) (+ additional 5 years for retirements in ill health in each case) |
| Commutation | One half of members take maximum lump sum, others take 3/80ths |
| Withdrawal | Increased allowance compared to 2004 valuation for younger members to leave service |
| Other demographics | As for 2004 Valuation |

Statement of Investment Principles

1. Aims and Purpose

- 1.1 To provide for members' pension and lump sum benefits on their retirement or for their dependant's benefit on death before or after retirement, on a defined benefit basis.
- 1.2 To achieve relative stability in contributions by employers, balanced against an objective of operating cost-effectively and reducing employers contributions from their present level in the longer-term.
- 1.3 Subject to the first two items, to conduct the business of the Fund and to use the influence of the Fund in a long term responsible way.

2. Background

- 2.1 By statute, the County Council is the "administering authority" for the Pension Fund and those responsible for the Pension Fund act in a quasi-trustee capacity (hereafter referred to as 'trustees'). The governance arrangements for the Fund are detailed in the Governance Compliance Statement.
- 2.2 Membership of the Fund is available to employees of all local authorities in Nottinghamshire and also employees of other local authority organisations in the County. Other appropriate organisations, primarily voluntary bodies may also request admission to the scheme. These were formerly admitted to the separate Admitted Bodies Fund but this fund was merged with the main fund from 1 April 2010.
- 2.3 The contributions by employees to the Fund are set by statute and are not affected by how the Fund is run.
- 2.4 The benefits to employees are set by statute and are not affected by how the Fund is run.
- 2.5 The contributions by employers are variable and dependent on their own employment policies, the performance of the Fund and the results of the triennial actuarial valuation.

3. Principles

- 3.1 The Fund will aim to be sufficient to meet all its obligations on a continuing basis.
- 3.2 The Fund will be invested in a diversified range of assets.
- 3.3 Independent advice on the suitability of types of investment will be obtained on a regular basis.
- 3.4 The Trustees recognise their full responsibility for the oversight of the Fund, and operate to a Code of Conduct.

4. Trustee Responsibilities

- 4.1 The Trustees shall determine the overall investment strategy, and what restrictions, if any, are to be placed on particular types of investment and the location, by market, of those investments.
- 4.2 The Trustees shall determine the type of investment management to be used and shall appoint and dismiss fund managers, and other providers of specialist services to the Funds.
- 4.3 The Trustees shall receive quarterly reports on performance from the main fund managers and shall question them regularly on their performance. There will be an independent report on the performance of fund managers that is produced at least annually and provided to the Trustees.
- 4.4 The Trustees shall be encouraged to receive suitable training to help them discharge their responsibilities and shall, within a defined budget, attend such training courses, conferences and meetings that deliver value for money to the Funds and their administration.

5. Asset Allocation

5.1 Contribution income currently exceeds benefit payments and a recent investment strategy review, carried out by the Fund's actuaries, found that this is likely still to be the case in 20-30 years time. This makes it unlikely that assets will have to be realised in order to meet pension benefits and allows the Fund to implement a long term investment strategy.

5.2 The agreed asset allocation ranges are therefore:-

| | |
|----------|------------|
| Equities | 55% to 75% |
| Property | 5% to 25% |
| Bonds | 10% to 25% |
| Cash | 0% to 10% |

These ranges will be kept under regular review. If it appears likely that these limits might be breached because of market movements, reference will be made to a meeting of the Pensions Working Party for advice. The proportions are those aimed at achieving best returns whilst minimising overall variability in the future employers' contribution rates. These have been confirmed as appropriate by the investment strategy review.

5.3 In carrying out the triennial valuation, the actuaries make allowance for the expected long term additional returns from the Fund's investments relative to a portfolio of Government bonds. The assumed level of out-performance at the most recent valuation was 2.3% per annum. Actual returns will be incorporated into each actuarial valuation.

5.4 The policy of the Fund will be to treat the equity allocation as a block aimed at maximising the financial returns to the funds (and thus minimising the employers contribution) consonant with an acceptable level of risk. The block of Bonds, Property and Cash is aimed at lowering overall risk (at the cost of anticipated lower return). The Fund will vary between the asset classes according to market circumstances, relative performance and cash flow requirements.

5.5 Within the Equities block, the Trustees have agreed an allocation to private equity and infrastructure. This will be effected principally through fund of funds arrangements to increase diversification and reduce risk. The allocation is based on committed amounts and, owing to the nature of these funds, the actual net investment level will be significantly lower. New investments will be made over time to target a commitment level of 10% of the Fund (within an allocation range up to 15% to allow for movements in market value).

5.6 Cash will be managed and invested on the Fund's behalf by the County Council in line with its treasury management policy. The policy is to invest surplus funds prudently, giving priority to security and liquidity rather than yield. If losses occur, however, the Fund will bear its share of those losses.

5.7 Pension fund cash is separately identified each day and specific investment decisions will be made on any surplus cash identified, based on the estimated cash flow requirements of the Fund. As the majority of cash is allocated to individual investment managers and may be called by them for investment at short notice, it is expected that the majority of cash will be placed on call or on short-term fixed deposits. Unallocated balances may be placed directly with the Fund's custodian.

5.8 Joint investments using a combination of Fund cash and County Council cash may be made where this is in the best interests of the Fund. In considering such investments, guidance issued by the Department for Communities and Local Government will be followed and the Fund will receive its fair share of interest in proportion to the share of cash invested.

5.9 Other asset classes, such as hedge funds and currency, will be reviewed as part of the regular asset allocation strategy review and, if a decision to invest in other assets is made, the Statement of Investment Principles will be revised accordingly.

6. Risk Management

- 6.1 The Fund has adopted a Risk Management Strategy to:
- a. identify key risks to the achievement of the Fund's objectives
 - b. assess the risks for likelihood and impact
 - c. identify mitigating controls
 - d. allocate responsibility for the mitigating controls
 - e. maintain a risk register detailing the risk features in a)-d) above
 - f. review and update the risk register on a regular basis
 - g. report the outcome of the review to the Pensions Committee.
- 6.2 The Risk Register is a key part of the strategy as it identifies the main risks to the operation of the Fund, prioritising the risks identified and detailing the actions required to further reduce the risks involved.
- 6.3 A key part of managing the investment risk is by ensuring an adequate number of suitably qualified investment managers and by requiring managers to hold a diversified spread of assets, which will be reviewed regularly by the Investment Sub-committee. The level of risk in the equities block will be managed by a balance between passive and active management that will be varied from time to time, according to performance and emerging knowledge and experience of the market.
- 6.4 The investment strategy review indicates that the correlation between UK and overseas markets has increased significantly over recent time, reflecting the increasing globalisation of the market. The Funds will therefore make no distinction between the relative holdings of UK and overseas equities, but will take into account exchange rate risks when deciding the balance.

