



If you have any views and comments on this report, or any questions on any of the services provided, please contact us in writing; by telephone; fax; or email as follows:

### NILGOSC

Templeton House 411 Holywood Road Belfast BT4 2LP

**Telephone:** 0345 3197 320 **Fax:** 0345 3197 321 **Email:** info@nilgosc.org.uk

Typetalk: 18001 0345 3197 320 (for people using a textphone)
Website: www.nilgosc.org.uk

This Annual Report can be made available in a wide range of alternative formats. Requests for alternative formats should be made to the Finance Manager at the above address. In addition to the Annual Report, NILGOSC can provide documents and correspondence in alternative formats, including audio and large print versions for people with sight problems. Documents can also be provided in minority languages for those whose first language is not English. If you would prefer an alternative method of communication, please let us know.

### **NILGOSC Annual Report and Accounts**

### For the Year Ended 31 March 2022

Laid before the Northern Ireland Assembly under Regulation 63(8) of the Local Government Pension Scheme Regulations (Northern Ireland) 2014 by the Department for Communities

on

12 September 2022

1	FOREWORD	06
2	PERFORMANCE REPORT	08
	Overview	08
	<ul> <li>Introduction</li> </ul>	08
	Joint Statement from the Chair and Chief Executive	08
	Statement of Purpose and Activities of the Organisation	13
	Key Issues and Risks	14
	Summary of Performance	17
	Performance Analysis	20
	• Summary	20
	Administration of the Pension Scheme	21
	Investment of the Fund	43
	Long Term Expenditure Trends	60
3	ACCOUNTABILITY REPORT	62
	Corporate Governance Report	62
	<ul> <li>Introduction</li> </ul>	62
	Chief Executive's Report	62
	Statement of Accounting Officer's Responsibilities	66
	Governance Statement	67
	Remuneration and Staff Report	76
	• Introduction	76
	Remuneration Report	76
	Staff Report	81
	Assembly Accountability Report	84
	• Introduction	84
	Losses and Special Payments (audited)	84
	• Fees and Charges (Audited)	85
	Remote Contingent Liabilities (audited)	85
	The Certificate and Report of the Local Government Auditor to the Department for Communities	86
4	FINANCIAL STATEMENTS	90
•	Fund Account	91
	Net Assets Statement	91 92
	Statement of Cash Flows	93
	Notes to the Financial Statements	94
	• Statement of the Actuary for Year Ended 31 March 2022	130
5	APPENDICES	134
	Annual Equality Statement Year Ended 31 March 2022	134
	Annual Report of the Audit and Risk Assurance Committee	
	for Year Ended 31 March 2022	136
	Employing Authorities Contributing to the Scheme	
	at 31 March 2022	140
	• Glossary	143

ANNUAL REPORT AND ACCOUNTS 2021/22 ANNUAL REPORT AND ACCOUNTS 2021/22 05

# 

### STATUTORY BACKGROUND

The Northern Ireland Local Government Officers' Superannuation Committee (NILGOSC) is a non-departmental public body sponsored by the Department for Communities, established on 1 April 1950 by the Local Government (Superannuation) Act 1950, to administer and maintain a fund providing pension benefits for employees of local authorities and other admitted bodies.

In accordance with Regulation 63(2) of the Local Government Pension Scheme Regulations (Northern Ireland) 2014, as amended, the Secretary of the Committee submits its Annual Report for the year ended 31 March 2022 to the Department for Communities.

### THE COMMITTEE

The Committee is the corporate body responsible for the administration of the Local Government Pension Scheme in Northern Ireland.

### **COMMITTEE'S RESPONSIBILITIES**

The Committee is required under the Local Government Pension Scheme Regulations (Northern Ireland) 2014, as amended, to:

- keep accounts of all financial transactions of the Fund; and
- prepare the Financial Statements for the financial year ended 31 March.

The financial statements shall comprise:

- a) a Foreword:
- **b)** a Statement of the Committee's Responsibilities;
- c) an Accounting Officer's Governance Statement;
- **d)** a Fund Account:
- e) a Net Assets Statement;
- f) a Statement of Cash Flows; and
- g) Notes to the Financial Statements;

and shall be prepared in accordance with guidance for the time being issued by the Department of Finance (DoF).

The financial statements shall give a true and fair view of the Fund Account for the financial year, and a Net Assets Statement as at the end of the financial year.



### **AUDIT**

The Local Government Pension Scheme Regulations (Northern Ireland) 2014 provide for the financial statements kept by the Committee to be audited annually by the Local Government Auditor. Her staff are wholly independent of NILGOSC and the audit fee is disclosed in Note 7 to the Financial Statements. The auditor did not perform any non-audit work this year.

# DISCLOSURE OF RELEVANT AUDIT INFORMATION

There is no relevant audit information of which the auditor is unaware; and the Accounting Officer has taken all the necessary steps to ensure both he and the auditor are aware of all relevant audit information.

# IMPORTANT EVENTS OCCURRING AFTER THE YEAR END

There have been no significant events since 31 March 2022.

### **PAYMENT TO CREDITORS**

In November 2008, under the Prompt Payment Initiative, former Prime Minister Gordon Brown announced that all Government Bodies would pay all external suppliers who provided a correctly rendered invoice to the correct location within 10 working days. Also in 2008, the Finance Minister announced that Northern Ireland Departments had set a target of payment of invoices within 10 working days, in order to help local businesses.

NILGOSC endeavours to meet the 10 day prompt payment target and aims to pay suppliers within 10 working days of receipt of a valid, undisputed invoice. Therefore, the default target for paying invoices is 10 working days. During the year ended 31 March 2022 NILGOSC paid 974 invoices totalling £20.708m on 10 day terms, of which 44 undisputed invoices were late. 98.67% of invoices were paid within 30 calendar days and no late payment interest was payable during the year. The average time to pay invoices during the year was 8.2 working days (2020/21: 9.0 working days).

# OVERVIEW

### INTRODUCTION

This section is intended to provide an overview of NILGOSC and how it has performed over the last twelve months. It also provides a summary of its main corporate objectives and activities, as well as the key issues and risks that could prevent it from meeting those objectives. The section begins with a Statement from the Chair and the Chief Executive which provides their perspective on NILGOSC's key activities and achievements during the year ended 31 March 2022. It concludes with highlights of NILGOSC's performance from both a Scheme Administration and Investment perspective.

## JOINT STATEMENT FROM THE CHAIR AND CHIEF EXECUTIVE

2021/22 was another tumultuous year as the ongoing global pandemic and associated economic disruption continued to impact investments and pension administration alike. NILGOSC adapted its operations early on in the pandemic to ensure the continued delivery of core services to scheme members and many of these adjustments continued into a second year. Despite maintaining service delivery throughout, subsequent waves of the virus and associated government restrictions imposed during 2021/22 did impact on efficiency as NILGOSC continued to adopt a hybrid working model for its staff.

The organisation remains driven by the desire to provide an exceptional level of service to members and other stakeholders, as well as to maintain a sustainable investment fund. Despite external challenges, 2021/22 saw a number of successes on an investment and administration front. This statement is our perspective on the performance and achievements of the organisation during the year ended 31 March 2022.

### **Investment Performance**

Global economies and financial markets continued their recovery from lows experienced at the onset of the pandemic in March 2020. Investor confidence has continued to grow, while encouraging economic growth and supportive fiscal policies has resulted in new highs in some developed markets. Equities in particular saw strong and relatively stable growth in 2021, with US markets leading the way with new all-time highs. Emerging markets however did not have such a good year as its key driver, the Chinese economy, saw a slowdown in economic growth, fears over debt default and a regulatory crackdown on technology companies.

The Russian invasion of Ukraine in February 2022 brought further volatility to global markets, with rising commodity prices and falls in both bond and equity markets being the initial response to sanctions imposed by Western governments.

Arguably the dominant feature of investment commentaries throughout 2021/22 is inflation. In the UK inflation reached highs not seen in three decades, while in the US levels reached a new 40 year high. First thought to be a transitory consequence of disruption to global supply chains, it has become clear that rising inflation is going to dominate the investment landscape in the period ahead, particularly in the case of fixed income.

Equity and fixed income markets posted returns of 12.9% and -5.1% for the year ended 31 March 2022, while other assets, such as property and infrastructure showed returns of 23.9% and 10.5% respectively.

NILGOSC's well diversified portfolio continued to perform strongly during 2021/22, crossing the £10bn threshold for the first time and ending the year at £10.231bn. NILGOSC measures investment performance over a 3 and 5 year horizon in line with its longer term strategy and, at 31 March 2022, had outperformed its revised investment objective of Consumer Price Index (CPI)+3% on a 3 and 5 year basis with returns of 8.3% and 7.47% respectively.

In June 2021 NILGOSC commenced the triennial review of its investment strategy. The primary purpose of the review was to ensure that the overall investment objective and allocation to different asset classes remains appropriate. Having taken professional advice from Aon, the Fund's investment adviser, it was agreed that the target objective should be revised downwards to CPI + 3% to reflect a deterioration in expected returns from various asset classes. The previous objective of CPI + 3.5% would have required additional risk to be introduced to the investment strategy, an approach which may have been counter to the desire to protect the current surplus and provide stability in contribution rates. The triennial review also considered the ongoing suitability of the existing asset mix and concluded that the asset allocation agreed in 2017 remained appropriate. A number of actions are needed to bring the current investment portfolio in line with the target strategic allocation and work is already underway to rebalance the equity portfolio and increase infrastructure holdings.

In May 2021, NILGOSC funded a new £235m emerging market equity mandate managed by William Blair which seeks to invest in leading emerging market

companies with high-quality attributes that drive leading corporate performance, sustainable value creation, and resilient growth. In the final guarter of the year, NILGOSC transitioned its passively held equity portfolio, valued at £2.8bn at the time of transfer, to a low carbon equivalent fund. The assets are now invested in Legal & General's Low Carbon Transition Fund, which seeks to reduce carbon emissions intensity by 70% when compared to the standard market-cap benchmark. This is a key component of NILGOSC's strategy for responding to climate change risk as the low carbon fund seeks to achieve sufficient decarbonisation over time to reach the goal of net zero carbon emissions by 2050. Also in the final quarter, the infrastructure portfolio received a boost with a commitment of £100m to IFM's Global Infrastructure Fund.

Further details on NILGOSC's investment strategy and fund objective are set out in the Performance Analysis Investment of the Fund section of this annual report starting on page 43.

The UK Government has committed to securing a 'green recovery' from Covid-19 and in November 2021, Glasgow hosted world leaders at the rescheduled COP26. While progress was perhaps not as great as many had hoped, COP26 did mark a step forward in global efforts to address climate change, including a material increase in ambitions to reduce emissions across the world, finalisation of rules on reporting emissions and international carbon trading, and the launch of a range of new initiatives and sector deals. Forty-six countries signed up to a Global Coal to Clean Energy Transition Statement, committing to transition away from unabated coal power generation by about 2030 for "major economies" and a global transition by roughly 2040. The success of these ambitions will ultimately depend on follow-up actions, including a robust policy response, being taken by global governments including the UK. Within the pensions industry, steps are already being taken to support the transition to a lower carbon and ultimately net zero economy. Managing climate risk and exploring climate change opportunities is something NILGOSC has been doing for over a decade, since it published its first Climate Risk Statement recognising the changing climate as an investment risk back in 2008. Further detail on our approach is set out in NILGOSC's Climate Risk Statement and Responding to Climate Change publication, both of which can be found on our website at www.nilgosc.org.uk/pension-fund/being-aresponsible-investor.

NILGOSC has been an official supporter of the Task Force on Climate-related Financial Disclosures (TCFD), an initiative created to improve and increase the reporting of climate-related financial information, since June 2020 and issued its inaugural Climate-related Disclosures Report for the year ended 31 March 2021. Disclosures are organised around the TCFD's four thematic areas, representing the core elements of how organisations operate: governance; strategy; risk management; and metrics and targets. NILGOSC's report is available to read on our website at <a href="www.nilgosc.org.uk/pension-fund/being-a-responsible-investor/climate-risk/climate-related-disclosure">www.nilgosc.org.uk/pension-fund/being-a-responsible-investor/climate-risk/climate-related-disclosure</a>.

2021/22 also saw NILGOSC continue its support for various global climate initiatives including signing the 2021 Global Investor Statement to Governments on the Climate Change. Issued ahead of COP 26, the 2021 Statement was signed by 587 investors managing \$46 trillion (USD) in assets and reiterates the call for governments to raise their climate ambition and implement meaningful policies including mandatory climate risk disclosures. NILGOSC became an inaugural member of the Occupational Pensions Stewardship Council (OPSC), which officially launched on 8 July 2021. Established by the Department of Work and Pensions it aims to promote and facilitate high standards of stewardship of pension assets to pension schemes. Continuing its support from prior years, NILGOSC is also a signatory to CDP's 2021 Non-Discloser, Climate Change, Water and Forests campaigns and believes that such engagement with governments and policy makers is the key to establishing long-term policies which will ultimately shape a low carbon future. We accept that there are differing views as to how to expedite the carbon transition but continue to believe that the best way to bring about change in corporate behaviour is to remain as an active and influential investor. Further information on the full range of NILGOSC's responsible investment activities, including its voting record at corporate AGMs, can be found on our website.

2022 is a valuation year for the Fund, with the next triennial valuation of assets and liabilities due as at 31 March 2022. Not only will the valuation provide an up-to-date snapshot of the funding position, the Actuary will also determine the contribution rates payable by employers for the three years commencing April 2023. Further details on funding position and current contribution rates payable can be found in the Performance Report.

### **Scheme Administration**

Scheme membership grew by 5.1% during the year, bringing the total number of members to 149,739 at 31 March 2022. Of this total, 49% are actively contributing to the pension scheme, 23% have previously contributed but have not yet reached retirement and the remaining 28% are currently in receipt of a NILGOSC pension every month. Meeting the needs of these three membership groups continues to be NILGOSC's core function.

The last twelve months saw further cycles of lockdowns and restrictions which continued to impact on day-today service delivery as social distancing requirements necessitated remote and hybrid working for a large part of the year. A further consequence of the pandemic was a shortage in global labour supply, which had a material impact on the attraction and retention of staff within pension administration. Like many public sector organisations, NILGOSC did experience recruitment challenges during 2021 however it is pleasing to note more recent successes in filling key pension vacancies in early 2022. Pensions are a niche area of technical expertise and skilled and experienced staff remain a critical business asset. While careful prioritisation of services based on each member group's needs and priorities resulted in the uninterrupted delivery of core services such as the payment of pensions, retirement lump sums and payments due on death, some activities have seen longer waiting times than usual in 2021/22. This has resulted in NILGOSC meeting 12 out of 15 service standards for the year ended 31 March 2022, as reported on page 27.

Member satisfaction remains paramount, particularly as the pandemic has expedited the trend towards electronic service delivery. In 2021/22 NILGOSC continued to promote the use of its member selfservice facility My NILGOSC Pension Online as an alternative delivery tool. My NILGOSC Pension Online allows members to access their pension records at a time convenient to them, as well as providing the facility to update basic information directly, upload documentation, see an estimate of what their pension will be on retirement and, in the case of pensioners, access their payslips and P60 online. In April 2021, P60's were issued electronically to registered pensioners for the first time, while the default delivery method was simultaneously changed to electronic for any new pensioners. In another first, August 2021 saw active members receive their annual pension benefit statement online, except those who had specifically requested a paper version. My NILGOSC Pension

Online is now the default delivery method for information sent to members upon joining the pension scheme however personal preference remains a critical factor in member engagement and everyone has the option to receive information in their preferred format. Member satisfaction continues to be monitored closely and the results of the annual satisfaction survey undertaken in February 2022 show an overall satisfaction level with the service provided of 92%.

Improvements in stakeholder service delivery is not limited to scheme members and 2021/22 saw the rollout of a new data exchange facility, i-Connect, to an initial group of employers. This system is expected to make a significant difference to both NILGOSC and scheme employers from an efficiency, data accuracy and information security perspective. Once operational, data will be remitted directly from employers' payroll systems by way of a secure portal, which will eliminate the need for the manual and time-consuming provision of member information by employers. At the 31 March 2022, it is very pleasing to report that 27 employers have been successfully onboarded and the facility will be rolled out to remaining employers on a phased basis.

Public pension administration continues to be dominated by the McCloud judgment, which requires amendments to all public sector schemes including the LGPS to remove any discrimination on the grounds of age. Uncertainty remains around the precise nature and timing of changes to scheme benefits however 2021/22 saw NILGOSC commence the process for collecting and uploading the historical data required to implement anticipated regulatory changes. The current expectation is that regulations will be laid early in the new financial year with a twelve-month implementation window before they come into force in October 2023.

Despite many challenges, NILGOSC delivered 91.5% of its corporate plan for 2021/22 and has set out ambitious plans for the year ahead, both in respect of core service delivery and new activities.



10 — PERFORMANCE REPORT OVERVIEW ANNUAL REPORT AND ACCOUNTS 2021/22 ANNUAL REPORT AND ACCOUNTS 2021/22

### **Looking Forward**

As noted above, the biggest challenge to the funding and administration of public sector pensions continues to be a series of high profile legal decisions, most notably the McCloud judgment, which requires amendments to the benefit structure of all public sector schemes. A further two legal judgments made during 2020, known as the Goodwin and Lloyds judgments, will result in additional changes to Scheme regulations in due course.