- 6.5 In addition, the following constraints will apply. These constraints will be reviewed from time to time, and if changes are made, these will be incorporated into a revised Statement of Investment Principles, and amendments will be published.
- a. Not more than 10% of the Fund to be invested in unlisted securities.
 - b. Not more than 10% of the Fund to be invested in a single holding.
 - c. Not more than 25% of the Fund to be invested in securities which are managed by any one body, i.e. in a unit trust type arrangement.
 - d. Not more than 15% of the Fund to be invested in partnerships, with not more than 2% in any one partnership.
 - e. Not to enter into any stock lending arrangements.
 - f. No underwriting without prior approval.
 - g. No involvement in derivatives (including currency options) without prior approval.

7. Other Issues

- 7.1 The Fund's assets are held in custody by a combination of an independent custodian, investment managers and in-house. The performance of fund managers will be measured against individual benchmarks, and the overall fund, including cash returns, against a combined benchmark. Performance will be measured by an independent agency. The statement of accounts will be audited by the County Council's external auditors.
- 7.2 The Investment Sub-Committee will meet at least eight times a year. At least five of these meetings will be at County Hall and the remainder may be held at the offices of the principal fund managers. The travel and subsistence arrangements for Trustees shall be those which prevail for Nottinghamshire County Council.

- 7.3 The Fund has appointed an independent adviser who will be present at meetings of the Investment Sub-Committee along with appropriate officers of the administering authority. This is considered best practice in accordance with the requirements for “proper advice” in the governing regulations.
- 7.4 This Statement of Investment Principles will be kept under review and will be revised following any material changes in policy.
- 7.5 The following appendices are attached:
- Appendix A
 - the investment management arrangements
 - Appendix B
 - the Fund’s Statement on Responsible Investment
 - Appendix C
 - compliance with the revised Myners principles.

The combined investment management arrangements as at 31 March 2010 were as below.

| Investment | Management | Style | Fee Structure | £ million |
|-----------------------|---------------------------------|--|--------------------------------|--------------|
| Equities | | | | |
| Global equities | In-house | Consensus indexation | | 1,058 |
| Global equities | Schroders | Active management | Fixed fee basis | 715 |
| Global equities | Martin Currie | Active management | Fixed fee basis | 15 |
| Global equities | Hermes Governance for Owners | Active with focus on company engagement | Fixed fee plus performance fee | 102 |
| Private equity | Various | Active management | Fixed fee plus performance fee | 48 |
| | | | | 1,938 |
| Fixed Interest | | | | 71.3% |
| Global fixed interest | Aegon | Active management | Fixed fee plus performance fee | 262 |
| Index linked bonds | Aegon | Active management | Fixed fee plus performance fee | 51 |
| | | | | 313 |
| Property | | | | 11.5% |
| Direct UK property | Aberdeen | Active management | Fixed fee basis | 248 |
| Property unit trusts | Various | Active management | | 38 |
| Overseas property | Various | Active management | Fixed fee plus performance fee | 92 |
| | | | | 378 |
| | | | | 13.9% |
| Cash | Nottinghamshire County Council | | | 90 |
| | | | | 3.3% |
| | | | | 2,719 |

Statement on Responsible Investment

Appendix B

1. Statement of Principles

- 1.1 The Nottinghamshire Fund adopts a long term approach to responsible investment. The Trustees recognise their full responsibility for the oversight of the Funds and are charged with determining the overall investment strategy and the type of investment management used. The investment strategy is aimed at achieving best returns whilst minimising risk and overall variability in future employers' contribution rates. Environmental, social and governance (ESG) issues will be taken into account where these are considered likely to impact on returns.
- 1.2 The Fund supports best practice in corporate governance and adopts the Stewardship Code as recommended by the revised Myners Principles. The Code states that institutional investors should:
 - publicly disclose their policy on how they will discharge their stewardship responsibilities.
 - have a robust policy on managing conflicts of interest in relation to stewardship and this policy should be publicly disclosed.
 - monitor their investee companies.
 - establish clear guidelines on when and how they will escalate their activities as a method of protecting and enhancing shareholder value.
 - be willing to act collectively with other investors where appropriate.
 - have a clear policy on voting and disclosure of voting activity.
 - report periodically on their stewardship and voting activities.
- 1.3 The Fund has adopted a number of specific policies to implement its approach to long term responsible investment and its responsibilities under the Stewardship Code.

2. Policies Adopted

- 2.1 The Fund adopts a policy of positive engagement with the companies in which it invests in order to promote high standards of corporate governance. It believes that this will help to raise standards across all markets and that this is in the best long term interests of the Fund, its beneficiaries and other stakeholders.
- 2.2 Investment performance is monitored on a quarterly basis and the Fund expects investment managers to engage with companies to address concerns affecting performance. The Fund also holds a number of investments that specifically focus on engaging with the management of under-performing companies in order to generate superior returns.
- 2.3 The Fund believes that the greatest impact on behaviour can be achieved when working together with others. It is a member of the Local Authority Pension Fund Forum (LAPFF) which exists to promote the investment interests of local authority pension funds and to maximise their influence as shareholders in promoting corporate social responsibility and high standards of corporate governance amongst the companies in which they invest. The Fund actively supports the work of LAPFF and sees this as an important element of its stewardship responsibilities.
- 2.4 The Fund continues to exercise its ownership rights by adopting a policy of actively voting stock it holds. The Fund retains responsibility for voting (rather than delegating this to investment managers) and proxy votes are submitted for the majority of its global equity holdings.

2.5 Voting is in line with corporate governance best practice and the Fund subscribes to independent research services for voting advice. Voting activity is reported to the Investment Sub-Committee. In exceptional circumstances the Fund will combine with others on a specific issue but only after a specific report has been made or consultation carried out.

2.6 In order to ensure ownership rights can be exercised, the Fund holds and will continue to hold, investments in its own name where possible, rather than in the name of investment managers. It will continue to oppose those processes, such as stock lending, which also deprive the Fund of the ability to meet its corporate governance objectives.

Summary of Compliance with the Revised Myners Principles

| Principle | CIPFA Guidance Key Issues | Compliance | Proposed Actions |
|---|--|----------------------------|--|
| <p>1. Effective Decision Making</p> <p>a) Decisions are taken by persons or organisations with the skills, knowledge, advice and resources necessary to make them effectively and monitor their implementation.</p> <p>b) Those persons or organisations have sufficient expertise to be able to evaluate and challenge the advice they receive, and manage conflicts of interest.</p> | <ul style="list-style-type: none"> ● Separate Committee responsible for the Pension Fund. ● Governance Compliance Statement published. ● Roles of Members, officers, external advisors and managers defined. ● Committee has specified appropriate skills. ● Skills and knowledge audit of Committee's membership occur. ● Committee has sub committees or a panel to progress significant areas between meetings of the Committee. ● Committee obtains proper advice from officers and external investment managers. ● Training plan for Members in place. ● Papers and reports should be clear and comprehensive and circulated in advance of meetings. ● A medium term business plan for the Pension Fund should be in place. | <p>Generally compliant</p> | <ol style="list-style-type: none"> 1. A training plan, referring to the recently published CIPFA Skills Framework for Members and officers working in public sector pensions is produced for consideration by a future meeting of the Pensions Investment Sub Committee. 2. A medium term business plan for the Pensions Fund is presented to the Investment Sub Committee for approval by the Pensions Committee. |

| Principle | CIPFA Guidance Key Issues | Compliance | Proposed Actions |
|--|---|----------------------------|--|
| <p>2. Clear Objectives</p> <p>An overall investment objective(s) should be set out for the fund that takes account of the scheme's liabilities, the potential impact on local taxpayers, the strength of the covenant for non local authority employers, and the attitude to risk of both the administering authority and scheme employers, and these should be clearly communicated to advisors and investment managers.</p> | <ul style="list-style-type: none"> ● In setting objectives, the Committee has considered: <ul style="list-style-type: none"> • the fund's liabilities • the adequacy of assets • the maturity of the Fund's liabilities • its cashflow and has sought proper advice. ● Risk is considered as part of the asset allocation strategy. ● Funding levels and employer contribution rates are considered and the advice of the Actuaries sought. ● The Committee considers whether to request an Asset Liability Study. ● The Committee states the range of investments it is prepared to include in its asset allocation and say why some asset classes may have been excluded. ● The Committee takes proper advice, including from specialist independent advisors where appropriate. ● Advisors are appointed in open competition and are set performance objectives. ● The Committee understands transaction related costs incurred, including commission, and has a strategy for ensuring these costs are properly controlled. | <p>Generally compliant</p> | <ol style="list-style-type: none"> 3. Following the Actuarial Valuation 2010, consideration is given to requesting an Asset Liability Study. 4. A report is provided to a future Pensions Investment Sub Committee on transaction related costs. |

| Principle | CIPFA Guidance Key Issues | Compliance | Proposed Actions |
|---|--|----------------------------|--|
| <p>3. Risk and Liabilities</p> <p>a) In setting and reviewing their investment strategy, administering authorities should take account of the form and structure of liabilities.</p> <p>b) These include the implications for local taxpayers, the strength of the covenant for participating employers, the risk of their default and longevity risk.</p> | <ul style="list-style-type: none"> ● The Committee sets an overall investment objective for the fund that represents its best judgement of what is necessary to meet the fund's liabilities and takes account of the Committee's attitude to risk. ● Appropriate performance benchmarks have been set. ● The Statement of Investment Principles includes a description of the risk assessment framework used for potential and existing investments. ● The triennial valuation includes a risk assessment in relation to the valuation of its liabilities/assets and factors affecting long term performance. ● The Committee uses internal and external audit reports to satisfy itself on the fund's internal controls. ● The Investment Strategy is suitable for the fund's objectives and takes account of the ability to pay of the employers in the fund. ● The Annual Report includes an overall risk assessment in relation to each of the fund's activities. | <p>Generally compliant</p> | <ol style="list-style-type: none"> 5. The triennial valuation report is presented to the Pensions Investment Sub Committee highlighting key factors such as the need for risk assessments in relation to the Fund's liabilities and assets. 6. Relevant Audit reports be presented to future appropriate Sub Committees. 7. The Annual Report to include updated detail on the fund's risk management strategy and risk register. |

| Principle | CIPFA Guidance Key Issues | Compliance | Proposed Actions |
|--|---|----------------------------|--|
| <p>4. Performance Assessment</p> <p>a) Arrangements should be in place for the formal measurement of performance of the investments, investment managers and advisors.</p> <p>b) Administering authorities should also periodically make a formal assessment of their own effectiveness as a decision making body and report on this to scheme members.</p> | <ul style="list-style-type: none"> ● The Committee should consider whether existing index benchmarks are appropriate and consider whether active or passive management are appropriate for managing the Fund's assets. ● Performance targets in relation to a benchmark should specify clear time periods and risk limits, and monitoring arrangements should include reports on tracking errors. ● In addition to overall Fund returns, the return achieved in each asset class should be measured so that the impact of different investment choices can be assessed. ● Although returns will be measured quarterly, a longer timeframe (typically 3–7 years) should be used to assess the effectiveness of Fund management arrangements. ● Returns should be obtained from specialist performance measurement agencies independent of the fund managers. ● Actuarial services should be market tested periodically. ● When assessing managers and advisors, the extent to which decisions have been delegated should be considered. ● The Committee should set out its expectations of its own performance in its business plan which should be assessed and reported in the fund's Annual Report. | <p>Partially compliant</p> | <ol style="list-style-type: none"> 8. A review of existing benchmarks is presented to the Investment Sub Committee. 9. A report on Fund performance from the Fund's performance measurement agency is presented to the Investment Sub Committee. 10. The Investment Sub Committee to consider setting a performance framework to help assess its own performance. |

| Principle | CIPFA Guidance Key Issues | Compliance | Proposed Actions |
|---|--|----------------------------|------------------|
| <p>5. Responsible Ownership Administering Authorities should:</p> <ul style="list-style-type: none"> a) adopt, or ensure their investment managers adopt, the Institutional Shareholders Committee (ISC) Statement of Principles on the responsibilities of shareholders and agents b) include a statement of their policy on responsible ownership in the Statement of Investment Principles c) report periodically on the discharge of such responsibilities. | <ul style="list-style-type: none"> ● Policies regarding responsible ownership must be disclosed in the statement of Investment Principles. ● The Committee should ensure that investment managers have an explicit strategy, setting out the circumstances in which they will intervene in a company that is acceptable within the Committee's policy. ● Funds should be aware of the ISC Code on the Responsibilities of Institutional Investors and the United Nations Environment Programme Finance Initiative. ● Authorities may wish to consider seeking alliances with other pension funds to enhance its influence on environmental, social and governance issues e.g. LAPFF. | <p>Generally compliant</p> | |

| Principle | CIPFA Guidance Key Issues | Compliance | Proposed Actions |
|--|--|------------------|---|
| <p>6. Transparency and Reporting Administering Authorities should:</p> <p>a) act in a transparent manner, communicating with stakeholders on issues relating to their management of investments, its governance and risks, including performance against stated objectives.</p> <p>b) provide regular communication to scheme members in the form they consider most appropriate.</p> | <ul style="list-style-type: none"> ● The Governance Compliance Statement should be maintained regularly. ● The Communication Statement should contain sufficient information. ● The Annual Report should be compared to the regulations setting out the required content. ● The content of the Statement of Investment Principles, the Funding Strategy Statement and the Governance Compliance Statement should comply with the relevant guidance and requirements. | <p>Compliant</p> | <p>11. The core source documents namely the Statement of Investment Principles, Funding Strategy Statement, Governance Compliance Statement and the Communication Statement continue to be updated as necessary to reflect guidance available and presented to the Investment Sub Committee as appropriate.</p> |

Communications Policy Statement

1. Purpose

- 1.1 To inform the Pensions Administration Committee of the Communications Strategy, which has been developed by the Nottinghamshire Pensions Office.