From a scheme administration perspective, the above legal judgments will have material implications on resourcing and service delivery, as NILGOSC will be required to update all its systems, software, processes and scheme literature to reflect any changes. Retrospective scheme changes are anticipated which are particularly challenging, as they require the recalculation of benefits paid or accrued since the effective date. The complexity of pensions increases with every passing set of regulations and taxation changes and communication with scheme members will be a key priority to ensure that members continue to engage with and understand their valuable pension entitlements.

Another key area of focus is data accuracy, which will be critical to the success of the Government's Pension Dashboard initiative. Once operational, the dashboard will allow individuals to view details of all pension entitlements in a single location, including state and other public sector pensions. The current timetable provides for NILGOSC, along with other public sector pension schemes, to be live on the dashboard by the end of April 2024.

From an investment perspective, the year ahead will focus on implementation of the 2021 investment strategy, including the appointment of new global equity and property mandates and the continued build-up of the infrastructure portfolio. The transfer of passive equity holdings to the Legal & General Low Carbon Transition Fund in February 2022 is a further important step on NILGOSC's journey to a more sustainable investment portfolio and it will continue to use its voice as a global investor to influence corporations and policy makers where it can.

### **Thanks**

The return to pre-pandemic normality was unfortunately not as swift as many had initially hoped and 2021/22 saw further disruption to businesses and individuals alike. We would like to take this opportunity to acknowledge the continued commitment and support of the staff and management team whose hard work helped deliver the many achievements set out in this report.

We would also like to express our thanks to current Committee members and also extend a warm welcome to two new members, Derek McCallan and Heather McKinstry, who were appointed in May 2021.



Lindsay Todd



David Murphy
Chief Executive
and Secretary

# STATEMENT OF PURPOSE AND ACTIVITIES OF THE ORGANISATION

NILGOSC was set up by the Government in April 1950 to operate a pension scheme for the local councils and other similar bodies in Northern Ireland. The pension scheme is known as the Local Government Pension Scheme (Northern Ireland), LGPS (NI) or the 'Scheme', and is a defined benefit scheme, which provides retirement benefits on a 'career average revalued earnings' basis from 1 April 2015. Prior to that date benefits were built up on a 'final salary' basis.

NILGOSC is the administrator of the Scheme.

As the administrator of the Local Government Pension Scheme (Northern Ireland) NILGOSC has two main functions which are laid down in Statutory Rules:

- To administer a pension scheme for local government and other admitted bodies
- To manage and maintain a fund out of which scheme benefits can be met

Day to day administration of the Scheme is performed by the Secretariat, who report to the Committee monthly. Led by the Chief Executive and Secretary and Deputy Secretary, approximately 80 experienced staff are responsible for the administration of retirement benefits and the monitoring of investments and operate within the functions shown in the chart below.



NILGOSC is a Non-Departmental Public Body but receives no funding from central government. It seeks to maximise income and minimise expenditure. The Scheme is funded by contributions made by both employees and employers who have been designated as employing authorities or admitted to the Scheme. All contributions are paid into a fund, the 'Fund', which is used to pay scheme benefits and other payments, as well as the costs of administering the pension scheme and investment fund.

NILGOSC provides pension services primarily to the public sector in Northern Ireland however a small

number of Scheme employing authorities are private sector in nature.

With effect from 1 April 2015, the governing regulations are the Local Government Pension Scheme Regulations (Northern Ireland) 2014, the Local Government Pension Scheme (Amendment and Transitional Provisions) Regulations (Northern Ireland) 2014, the Local Government Pension Scheme (Amendment) (Governance) Regulations 2015 and the Local Government Pension Scheme (Management and Investment of Funds) Regulations (Northern Ireland) 2000, as amended.

12 — PERFORMANCE REPORT OVERVIEW ANNUAL REPORT AND ACCOUNTS 2021/22 ANNUAL REPORT AND ACCOUNTS 2021/22 PERFORMANCE REPORT OVERVIEW — 13

NILGOSC's corporate vision is "to provide an excellent and sustainable pension scheme" and its mission statement is "to operate the pension scheme efficiently and effectively while enhancing the quality of service provided to stakeholders". In order to achieve this aim, NILGOSC has set 6 corporate aims which drive its business priorities and activities:

- **Aim 1** To provide an effective service complying with the pension scheme regulations, good practice, other legislation and stakeholder expectations.
- Aim 2 To deliver an effective investment strategy in line with the actuarial profile of the fund.
- **Aim 3** To promote the scheme and inform members and employers of their pension options.
- **Aim 4** To influence and inform the debate on the future of the Local Government Pension Scheme.
- **Aim 5** To undertake business in an efficient, effective and accountable manner as required of a public body.
- **Aim 6** To promote equality of opportunity, good relations and to fulfil Section 75 obligations.

Under the 6 corporate aims sit a number of business objectives and operational actions, each of which has its own performance indicator against which success can be measured. Detailed performance analysis, including updates to the Corporate Plan objectives for 2021/22, is set out on pages 31 to 42.

### **KEY ISSUES AND RISKS**

NILGOSC has put in place a robust risk management framework as a means of identifying, recording and managing those risks which could prevent it from achieving its strategic objectives. NILGOSC has a single corporate risk register which is subject to formal quarterly reviews to ensure it remains relevant and accurately reflects the risks facing the organisation. Risks are classified into one of 6 categories – Investment, Financial, Reputational, Political/Strategic, Compliance or Operational. Each category has its own risk appetite, which is the amount of risk NILGOSC is willing to accept to achieve its objectives. This is in line with HM Treasury's classification system for risk appetite which has the 5 levels – Hungry, Open, Cautious, Minimalist or Adverse.

Further information on NILGOSC's risk assurance framework is contained within the Governance Statement on pages 67 to 75.

NILGOSC provides a frontline service to its members and pensioners and prides itself on providing a high quality service to all its stakeholders. Despite the impact of the global pandemic on its business model NILGOSC achieved or substantially achieved 91.5% of operational actions set out in its business plan and notably 12 out of 15 of its service standards.

It is often the external environment which presents the greatest challenge for NILGOSC as policy, legislative and taxation changes, often with little or no lead-in period, can impact materially on the administration of the Scheme. In 2022, NILGOSC is awaiting legislative changes required to remove the illegal age discrimination arising from the transitional arrangements in all public service schemes, following the 2019 UK Court of Appeal ruling in both the Judges' Pension Scheme (McCloud) and Firefighters' Pension Scheme (Sargeant). The Department for Communities (DfC) has consulted on proposed changes to the LGPS (NI) aged based transitional protections, or 'underpin'. DfC has proposed extending a revised underpin to all members who were in the Scheme on 1 April 2012 and had membership after 1 April 2015. The underpin ends on 31 March 2022. The local consultation and consideration of any proposed remedy continues to be developed by the UK Collective Consultation Working Group and the LGPS(NI) Scheme Advisory Board. Any subsequent changes to the LGPS(NI) will be subject to further scheme level consultation.

Subsequent regulations are not expected to be introduced until later in 2022.

At the same time NILGOSC awaits the outcome of the pension cost control mechanism which regulates the cost of any scheme to ensure that it remains within margins either side of an employer cost cap. This mechanism had previously been paused by the Government due to uncertainty around the out workings of the McCloud/Sargeant court decisions. Following consultation with member representatives, the Department of Finance published revised valuation directions on 22 November 2021 which will enable the 2016 valuation to be completed and the final cost cap results to be determined.

The anticipated changes to Scheme Regulations, be they from the cost cap mechanism or from potential wider public sector scheme reform arising from McCloud, will require major updates to all NILGOSC's systems, software and processes, to reflect any changes in benefit structure. NILGOSC's comprehensive suite of Scheme literature will require revision and republishing to reflect any changes,

including the redesign of statutory communications such as pension benefit statements.

This proposed McCloud remedy will require retrospective review and recalculation for those members falling under the proposed underpin and NILGOSC has begun collecting the required data from employers in anticipation of this change to the regulations. This is an extensive exercise estimated to require review of over 37,000 records.

In preparation for the anticipated actions outlined above, there has been a sizeable increase in the administration budget for the implementation phase and the administrative challenge is compounded by the typically short lead time provided to introduce these changes. There continues to be uncertainty around the timing of the anticipated amending regulations. Where legislation is made after its effective date, NILGOSC is forced to operate within a very challenging transition window, particularly where third-party software developments are required. NILGOSC can only make payments in accordance with the prevailing regulations and therefore the potential for retrospective regulations and corresponding recalculation of benefits could create a material administration burden on NILGOSC.

As society starts to recover from the major impacts of the pandemic there has been an increase in administration as the public sector returns to more normal operations and any pause in early retirement decisions have caught up in 2021/22. Future actions by the UK Government in the wake of unprecedented economic support provided in response to the COVID-19 pandemic may place further constraints on public spending and lead to further restructuring and reform across the public sector. Whilst the timing and nature of any potential public sector constraint is unknown, NILGOSC remains alert to the potential for a more significant increase in benefits administration as a result of future redundancies or early exits.

The pandemic has also resulted in changes to how NILGOSC delivers its services to members during the period of lockdown and social distancing restrictions. Throughout 2021/22 the facility for members to visit onsite remained largely suspended with NILGOSC only reinstating its face-to-face service in 2022. Mindful of the prevailing local social distancing guidelines, it continues to explore and promote its virtual service delivery opportunities. This includes its online member self-service facility, *My NILGOSC Pension Online*, which forms a key part of its on-going communication and self-service delivery strategy. NILGOSC monitors

member usage of the self-service portal and at March 2022 over 33,000 members have registered and website activity indicates growing participation. The portal permits members to directly access and update the information NILGOSC holds on them as well as allowing members to view and project their NILGOSC pension, providing dual benefit to both NILGOSC and the member. While the primary beneficiary is the member, through timeliness and enhanced service delivery options, there are important data quality benefits if members update their own personal data on a more timely basis and potential financial and environmental savings to be made in the longer term through reduced postage and printing costs. A key challenge remains to ensure that any move to electronic delivery methods does not result in disengagement by those members with a preference for either paper or in-person communications. NILGOSC has established a reconnection programme with its less engaged members to collect individual communication preferences and to encourage greater engagement on their pension entitlements.

As an essential public service, NILGOSC has continued to maintain a comprehensive service to its members and pensioners throughout the pandemic. Despite the significant operational challenges that COVID-19 and associated restrictions have placed on the organisation, and greater levels of pandemic related staff absence in 2021/22 than the previous year, there was limited disruption to service delivery as evidenced by the service performance metrics on page 27. Following the first lockdown, NILGOSC adopted a hybrid model for home and office-based working which has become more formal working patterns for some staff in 2021/22. Increased reliance on IT infrastructure means that cyber threat management and information security remains a high priority for NILGOSC given the large volumes of personal data held. A robust control environment is essential to effectively manage information risk and NILGOSC undertakes annual vulnerability testing of its IT systems as part of its annual Business Continuity Plan to assess the continued robustness of its IT infrastructure to external attack. Like all public bodies, the threat of cyber-attack remains high and in March 2022 NILGOSC sought and obtained Cyber Essentials Plus accreditation as a means of further mitigating this risk. Cyber Essentials is a UK Government backed scheme which aims to help organisations protect themselves against cyber attacks.

In addition to servicing the members of the Scheme NILGOSC's other primary stakeholders are the 170+

employing authorities that contribute to the Scheme. Employer education and engagement is essential to ensuring that NILGOSC receives the high quality and timely data needed to process member pension benefits in accordance with stated service standards. During 2021/22 NILGOSC has continued to reach out to both employers and members hosting virtual pension information seminars and training sessions. Feedback on the virtual sessions has been overwhelmingly positive and NILGOSC has observed a significant increase in participation vis-a-vis that recorded historically for in-person events.

Poor data quality remains one of the key risks to the achievement of NILGOSC's corporate aims and objectives and, while current data accuracy scores remain high, in 2021/22 NILGOSC commenced the roll-out of its new data exchange platform. This secure platform automates the submission of pension data on a monthly basis, by generating an extract directly from the participating employer's payroll systems. This integrated data collection and verification system eliminates the need for the manual and timeconsuming provision of member information and once fully operational is expected to yield significant benefits from a data accuracy and information security perspective and remove the need for what is a resource intensive annual return and reconciliation exercise. The first two phases of this project were complete at the end of March 2022 with 27/171 employers successfully onboarded and 15 already providing monthly payroll information by member via the new data exchange platform.

Over recent years public sector financial constraint has created uncertainty for many scheme employers over future funding streams and the ongoing ability to meet pension liabilities as they fall due. There were no employers entering insolvency in 2021/22. NILGOSC undertook a full employer covenant strength assessment in autumn 2021 as part of the 2022 triennial actuarial valuation exercise. This assessment helped inform the consideration of NILGOSC's Funding Strategy going forward. The Funding Strategy Statement has been updated and is the subject of a stakeholder consultation in 2022, allowing stakeholders to feed into the funding strategy. The Funding Strategy Statement sets out the basis on which the fund valuation is undertaken and furthermore how NILGOSC will protect the Fund and therefore scheme employers from the risk of individual employer default. This is a key part of NILGOSC's strategic aim to ensure longer term scheme sustainability.

This assessment highlighted no concerns with respect to possible future defaults, noting however that this assessment was carried out prior to 2022/23 budget settlements and concerns over whether there will be a functioning executive following NI Assembly elections in May 2022. There remains a risk that the short to medium term impact of post-pandemic economic stresses exacerbated by market response to Russia's invasion of Ukraine will impact the Scheme's employers and could present challenges to employers in meeting their short and long-term obligations. NILGOSC will continue to work with its employers and the Department for Communities during this period of uncertainty, to manage any potential increase in employer default and any such impact on the Scheme funding level.

In respect of the General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018, NILGOSC systems and processes are continually reviewed and staff trained to ensure compliance with these legislative requirements. Data accuracy and management continues to be a high priority in the 2021/22 business plan, particularly given the drive towards electronic delivery methods. Work on the NILGOSC project to roll-out an organisation wide electronic document management system has continued following a successful pilot in 2020/21. Completion of this project will help to enhance the management and mitigation of information risks.

NILGOSC participates in the National Fraud Initiative's (NFI) biennial data matching exercises for the purposes of assisting in the prevention and detection of fraud and took part in the NFI 2020/21 data matching exercise during the year. Data was received in January 2021 and significant progress has been made in investigating and resolving these matches. An update in relation to the NFI exercise is provided in the Performance Report on page 25.

The focus on long term Scheme sustainability and the achievement of steady long term returns from a suitably diversified investment portfolio is an important part of NILGOSC's on-going risk management process. In addressing its strategic theme of long-term scheme sustainability, NILGOSC concluded its triennial Investment Strategy Review in September 2021. The purpose of the 2021 review was not to overhaul the strategy from 2017, but instead pause and review, to ensure that it continues to be appropriate for the Fund.

The overarching focus of the strategy remains on reducing exposure to more volatile equity holdings whilst increasing the Fund's exposure to real assets, in

particular infrastructure investments. The 2021 review also addressed further integrating environmental, social and governance (ESG) views into the strategy, as well as taking steps to mitigate climate risk in the Fund. In March 2022, steps were taken to reduce climate risk in the Fund's passive equity portfolio, with the transfer of £2.8bn of passive equity holdings to the Legal and General Investment Management (LGIM) Low Carbon Transition Fund.

Guided by its investment advisor, NILGOSC has revised the existing performance target down from CPI+3.5% to CPI+3.0%, recognising the outlook for the overall portfolio of assets. The expected asset returns and basis for setting assumptions such as discount rates will be agreed with the Scheme's Actuary in advance of the next triennial valuation as at 31 March 2022.

Strong returns have been achieved since the last investment review in 2017, particularly in 2020/21. The current year performance has been rather muted in comparison but delivered returns that exceeded the revised 3 and 5 year targets set for the Fund.

Information on the Fund's investment returns in the period are set out in detail in the NILGOSC Investment Performance section of the Performance Report starting on page 51.

### **SUMMARY OF PERFORMANCE**

The following section summarises NILGOSC's performance from both a Scheme Administration and Investment perspective. A detailed analysis of performance across both the administration and investment functions can be found on pages 20 to 59 in the Performance Analysis section of the Annual Report.

### **Administration of the Scheme**

- Membership of the Scheme continued to grow during the year with 149,739 (+5.1%) contributing members, pensioners and deferred pensioners at 31 March 2022.
- At 31 March 2022 there were 171 bodies contributing to the Scheme with one employer leaving and no new employers joining during 2021/22.
- Following the last actuarial valuation as at 31 March 2019, employer contribution rates were set at 19.5% for the three years commencing April 2020 for those employers whose participation in the Scheme is deemed to be indefinite and/or where an adequate covenant is in place.