2. Background

- 2.1 The Local Government Pension Scheme is one of the most important benefits that the Employer offers, and the giving of information and its feedback can only enhance the Pension Scheme. An effective communications strategy is therefore vital for an organisation like ours which strives to provide a high quality and consistent service to its customers.
- 2.2 The Office of the Deputy Prime Minister on 28 November 2005 issued The Local Government Pension Scheme (Amendment) (No.2) Regulations 2005, which required each pension fund administering authority to prepare and publish and maintain a policy statement on governance, and a policy statement on its communication strategy.
- 2.3 The policy statement on the communication strategy is required to set out how the authority would communicate with members, members' representatives, prospective members and employing authorities; and for the promotion of the Scheme to prospective members and their employing authorities. The first such policy statement must be published on or before 1 April 2006, and a revised statement to be published thereafter whenever there is a material change. In the authority's policy. The ODPM expects administering authorities to submit a copy of their policy statement after 1 April 2006.
- 2.4 A report was presented to the Pensions Administration Sub-Committee on 24 October 2005, outlining key aspects of a Communications Strategy and based on the views of the Committee the final draft is as noted below in 3.

3. Strategy

- 3.1 This report intends to consult the Committee about the potential and the scope of communications. The report sets out the mechanisms which are to be used to meet those communication needs. The Pensions Office would use the most appropriate communication medium for the audiences receiving the information. This may involve using more than one method of communication.
- 3.2 There are six distinct groups with whom the Pensions Office needs to communicate with:
 - a) Trustees
 - b) Scheme Members
 - c) Prospective Scheme Members
 - d) Scheme Employers
 - e) Administration Staff
 - f) Other Bodies

Trustees

- 3.3 The Pensions Office would aim to develop a micro site on the County Council Intranet to contain relevant information for Trustees with regard to training and the roles of the trustees. The development of knowledge and training can be provided by Officers under investment and administration matters, and supplemented by attendance at relevant external training sessions, conferences, and seminars. The role of the Trustees can be supplemented through the Pensions Committee, Investment Committee, and the Pensions Administration Sub Committee, at which specific advice can be provided by Officers. All the respective Committees will be provided with information and reports on all relevant pension matters, and where approval and leadership on issues is required.
- 3.4 It is worth noting the ten investment principles as set out in the Myner's report in relation to the role of Trustees and Fund Management. The principles are as set out below:

- a) Effective Decision Making
- b) Clear Objectives
- c) Focus On Asset Allocation
- d) Expert Advice
- e) Explicit Manager Mandates
- f) Activism
- g) Appropriate Benchmarks
- h) Performance Measurement
- i) Transparency
- j) Regular Reporting

The Pension Fund already complies with most parts of the principles, and the extent of compliance is disclosed in the Statement of Investment Principles. There is currently a Government Treasury Working Party which is looking to assess the extent of compliance by Pension Funds generally, and it is already apparent that Public Sector Schemes are doing better than Private Sector Schemes. Nevertheless, the Working Party is likely to re-emphasise the importance of Trustees having 'familiarity' with investment matters.

Scheme Members

- 3.4 The Pensions Office would aim to develop an extensive internet website containing scheme details, scheme leaflets, etc. There would be links to other organisations relevant to scheme members, e.g. Employers, AVC Providers, Employers' Organisations, etc.
- 3.5 The publication of 'Nest Egg' for Active Members and Pensioners would continue, which would target specific issues related to their needs. The communications with Pensioners needs to be developed in the context of informing on pertinent issues, such as Health, Finances, etc. It is intended that the Pensions Office would liaise with Employers to ascertain up to date address details of members in order to send the 'Nest Egg' to home addresses. It would then request members to inform the office of any address

changes. This would ensure that all Active Members of the LGPS received a copy of the publication. We would also consider upon request attending various Pensioner forums or meetings to inform on issues or answer questions relating to the LGPS.

- 3.6 The Pensions Office would send Benefit Illustrations to all Active and Deferred Members. There is development work underway to improve upon the timing of the despatch of such illustrations, so that members receive the statements soon after the end of the previous year end.
- 3.6 An extensive range of scheme literature is produced by the Pensions Office and is supplied to employing bodies and Scheme Members directly. Copies of the scheme literature will form part of the website.
- 3.7 The Pensions Office continues to issue periodic pay advices to scheme pensioners. This can be utilised as a communication mechanism, as messages can be included on the advice, e.g. to reinforce the needs for pensioners to ensure that in the event of their demise or change of address that the service is notified promptly.
- 3.8 The Pensions Office utilises both surface and e-mail to receive and send correspondence.
- 3.9 A dedicated telephone help line has been established and is widely publicised in scheme literature.
- 3.10 The Pensions Office aims to provide more frequent Pensions Roadshows around the County, whilst undertaking satellite Roadshows and surgeries, as requested, by specific organisations.
- 3.11 There would be other miscellaneous actions taken for Scheme Members, such as Customer Satisfaction Surveys, Specific Customer Complaints and Commendations, and the tracking and contacting of Deferred Beneficiaries.

Prospective Scheme Members

- 3.12 As part of the Government's aim to encourage the public to save for the future, the Pensions Office would aim to target prospective members. This would be done by ensuring that all new appointees receive the scheme booklet. There would be specific information on the website for non-joiners and with data from Employers would focus on specific groups to market the scheme, e.g. by messages on payslips.
- 3.13 Staff from the Pensions Office would attend induction courses for new recruits to inform of the scheme and the benefits the LGPS offers. We would utilise the Pension Roadshows to, and in partnership with the Department of Works & Pensions and AVC Providers, target specific non-members to provide a more informed choice.
- 3.14 The Pensions Office would work with the Trade Unions to ensure that the scheme is understood, and that all related pension issues are communicated effectively through the Unions.

Scheme Employers

- 3.15 The Pensions Office aims to work in partnership with Scheme Employers to assist them in the application of the scheme. It is intended to establish a frequent 'dialogue meeting' with District Councils and other group Employers to pass information, and identify and resolve cases. A 'Technical Newsletter' would be developed to communicate issues under current debate and any changes on Employer functions.
- 3.16 We currently have an Employer's Guide through which they are informed of administration responsibilities. An Internet site would be developed for manuals and scheme literature to be available for Employers.