- The Pension Increase (Review) Order (Northern Ireland) 2021 increased pensions which had been in payment for more than a year (commenced before 9 April 2020) by 0.5%. A proportionate increase applied to any pensions beginning on or after 6 April 2020 but before 28 March 2021.
- Despite the impact of pandemic related absences and a challenging recruitment environment, NILGOSC continued to provide a comprehensive service to stakeholders and met or exceeded 12 out of its 15 service standards as set out on page 27.
- NILGOSC achieved, substantially achieved or was on target to achieve 86 out of the 94 operational actions included in its 2021/22 Corporate Plan. This equates to an achievement rate of 91.5% (2020/21 92%).
- A stakeholder satisfaction survey was undertaken in March 2022 to measure the satisfaction levels of Scheme members, pensioners and employers. The total satisfaction rating for the year was 90% (2020/21 90%).
- Utilisation of My NILGOSC Pension Online, the member self-service facility, has continued to grow with over 33,750 members registered at 31 March 2022. Pension benefit statements were delivered to active members electronically for the first time in 2021/22.
- NILGOSC commenced the rollout of its new data exchange platform for Scheme employers, i-Connect. Once operational, i-Connect will automate the extract and delivery of monthly pension data directly from an employer's payroll system. At 31 March 2022, 27 employers have been onboarded, with 15 employers now providing monthly payroll information via the new system.
- NILGOSC measures its data quality annually and saw an improvement in both its common data score and scheme specific data score for 2021.
- The Local Government Pension Scheme (Amendment) Regulations (Northern Ireland) 2022 were made on 24 March 2022 and came into effect on 18 April 2022. These regulations introduced minor technical amendments to the current Scheme rules. New parental bereavement leave and pay legislation was introduced on 20 March 2022 which also amended Scheme regulations to include provision for entitlements to such leave and pay.

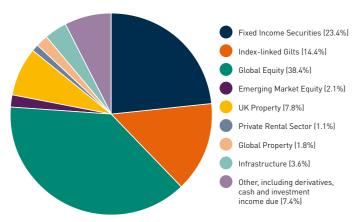
16 — PERFORMANCE REPORT OVERVIEW ANNUAL REPORT AND ACCOUNTS 2021/22 ANNUAL REPORT AND ACCOUNTS 2021/22 PERFORMANCE REPORT OVERVIEW — 17

 During the year ended 31 March 2022 NILGOSC received a total of 35 ill-health retirement appeals, 6 formal complaints and 37 informal complaints, a total of 78 appeals/complaints (2020/21 64).

### **Investment of the Fund**

• The recent turbulent period continued throughout 2021/22 as the ongoing global pandemic and associated economic disruption impacted on global markets. Despite sustained volatility, the Fund continued to grow, crossing the £10bn threshold for the first time, rising to a high of £10.5bn before ending the year at £10.231bn. This represents an increase in value in absolute terms of £436m or 4.4%. Fund performance overall delivered steady growth until the Russian invasion of Ukraine in February 2022 brought further volatility to global markets with rising commodity prices and falls in both bond and equity markets being the initial response to this unprecedented event.

### Fund Asset Allocation at 31 March 2022



 The latest formal strategic investment review was conducted during the year and culminated in a revised Fund investment objective. The review concluded that due to changes in outlook for various asset classes, the previous performance objective was no longer achievable within the existing risk budget. Accordingly, the performance objective was lowered from CPI+3.5% to CPI+3.0% with effect from 1 January 2022.

- The Fund outperformed its performance objective by 1.80% and 0.99% on a three and five year basis respectively for the period ended 31 March 2022, largely driven by global property and infrastructure returns.
- The comparable statistics for the three and five year periods to 31 March 2022 on an annualised basis are set out in the following table:

	3 Years	5 Years
NILGOSC	8.30%	7.47%
CPI + 3.0%	6.53%	6.48%

- It was a disappointing year for NILGOSC's two global equity managers despite global markets delivering solid, positive returns. NILGOSC banked some of the gains in its equity growth mandate and despite recent underperformance the portfolio remains 3.65% ahead of target since inception. The other more defensive global equity mandate which is tailored to downside protection is well placed to improve performance in 2022/23 with the expected continued market volatility.
- Funded in May 2021, NILGOSC's new emerging equities manager experienced a challenging start. Rises in interest rates by major central banks resulted in emerging markets returns lagging other markets in the period. The ten months since inception is too short to draw any meaningful conclusion.
- NILGOSC's Absolute Return Bonds (ARB) and Multi-Asset Credit (MAC) managers also had a difficult year with all four managers underperforming their targets. Both ARB managers experienced fluctuating performance but delivered a positive return in absolute terms. The MAC managers had mixed results with only one delivering a positive absolute return over the year.
- The UK and Global Property portfolios delivered positive returns over the period with UK returns driven primarily by industrial assets. The new Global Property Manager, appointed in May 2020, has taken a prudent approach to capital deployment during the global pandemic delivering double digit returns over the twelve months.



- During the year NILGOSC continued to implement its medium-term plan to reduce allocation to equities and increase its investment in a range of infrastructure funds with commitments of £115m in 2021/22. The Infrastructure Funds as a whole continued to deliver strong returns during the year.
- In March 2022, NILGOSC took a significant step forward in aligning its investments with the UK's goal of Net Zero carbon emissions by 2050, transferring £2.8bn of passive equities to Legal & General's Low Carbon Transition Fund.
- NILGOSC took part in a number of climate risk mitigation activities in 2021/22, including signing the 2021 Global Investor Statement to Governments on the Climate Crisis and signing an open letter to 50 highly exposed companies urging implementation of the IIGCC's "Investor Expectations of Companies on Physical Climate Risks and Opportunities".
- In March 2022, NILGOSC renewed its
  commitment to CDP (formerly the Carbon
  Disclosure Project) signing up to its 2022
  Non-disclosure campaign and joined the
  Investment Association and Pension and
  Lifetime Savings Association's (PLSA) working
  group on asset manager data for Taskforce
  on Climate-related Financial Disclosures
  (TCFD) aligned disclosures. The working
  group's intention is to formulate a template
  for asset managers to provide emissions data
  and metrics, that pension schemes can then
  use in compiling TCFD-aligned reporting.
- In November 2021 NILGOSC produced its first TCFD-aligned Climate-related Disclosures report for the year ended 31 March 2021.
- NILGOSC continues to exercise its voting rights in investee companies and voted at 178 AGMs and other corporate meetings during 2021/22. The main areas of dissent continue to be executive remuneration practices, board composition or where significant Environmental, Social and Governance (ESG) failings are identified.

18 — PERFORMANCE REPORT OVERVIEW ANNUAL REPORT AND ACCOUNTS 2021/22 ANNUAL REPORT AND ACCOUNTS 2021/22 PERFORMANCE REPORT OVERVIEW — 19

### **SUMMARY**

As set out in the Statement of Purpose and Activities of the Organisation the two main functions of NILGOSC are:

- To administer a pension scheme for local government and other admitted bodies
- To manage and maintain a fund out of which scheme benefits can be met

The key measures of performance for the administration of the pension scheme are:

- performance standards, which set a performance target for each of NILGOSC's key pension administration activities;
- progress in relation to the Corporate Plan objectives;
- the annual Stakeholder Satisfaction survey; and
- the cost per member to administer the Scheme.

In addition, NILGOSC monitors the level of complaints received and the nature of these complaints.

Performance against targets in respect of NILGOSC's key pension administration activities is monitored on a monthly basis by the Head of Pension Services based on data generated by the pension administration software system and is presented to the Management Committee for review on a biannual basis. Progress in relation to corporate plan objectives is reviewed on a quarterly basis by the Senior Management Team and by the Management Committee every six months; a 'status' indicator is applied to each operational action to indicate the progress made in meeting the performance indicator and focus is placed on the areas where performance is behind target. Stakeholder satisfaction and the cost per member to administer the scheme are measured on an annual basis.

The key measure of performance for the investment of the Fund is the overall return on total assets. NILGOSC's overall investment objective is to exceed the Consumer Price Index (CPI) by 3.0% per annum, to be measured over three and five year periods. A robust quarterly investment monitoring process is in place, which aims to look behind returns to see the underlying cause of any underperformance. In addition to monitoring financial returns, NILGOSC also reviews a number of important qualitative factors such as investment style and team, business strength, risk management and the level of assets under management.

In relation to asset allocation, NILGOSC sets a longterm investment strategy which informs the Fund's asset allocation target and the actual asset allocation of the Fund is monitored on a regular basis.

NILGOSC has a system of internal control that is based on an ongoing process designed to identify and prioritise the risks to the achievements of the Committee's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically. A full description of NILGOSC's risk management process is provided in the Governance Statement on pages 67 - 75. Key Performance Indicators are set annually as part of the business plan cycle which formulates the Risk Register, the business plan and the budget for the year ahead.

A detailed analysis and explanation of the development and performance within the administration and investment functions is provided in the following sections of this Performance Report.

# ADMINISTRATION OF THE PENSION SCHEME

### **Scheme Benefits and Contributions**

From 1 April 2015, a member builds up retirement pension under the career average revalued earnings (CARE) Scheme at the rate of 1/49th pensionable pay for each year. Prior to that date the Scheme was a final salary scheme. Pension benefits in relation to membership between 1 April 2009 and 31 March 2015 were built up at the rate of 1/60th pensionable pay for each year of membership. There is no automatic lump sum provided in respect of membership after 31 March 2009. Pension benefits in relation to any membership before 1 April 2009 were built up at the rate of 1/80th (pension) and 3/80ths (tax-free lump sum) of pensionable pay for each year of membership up to 31 March 2009. At retirement, members may give up some pension for additional lump sum, subject to HM Revenue and Customs (HMRC) limits. The conversion rate is £12 additional lump sum for every £1 of pension given up.

The Scheme is funded by contributions made by both employees and employers who have been designated as employing authorities or admitted to the Scheme. Tiered employee contribution rates, determined by the whole-time equivalent rate of pay, were introduced from 1 April 2009. From 1 April 2015, employee

contribution rates are determined on the actual rate of pay and not the whole-time equivalent rate of pay.

The ranges for the bands for tiered contribution rates are revised by the Department for Communities in April each year in accordance with the pensions increase. The Pensions (Increase) Act (Northern Ireland) 1971 applies the rate of inflation (as measured by the Consumer Price Index (CPI)) for the preceding September. The CPI figure for September 2020 was 0.5% and this was applied to the actual pensionable pay ranges for 2021/22. The rates effective from 1 April 2021 were as follows:

Actual Pensionable Pay Range	Employee Contribution Rate
£0 - £15,000	5.5%
£15,001 - £23,000	5.8%
£23,001 - £38,400	6.5%
£38,401 - £46,600	6.8%
£46,601 - £92,300	8.5%
More than £92,300	10.5%

Employers' contribution rates are determined by the Scheme's Actuary every three years. The last valuation took place as at 31 March 2019 and set the employers' contribution rates for the period from 1 April 2020 to 31 March 2023. For those employers whose participation in the Scheme is deemed to be indefinite and/or where an adequate covenant is in place, NILGOSC has agreed with its Actuary employer contribution rates of 19.5% for the three years commencing 1 April 2020.

Year	Employer Contribution Rate
1 April 2020 – 31 March 2021	19.5%
1 April 2021 – 31 March 2022	19.5%
1 April 2022 – 31 March 2023	19.5%

Those employers who have closed the Scheme to new entrants, or those whose participation in the Scheme is believed to be of limited duration, have individual contribution rates and capital payments as determined by the Actuary.

The next valuation takes place as at 31 March 2022.

### Scheme Status and Regulations

The Scheme is a statutory public service pension scheme as defined by the Pension Schemes Act (Northern Ireland) 1993. All the rules of the Scheme and the powers of NILGOSC are set out in legislation.

The Public Service Pensions Act (NI) 2014 set out a common framework for all the public service pension schemes in Northern Ireland from 1 April 2015. The Act provides that the Department for Communities is the responsible authority with the power to make regulations, with the consent of the Department of Finance, for a scheme for the payment of pensions and other benefits to or in respect of local government workers. Prior to the 2014 Act, the Department's power to make regulations was set out in the Superannuation (NI) Order 1972.

The principal regulations relating to the 2020/21 financial year are contained in the following sets of regulations, as amended:

- The Local Government Pension Scheme Regulations (Northern Ireland) 2014 (SRNI 2014/188)
- The Local Government Pension Scheme (Amendment and Transitional) Regulations (Northern Ireland) 2014 (SRNI 2014/189)

The Scheme is also governed by:

- Local Government Pension Scheme (Management and Investment of Funds) Regulations (Northern Ireland) 2000 (SRNI 2000/178)
- Local Government (Early Termination of Employment) (Discretionary Compensation) Regulations (Northern Ireland) 2007 (SRNI 2007/93)

As a public service pension scheme, the Scheme was contracted out of the State Second Pension (S2P) up until 5 April 2016 and is a registered public service scheme under Chapter 2 of Part 4 of the Finance Act 2004. Automatic registration was achieved by Part 1 of Schedule 36 of that Act. Full tax relief is granted on members' and employers' contributions paid to the Fund.

### **New Regulations**

The Local Government Pension Scheme (Amendment) Regulations (Northern Ireland) 2022 (SRNI 2022 No.163)

These regulations were made on 24 March 2022 and came into operation on 18 April 2022. They made minor technical amendments to the Scheme's regulations, some of which are retrospective. The key amendments are as follows:

### 2014 Scheme amendments

- Members pay contributions for the first 30 days of a continuous absence with permission. If the member is continuously absent for more than 30 days, no contributions are paid even for the first 30 days other than they wish to cover the period following their return to work (applicable from 18 April 2022).
- The 50% limit to Additional Voluntary Contributions (AVCs) is removed from 18 April.
- From 18 April, NILGOSC may at its discretion pay refunds when more than five years have passed from the date the member left active membership. They still must be paid before the member reaches age 75.
- In cases where a member ceases to be active, becomes deferred and then a pensioner all in the same Scheme year, the revaluation adjustment applied at the beginning of the following year is that adjustment applicable when the retirement pension account was opened.
- Death grants can now be paid to estates or beneficiaries where the deceased was aged 75 or over and the death occurred on or after 1 April 2015.
- The time allowed for each of the two stages of the Internal Disputes Resolution Procedure is increased from two months to four months.
- A member can be stripped of their pension if convicted of a relevant offence in connection with their employment. The amendment regulations removed the requirement that the member must have left their employment because of the offence.

### 2014 Amendment and Transitional Regulations

With effect from 5 December 2005 survivor benefits are now calculated on the same basis, in the same circumstances, irrespective of gender of the member or survivor.
 Following the changes, all benefits due to survivors of members where the marriage or civil partnership took place after the member left the Scheme (that is when they were a deferred member or pensioner), are calculated on membership after 5 April 1978. There is one exception; where the transitional provisions put in place when survivors' pensions for widowers were first introduced under the 2000 Regulations apply, benefits may be calculated differently.

### 2009 Scheme amendments

 The definition of fluctuating emoluments is amended so that they are averaged over three years for the purpose of final salary pay rather than averaging them over the period they were paid if this is less than three. This applies from 18 April 2022.

# The Parental Bereavement Leave and Pay (Consequential Amendments to Subordinate Legislation) Regulations (Northern Ireland) 2022 (SRNI 2022 No. 168)

These regulations were made on 30 March 2022 and came into operation on 6 April 2022. They make amendments to secondary legislation, including the Scheme's regulations, to make provision for entitlements to be reavement leave and pay for parents following the death of a child. Within the Scheme they amend the definition of 'child-related leave' to include parental bereavement leave.

### **Scheme Membership**

The number of active, deferred and pensioner members of the Scheme continued to grow during 2021/22 and one employing authority exited the Scheme.

### **Members**

Membership of the Scheme increased during the year to 149,739 members. At 31 March 2022, the Scheme consisted of 73,960 contributing members, 41,557 pensioners and 30,902 deferred members plus 1,051 records in process and 2,269 unclaimed refunds.

### **Employing Authorities**

At 31 March 2022, there were 171 employing authorities contributing to the Scheme. These employing authorities were composed of 11 councils, 1 Education Authority, 1 Library Authority, 48 associated bodies, 89 schools, 9 further and higher education colleges and universities and 12 employers with restricted membership (closed to new members). A full list of these organisations can be found on pages 140 to 142.

OCS Group UK Limited left the Scheme on 31 January 2022.

### **Revaluation of CARE Benefits**

The Public Service Pensions Revaluation Order (Northern Ireland) 2021 makes legislative provision

for the revaluation of active contributing members' benefits for those CARE schemes which use the change in prices (the LGPS (NI)) or change in earnings as the measure for revaluation. An increase of 0.5% was applied on 1 April 2021 in relation to CARE benefits built up as at 31 March 2021.

The Public Service Pensions Revaluation Order (Northern Ireland) 2022 confirmed an increase of 3.1% was to be applied on 1 April 2022 to CARE benefits built up to 31 March 2022.

### **Pensions Increase**

The Pensions (Increase) Act (Northern Ireland) 1971 and the Social Security Pensions (Northern Ireland) Order 1975 are the primary legislation that govern increases to public sector pensions. The Pensions Increase Orders govern increases to Scheme pensions and the Social Security Revaluation of Earnings Factors Orders govern increases to guaranteed minimum pensions (GMPs), a component of some members' pensions.

The Pensions Increase (Review) Order (Northern Ireland) 2021, operational from 12 April 2021, increased pensions which had been in payment for more than a year (commenced before 6 April 2020) by 0.5%. A proportionate increase applied to any pensions beginning on or after 6 April 2020 but before 28 March 2021.

The Guaranteed Minimum Pensions Increase Order (Northern Ireland) 2021 increased GMPs by 0.5% from 6 April 2020.

### **Cost Cap Mechanism**

The Scheme's regulations make provision requiring the cost of the scheme to remain within specified margins either side of an employer cost cap, and, for cases where the cost of the scheme would otherwise go beyond either of those margins, provision specifying a target cost. The cost cap for the Local Government Pension Scheme (Northern Ireland) was set at 17%.