3.17 It is intended that Employer Forums would be established to facilitate discussion with small employers and subsequently improve communication. Staff from the Pensions Office attend Pre-Retirement Courses at District Councils to inform retiring members of specific retirement issues.

3.18 The Pensions Office uses the 'Axis' database to hold member records. It is intended to achieve greater web compatibility and the transmission of data electronically. Furthermore, we intend to develop systems so that major Employers have access through the internet to pension records of employees together with a calculation suite, for the provision of estimates direct to employees.

Administration Staff

- 3.19 The Pensions Office currently ensures that all new staff receive robust induction and training, so that they are able to undertake their duties and responsibilities effectively. The Pensions Office has Team Meetings and Management Team Meetings to discuss issues ranging from planning to communications. It is intended to establish an Issues Meeting which will require a cross section of staff from the Pensions Office to discuss issues and concerns.
- 3.20 There is currently an Intranet site for the administration staff called 'Documents on Line', which needs to be further developed. A Review Group would also be established to review on a periodic basis the Pensions Office's work practices and process, including communications.

Other Bodies

- 3.21 The Trade Unions are a valuable organisation for the Pensions Office to ensure that the details of the LGPS's availability are brought to their members' attention. The management of the Pensions Office regularly attend various national and regional forums to share issues of common interest and develop and establish best practice, i.e. the National Information Forum, and the East Midlands Pensions Officer Group. The Pension Manager attends the annual Pension Managers' conference in Torquay to discuss various common and pertinent issues. The meeting of the Additional Voluntary Contribution Providers are also attended on a regular basis to discuss various issues, and to, as required, circulate information to scheme members.
- 3.22 The Pensions Office is a member of the Pensions Benchmarking Club which is run by the Institute of Public Finance. We provide information on membership numbers and administration costs and subsequently benchmark our costs and service with all members and specified members of the Club.
- 3.23 Staff from the Pensions Office undertakes visits to Comparator Administering Authorities to learn and share new practices and systems, and to facilitate new ideas and solutions which have a common goal.

Risk Management Strategy

1. Aims and Purpose of the Pension Funds

1.1 The aims of the Fund are to:

- manage employers' liabilities effectively
- ensure that sufficient resources are available to meet all liabilities as they fall due
- maximise the returns from investments within reasonable risk parameters
- enable employer contribution rates to be kept as nearly constant as possible and at reasonable cost to the taxpayers, scheduled, resolution and admitted bodies.

1.2 The purpose of the Fund is to:

- receive monies in respect of contributions, transfer values and investment income
- pay out monies in respect of scheme benefits, transfer values, costs, charges and expenses as defined in the relevant regulations.

1.3 In terms of its investments the Fund will:

- aim to be sufficient to meet all of its obligations on a continuing basis
- be invested in a diversified range of assets
- obtain independent advice on the suitability of types of investment on a regular basis.

1.4 Subject to the requirements of the points set out above, the Fund will aim to conduct its business and to use its influence in a long term responsible way.

2. Risk Management

2.1 Risk can be defined as any event or action which could adversely affect the Fund's ability to achieve its aims and purpose. Proper management of those risks is the process by which:

- risks are systematically identified
- the potential consequences are evaluated
- the element of risk is reduced where reasonably practicable

- actions are taken to control the likelihood of the risk arising and reducing the impact if it does.

2.2 Risk Management is a key element in the Fund's overall framework of internal control and its approach to sound governance. However, it is not an end in itself, but a means of minimising the costs and disruption to the Fund caused by undesirable or unexpected events. The aim is to eliminate or reduce the frequency of risk events occurring (wherever possible) and minimise the severity of the consequences if they do occur.

3. Pension Fund Risk Management Strategy

3.1 The Pension Fund's Risk Management Strategy is to:

- a) identify key risks to the achievement of the Fund's aims
- b) assess the risks for likelihood and impact
- c) identify mitigating controls
- d) allocate responsibility for the mitigating controls
- e) maintain a risk register detailing the risk features in a)-d) above
- f) review and update the risk register on an annual basis
- g) report the outcome of the review to the Pensions Committee annually.

3.2 The Risk Register is a key part of the Risk Management Strategy as it identifies the main risks to the operation of the Fund, prioritising the risks identified and detailing the actions required to further reduce the risks involved. These actions will link to the Business Plan process currently reported to the Pensions Investment Sub Committee in accordance with the Myners Principles.

4. Roles and Responsibilities

- 4.1 All staff involved in the Pension Fund and Members of the Nottinghamshire Pension Fund Committee and its two Sub Committees need to have an appropriate level of understanding of risk and how risks affect the performance of the Fund. To consolidate the risk management process, the Nottinghamshire Pension Fund Committee will be asked to:
- agree the Risk Management Strategy
 - approve the Risk Register
 - approve the agreed Risk Register actions
 - receive and approve the Annual Governance Statement, which will comment upon the Fund's risk management process.
- 4.2 By adopting this approach, the Pension Fund will be able to demonstrate a clear commitment, at a strategic level, to the effective management of Pension Fund risks.

Risk Register

Objectives

- The objectives of the Risk Register are to:
 - identify key risks to the achievement of the Fund's objectives
 - consider the risks identified
 - assess the significance of the risks.

Risk Assessment

- Identified risks are assessed separately and for each the following is determined:
 - the likelihood of the risk materialising
 - the severity of the impact/potential consequences if it does occur.
- Each factor is evaluated on a sliding scale of 1 to 5 with 5 being the highest value i.e. highest likelihood/most severe impact/consequences. The risk evaluation tables below have been used in order to assess specific risks and to introduce a measure of consistency into the risk assessment process. The overall rating for each risk is calculated by multiplying the likelihood value against the impact value.