In January 2019, the government announced a pause to the cost control mechanism in public sector pension schemes, due to uncertainty about benefit entitlements arising from the 'McCloud' judgment on age discrimination in public service pension schemes.

Following consultation with member representatives, the Department of Finance published revised valuation directions on 22 November 2021 which will enable the 2016 valuation to be completed and the final cost cap results to be determined.

### **McCloud Judgment**

In December 2018, the Court of Appeal ruled that transitional protection provisions contained in reformed judicial and firefighter pension schemes, introduced as part of public service pension reforms in 2015, amounted to direct age discrimination and were therefore unlawful.

In June 2019, the Supreme Court refused permission for any further appeal of that ruling and the judicial and firefighter cases in question were referred to the Employment Tribunal to determine a remedy for members who suffered discrimination.

In July 2019, the UK Government confirmed that, as transitional protection was offered to members of all the main public service pension schemes, the government intends to address the difference in treatment across all schemes. The reformed public service schemes in Northern Ireland, including the LGPS(NI), incorporate similar aged-based transitional protections.

The Department for Communities ran a consultation from 11 November 2020 to 31 January 2021 consulting on proposals to

- (i) remove discrimination in the LGPS(NI) for the future; and
- (ii) remedy the effect of any discrimination scheme members may have accrued since April 2015.

The proposed approach is to extend the underpin arrangement to all members who were active in the 2009 Scheme before 1 April 2012 and have accrued benefits under the 2015 Scheme without a disqualifying break in service (five or more years), subject to aggregation requirements. The underpin will cover the period between 1 April 2015 and 31 March 2022, known as the remedy period. These proposals have been developed in conjunction with the Collective Consultation Working Group, which is the recognised forum for consultation on pension policy for devolved schemes and where both public service employers and employees are represented. and with the LGPS(NI) Scheme Advisory Board. Any subsequent changes to the LGPS(NI) will be subject to further scheme level consultation.

# Indexation and Equalisation of Guaranteed Minimum Pensions (GMP)

The Government consulted between 28 November 2016 and 20 February 2017 on how GMP indexation and equalisation should be applied to public service pension schemes from 6 December 2018. An interim solution applied for the period from 6 April 2016 to 5 December 2018 (subsequently extending to 5 April 2021) where public service pension schemes were to pay full indexation for members reaching state pension age between those dates i.e. no increase in respect of the GMP is paid along with the member's state pension.

In March 2021, HMT published its response confirming that the Government had decided to make permanent the interim solution for indexation in the public service pension schemes. The Department of Finance published a direction on 1 April 2021 giving this effect. This means that the LGPS (NI) will be responsible for fully uprating the GMP pensions in line with the Consumer Price Index for all members who have a GMP element to their pension and reach their state pension age on or after 5 April 2016.

Equalisation of GMPs for public service pension schemes is still under review.

# Proposed Increase in Normal Minimum Pension Age

Section 10 of the Finance Act 2022 increases the normal minimum pension age from 55 to 57 from 6 April 2028. The Department for Communities will need to change the Scheme rules to align with the normal minimum pension age before 6 April 2028 and consider whether members who qualify for protections will be allowed to receive payment before age 57.

# Independent Review of the State Pension Age

The Pensions Act 2014 set a statutory requirement to review the rules about state pension age every six years. The Department for Work and Pensions launched its review in December 2021. The results of this review must be published by 7 May 2023. State Pension Age is currently age 66 and there will be a gradual increase to age 67 for those born on or after April 1960. There is a further increase to age 68 between 2044 and 2046 for those who were born on or after April 1977. The last review concluded that the

next review should consider whether the increase to age 68 should be brought forward to between 2037 and 2039. As the normal pension age for Scheme benefits is now linked to the State Pension Age, any change in State Pension Age will affect the normal pension age for pension benefits payable by the Scheme.

### **Pensions Dashboard**

In 2016 the Financial Conduct Authority (FCA) recommended that pensions dashboards should be available to individuals to enable them to engage more easily with their pensions. The Government was supportive of this initiative and since then has consulted on the issues and options for delivering this service. In April 2019 it decided that it would legislate to make pension schemes provide data and that the Money and Pensions Service (MaPS) would be responsible for working with the pensions industry to deliver the dashboard service. MaPS established the Pensions Dashboards Programme to design and implement the infrastructure for the pension dashboards. The vision of the Pensions Dashboards Programme is 'to enable individuals to access their pensions information online, securely and all in one place, thereby supporting better planning for retirement and growing financial wellbeing'. The delivery of the programme has been broken into six phases with the intention that from mid-2024 public service pension schemes will begin to provide data for the dashboards. NILGOSC is supportive of the Pensions Dashboards project and has been responding to Calls for Input and reviewing the information that may potentially be required.

### **National Fraud Initiative**

NILGOSC participates in the biennial National Fraud Initiative (NFI) run by the Northern Ireland Audit Office, which has statutory powers to conduct data matching exercises for the purpose of assisting in the prevention and detection of fraud. NILGOSC participated in the NFI 2020/21 data matching exercise in November 2020 and matches were released in January 2021.

In total, 556 data matches were released across nine reports. Of the 556 matches, 487 were investigated as potential pensioner overpayments. 10 of these totalling £26.1k were confirmed as overpayments and the rest were closed with no further action. Of these 10 overpayments, two cases have been repaid in full and recovery of the other eight overpayments totalling £17.8k is being pursued as at 31 March 2022.

No cases of proven or suspected fraud have been identified through the 2020/21 data matching exercise. NILGOSC is continuing to pursue recovery of the overpayments identified through previous NFI data matching exercises.

The next NFI matching exercise for 2022/23 is expected to commence in October 2022.

# **Equality, Social Matters** and Human Rights

NILGOSC has a commitment to the fulfilment of its duties under Section 75 of the Northern Ireland Act 1998 and NILGOSC's Equality Scheme states that it will report on the progress it has made in the delivery of its Section 75 statutory duties. NILGOSC's Annual Equality Statement is set out on pages 134 to 135 of this report. NILGOSC's commitment to the promotion of equality of opportunity and diversity within its workforce is reflected across all of its staff policies.

As a global investor NILGOSC can influence social factors including human rights through its responsible investment activities. NILGOSC has developed a Statement of Responsible Investment which sets out its practices in this regard. Further information in respect of NILGOSC's responsible investment activities can be found within the Investment of the Fund section of this Performance Analysis, starting on page 55.

## Anti-Bribery and Anti-Corruption Matters

NILGOSC values its reputation for ethical behaviour, financial probity and reliability and is committed to conducting business in an honest and ethical manner. NILGOSC takes a zero-tolerance approach to acts of bribery and corruption, by its staff or anyone acting on its behalf. Further details are set out in NILGOSC's Anti-Bribery Policy Statement which can be found on NILGOSC's website at the following address:

https://nilgosc.org.uk/document-category/scheme-governance/page/2/

### Environmental Matters and Sustainability Targets

NILGOSC's Statement of Investment Principles acknowledges that environmental, social and governance (ESG) issues can affect the financial performance of investment portfolios and states that NILGOSC will take such matters into consideration as part of the investment process. As a responsible

investor, NILGOSC exercises its ownership rights and uses its vote to inform companies of the corporate behaviour it expects to see, including by voting against management where there are significant ESG failings. NILGOSC's expectations for good corporate governance are laid out in its Proxy Voting Policy, which is reviewed and updated annually.

NILGOSC developed its Statement of Responsible Investment to further outline how ESG issues are incorporated into its investment practices. Recognising that of all of the ESG risks facing investors, climate change has arguably the greatest potential for widespread impact, NILGOSC also developed a Climate Risk Statement. This statement sets out the framework in which climate risk is taken into account across the range of assets in which NILGOSC invests and confirms NILGOSC's support for the aims of the Paris Agreement, which seeks to limit global temperature rise to 2°C degrees or below. In June 2020, NILGOSC became an official supporter of the Task Force on Climate-related Financial Disclosures (TCFD), and in November 2021 NILGOSC produced its first TCFD-aligned Climaterelated Disclosures report for the year ended 31 March 2021. During the year, NILGOSC took a significant step forward in aligning its investments with the UK's goal of Net Zero carbon emissions by 2050 by transferring £2.8bn of passive equities to Legal and General's Low Carbon Transition Fund.

Further information regarding ESG issues and NILGOSC's actions to address climate risk during the year are provided within the Investment of the Fund section of the Performance Analysis Report.

NILGOSC is exempt from the targets within the Greening Government Commitments, however NILGOSC gives due consideration for sustainability factors in its procurement exercises where appropriate.

Furthermore, NILGOSC has invested in e-communications and encourages members to engage via electronic media platforms not least through its member self-service facility, *My NILGOSC Pension Online*.

### **Publications**

NILGOSC has produced a series of guides and booklets, which have been designed to provide additional information on various aspects of the Scheme. Copies of these publications are available on request from NILGOSC or may be downloaded from our website <a href="https://www.nilgosc.org.uk">www.nilgosc.org.uk</a> or via My NILGOSC

Pension Online. The guides and booklets available are as follows:

- Member Guide to the Local Government Pension Scheme (Northern Ireland)
- NILGOSC Pension Guide
- · Retirement Guide
- Increasing your Retirement Benefits
- Leaving the Scheme Before Retirement
- Pensions on Divorce or Dissolution
- Alternative Communications Leaflet
- Decisions, Reviews and Complaints
- Re-Joining the Scheme
- Equality Scheme Summary
- Employers' Guide to the 2015 Scheme
- Employers' Guide to Automatic Enrolment
- Human Resources Guide to LGPS (NI)
- Payroll Guide to LGPS (NI)
- Members' News, Deferred Members' News and Pensioners' News
- Annual Report

The Scheme rules are available from the TSO shop at <a href="http://www.tsoshop.co.uk/">http://www.tsoshop.co.uk/</a>. The Regulations are also available online at <a href="www.legislation.gov.uk">www.legislation.gov.uk</a>.

In addition to providing information to members, deferred members, prospective members, pensioners, and employers, the NILGOSC website also contains a wide range of corporate information including:

- Statement of Investment Principles
- Funding Strategy Statement
- Management Committee Biographies
- Equality Scheme
- Publication Scheme
- Corporate Plan
- Decisions, Reviews and Complaints

### **Performance Standards**

In May 1997, the Management Committee approved service standards for key NILGOSC activities and set a performance target for each service standard. The service standards are reviewed annually, and performance against the targets is monitored by the Committee. In April 2022, the internal auditor, ASM, tested NILGOSC's service

standards reporting system and performance outturn as part of its annual validations review.

The ongoing pandemic created further challenges for NILGOSC in 2021/22 with higher levels of staff absence as a result of illness and isolation requirements. Similar to other public bodies, a post-pandemic rise in resignations and a buoyant labour market created a very challenging recruitment environment. This impacted on the processing times of certain tasks and performance fell short of target for 3 of the 15 service standards. Two actions relating to leaver

options notifications and benefit quotations fell considerably short of target as a result of workload management decisions which prioritised those actions where a monetary benefit was due to members, such a retirements and deaths. The action to issue annual benefit statements achieved a performance level of 98%, with 2% of members not receiving a statement as NILGOSC did not hold address or pay information necessary to produce the statement.

The following table provides a summary of performance against the service standards during 2021/2022:

Task	Service Delivery Standard	Target Performance %	2021/22 Actual Performance %
Lump sum retirement payments	Within 10 days	90%	90%
Death grant payments	Within 10 days	90%	98%
Leaver options notifications	Within 20 days	90%	69%
Refund payments	Within 10 days	95%	99%
Transfer out quotations	Within 20 days	90%	98%
Transfer out payments	Within 10 days	90%	90%
Transfer in quotations	Within 10 days	90%	94%
Transfer in confirmations	Within 20 days	90%	100%
New entrant certificates	Within 20 days	95%	100%
Correspondence	Within 10 days	95%	95%
Benefit quotation requests	Within 10 days	90%	60%
Issue members' annual report	By 30 November	100%	100%
Issue members' annual benefit statements	Within 5 months of year end, unless relevant data unavailable	100%	98%
Pensions paid each month	Last banking day of month	100%	100%
P60s issued to all pensioners	By 31 May	100%	100%

### **Service Delivery Enhancements**

### i-Connect

In January 2022, NILGOSC launched a project in conjunction with its employers to transition to a new data exchange platform. This secure platform automates submission of pension data on a monthly basis, by generating an extract directly from the participating employer's payroll systems. The objectives of the project are to improve the quality of the data, accuracy of member records and reduce the administrative burden on employers.

NILGOSC has adopted a system called 'i-Connect' for this secure data exchange from employers payroll platform to NILGOSC's pension administration system. The project is adopting a phased approach and is scheduled to complete 2024/25. As at 31 March 2022, 27 employers were live on the system, of which 15 were actively using the system. Initial feedback on the system and the transition experience has been positive with 80% of employers rating it 8/10 or higher.

### My NILGOSC Pension Online

My NILGOSC Pension Online, the self-service facility for members, was launched in 2018/19. This secure online portal allows members 24/7 access to their pension records enabling them to view and update personal information, check the value of their pension benefits and estimate the value of their pension upon retirement.

Since then NILGOSC has continued to promote the functionality offered by *My NILGOSC Pension Online* as a means of enhanced service delivery and the empowerment of members to manage their pension directly. During 2020/21, NILGOSC moved the default delivery setting for deferred members to electronic, subject to individual member preference. As a result, Scheme communications to deferred members, including annual benefit statements, were issued online via *My NILGOSC Pension Online* unless postal communications had been specifically requested. In 2021/22 this approach was extended to active members, subject to individual preference.

In addition, to its secure member self-service facility, NILGOSC makes available a wide range of information through its public website <a href="www.nilgosc.org.uk">www.nilgosc.org.uk</a>. In March 2021 NILGOSC launched its new public website, which offered improved accessibility, navigation and search facilities. In the year to 31 March 2022 the website had nearly 58,000 users, 108,000 individual sessions and 291,000 page views.

Communication and member engagement remains a strategic priority for NILGOSC and it continues to monitor member satisfaction and behaviour. At March 2022 over 33,750 members had registered for *My NILGOSC Pension Online* and this, together with public website activity indicates a clear demand for information being available online. In the 2021/22 satisfaction survey, members gave a satisfaction rating of 92% for *My NILGOSC Pension Online* when asked to consider factors such as ease of registration, quality and accuracy of information provided, look and layout of website and ease of navigation.

NILGOSC prides itself on offering a high quality, individual service to its members for over 70 years and is keen to maintain its reputation despite moving to virtual service delivery in 2020/21, as a result of the pandemic. Whilst there are undoubtedly benefits to members to be able to access their pension information electronically at a time of their choosing, NILGOSC also recognises that many members value personal interaction and paper communications. Prior to any change, NILGOSC has written to members seeking their individual communication preferences. During 2021/22, NILGOSC launched its reconnection programme which is designed to reconnect with those members who are less engaged with their pension scheme.

### **Satisfaction Survey**

A Stakeholder Satisfaction Survey for the year 2021/22 was carried out in February 2022. Surveys were drawn up for members, deferred members and pensioners, relevant to the service they receive from NILGOSC. Approximately 3,750 surveys were sent to the three member groups, and the response rate averaged at 22.5%. In addition, online surveys were also sent to all 171 employing authorities. A total of 51 employers responded to the survey, a response rate of 30%.

The surveys focused on three main areas:

- Publications
- Customer service
- My NILGOSC Pension Online and the NILGOSC website

Satisfaction levels, which are measured with respect to the percentage of good or excellent ratings given, ranged from 81% for deferred members, 92% for active members and 97% of pensioners. 95% of employers indicated a satisfaction rating of good or excellent. The aggregate satisfaction rate across all stakeholder groups was 91%.

### **Publications**

Respondents were asked to rank communication materials on a scale of 1 to 5 (1 being poor and 5 being excellent). Questions related to relevance of information, presentation and layout and ease of understanding. 93% of member respondents and 95% of employers rated NILGOSC communications as being good or excellent.

### **Customer Service**

The survey examined a range of areas relating to customer service for members including staff knowledge, courtesy and professionalism. Overall customer service received a good or excellent rating from members and employers of 89.5% and 88% respectively.

### My NILGOSC Pension Online and the NILGOSC website

My NILGOSC Pension Online is a self-service facility that allows members to access their pension details securely and update their information.

Elements of My NILGOSC Pension Online surveyed included ease of registration, quality and accuracy of information provided, look and layout of website and ease of use and 92% of respondents gave an overall rating of good or excellent.

Respondents were also asked to rate the look, usefulness, and quality of content on the NILGOSC website. Satisfaction across all stakeholder groups was high with 94% of respondents rating the NILGOSC website as good or excellent.

### **Cost per Member**

The table below shows administration expenses per Scheme member, together with the ratio of members to staff. In the year ended 31 March 2022, the cost per member adjusted for inflation has decreased from the previous year. After adjustment there has been a marginal increase in the administration expenses from the prior period but the net uplift in total membership has reduced the cost per member for 2021/22.

Year ended 31 March	Total Members	Number of Staff	Members/ Staff	Admin Expenses £'000	Cost/ Member £	Inflation adjusted cost £
2013	95,382	50	1,908	2,892	30.32	36.14
2014	103,382	53	1,951	3,112	30.10	35.32
2015	109,462	58	1,887	3,267	29.85	35.02
2016	114,026	64	1,782	3,803	33.35	38.94
2017	118,794	78	1,523	4,348	36.60	41.77*
2018	122,587	84	1,459	4,393	35.84	39.90*
2019	129,947	82	1,585	4,699	36.16	39.55*
2020	139,048	77	1,806	4,643	33.39	35.97**
2021	142,492	79	1,804	4,675	32.81	35.10**
2022	149,739	76	1,970	4,745	31.69	31.69**

- \* Between 2017 2019 adjustments to the administration expenses totals have been made (2018/19 £846k; 2017/18 £281k; 2016/17 £1,933k) for the purposes of the cost per member calculation. These adjustments reflect the amount of the total movement in employing authority bad debt provision in 2018/19 and 2017/18. For 2016/17, the adjustment figure also includes the bad debt write off in relation to employing authority debt which, like the provision, is not a member related cost but is attributed to the employing authorities in the Scheme through the triennial valuation.
- \*\* The total administration expenses in 2019/20, 2020/21 and 2021/22 have been reduced by £625k, £386k and £782k respectively, that being an IAS 19 adjustment to current service pension costs as these adjustments are sufficiently material to impact the cost per member calculation and are also not a member related cost.

### **Decisions, Reviews and Complaints**

NILGOSC and its employing authorities have the right to make decisions regarding membership, contributions payable and benefits to be awarded.

If a member does not understand, or is unhappy with, a decision made by their employer, the member should take this up with the employer via its complaints and disputes procedure.

If an individual is unhappy with a decision made by NILGOSC, they should try to resolve the issue with the member of staff who made the decision, or with their manager. This can be done in writing, by telephone or by personal visit. If the matter is not resolved to their satisfaction, they can make a formal complaint.

NILGOSC operates a two stage process for Reviews and Complaints. At stage one, the individual sends the Head of Pension Services at NILGOSC a letter or a Reviews and Complaints Form giving details of the complaint, and asking for a review of the decision. The form is available on the NILGOSC website or on request from the Pensions Service team. The person appointed to consider a stage one review is NILGOSC's Secretary, Deputy Secretary or Acting Secretary.

If the individual is unhappy with the decision made by the Secretary at the stage one review, they may ask the Committee's Internal Dispute Resolution Committee to undertake a stage two review. Any request for a stage two review must be sent to the Head of Pension Services within six months of the date of the Secretary's stage one review decision.

Further details can be found in the 'Decisions, Reviews and Complaints' booklet, which is available on the NILGOSC website or on request. This guide provides full contact details for external bodies which may be able to help to resolve complaints, such as MoneyHelper, the Pensions Ombudsman Service, The Pensions Regulator and the Northern Ireland Public Services Ombudsman.

NILGOSC received a total of 35 ill-health retirement benefit appeals (29 at stage one and 6 at stage two), 6 formal complaints (4 at stage one and 2 at stage two), and 37 informal complaints during 2021/22, a total of 78 appeals/complaints.

Two formal complaints were heard by the Committee during the 2021/22 year, both relating to transfers out of the Scheme, and both were not upheld.

The 35 ill-health retirement appeals consisted of 29 stage one appeals and 6 stage two reviews. At stage one, 9 appeals were upheld meaning the initial ill-health decisions were overturned, 12 appeals were not upheld meaning the initial ill-health decisions remained the same and 8 remain outstanding. Of the 29 stage 1 ill-health retirement benefit appeals, 2 progressed to stage two reviews within the same year. A total of 6 ill-health appeals were heard by the Committee during the 2021/22 year, 4 decisions were upheld meaning the initial ill-health decisions were overturned and the remaining two appeals were deferred pending further information.

NILGOSC regularly monitors the nature of complaints to ensure that any trends are noted, and that appropriate action is taken, as required. The complaints log review is a standing biannual agenda item at meetings of the Senior Management Team.

Further information on the monitoring of appeals/ complaints received by NILGOSC can be requested by writing to the Head of Pension Services at NILGOSC's address which is provided on page 2 of this report.

### Review of Corporate Plan 2021/22

NILGOSC publishes its Corporate Plan over a rolling three-year period. The purpose of the Corporate Plan is to set out the aims, objectives and service standards of the Committee, taking into account external factors such as government policy and stakeholder needs. The Corporate Plan is reviewed and revised annually, and a copy of the 2021/22 – 2022/23 Corporate Plan can be downloaded from the NILGOSC website at <a href="https://www.nilgosc.org.uk">www.nilgosc.org.uk</a>. As can be seen from the following table, a significant proportion of the 2021/22 Corporate Plan was completed or on target at 31 March 2022.

1. To provide an effective service complying with the pension scheme regulations, good practice, other legislation and stakeholder expectations.

1.1.1 To pay members' pension harmonishy pensions harmonish, refunds and transfers promptly and accurately  1.1.2 To pay pension tump sums promptly and accurately  1.1.3 To pay refunds of contributions promptly and accurately  1.1.4 To pay transfer payments promptly and accurately  1.1.5 To pay transfer payments promptly and accurately  1.1.6 To pay transfer payments promptly and accurately  1.1.6 To pay transfer payments promptly and accurately  1.1.7 To pay transfer payments promptly and accurately  1.1.8 To pay transfer payments promptly and accurately  1.1.9 To credit pension contributions, transfers and accurately  1.2.1 To collect monthly contributions and invest in scheme fund promptly and accurately  1.2.1 To collect monthly contributions and invest in account on receipt of annual returns from employers  1.2.2 To update member records on receipt of annual returns from employers  1.2.3 To credit pension account on receipt of annual returns from employers of accurate and employers of a	Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status
and transfers promptly and accurately  1.1.2 To pay pension lump be promptly and accurately  1.1.3 To pay refunds of contributions promptly and accurately  1.1.3 To pay refunds of contributions promptly and accurately  1.1.4 To pay transfer payments promptly and accurately  1.1.4 To pay transfer payments promptly and accurately  1.2.1 To credit pension contributions, transfer and other employer liabilities received promptly and accurately  1.2.2 To update members with information needige to dransfer payment within 10 working days of receipt of information of transfers into the scheme with promptly and the remployers of actualist costs and agree payment schedule promptly  1.2.3 To credit pension contributions and advise promptly and accurately  1.2.4 To obtain and advise members with information needige to dransfer payment schedule promptly  1.2.5 To provide members with information needige to dransfer payment schedule promptly  1.3.1 To respond to members with information needige to dransfer payment schedule promptly  1.3.2 To provide members with information needige to dransfer payment schedule promptly  1.3.3 To provide members with information needige to dransfer payment schedule promptly  1.3.3 To provide members with information decisions promptly  1.3.1 To respond to members with information decisions promptly  1.3.2 To provide members and deferred members and deferr				· ·	Ashiousd
Sums promptly and accurately   1.1.3 To pay refunds of contributions promptly and accurately   2.7.4 To cellet pension contributions, transfers and other employer contributions, transfers and other employer insbitities receipt of accurately   2.7.2 To cellet mentals   2.7.2 To credit pension contributions, transfers and other employer liabilities receipt of accurate expensions to transfer sund the employer receipt of accurate expensions and accurately   2.7.2 To cellet monthly contributions, transfers and other employer contributions and invest in scheme fund promptly   2.2.3 To credit pension accurately   2.2.4 To cellet mentals   2.2.5 To cellet monthly contributions and invest in scheme fund promptly   2.2.5 To cellet mentals   2.2.5 To cellet pension and returns from employers   2.2.5 To credit pension and returns from employers of actuarial costs and agree payment schedule promptly   2.2.4 To obtain and advise expension accepts of an accurately   2.2.4 To obtain and advise expension accepts of information   2.2.5 To cellet pension accepts of accepts of information   2.2.5 To cellet pension accepts of accepts of information   2.2.5 To cellet pension accepts of accepts of information   2.2.5 To cellet pension accepts of accepts of information   2.2.5 To cellet pension accepts of information   2.2.5 To cellet pension accepts of accepts of information   2.2.5 To cellet pension accepts of information	and transfers promptly				Achieved
accurately    accurately   details   Average time taken 7 days				2,565 pension lump sums paid	
1.1.3 To pay refunds of contributions promptly and accurately   2,200 refunds paid   2,200 refunds   2,20				90% within target	Achieved
Contributions promptly and accurately   Pay the cash equivalent promptly and accurately   Pay the cash equivalent promptly and accurately   Pay the cash equivalent within 10 working days of receipt of required information   Pay the cash equivalent promptly and accurately   Pay the cash equivalent promptly and accurately   Pay the cash equivalent within 10 working days of contributions, transfers and other employer contributions, transfers and other employer contributions and invest in scheme fund promptly following month   Pay the cash equivalent promptly and accurately   Pay the cash equivalent promptly following month   Pay the cash equivalent promptly and accurately   Pay the cash equivalent promptly   Provide confirmation   Provide a pay the provided promptly   Pay the provided pro				Average time taken 7 days	
and accurately application  Pay the cash equivalent within 10 working days of receipt of information account on receipt of annual returns from employers of actuarial costs and agree payments into the scheme with option choices  1.2.4 To obtain and advise emembers teaving benefits attements of the make pension decisions promptly  1.3.3 To provide members and formation  and accurately  1.2.5 To provide members teaving the scheme with option choices  1.3.3 To provide members and deferred me				2,260 refunds paid	
1.1.4 To pay transfer payments promptly and accurately   Pay the cash equivalent within 10 working days of receipt of required information   Paythe cash equivalent within 10 working days of fellowing month   Paythe cash equivalent within 10 working days of fellowing month   Paythe cash equivalent within 10 working days of fellowing month   Paythe cash equivalent within 10 working days of fellowing month   Paythe cash equivalent within 10 working days of fellowing month   Paythe cash equivalent within 10 working days of receipt of annual returns from employers   Paythe cash equivalent within 10 working days of receipt of transfers into the scheme promptly   Paythe cash equivalent within 10 working days of receipt of information account on receipt of transfers into the scheme promptly   Paythe cash equivalent within 10 working days of receipt of information account on receipt of transfers into the scheme promptly   Paythe cash equivalent within 10 working days of receipt of information account on receipt of inf				99% within target	Achieved
Dayments promptly and accurately   Secretary   Secre				Average time taken 4 days	
1.2 To credit pension contributions, transfers and other employer [Institution and invest in scheme fund promptly]  1.2 To credit pension contributions, transfers and other employer [Institution and invest in scheme fund promptly]  1.2 To update member records on receipt of annual returns from employers in scheme fund promptly and accurately promptly and accurately  1.2 To update member records on receipt of annual returns from employers of annual returns from employers of annual returns from employers of accuration account on receipt of transfers into the scheme promptly  1.2.4 To obtain and advise employers of actuarial costs and agree payment costs and agree payment schedule promptly  1.3.1 To respond to member swith information needed to make pension decisions promptly  1.3.2 To provide members teaving the scheme with option choices  1.3.3 To provide members leaving the scheme with option choices  1.3.4 To provide members leaving the scheme with option choices  1.3.5 To provide members and deferred members with benefit statements and deferred members and the provided within 5 months of year end within 15 months of the provided and contribution receipts and correcipts and contributions and accurated policy applied as required and credit control policy				'	
1.2 To credit pension contributions, transfers and other employer field between the promptly and accurately promptly and accurately promptly and accurately promptly and accurately and accurately promptly promptly and accurately promptly prompt			receipt of required	90% within target	Achieved
contributions, transfers and other employer liabilities received promptly and accurately promptly and accurately promptly and accurately and accurately promptly and accurately and accurately and accurately promptly and accurately and accurate and accurately and accurately and accurately and accurately and			information	Average time taken 9 days	
and other employer liabilities received promptly and accurately  1.2.2 To update member records on receipt of annual returns from employers  1.2.3 To credit pension account on receipt of transfers into the scheme promptly  1.2.4 To obtain and advise employers of actuarial costs and agree payment schedule promptly  1.3.1 To provide members with information needed to make pension decisions promptly  1.3.2 To provide members eaving the scheme with option choices  1.3.3 To provide shorts leaving the scheme with option choices  1.3.3 To provide a statement of service members leaving the scheme with option choices  1.3.4 To provide members with in formation needed and deferred members with benefit statements with benefit statements sitsued within 5 months of specific and a control policy applied as required  1.00% annual returns posted by July 2021  1.00% within target  Achieved  Ach					
Promptly and accurately  1.2.2 To update member records on receipt of annual returns from employers  1.2.3 To credit pension account on receipt of transfers into the scheme promptly  1.2.4 To obtain and advise employers of actuarial costs and agree payment schedule promptly  1.2.4 To obtain and advise employers of actuarial costs and agree payment schedule promptly  1.2.5 To provide members with information needed to make pension decisions promptly  1.3.1 To provide members leaving the scheme with option choices  1.3.2 To provide members leaving the scheme with option choices  1.3.3 To provide members with benefit statements  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.5 To provide members with benefit statements of opear end  1.3.6 To provide members with benefit statements of opear end  1.3.6 To provide members with benefit statements of opear end  1.3.7 To provide members with benefit statements of opear end  1.3.8 To provide members with benefit statements of opear end  1.3.8 To provide members with benefit statements of opear end  1.3.9 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members with benefit statements of opear end  1.3.4 To provide members w	and other employer		Tottowing month	up-to-date and credit control	Achieved
Provide confirmation eccipt of annual returns from employers				policy applied as required	
annual returns from employers  1.2.3 To credit pension account on receipt of transfers into the scheme promptly  1.2.4 To obtain and advise employers of actuarial costs and agree payment schedule promptly  1.3 To provide members with information needed to make pension decisions promptly  1.3.1 To respond to member queries  1.3.2 To provide members leaving the scheme with option choices  1.3.3 To provide members and deferred members with longton choices  1.3.4 To provide members and deferred members with benefit statements sissued within 5 months of year end  1.5.5 To provide deferred members with benefit statements of penefit statements of year end  1.5.6 To provide members with benefit statements of penefit statements of year end  1.5.7 To provide members with benefit statements of year end  1.5.8 To provide members with benefit statements of year end  1.5.9 To provide members with benefit statements of year end  1.5.1 To provide members with benefit statements of year end  1.5.2 To provide members with benefit statements of year end  1.5.3 To provide members with benefit statements of year end  1.5.4 To provide pension account on receipt of transfers in confirmations provided 100% within target Achieved  1.5.2 To provide members with provide a statement of popular pension within 10 working days of notification  1.5.3 To provide pension account on receipt of information account of provided and provided on account of the scheme with option choices  1.5.3 To provide members with option choices  1.5.4 To provide members with pension deferred members with pension the scheme of pensions within 10 working days of notification and advise employers of receipt of information provided only actuarial costs within target and pensions of provided and pensions provided on the provided of pensions within 10 working days of notification and pensions of provided and pensions provided on the pension of pensions within 10 working days of notification and pensions provided on the pension of pensions of pensions of pensions of pen		records on receipt of annual returns from			
1.2.3 To credit pension account on receipt of transfers into the scheme promptly  1.2.4 To obtain and advise employers of actuarial costs and agree payment schedule promptly  1.3 To provide members with information needed to make pension decisions promptly  1.3.2 To provide members leaving the scheme with option choices  1.3.3 To provide members with option choices  1.3.4 To provide members with less cheme with option choices  1.3.5 To provide members leaving the scheme with option choices  1.3.6 To provide members with less cheme with option choices  1.3.7 To provide members leaving the scheme with option choices  1.3.8 To provide members leaving the scheme with option choices  1.3.9 To provide members leaving the scheme with option swithin 10 working days of notification  1.3.9 To provide members leaving the scheme with option choices  1.3.4 To provide members leaving the scheme with option swithin 10 working days of notification  1.3.4 To provide members leaving the scheme with option choices  1.3.5 To provide members leaving the scheme with option swithin 10 working days of notification  1.3.6 To provide members leaving the scheme with option choices  1.3.6 To provide members leaving the scheme with option choices  1.3.7 To provide members with option choices  1.3.8 To provide members leaving the scheme with option choices  1.3.9 To provide members leaving the scheme with option choices  1.3.6 To provide members with option choices  1.3.7 To provide members leaving the scheme with option choices  1.3.8 To provide members leaving the scheme with option choices  1.3.9 To provide members leaving the scheme with option choices  1.3.9 To provide members leaving the scheme with option choices  1.3.9 To provide members leaving the scheme with option choices  1.3.1 To provide members leaving the scheme with option choices  1.3.9 To provide members leaving the scheme with option choices  1.3.1 To provide members leaving the scheme with option choices  1.3.1 To provide members leaving the scheme with option choices				3 diy 2021	Achieved
account on receipt of transfers into the scheme promptly  1.2.4 To obtain and advise employers of actuarial costs and agree payment schedule promptly  1.3.1 To respond to members with information needed to make pension decisions promptly  1.3.2 To provide members leaving the scheme with option choices  1.3.3 To provide members leaving the scheme with option choices  1.3.4 To provide members with escheme with option choices  1.3.5 To provide members leaving the scheme with option choices  1.3.6 To provide members leaving the scheme with option choices  1.3.7 To provide members leaving the scheme with option choices  1.3.8 To provide members leaving the scheme with option choices  1.3.9 To provide members leaving the scheme with option choices  1.3.1 To provide members leaving the scheme with option choices  1.3.2 To provide short service members leaving the scheme with option choices  1.3.3 To provide short service members leaving the scheme with option choices  1.3.4 To provide members and deferred members with benefit statements lissued within 5 months of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.5 To provide members with provided of year end  1.3.5 To provide members with provided of year end  1.3.5 To provide members with provided of year end  1.3.5 To provide members with provided of year end  1.3.5 To pr					
transfers into the scheme promptly  Teceiving the transfer payment  1.00% within target Average time taken 6 days  1.2.4 To obtain and advise employers of actuarial costs and agree payment schedule promptly  1.3 To provide members with information needed to make pension decisions promptly  1.3.2 To provide members leaving the scheme with option choices  1.3.3 To provide short service members leaving the scheme with option choices  1.3.4 To provide a statement of options within 10 working days of notification  Provide a statement of options within 10 working days of notification  Provide a statement of options within 10 working days of notification  Provide a statement of options within 10 working days of notification  1.3.4 To provide members leaving the scheme with option choices  1.3.4 To provide members with benefit statements issued within 5 months of year end  1.00% within target Achieved		account on receipt of transfers into the scheme	within 20 working days of receiving the transfer		
Achieved  1.2 4 To obtain and advise employers of actuarial costs and agree payment schedule promptly  1.3 To provide members with information needed to make pension decisions promptly  1.3.1 To respond to member queries  1.3.2 To provide members leaving the scheme with option choices  1.3.3 To provide short service members leaving the scheme with option choices  1.3.4 To provide a statement of options within 10 working days of notification  1.3.5 To provide short service members leaving the scheme with option choices  1.3.4 To provide members and deferred members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements of year end  1.3.5 To provide members with benefit statements of payment actuarial costs within the timescales  1.3.4 To provide members with potion choices  1.3.5 To provide members and deferred members with benefit statements issued within 5 months of year end  1.3.6 Average time taken 6 days  1.3.7 To provide members and vicinity actuarial costs within the timescales  1.3.8 To provide members within 10 working days  1.3.9 To provide members and deferred members with benefit statements issued within 5 months of year end  1.3.4 To provide members with benefit statements issued within 5 months of year end  1.3.4 To provide members with potion choices  1.3.5 To provide members with potion choices  1.3.6 To provide members with option choices  1.3.7 To provide members with potion choices  1.3.8 To provide members with potion choices  1.3.9 To provide members with potion choices  1.3.4 To provide members with potion choices  1.3.4 To provide members with potion choices  1.3.5 To provide members with potion choices  1.3.6 To provide members with potion choices  1.3.7 To provide members with potion choices  1.3.8 To provide members with potion choices  1.3.9 To provide members with potion choices  1.3.1 To provide members with potion choices  1.3.2 To provide members with potion choices  1.3.3 To provide short				'	Achieved
employers of actuarial costs and agree payment schedule promptly  1.3 To provide members with information needed to make pension decisions promptly  1.3.2 To provide members leaving the scheme with option choices  1.3.3 To provide short service members leaving the scheme with option choices  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements scieul within 5 months of year end  1.3.5 To provide members actuarial costs within the timescales  2,338 items of correspondence 95% within target Achieved			payment	, and the second	
employers of actuarial costs and agree payment schedule promptly  1.3 To provide members with information needed to make pension decisions promptly  1.3.2 To provide members leaving the scheme with option choices  1.3.3 To provide short service members leaving the scheme with option choices  1.3.4 To provide members with benefit statements of year end  1.3.4 To provide members with benefit statements issued within 5 months of year end  1.3.5 To provide members actuarial costs within the timescales  2.338 items of correspondence 95% within target Achieved		employers of actuarial costs and agree payment		Employers were advised of any	
1.3 To provide members with information needed to make pension decisions promptly  1.3.2 To provide members leaving the scheme with option choices  1.3.3 To provide short service members leaving the scheme with options within 20 working days of notification  1.3.4 To provide short service members leaving the scheme with options within 20 working days of notification  1.3.4 To provide members leaving the scheme with option choices  1.3.4 To provide members and deferred members with benefit statements with benefit statements with benefit statements  1.3.4 To provide members with benefit statements issued within 5 months of year end  1.3.5 To provide members with not working days of notification  1.3.6 To provide members and deferred members with benefit statements issued within 5 months of year end  1.3.6 To provide members with benefit statements issued within 5 months of year end  1.3.6 To provide members with benefit statements issued within 5 months of year end  1.3.6 To provide members with benefit statements issued within 5 months of year end  1.3.6 To provide members with benefit statements issued within 5 months of year end  1.3.6 To provide members with benefit statements issued within 5 months of year end  1.3.6 To provide members with benefit statements issued within 5 months of year end  1.3.7 To provide members with benefit statements issued within 5 months of year end  1.3.6 To provide members with benefit statements issued within 5 months of year end  1.3.6 To provide members with benefit statements issued within 5 months of year end  1.3.7 To provide members with benefit statements issued within 5 months of year end				actuarial costs within the	Achieved
with information needed to make pension decisions promptly  1.3.2 To provide members leaving the scheme with option choices  1.3.3 To provide short service members leaving the scheme with option choices  1.3.4 To provide members and deferred members with benefit statements with benefit statements    Mot Achieved				timescales	Acinevea
with information needed to make pension decisions promptly  1.3.2 To provide members leaving the scheme with option choices  1.3.3 To provide short service members leaving the scheme with option choices  1.3.4 To provide members and deferred members with benefit statements with benefit statements    Mot Achieved	1.3 To provide members	1.3.1 To respond to	Within 10 working days	5,338 items of correspondence	
Average time taken 3 days	with information needed		,	·	Achieved
leaving the scheme with option choices  benefit options within 20 working days of notification  1.3.3 To provide short service members leaving the scheme with option choices  Provide a statement of options within 10 working days of notification  Provide a statement of options within 10 working days of notification  2,889 quotations provided 98% within target Achieved  Achieved  1.3.4 To provide members and deferred members with benefit statements  Senefit statements issued within 5 months of year end  Not Achieved  Not Achieved  Not Achieved				Average time taken 3 days	
option choices  working days of notification  49% within target Average time taken 24 days  1.3.3 To provide short service members leaving the scheme with option choices  1.3.4 To provide members and deferred members with benefit statements  working days of notification  Provide a statement of options within 10 working days of notification  2,889 quotations provided 98% within target Achieved  Achieved  1.3.4 To provide members and deferred members with benefit statements  issued within 5 months of year end  Not Achieved  Not Achieved				2,538 early leaver notifications	
1.3.3 To provide short service members leaving the scheme with option choices  1.3.4 To provide members and deferred members with benefit statements with benefit statements  1.3.4 To provide members with option choices  1.3.4 To provide members and deferred members with benefit statements with benefit statements and deferred members with benefit statements with motification  1.3.5 To provide short service a statement of options within 10 working days of notification  2,889 quotations provided 98% within target  Achieved  Achieved  1.3.4 To provide members issued within 5 months of year end  Not Achieved				'	Not Achieved
1.3.3 To provide short service members leaving the scheme with option choices  Provide a statement of options within 10 working days of notification  Provide a statement of options within 10 working days of notification  Achieved  Achieved  1.3.4 To provide members and deferred members with benefit statements with benefit statements  Output  Description of the provide a statement of options within 10 working days of notification  Achieved  2,889 quotations provided 40% within target  Achieved  Achieved  Not Achieved		Sp. Total Citotico			Not Achieved
service members leaving the scheme with option choices  options within 10 working days of notification  Achieved  1.3.4 To provide members and deferred members with benefit statements  with benefit statements  options within 10 working days of notification  P8% within target  Achieved  Achieved  Achieved  Not Achieved				Average time taken 24 days	
the scheme with option choices  days of notification  Average time taken 4 days  1.3.4 To provide members and deferred members with benefit statements with benefit statements  Denefit statements issued within 5 months of year end  Achieved  Achieved  Achieved  Not Achieved				2,889 quotations provided	
1.3.4 To provide members and deferred members with benefit statements with benefit statements of year end  Benefit statements issued within 5 months of year end  2,016 quotations provided 60% within target  Not Achieved		the scheme with option			Achieved
and deferred members with benefit statements issued within 5 months of year end 60% within target  Not Achieved		choices		Average time taken 4 days	
with benefit statements year end 60% within target Not Achieved					
Average time taken 11 days				60% within target	Not Achieved
				Average time taken 11 days	