Having scored each risk for likelihood and impact, the risk ratings can be plotted onto the following matrix to enable risks to be categorised into Low, Medium, High and Very High Risk. The risk rating scores and categories are then used to prioritise the risks shown in the register in order to determine where additional action is required.

| | | | | | | |
|-----------------|-------------------|---------------------|-----------------|-----------------|---------------|-----------------------|
| Relative Impact | Catastrophic (5) | M | H | VH | VH | VH |
| | Significant (4) | M | H | VH | VH | VH |
| | Moderate (3) | M | M | H | H | H |
| | Minor (2) | L | L | M | M | M |
| | Insignificant (1) | L | L | L | L | L |
| | | (1) Rare | (2) Unlikely | (3) Possible | (4) Likely | (5) Almost Certain |
| | | Relative Likelihood | | | | |

LIKELIHOOD:

| | | |
|---|----------------|------------------|
| 1 | Rare | 0 to 5% chance |
| 2 | Unlikely | 6 to 20% chance |
| 3 | Possible | 21 to 50% chance |
| 4 | Likely | 51 to 80% chance |
| 5 | Almost certain | 81%+ chance |

IMPACT:

| | | |
|---|---------------|------------------|
| 1 | Insignificant | 0 to 5% chance |
| 2 | Minor | 6 to 20% chance |
| 3 | Moderate | 21 to 50% chance |
| 4 | Significant | 51 to 80% chance |
| 5 | Catastrophic | 81%+ chance |

Nottinghamshire Pension Fund Risk Register

| Risk | Rating | Impact | Change |
|---|--------|-----------|--------|
| Risk V1. Significant variations from assumptions used in the actuarial valuation | 16 | VERY HIGH | ★ |
| Risk G6. Fund assets are assessed as insufficient to meet long term liabilities. | 12 | VERY HIGH | ★ |
| Risk G3. An effective performance management framework is not in place. | 9 | HIGH | ↑ |
| Risk A2a. Fund manager mandates | 8 | HIGH | ↔ |
| Risk A2b. Custody arrangements | 8 | HIGH | ↓ |
| Risk G1. Pension Fund governance arrangements are not effective | 8 | HIGH | ↑ |
| Risk G4. Inappropriate investment strategy is adopted. | 8 | HIGH | ↓ |
| Risk A1. Standing data & permanent records are not accurate or do not reflect changes of circumstances. | 8 | MEDIUM | ↓ |
| Risk A2c. Accounting arrangements | 6 | MEDIUM | ↓ |
| Risk A2d. Financial Administration | 6 | MEDIUM | ↔ |
| Risk A2e. Pensions Administration | 6 | MEDIUM | ↓ |
| Risk A3. Inadequate resources are available to manage the pension fund. | 6 | MEDIUM | ★ |
| Risk G2. Pension Fund objectives are not defined and agreed. | 6 | MEDIUM | ↑ |
| Risk G5. Fund cash is insufficient to meet its current obligations. | 6 | MEDIUM | ★ |
| Risk R1. Failure to adhere to relevant statutory regulations including updates from LGPS. | 6 | MEDIUM | ↓ |
| Risk A2f. Stewardship | 4 | LOW | ★ |
| Risk A4. Failure to communicate adequately with all relevant stakeholders. | 4 | LOW | ↓ |

Key to Risk Rating change since previous version of Risk Register:

 Increase
  Decrease
  No Change
  New

Pension Fund Governance

Risk G1. Pension Fund governance arrangements are not effective (Myners' Principle 1 / 6)

| Likelihood | 2 | Impact | 4 | Risk rating | ↑ | 8 | HIGH |
|---|---|--------|---|------------------|----------|---|------|
| Current Controls | <ul style="list-style-type: none"> The Council's constitution clearly delegates the functions of administering authority of the pension fund to the Nottinghamshire Pension Fund Committee (NPF Committee), supported by two Sub-Committees. The terms of reference of each Sub-Committee are agreed. The Fund publishes a Governance Compliance Statement which details the governance arrangements of the Fund and assesses compliance with best practice. This is kept regularly under review. A training policy is in place which requires Members to receive continuing training and all new Members to attend the Local Government Employers training course. Officers of the Council attend meetings of the Pensions Committee and Sub-Committees. The Fund has a formal contract for an independent adviser to give advice on investment matters. They are required to attend each meeting of the Pension fund investment sub-committees. | | | | | | |
| Additional Controls/ Action Required | <ul style="list-style-type: none"> Continue to monitor via existing processes. | | | | | | |
| Responsibility | Group Manager (Financial Strategy & Compliance) | | | Timescale | On-going | | |

Pension Fund Governance

Risk G2. Pension Fund objectives are not defined and agreed. (Myners' Principle 2)

| Likelihood | 2 | Impact | 3 | Risk rating | ↑ | 6 | MEDIUM |
|---|---|--------|---|------------------|----------|---|--------|
| Current Controls | <ul style="list-style-type: none"> Objectives are defined in the Funding Strategy Statement and approved by the NPF Committee. | | | | | | |
| Additional Controls/ Action Required | <ul style="list-style-type: none"> Continue to monitor via existing processes. | | | | | | |
| Responsibility | NPF Committee; Group Manager (Financial Strategy & Compliance) | | | Timescale | On-going | | |

Pension Fund Governance

Risk G3. An effective performance management framework is not in place.

(Myners' Principle 4)

| Likelihood | 3 | Impact | 3 | Risk rating | ↑ | 9 | HIGH |
|---|---|--------|---|------------------|----------------|---|------|
| Current Controls | <ul style="list-style-type: none"> A performance management framework involving quarterly performance reports to the Pensions Investment Sub Committee is in place. Poor performance is highlighted and addressed directly by the Pensions Investment Sub Committee and ultimately the NPF Committee. | | | | | | |
| Additional Controls/ Action Required | <ul style="list-style-type: none"> Devise performance framework to monitor effectiveness of asset allocation decisions. | | | | | | |
| Responsibility | Pensions Investment Sub-Committee; Group Manager (Financial Strategy & Compliance) | | | Timescale | September 2013 | | |

Pension Fund Governance

Risk G4. Inappropriate investment strategy is adopted.

(Myners' Principle 2)

| Likelihood | 2 | Impact | 4 | Risk rating | ↓ | 8 | HIGH |
|---|--|--------|---|------------------|------------|---|------|
| Current Controls | <ul style="list-style-type: none"> The Investment Strategy is in accordance with LGPS investment regulations. The terms of reference of each Sub-Committee are agreed. The Investment Strategy is documented, reviewed and approved by the Pensions Committee. The Strategy takes into account the Fund's liabilities. A regular review takes place of the Fund's asset allocation strategy by the Pension Fund Working Party. An external advisor provides specialist guidance to the Pensions Investment Sub Committee on the investment strategy. | | | | | | |
| Additional Controls/ Action Required | <ul style="list-style-type: none"> Consider the need for an explicit assessment of the strategic risk inherent in the Fund's Investment Strategy. This could form part of an Investment Strategy Review following the triennial valuation. | | | | | | |
| Responsibility | Group Manager (Financial Strategy & Compliance) | | | Timescale | March 2014 | | |

Pension Fund Governance

Risk G5. Fund cash is insufficient to meet its current obligations.
(Myners' Principle 3)

| Likelihood | 2 | Impact | 3 | Risk rating | ★ | 6 | MEDIUM |
|---|---|--------|---|------------------|----------|---|---------------|
| Current Controls | <ul style="list-style-type: none"> Fund cash flow is monitored daily and reported to Investment Sub-Committee annually Annual accounts are produced for the pension fund and these show the movements in net cash inflow Regular assessment of Fund assets and liabilities is carried out through Actuarial valuations. The Fund's Investment and Funding Strategies are regularly reviewed | | | | | | |
| Additional Controls/ Action Required | <ul style="list-style-type: none"> Consider the need for an Investment Strategy Review following the latest actuarial valuation. | | | | | | |
| Responsibility | Investments Sub-Committee; Group Manager (Financial Strategy & Compliance) | | | Timescale | On-going | | |

Pension Fund Governance

Risk G6. Fund assets are assessed as insufficient to meet long term liabilities.
(Myners' Principle)

| Likelihood | 3 | Impact | 4 | Risk rating | ↔ | 8 | HIGH |
|---|--|--------|---|------------------|------------|---|-------------|
| Current Controls | <ul style="list-style-type: none"> Fund assets are kept under review as part of the Fund's performance management framework. Regular assessment of Fund assets and liabilities is carried out through Actuarial valuations. The Fund's Investment and Funding Strategies are regularly reviewed. An external advisor provides specialist guidance to the Pensions Investment Sub Committee on the investment strategy. | | | | | | |
| Additional Controls/ Action Required | <ul style="list-style-type: none"> Consider the need for an Investment Strategy Review following the latest actuarial valuation. | | | | | | |
| Responsibility | Investments Sub-Committee; Group Manager (Financial Strategy & Compliance) | | | Timescale | March 2014 | | |

Pension Fund Administration

Risk A1. Standing data and permanent records are not accurate or do not reflect changes of circumstances.

| | | | | | | | |
|---|----------|--|----------|--------------------|--|----------|---------------|
| Likelihood | 4 | Impact | 2 | Risk rating | | 8 | MEDIUM |
| Current Controls | | <ul style="list-style-type: none"> Business processes are in place to identify changes to standing data. Records are supported by appropriate documentation; input and output checks are undertaken; reconciliation occurs to source records once input. Documentation is maintained in line with agreed policy. Change of details form sent out to members alongside annual statement. Data matching exercises (National Fraud Initiative) identifies discrepancies. | | | | | |
| Additional Controls/ Action Required | | <ul style="list-style-type: none"> Existing arrangements are sufficient and will continue. | | | | | |
| Responsibility | | Group Manager (BSC) | | Timescale | | On-going | |

Pension Fund Administration

Risk A2. Inadequate controls to safeguard pension fund assets.

A2a. Fund manager mandates.

| | | | | | | | |
|---|----------|--|----------|--------------------|--|----------|-------------|
| Likelihood | 2 | Impact | 4 | Risk rating | | 8 | HIGH |
| Current Controls | | <ul style="list-style-type: none"> Complete and authorised client agreements are in place. This includes requirement for fund managers to report quarterly on their performance. Client portfolios are managed in accordance with investment objectives. AAF 01/06 reports on internal controls of service organisations reviewed for external managers. In House Fund has a robust framework in place which is regularly tested by internal audit. Fund Managers maintain an appropriate risk management framework to minimise the level of risk to Pension Fund assets. | | | | | |
| Additional Controls/ Action Required | | <ul style="list-style-type: none"> Continue to monitor via existing processes. | | | | | |
| Responsibility | | Group Manager (Financial Strategy & Compliance); Senior Accountant - Pensions & TM | | Timescale | | On-going | |

Pension Fund Administration

Risk A2. Inadequate controls to safeguard pension fund assets.

A2b. Custody arrangements

| Likelihood | 2 | Impact | 4 | Risk rating | ↓ | 8 | HIGH |
|---|---|--------|---|------------------|----------|---|------|
| Current Controls | <ul style="list-style-type: none"> • Complete and authorised agreements are in place with external custodian. <hr/> • AAF 01/06 report on internal controls of service organisations reviewed for external custodian. <hr/> • Regular reconciliations carried out to check external custodian records. <hr/> • Change of details form sent out to members alongside annual statement. <hr/> • In-house custody arrangements require physical stock certificates to be held in secure cabinet to which access is limited. | | | | | | |
| Additional Controls/ Action Required | <ul style="list-style-type: none"> • Continue to monitor via existing processes. | | | | | | |
| Responsibility | Group Manager (Financial Strategy & Compliance); Senior Accountant - Pensions & TM | | | Timescale | On-going | | |

Pension Fund Administration

Risk A2. Inadequate controls to safeguard pension fund assets.

A2c. Accounting arrangements

| Likelihood | 3 | Impact | 2 | Risk rating | ↓ | 6 | MEDIUM |
|---|--|--------|---|------------------|----------|---|--------|
| Current Controls | <ul style="list-style-type: none"> • Pension Fund accounting arrangements conform to the Local Authority Accounting Code and the Pensions' SORP. <hr/> • The Pension Fund subscribes to the CIPFA Pensions Network and Technical Information Service and officers attend courses as appropriate. <hr/> • Regular reconciliations are carried out between in-house records and those maintained by external custodian and investment managers. <hr/> • Internal Audits are carried out on an annual basis. <hr/> • External Audit review the Pension Fund's accounts annually. | | | | | | |
| Additional Controls/ Action Required | <ul style="list-style-type: none"> • Continue to monitor via existing processes. | | | | | | |
| Responsibility | Group Manager (Financial Strategy & Compliance); Senior Accountant - Pensions & TM | | | Timescale | On-going | | |

Pension Fund Administration

Risk A2. Inadequate controls to safeguard pension fund assets.

A2d. Financial Administration

| Likelihood | 2 | Impact | 3 | Risk rating | ↔ | 6 | MEDIUM |
|---|--|--------|---|------------------|----------|---|--------|
| Current Controls | <ul style="list-style-type: none"> The pension fund adheres to the County Council's financial regulations with appropriate separation of duties and authorisation limits for transactions. Daily cash settlements are made with external custodian to maximise returns on cash. Investment transactions are properly authorised, executed and monitored. Contributions due to the fund are governed by Scheme rules which are implemented by the Pensions Manager. The Pension fund maintains a bank account which is operated within regulatory guidelines | | | | | | |
| Additional Controls/ Action Required | <ul style="list-style-type: none"> Continue to monitor via existing processes. | | | | | | |
| Responsibility | Group Manager (Financial Strategy & Compliance); Senior Accountant - Pensions & TM | | | Timescale | On-going | | |

Pension Fund Administration

Risk A2. Inadequate controls to safeguard pension fund assets.