30 — PERFORMANCE REPORT PERFORMANCE ANALYSIS ANNUAL REPORT AND ACCOUNTS 2021/22 ANNUAL REPORT AND ACCOUNTS 2021/22 PERFORMANCE REPORT PERFORMANCE ANALYSIS—31

Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status
1.3 To provide members with information needed to make pension decisions promptly	1.3.5 To provide members and deferred members with benefit statements	Benefit statements issued within 5 months of year end	Deferred statements issued to 96.8% of deferred members  Active member statements issued to 99% of active members in August 2021  Overall statements were issued to 98.4% of active and deferred members ahead of the statutory deadline	Substantially Achieved
	1.3.6 To provide members with annual allowance statements as applicable	Statements issued by 6 October	119 Pension Savings Statements were issued ahead of the deadline of 6 October 2021 100% within target	Achieved
	1.3.7 To provide an estimate of a CETV	Within 20 working days of receipt of relevant details	708 transfer out quotations provided 98% within target Average time taken 9 days	Achieved
1.4 To pay death benefits promptly and accurately	1.4.1 To notify dependants of pensions payable	Within 10 working days of receipt of the relevant proof of title	83 dependants paid 9% within target Average time taken 5 days	Achieved
	1.4.2 To pay death grants promptly	Within 10 working days of receipt of relevant proof of title	1,117 death grants paid 98% within target Average time taken 3 days	Achieved
1.5 To ensure that all necessary action is taken on any change to scheme rules	1.5.1 Ensure that processes change to reflect regulation changes	Complete changes within 3 months of regulations made	Changes to transfer out legislation were made on 9 November 2021 and were operational from 30 November  The processes were updated within 3 months of the regulations changing  New regulations in relation to parental bereavement leave and a set of amending Scheme regulations were made at the end of March 2022  The actions in relation to these are carried into the next year	Achieved
	1.5.2 To train relevant staff on any regulation changes	Relevant staff trained on new regulations within 3 months of regulations made	Training on transfer out regulations took place at both supervisor/ manager level within the first three months  The team training was delivered in February 2022	Substantially Achieved
	1.5.3 To have administration systems updated for any new or amended regulations	To have administration systems in place within 3 months of regulations made	Processes were updated for the transfer changes and systems set up to check their effectiveness	Substantially Achieved
	1.5.4 To update processes to reflect scheme changes arising from McCloud/ cost cap breach	Processes updated within 6 months of regulations made	No McCloud/cost cap regulations changes during the year	On Target

Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status
1.5 To ensure that all necessary action is taken on any change to scheme rules	1.5.5 To train staff on scheme changes arising from McCloud/ cost cap breach	Staff trained on new regulations within 3 months of regulations made	No regulations changes for McCloud/cost cap during the year	On Target
	1.5.6 To update administration systems for scheme changes arising from McCloud/ cost cap breach	To have pension software updated within 9 months of regulations made	Pension software programming for McCloud is ongoing in advance of regulations being made	On Target
	1.5.7 To implement benefit changes and record amendments arising from McCloud/ cost cap legislation	To complete necessary changes in line with agreed implementation plan	Data collection spreadsheets issued to employers Internal validation process developed alongside software amendments required to interface data Final software programming is pending Regulations	On Target
	1.5.8 To obtain and upload McCloud data requirements to the pension administration system	To upload McCloud data to individual member records by 31 March 2022	Recruitment challenges resulted in team commencing employment in January 2022 Initial indications are that data quality is poor and a number of employer submissions remain outstanding	Behind Target
	1.5.9 To recalculate any benefits required as a result of changes in legislation due to the Goodwin decision	To complete necessary recalculations by agreed date	Still awaiting revised scheme regulations	On Target
	1.5.10 To process any adjustments to benefits or transfer payments as a result of GMP equalisation	To process any adjustments by agreed date	Still awaiting revised scheme regulations and guidance	On Target
1.6 To ensure that systems and procedures comply with relevant legislation	1.6.1 To respond to Data Protection and Freedom of Information (FOI) requests	Within 1 month (GDPR) or 20 days (FOI) of request	25 SARs received and responded to within timescales. 15 FOI requests received and responded to within timescales One SAR and one FOI processed outside published timeframes	Moderately Behind Target
	1.6.2 To implement the Retention and Disposal Schedule	To complete implementation for electronic records by March 2022	SharePoint Developer appointed to assist with the development of the EDRMS site  Pilot phase involving governance and IT records is underway and initial user acceptance testing completed  Retention testing delayed due to acquisition of licences and staff resources	Moderately Behind Target

32 — PERFORMANCE REPORT PERFORMANCE ANALYSIS ANNUAL REPORT AND ACCOUNTS 2021/22 ANNUAL REPORT AND ACCOUNTS 2021/22 PERFORMANCE REPORT PERFORMANCE ANALYSIS — 33

Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status
1.7 To ensure NILGOSC attracts and retains well trained personnel	1.7.1 To ensure all staff complete training plans and undertake appropriate training	That all staff complete plans and that training is received	Total of 752 hours of training completed during 2021/22	Achieved
	1.7.2 To utilise e-learning packages for mandatory corporate training, where appropriate	All staff have successfully completed e-learning modules issued	All new staff have been enrolled on e-learning programmes and have been completed or are in progress (for new starts) at the year end	Achieved
	1.7.3 To undertake a review of the staff structure and capacity	Review completed by 31 March 2023	Not due in current reporting period	On Target
	1.7.4 To monitor staff retention and address any issues identified	Staff turnover level maintained below 20%	Staff turnover for the year is 20%	Substantially Achieved
	1.7.5 To undertake a biennial staff satisfaction survey and address any issues identified	Staff survey completed by 31 March 2023	Not due in current reporting period	On Target
	1.7.6 To launch a staff wellbeing programme	Wellbeing programme rolled out by 30 September 2022	A Wellbeing Hub is available on the Staff Intranet, which includes access to e-learning training and links to useful wellbeing resources A virtual Wellbeing Day was held on 30 June, which was well received	Achieved
1.8 To ensure that the office environment meets the growing needs of stakeholders and staff.	1.8.1 To maintain and improve office facilities to meet the ongoing needs of stakeholders and staff	Full office refurbishment completed by 31 March 2024	Refurbishment plans remain on hold pending greater certainty around workplace restrictions Revised target date of March 2026 reflected in latest Corporate Plan	Not Achieved
1.9 To maintain accurate and complete member data	1.9.1 To undertake annual data matching and address tracing exercise	Reduce missing addresses by 25% relative to 31 December 2020	Missing addresses held reduced by 26% relative to baseline	Achieved
	1.9.2 To monitor and improve data quality and ensure common data quality meets TPR standards	Data scores calculated in line with TPR guidance and action taken in line with data improvement plan	Data scores show an improvement on previous year:  Common 99.4% [2020/21 99.1%]  Scheme specific 98.7% [2020/21 98.5%]	Achieved

### 2. To deliver an effective investment strategy in line with the actuarial profile of the fund.

Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status
2.1 To value the scheme assets and liabilities and set contribution rates accordingly	2.1.1 Undertake Actuarial valuation every 3 years	Publish valuation by 31 March 2023	Not due in current reporting period	On Target
	2.1.2 To provide necessary information to GAD for cyclical cost cap valuations	Information provided by due date	Not due in current reporting period	On Target
	2.1.3 To ensure employer contribution rates for 2020/21 implemented and deficit recovery contribution streams collected	Collect minimum contributions due under current Rates & Adjustment certificate	All contributions and deficit recovery streams collected as set out in the Rates & Adjustment certificate  Outstanding deficit recovery amounts collected with March 2022 contributions in April 2022	Achieved
2.2 To invest scheme funds in accordance with the Statement of Investment Principles	2.2.1 To achieve investment performance in line with targets	NILGOSC fund target	3 and 5 year return to 31 March 2022 was ahead of the fund target of CPI+3.0% by 1.80% and 0.99% respectively	Achieved
and the Statement of Responsible Investment	2.2.2 To monitor and regulate investment management	That no manager breaches investment guidelines and that under performance is promptly addressed	During the year ended 31 March 2022, no active breaches were reported Underperformance is addressed through the scorecard process	Achieved
	2.2.3 To maximise income from scheme assets	Amount of income earned	In the 12 months to 31 March 2021: Stock Lending income to 31 March 2022 £925,931 Class actions income £329,226	Achieved
	2.2.4 Implement the Statement of Responsible Investment and Climate Risk Statement	Vote in as many company meetings as possible, recoup earnings through class actions and to engage with companies to improve ESG performance.	In the 12 months to 31 March 2021:  Votes were cast at 178 meetings for 145 companies  19 engagement letters were issued to European companies £329,226 recovered through class actions to 31 March 2022	Achieved
	2.2.5 To undertake initial carbon intensity analysis of portfolio	Analysis completed by 31 December 2021	Analysis undertaken for year ended 31 March 2021 Report published on website in November 2021	Achieved
	2.2.6 To undertake the triennial Investment Strategy Review	To complete the strategy review by December 2021	Strategy review undertaken and changes agreed in September 2021 Implementation of changes has commenced	Achieved

34 — PERFORMANCE REPORT PERFORMANCE ANALYSIS ANNUAL REPORT AND ACCOUNTS 2021/22 PERFORMANCE REPORT PERFORMANCE ANALYSIS — 35

Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status
2.3 To review investment performance regularly	2.3.1 To undertake a balanced scorecard review of investment managers on a quarterly basis	Quarterly Scorecard report completed	Quarterly Scorecard reports completed and noted at relevant Management Committee meetings	Achieved
	2.3.2 To benchmark investment performance against LGPS peers	Annual benchmark report produced by 30 September	Annual report presented to the Committee on 24 August 2021	Achieved
	2.3.3 To monitor and report on investment costs using standard industry templates	Annual investment costs report by 31 August	Investment management costs monitored on an on-going basis Annual cost analysis completed and presented to Committee in August 2021	Achieved
2.4 To understand and adopt good practice in Public Sector fund management	2.4.1 Review Statement of Investment Principles and Funding Strategy Statement	Revise FSS and revise SIP when necessary	SIP approved by the Committee in November 2021 Draft FSS approved by the Committee in February 2022	Achieved
	2.4.2 To monitor and manage employer covenants in line with Funding Strategy Statement	Covenant assessment completed by 31 March 2022	A full covenant assessment exercise was undertaken and concluded in January 2022  All employers assessed as having a weak covenant have been so advised, in advance of the 2022  Valuation	Achieved
2.5 To work collaboratively on investment matters when suitable opportunities arise	2.5.1 To explore the benefits of scale investing and share knowledge and expertise on opportunities in alternative private markets	Collaboration with like-minded investors where mutually beneficial	One co-investment commitment made during the period	Achieved
	2.5.2 To collaborate with like-minded investors on environmental, social and governance matters to support common goals	To join collaborative initiatives and share knowledge and expertise where appropriate	Key initiatives include:  • 2021 Global Investor Statement to Governments on the Climate Crisis;  • Occupational Pensions Stewardship Council;  • 2021 CDP Non-discloser engagement campaign;  • IIGCC's investor expectations on climate risks and opportunities campaign; and  • CDP's 2022 Climate Change, Water and Forests campaigns	Achieved

3. To promote the scheme and inform members and employers of their pension options.

Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status
3.1 To actively encourage retention in, and new membership of, the Scheme	3.1.1 To monitor the level of members opting-out of the scheme, understand the reasons and market the Scheme to non- members	Maintain active membership levels at March 2019 levels	At 31 March 2022 the Scheme had 73,960 active members, an increase of 20% on the March 2019 figure	Achieved
3.2 To provide general scheme information to scheme employers, their employees, members, Trade Unions and pensioners through active engagement	3.2.1 Publish comprehensive scheme literature and guidance	Within 3 months of Scheme changes	Scheme literature and guidance updated within 3 months, including new financial year updates and changes in transfer regulations made in November 2021  Further updates made in April 2022 to reflect March 2022 regulations changes	Achieved
	3.2.2 Provide employee and employer seminars	Employer satisfaction rating as measured through annual satisfaction survey	Ten member seminars and 19 employer seminars were held with 1,496 and 597 attendees respectively 100% rated the seminars as Good or Excellent.	Achieved
	3.2.3 To lay the Annual Report in the NI Assembly	In accordance with date agreed with the Department	2021 annual report laid in the NI Assembly on 10 September 2021 as agreed with DfC	Achieved
	3.2.4 To implement the Communications Strategy	Actions completed in line with target dates	44/47 actions were achieved or substantially achieved  The three not achieved relate to website accessibility certification, guide simplification and the creation of scheme administration videos	Substantially Achieved
3.3 To provide members and employers with specific details of regulation changes and relevant tax legislation changes	3.3.1 Communication of any relevant regulation and tax changes	Within 3 months of regulations or changes being made	Changes to transfer rules were immediately incorporated into standard letters  The regulation changes made at the end of March 2022 communicated to employers and members in April and May 2022	Achieved
	3.3.2 To advise all new members of the benefits of the pension scheme	Issue information to new scheme members and membership certificates within 20 working days of receipt	14,168 new members processed within 20 days of receipt of information from employer 100% within target	Achieved

36 — PERFORMANCE REPORT PERFORMANCE ANALYSIS ANNUAL REPORT AND ACCOUNTS 2021/22 ANNUAL REPORT AND ACCOUNTS 2021/22 PERFORMANCE REPORT PERFORMANCE ANALYSIS — 37

### 4. To influence and inform the debate on the future of the Local Government Pension Scheme.

Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status
4.1 To influence changes to the LGPS and actively contribute to relevant consultations	4.1.1 To ensure that employers are aware of potential scheme changes	All employers and recognised Trade Unions informed of key potential scheme changes	Circulars issued to highlight consultations on cost cap and draft amending regulations Subsequent Circular issued after regulations made to advise employers of actions required	Achieved
	4.1.2 To respond to relevant Government consultation exercises	By consultation reply date	Responded to TPR Combined Code and HMT Minimum Pension Age consultations	Achieved
	4.1.3 To respond to parent Department consultation exercises	By consultation reply date	Responded to Amendment Regulations consultation in December 2021	Achieved
	4.1.4 To contribute to consultee groups e.g. PLSA, LGPC etc		Representation continued on key groups	Achieved
	4.1.5 To contribute to industry discussions around scheme simplification	To be represented at LGPS simplification discussions	PLSA has abandoned planned project on simplification for other priorities  NILGOSC will continue to make case for simplification at all industry bodies	Not Achieved
4.2 To engage with, and inform, interested parties and relevant decision makers	4.2.1 To identify interested parties and decision makers for relevant issues and ensure they are adequately briefed on the consequences for NILGOSC	Evidence of engagement	Engagement with employer representative body, employers and Assembly All Party Group on ESG issues Engagement with HMT on cost cap issues	Achieved
4.3 To improve the Scheme Regulations for the benefit of employers and members	4.3.1 Identify potential changes to the existing regulations or draft regulations and lobby the Department to make the changes	Formal notification of amendments to the Department	Ongoing communication with DfC during year Amendment Regulations made in March 2022	Achieved

### 5. To undertake business in an efficient, effective and accountable manner as required of a public body.

Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status
5.1 To enhance corporate governance arrangements appropriate for a public body	5.1.1 Respond to External Auditor letters	Within 10 working days	All audit requests responded to in a timely fashion and formal NIAO RTTWCG responded to within 3 working days	Achieved
	5.1.2 Review of NILGOSC Internal Controls	Annually by 31 March	Governance Statement published	Achieved
	5.1.3 Participate in data matching exercises as appropriate	Identify invalid payments and recoup losses	NILGOSC participated in the 2020/21 NFI Data Matching Exercise which identified 10 overpayments totalling £26k At 31 March 2022, the recovery of the remaining balance of £17.8k is being pursued Recovery of overpayments identified through earlier NFI exercises continues with £3.8k outstanding	Achieved
	5.1.4 To test Business Continuity procedures and ensure effective	Annual test of Business Continuity Plan	Annual test successfully completed in March 2022 including scenario testing alongside enhanced penetration and vulnerability testing  Cyber Essentials Plus accreditation was awarded on 24 March 2022	Achieved
	5.1.5 Maintain a Risk Register and take actions to mitigate identified risks	The Risk Register is compiled, reviewed quarterly and actions identified, completed	The annual risk review took place on 26 April 2021  The Risk Register 2021/22 was approved by the ARAC and Management Committee on 7 and 22 June 2021 respectively  Quarterly risk reviews tool place throughout the year	Achieved
	5.1.6 To undertake a triennial review of the Organisation's Strategic Objectives	Review undertaken by 31 December 2021	Strategic review process concluded in September 2021 with finalisation of Vision, Mission, Values, Aims and Objectives	Achieved
	5.1.7 To undertake the retendering of goods and services	Tenders completed in line with procurement schedule	All procurement activity conducted in line with 2021/22 procurement schedule and adherence to prevailing PGNs and DoF/DfC direction	Achieved
	5.1.8 To utilise relevant procurement frameworks to minimise costs and increase efficiency	Frameworks utilised where they offer value for money and meet business needs	NILGOSC continues to use public sector collaborative frameworks and contracts where they offer value for money	Achieved

38 — PERFORMANCE REPORT PERFORMANCE ANALYSIS ANNUAL REPORT AND ACCOUNTS 2021/22 ANNUAL REPORT AND ACCOUNTS 2021/22 PERFORMANCE REPORT PERFORMANCE ANALYSIS ANNUAL REPORT AND ACCOUNTS 2021/22

Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status
5.1 To enhance corporate governance arrangements appropriate for a public body	5.1.9 To ensure that all Committee members undertake appropriate training in line with good practice, guidance and legislation	Each member has undertaken 40 hours of training/ development per annum	752 hours of training/ development were completed during the year Each Member has achieved the required minimum 40 hours	Achieved
	5.1.10 To provide tailored induction training and support for new Chair and Committee members	Induction completed within 2 months of appointment to Committee and relevant Sub-Committees	Two new members were appointed on 1 May 2021 Induction training was completed on 20 July 2021 Further Committee training delivered in October 2021.	Substantially Achieved
5.2 To maximise efficiency through the use of technology	5.2.1 To implement automated receipt and straight through processing of data from employers	System operational by 31 March 2022	The system is fully operational and initial rollout commenced with 26 employers onboarded to i-Connect as at 31 March 2022	Achieved
	5.2.2 To promote the take-up for Member Self Service across scheme membership	To achieve a 30% registration level for members by 31 March 2022	29.4% (33,750) unique members registered by 31 March 2022	Substantially Achieved
	5.2.3 To issue 2020/21 active member pension benefit statements via Member Self Service	Statements issued online by 31 August 2021	Statements and guidance notes have been designed in Member Self Service and all active member statements were published online before 31 August 2021	Achieved
	5.2.4 To implement a cloud-based hosting solution for non-essential servers	Proof of concept completed by 31 March 2022	A cloud readiness assessment and network discovery exercise (proof of concept) was completed in early October and indicated no issues which would impede a cloud migration	Achieved
	5.2.5 To launch a reconnection programme for members not utilising the Member Self Service facility	To write to non-registered deferred members by 31 March 2022 and actives by 31 March 2023	Reconnection letters issued to deferred and active members in May 2021 Active members not registered are automatically written to each year to advise that their statements are online	Achieved

40 — PERFORMANCE REPORT PERFORMANCE ANALYSIS ANNUAL REPORT AND ACCOUNTS 2021/22

Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status
5.2 To maximise efficiency through the use of technology	5.2.6 To utilise functionality on Member Self Service for pensioner members	Issuance of 20/21 P60s via Member Self Service for registered pensioners. To change default setting for new pensioners to electronic delivery of pay slips and P60s from April 2021	P60s issued in April 2021 via MSS to registered users Default changed to electronic delivery for new pensioners from April 2021	Achieved
	5.2.7 To purchase, install and commission a suitable replacement finance system	System implemented by 31 March 2022	The procurement exercise and initial installation is complete. A broadening of scope and resource constraints have delayed final commissioning and data migration The integrated platform is now expected to be fully functional	Not Achieved
	5.2.8 To facilitate the exchange of data with the pension dashboard	To be compliant with legislative requirements and timeframes	by end of September 2023  An i-Connect and Pensions Dashboard Implementation Manager was appointed during the year and an assessment of the data required is underway	On Target
5.3 To manage change in an effective and timely manner	5.3.1 To issue an internal newsletter to improve and promote staff communication	Newsletter issued quarterly	The newsletters were issued each quarter during the year	Achieved
	5.3.2 To establish project groups to manage projects on a timely and effective manner	Projects managed in accordance with industry standard methodology and in line with project timetable	The Project & Premises Officer is Agile and PRINCE 2 trained and where applicable provides advice to ensure projects are managed in line with these methodologies	Achieved

ANNUAL REPORT AND ACCOUNTS 2021/22 PERFORMANCE REPORT PERFORMANCE ANALYSIS — 41

### 6. To promote equality of opportunity, good relations and to fulfil Section 75 obligations.

Business Objective	Operational Action	Performance Indicator	Progress at 31 March 2022	Status	
6.1 To assess the likely impact of policies on the promotion of equality of opportunity and good relations	6.1.1 Use the tools of screening and EQIA to determine the likely impact of any new policy	Screening and/or EQIA completed during the policy development or review process	One policy was screened during the period	Achieved	
6.2 To ensure NILGOSC personnel policies promote equality of	6.2.1 To prepare s55 Report for Equality Commission	Report prepared by April 2020	This report is prepared every three years and is next due for completion in April 2023	On Target	
opportunity	6.2.2 To record annual recruitment monitoring information	Report submitted by 1 May each year	Completed and submitted to ECNI in March 2021	Achieved	
6.3 To ensure that NILGOSC meets or exceeds best practice as set out by the Equality Commission	6.3.1 To implement the Equality Scheme Action Plan 2018/19-2020/21	Actions completed in line with plan	Progress was reviewed by SMT biannually and a small number of outstanding actions carried forward into the next Action Plan An Audit of Inequalities was carried out in November 2021 which informed the draft Equality	Achieved	
			Action Plan for 2022-2025  The Equality Scheme was updated in December 2021  Both the Audit of Inequalities and Draft Equality Action Plan were issued for consultation on	Actileveu	
	6.3.2 To submit s75 Annual Progress Report to include publication of EQIA monitoring information	Submission to Equality Scheme by 31 August 2022	1 April 2022 The Annual Equality Progress Report is due to be submitted by 31 August 2022	Achieved	
	6.3.3 To publicise Equality Scheme in routine publications	Equality Scheme publicised in Annual Report, Members' News, Deferred Members' News and Pensioners' News.	Equality Scheme referenced in all three membership newsletters and the Annual Report 2020/21	Achieved	

Status Key	
Achieved	Target Met
On Target	Substantially Achieved (>90%) or Progress in line with Plan
Caution	Moderately Behind Target (between 75% and 90%)
Behind Target/ Not Achievable	Significantly Behind Target (<75%) or Not Achieved

### **INVESTMENT OF THE FUND**

### **Background**

The LGPS (NI) Regulations require NILGOSC to maintain a Fund to provide for the payment of current and prospective benefits to members of the Scheme. In order to ensure that this objective is achieved, NILGOSC must determine a suitable investment strategy, which provides a sound return on investments within an acceptable level of risk.

All income received by NILGOSC, including employees' and employers' contributions, rents, interest and dividends are paid into the Fund. Expenditure, such as monthly pensions, retirement allowances, death grants, refunds and the administration costs of NILGOSC are met from the Fund.

The assets and liabilities of the Fund are valued every three years by the Scheme Actuary. Following each valuation, the Actuary certifies the employers' contribution rates to maintain the viability of the Fund. A statement by the Scheme Actuary for the year ended 31 March 2022 is included on pages 130 to 132.

### **Fund Management**

NILGOSC retains overall responsibility for the Fund, with the power to appoint one or more fund managers to manage and invest fund monies on its behalf. In appointing fund managers, NILGOSC retains statutory responsibility for the management of the Fund and that responsibility cannot be delegated.

NILGOSC has a statutory duty to:

- Take account of the amount to be managed by each manager and be satisfied, having taken advice, that it is not excessive
- Have regard to the suitability of investments
- Monitor the performance of the managers and from time to time review their appointment
- Take proper advice, obtained at regular intervals

NILGOSC maintains overall control of the Fund by:

- Agreeing the overall investment objectives with the fund managers taking into account actuarial expectations and investment powers
- Setting targets for asset allocation
- Monitoring investment performance
- Monitoring investment transactions

NILGOSC has compiled a Statement of Investment

Principles (SIP) as required by the Local Government Pension Scheme (Management and Investment of Funds) Regulations (Northern Ireland) 2000. Copies of the SIP are available on the NILGOSC website at www.nilgosc.org.uk.

### **Investment Aims and Objectives**

NILGOSC aims to invest the assets of the Scheme prudently to ensure that the benefits promised to members are provided, and to provide reasonable stability in contribution rates for the employers. To meet this aim NILGOSC's overall investment objective is to exceed price inflation and general salary growth over long term periods.

The Consumer Price Index (CPI) is a measure of the average change over time in the prices paid by consumers for a market basket of consumer goods and services. The annual percentage change in CPI is used as a measure of inflation and to index (i.e. adjust for the effect of inflation) the real value of wages, salaries and pensions to show changes in real values. NILGOSC's actuarial valuation as at 31 March 2019 assumes a prudent investment return of 4.1% for the main group of employers, which is equivalent to CPI+2.1%. NILGOSC's overall investment target changed on 1 January 2022 and is to exceed CPI by 3.0% per annum, to be measured over three and five year periods.

### **Investment Strategy**

NILGOSC sets its long-term investment strategy by taking into account the nature and timing of the Fund's liabilities identified through the triennial actuarial valuation and its investment aims and objectives. In setting the Fund's investment strategy, NILGOSC first considers the lowest risk strategy that it could adopt in relation to the Scheme's liabilities. The investment strategy is designed to achieve a higher return than the lowest risk strategy while maintaining a prudent approach to meeting the Scheme's liabilities.

These considerations drive decisions over asset allocation. NILGOSC formally reviews the Fund's strategic asset allocation every three years. In determining its asset allocation, NILGOSC considers:

- A full range of asset classes
- The risks and rewards of a range of alternative asset allocation strategies
- The suitability of each asset class
- The need for appropriate diversification

The Fund's investments are diversified across various asset classes, in order to increase the overall expected return while reducing the overall level of expected risk. A mixture of passive and active mandates is also used to capture the return required to meet the Fund's objectives.