A2e. Pensions Administration

| Likelihood | 3 | Impact | 2 | Risk rating | ↓ | 6 | MEDIUM |
|---|--|--------|---|------------------|----------|---|--------|
| Current Controls | <ul style="list-style-type: none"> The Pension fund maintains a bank account which is operated within legislative guidelines Data is backed up on an incremental basis daily and fully backed up weekly Audit trails and reconciliations are in place. There is no home working on the Pensions system (Axis) by Pensions Section staff. Systems are protected against viruses and other threats. Software is regularly updated to meet LGPS requirements. Records are supported by appropriate documentation; input and output checks are undertaken; reconciliation occurs to source records once input. Documentation is maintained in line with agreed policy. Change of details form sent out to members alongside annual statement. Data matching exercises help to identify discrepancies | | | | | | |
| Additional Controls/ Action Required | <ul style="list-style-type: none"> Continue to monitor via existing processes. | | | | | | |
| Responsibility | Group Manager (Financial Strategy & Compliance); Senior Accountant - Pensions & TM | | | Timescale | On-going | | |

Pension Fund Administration

Risk A2. Inadequate controls to safeguard pension fund assets.

A2f. Stewardship (Myners' Principle 5)

| | | | | | | | |
|------------|---|--------|---|-------------|---|---|-----|
| Likelihood | 2 | Impact | 2 | Risk rating | ★ | 4 | LOW |
|------------|---|--------|---|-------------|---|---|-----|

| | |
|-------------------------|--|
| Current Controls | <ul style="list-style-type: none"> The pension fund aims to be a responsible investor and has adopted the FSA's Stewardship code. <hr/> <ul style="list-style-type: none"> It is a member of Local Authority Pension Fund Forum, National Association of Pension Funds and supports their work on shareholder engagement. <hr/> <ul style="list-style-type: none"> The pension fund has a contract in place for a proxy voting service and voting is reported to the Pensions sub-committee each quarter. |
|-------------------------|--|

| | |
|---|---|
| Additional Controls/ Action Required | <ul style="list-style-type: none"> Continue to monitor via existing processes. |
|---|---|

| | | | |
|-----------------------|---|------------------|----------|
| Responsibility | Group Manager (Financial Strategy & Compliance); Senior Accountant - Pensions & TM | Timescale | On-going |
|-----------------------|---|------------------|----------|

Pension Fund Administration

Risk A3. Inadequate resources are available to manage the pension fund.

| | | | | | | | |
|------------|---|--------|---|-------------|---|---|--------|
| Likelihood | 2 | Impact | 3 | Risk rating | ★ | 6 | MEDIUM |
|------------|---|--------|---|-------------|---|---|--------|

| | |
|-------------------------|--|
| Current Controls | <ul style="list-style-type: none"> The pension fund is managed by the Pensions & Treasury Management and HR Pensions teams. <hr/> <ul style="list-style-type: none"> Operating costs are recharged to the pension fund in accordance with regulations. <hr/> <ul style="list-style-type: none"> Staffing levels and structures are kept under regular review. |
|-------------------------|--|

| | |
|---|---|
| Additional Controls/ Action Required | <ul style="list-style-type: none"> Continue to monitor via existing processes. |
|---|---|

| | | | |
|-----------------------|---|------------------|----------|
| Responsibility | Group Manager (Financial Strategy & Compliance); Senior Accountant - Pensions & TM | Timescale | On-going |
|-----------------------|---|------------------|----------|

Pension Fund Administration

Risk A4. Failure to communicate adequately with all relevant stakeholders. (Myners' Principle 6)
A2f. Stewardship (Myners' Principle 5)

| | | | | | | | |
|------------|---|--------|---|-------------|---|---|-----|
| Likelihood | 2 | Impact | 2 | Risk rating | ↓ | 4 | LOW |
|------------|---|--------|---|-------------|---|---|-----|

| | |
|-------------------------|---|
| Current Controls | <ul style="list-style-type: none"> • A communications strategy is in place. <hr/> • Website periodically updated. <hr/> • Nest Egg newsletter is published twice a year. <hr/> • The Pensions Investment Sub Committee has representatives of the County Council, City Council, Nottinghamshire Local Authorities, Trade Unions, Scheduled and Admitted Bodies. <hr/> • Regular Pension road shows and communication takes place. <hr/> • Meetings are held regularly with employers within the Fund. <hr/> • Benefit Illustrations are sent annually to contributing and deferred Fund members. <hr/> • Annual report prepared in accordance with statutory guidelines which include all key strategies and is published on the website. |
|-------------------------|---|

| | |
|---|---|
| Additional Controls/ Action Required | <ul style="list-style-type: none"> • Continue to monitor via existing processes. |
|---|---|

| | | | |
|-----------------------|---------------------|------------------|----------|
| Responsibility | Group Manager (BSC) | Timescale | On-going |
|-----------------------|---------------------|------------------|----------|

Regulatory

Risk R1. Failure to adhere to relevant statutory regulations including updates from LGPS.

| | | | | | | | |
|------------|---|--------|---|-------------|---|---|--------|
| Likelihood | 2 | Impact | 3 | Risk rating | ↓ | 6 | MEDIUM |
|------------|---|--------|---|-------------|---|---|--------|

| | |
|-------------------------|---|
| Current Controls | <ul style="list-style-type: none"> • An established process exists to inform members and officers of statutory requirements and any changes to these. <hr/> • Sufficient resources are in place to implement LGPS changes while continuing to administer the scheme. <hr/> • Membership of relevant Pensions professional groups ensures changes in statutory requirements are registered before the implementation dates. |
|-------------------------|---|

| | |
|---|--|
| Additional Controls/ Action Required | <ul style="list-style-type: none"> • Continue to monitor statutory requirements via the DCLG website and Pension Groups meetings. |
|---|--|

| | | | |
|-----------------------|---|------------------|----------|
| Responsibility | Group Manager (Financial Strategy & Compliance); Senior Accountant - Pensions & TM | Timescale | On-going |
|-----------------------|---|------------------|----------|

Valuation

Risk V1. Significant variations from assumptions used in the actuarial valuation

| Likelihood | 4 | Impact | 4 | Risk rating | ★ | 16 | VERY HIGH |
|---|--|--------|---|------------------|----------|----|------------------|
| Current Controls | <ul style="list-style-type: none"> • Assumptions made by actuaries reviewed by officers and members. <hr/> • Sensitivity analysis undertaken on assumptions to measure impact. <hr/> • Valuation undertaken every 3 years. <hr/> • Monitoring of cash flow position and preparation of medium term business plan. <hr/> • Contributions made by employers vary according to their member profile. | | | | | | |
| Additional Controls/ Action Required | <ul style="list-style-type: none"> • Continue to monitor via existing processes. | | | | | | |
| Responsibility | Group Manager (Financial Strategy & Compliance); Senior Accountant - Pensions & TM | | | Timescale | On-going | | |



The Nottinghamshire Local Government Pension Scheme

is administered by Nottinghamshire County Council

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