The latest formal strategic review took place during 2021 and resulted in a revised investment objective for the Fund. The review was informed by the current funding position, as well as future capital market and demographic expectations. NILGOSC is a long-term investor and makes long-term strategic decisions, rather than short-term tactical decisions. Therefore, the focus of the 2021 review was to pause and review the existing strategy, to ensure that it continues to be appropriate for the Fund. The review concluded that the strategy adopted in 2017 remained appropriate and that further action was required to bring the Fund in line with the agreed asset allocation.

As part of the 2021 review, NILGOSC, along with its investment advisor concluded that due to changes in the outlook for various asset classes, the existing target of CPI+3.5% was no longer achievable over the long-term whilst maintaining the same level of risk. To reflect the more muted outlook for investment returns going forward, the overall investment objective was lowered from CPI+3.5% to CPI+3.0%, effective from 1 January 2022.

The current focus remains on reducing equity holdings to the strategic allocation of 34% of the Fund, whilst simultaneously increasing the Fund's exposure to real assets, in particular the build up of infrastructure to its target of 7.5%. The allocations to equity, property, fixed income and infrastructure did not change as a result of the 2021 review, but further action is required to implement the strategy in full. The 2021 review also addressed further integrating environmental, social and governance (ESG) views into the strategy, as well as taking steps to mitigate climate risk in the Fund.

A revised Statement of Investment Principles (SIP) that reflects the new overall Fund target of CPI+3.0% was approved by the Committee, and was effective from 1 January 2022. A rebalancing exercise was undertaken during the year to reduce the equity mandate managed by Baillie Gifford and to top up the fixed income mandates to their strategic allocation. In March 2022, steps were taken to reduce climate risk in the Fund's passive equity portfolio, with the transfer of £2.8bn of passive equity holdings to the Legal and General Investment Management (LGIM) Low Carbon Transition Fund. This particular fund seeks

to reduce carbon emissions intensity by 70% when compared to the standard market cap benchmark. At the end of March 2022, a £100m commitment was made to IFM Global Infrastructure Fund (IFM GIF), an open-ended infrastructure fund which invests in core infrastructure assets globally. At the year end, further due diligence exercises were underway on potential infrastructure opportunities and a process underway to identify a suitable global equity manager.

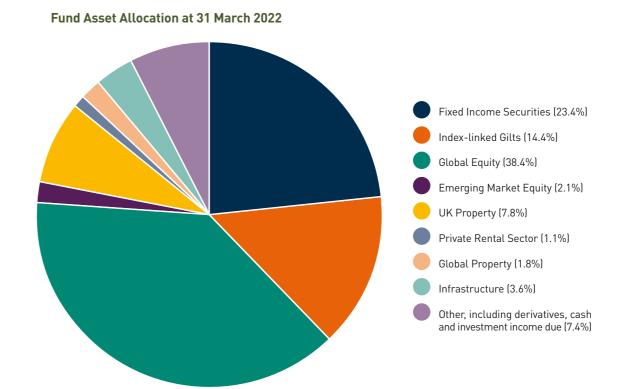
The next phase of the strategy implementation will take place during 2022/23 and will include: the appointment of a third global equity manager; the appointment of a second global property manager; further rebalancing exercises as required; and additional commitments to infrastructure funds in order to reach the 7.5% target allocation. The final phase of the strategy implementation is scheduled for 2023/24 and will include the appointment of a second Private Rental Sector (PRS) manager as well as continued investment in infrastructure.

The following table shows the target asset allocation along with the current weighting as at 31 March 2022. It also sets out the approximate assumptions made about the real return for each asset class as at 31 March 2022.

Asset Class	Target Weighting %	Current Weighting % <sup>1</sup>	Real Return % p.a.²
Global Equity	31.5	40.0	4.25
Emerging Market Equity	2.5	2.2	5.25
UK Traditional Property	4.0	5.1	2.75
Private Rental Sector	1.5	1.1	2.75
Index-Linked Leases	3.5	3.0	3.75
Global Property <sup>3</sup>	6.0	1.9	2.25
Infrastructure <sup>4</sup>	7.5	3.9	5.25
Index-Linked Gilts	14.5	15.0	-1.75
Absolute Return Bonds	14.5	14.4	1.50
Multi Asset Credit	14.5	13.4	2.00

 $<sup>^{\</sup>rm 1}\,\mbox{The calculation}$  of target and current weighting excludes

The actual asset allocation as at 31 March 2022 is illustrated in the following pie chart. The calculations include investment cash held for trading purposes which is categorised as 'other'.



NILGOSC monitors the suitability of its investment strategy, taking into account the funding position and Funding Strategy Statement (FSS), a copy of which can be downloaded from the NILGOSC website at <a href="https://www.nilgosc.org.uk">www.nilgosc.org.uk</a>. NILGOSC prudently seeks to secure the solvency of the Fund, where solvency is defined as being achieved when the value of the Fund's assets is greater or equal to the value of the Fund's liabilities, measured using appropriate actuarial assumptions.

A funding level of 100% has been targeted over a period of 20 years. NILGOSC believes that the Fund's investment strategy, in conjunction with the certified levels of future contributions to the Fund, is consistent with the requirement to maintain Fund solvency at 100%, within acceptable levels of risk and contribution rate volatility. The funding level will be monitored, on an approximate basis, at regular intervals between each triennial valuation and the investment strategy will be reviewed as necessary.

### **Investment Managers and Primary Funds**

For certain asset classes in which NILGOSC wishes to invest, a range of asset managers have been appointed to manage particular types of assets depending on their areas of expertise. In the case of alternative assets such as infrastructure and residential property, commitments to invest have been made in respect of a number of funds, known as primary funds, each with its own specialist manager. In addition to the primary infrastructure funds, NILGOSC collaborates with other LGPS funds, led by Lothian Pension Fund, to access infrastructure opportunities directly. These co-investment and single asset investment vehicles are designed to help build a low risk, diversified infrastructure portfolio in line with the Fund's target allocation. During 2021/22, NILGOSC continued this collaboration and at 31 March 2022 had committed a total of £77m through such investments. A further £54m is committed to co-investment opportunities directly with Antin Infrastructure Partners.

investment cash held for trading purposes.

<sup>&</sup>lt;sup>2</sup> The real return figures are based on Aon's 10-year forward-looking assumptions as at 31 March 2022 for each asset class and have been adjusted for its CPI assumption of 2.5% per annum. The figures do not allow for active management in traditional (equity, bonds, property) asset classes.

<sup>&</sup>lt;sup>3</sup> Return assumption is for US and European property.

<sup>&</sup>lt;sup>4</sup> Return is for US and European infrastructure investments.

NILGOSC has committed £602m to a number of Infrastructure investment funds. As at 31 March 2022, NILGOSC had funded £361m, approximately 60% of this commitment. The funds are denominated in Euros, US Dollars and Sterling. The amounts quoted are the base currency converted at the year-end exchange rate.

The following table sets out the mandates and primary fund investments in place as at 31 March 2022 and details the type and percentage of assets invested with each at this date, including cash held for trading purposes. In the case of the primary funds, the percentage shown in the table reflects the value of NILGOSC's asset investment (excluding derivatives, investment cash and cash equivalents) at 31 March 2022 and not the total commitment made to the fund. This information can be found in the footnote to the following table:

Asset Class	Fund Manager	% of Total Fund
Mandates:		
Global Unconstrained Equities	Baillie Gifford	6.10%
	Unigestion	4.69%
	William Blair	2.14%
Passive Funds	Legal & General Investment Management	45.55%
Absolute Return Bonds (ARB)	Royal London Asset Management	6.91%
	T. Rowe Price	7.04%
Multi Asset Credit (MAC)	BlueBay	6.81%
	PIMCO	6.28%
UK Traditional Property	LaSalle Investment Management	5.07%
Index Linked Property	LaSalle Investment Management	2.95%
Global Property	CBRE Global Investment Partners	1.88%
Primary Funds:		
UK Residential Property	M&G UK Residential Property Fund <sup>1</sup>	1.06%
Infrastructure	Antin Infrastructure Fund II <sup>2</sup>	0.05%
	Antin Infrastructure Fund III <sup>3</sup>	0.70%
	Antin Infrastructure Fund IV <sup>4</sup>	0.39%
	Antin Mid Cap I <sup>5</sup>	0.04%
	Copenhagen Infrastructure IV <sup>6</sup>	0.09%
	DIF V <sup>7</sup>	0.37%
	KKR Global Infrastructure Investors Fund II <sup>8</sup>	0.25%
	KKR Global Infrastructure Investors Fund III <sup>9</sup>	0.27%
	IFM Global Infrastructure Fund <sup>10</sup>	0.00%
Infrastructure Co-Investments <sup>11</sup>		1.26%
Smaller NI Investments and cash		0.10%

SOURCE: The Northern Trust Company

For those mandates where a specialist asset manager has been appointed, a performance target has been compiled by NILGOSC using indices applicable to the asset type and geographic market. The standard targets and benchmark indices for each asset class held by the fund as at 31 March 2022 are shown in the following table:

Asset Class	Target/Benchmark Indices* (Outperformance shown per annum)	
Equities	MSCI All Countries World Index+3%	
	FTSE All World Index+3%	
	MSCI Emerging Markets Index+3%	
	Solactive L&G Low Carbon Transition Developed Markets Index	
	Solactive L&G Low Carbon Transition Developed  Markets Index - GBP Hedged	
Cash	Sterling Overnight Index Average (SONIA)	
Fixed Income		
Index Linked Gilts	FTSE Actuaries UK Index-Linked Gilts Over 5 Years Index	
Absolute Return Bonds	Sterling Overnight Index Average (SONIA)+2.5%	
	3 month Sterling Overnight Index Average (SONIA)+3%	
Multi Asset Credit	ICE BofA SONIA 1-Month Constant Maturity Index+5 %	
	To outperform the below composite benchmark by 2.5%: 33% JP Morgan EMBI Global (GBP hedged); 33% Bloomberg Barclays Global Aggregate Credit Index Ex Emerging Markets (GBP hedged); and 33% BofA Merrill Lynch BB/B Rated Developed Markets High Yield Constrained Index (GBP hedged)	
Property		
Index-Linked Property	Retail Price Index (RPI)+3%	
Traditional Property	MSCI Quarterly Universe Index+0.5%	
Global Property	Absolute Return of 5-7%	
Private Rented Sector	6% Absolute Return	
Infrastructure	CPI+3.0%	

<sup>\*</sup> Other indices were applicable during the period under review but did not relate to the mandates in place at 31 March 2022.

<sup>&</sup>lt;sup>1</sup> Total commitment £100m

<sup>&</sup>lt;sup>2</sup> Total commitment €44m (£37.3m converted at 31 March 2022 exchange rate)

<sup>&</sup>lt;sup>3</sup> Total commitment €75m (£63.4m converted at 31 March 2022 exchange rate)

 $<sup>^4</sup>$  Total commitment  ${\odot}75 m$  (£63.4m converted at 31 March 2022 exchange rate)

 $<sup>^5</sup>$  Total commitment  ${\in}45\text{m}$  (£38.0m converted at 31 March 2022 exchange rate)

 $<sup>^6</sup>$  Total commitment  ${ \ensuremath{\mathfrak{C}} 50m}$  (£42.3m converted at 31 March 2022 exchange rate)

 $<sup>^{7}</sup>$  Total commitment  $\mathfrak{C}50m$  (£42.3m converted at 31 March 2022 exchange rate)

 $<sup>^{\</sup>rm 8}$  Total commitment \$60m (£45.6m converted at 31 March 2022 exchange rate)

 $<sup>^{9}</sup>$  Total commitment \$50m (£38.0m converted at 31 March 2022 exchange rate)

<sup>&</sup>lt;sup>10</sup> Total commitment £100m

<sup>&</sup>lt;sup>11</sup> Total commitment £54m, €47m and \$49.8m [£131.6m converted at 31 March 2022 exchange rate]

No explicit performance target has been set for the investments in the real asset infrastructure funds however, for performance reporting purposes these are measured against the Fund's overall investment objective, which was CPI+3.0% at year end.

NILGOSC monitors its asset managers through reports produced by the investment team, the investment advisor and the performance measurement provider, who is NILGOSC's appointed global custodian, The Northern Trust Company (Northern Trust). Specifically, reports showing the financial performance of each asset manager and performance at the overall Fund level are provided by Northern Trust, both monthly and quarterly. Each manager is remunerated on a fee basis, dependent on the market value of the mandate. These structures have been established in order to align the interests of the asset managers with those of the Fund.

All of NILGOSC's managers work to long-term investment horizons, generally a five to ten year market cycle, and accordingly, NILGOSC is not unduly concerned with short term volatility in investment returns. A robust quarterly investment monitoring process is in place, which aims to look beyond returns to uncover the underlying cause of any underperformance. Therefore, in addition to monitoring financial returns, NILGOSC reviews a number of key qualitative factors such as investment style and team, business strength, ESG practices, risk management, and the asset managers' level of assets under management. NILGOSC also takes advice from its investment advisor. Aon, and thereby retains conviction in the underlying investment process adopted by its external managers to deliver the target level of return over a three to five year investment horizon.

### Market Report

Global equities generated positive returns over the twelve months to 31 March 2022. Equities delivered solid returns in 2021, boosted by optimism over Covid-19 vaccine roll-outs, supportive monetary and fiscal policies, and improving economic data. However, markets reversed some of their gains in Q1 2022 as geopolitical risk took centre stage with Russia invading Ukraine. Furthermore, major central banks continued to move forward with normalising monetary policy as inflation rates worldwide rose rapidly.

The Russian invasion of Ukraine created significant market volatility and economic uncertainty over Q1 2022. G7 sanctions against Russia are likely to slow Gross Domestic Product (GDP) growth for the remainder of 2022 and cause further supply chain disruption. While the United States (US) has banned Russian oil and gas imports, the picture in Europe is more complicated given its Russian oil and gas dependence.

Sterling ended the period 1.1% lower on a trade-weighted basis. In Q4 2021, the Bank of England (BoE) raised its benchmark interest rate by 0.15% to 0.25% to combat inflation. In Q1 2022, the BoE increased its benchmark interest by another 0.5% to 0.75%. The expectation of higher interest rates and diminishing Brexit fears had improved sentiment over much of 2021, but the outbreak of war in Ukraine led to significant flows towards the US dollar.

Brent crude oil prices rose by 69.8% to \$108 per barrel over the twelve months. Economic recovery and a cutback in production over the pandemic supported oil prices. In Q3 2021, the Organization of the Petroleum Exporting Countries Plus (OPEC+) reached an agreement to increase crude oil production by 400,000 barrels a day from August until the end of 2022, although this pace disappointed expectations. In the fourth quarter of 2021, the momentum in oil prices dropped as Omicron and resurgent Covid-19 fears surfaced. However, crude oil prices rose sharply during the first quarter of 2022 as geopolitical tensions due to the Russia-Ukraine war further exacerbated supply fears.

### **Equities**

US equities posted the strongest local and sterling returns over the period, helped by their high exposure to large technology companies. After approving a \$1.9tn economic relief package, the US Senate passed a \$1.2tn bipartisan infrastructure bill. However, President Biden's ambitious \$1.75tn "Build Back Better" bill suffered a significant setback after his fellow Democratic Senator, Joe Manchin, opposed the bill due to rising inflation, a surging pandemic, and global uncertainty. In Q1 2022, the US equity market started poorly as inflation concerns led to the expectation of a faster than anticipated tightening of monetary policy, which weighed on the performance of sectors such as Information Technology and Consumer Discretionary. However, economic data continued to be robust with the unemployment rate falling to 3.8%.

UK equities were the second-best performing equity market in sterling terms over the year. The reopening of the global economy bolstered the UK's Energy and Industrials sectors during

2021. However, the UK reported approximately five million Covid-19 cases in Q4 2021 due to the newly discovered Omicron variant, dampening equity returns relative to other regions such as the US and Europe over that quarter. UK equities rebounded strongly over Q1 2022 due to their tilt towards the Energy and Materials sectors. This performance was driven by fears over the supply of oil and other key commodities impacted by the conflict in Ukraine.

European equities posted single digit positive returns in both sterling and local currency terms over the year. Performance over the period was mixed, with positive returns for the first three quarters, supported by the increased vaccine roll-out and reduction in Covid-19 cases, offset by falls in Q1 2022 due to Europe's close trading relationship with Russia and, in particular, reliance on Russian energy.

Japanese equities delivered a positive return in local currency terms, but a small negative return in sterling terms, as the Bank of Japan maintained its loose monetary policy, in contrast to most central banks, which pulled down the sterling return over Q1 2022. Escalating Covid-19 cases and poor vaccine uptake added to growth worries due to Chinese economic growth and political uncertainty under a new Prime Minister. Economic growth and corporate earnings were impacted by the higher oil price as the country is a large importer of oil. However, there were also fewer inflation worries.

Emerging markets were the worst-performing market in local currency and sterling terms. The rise in interest rates by major central banks resulted in emerging market returns lagging other markets.

State regulatory clampdowns across many of China's corporate sectors and China's zero-tolerance Covid-19 policy causing several Chinese cities to enter strict lockdown, dampened economic growth. Russian equities collapsed in price, and MSCI and FTSE Russell removed "uninvestable" Russian equities from their widely-tracked emerging markets indices although the weight of Russia is not that large in the equity universe.

### Bonds

UK fixed gilts returned -5.1%, whilst UK index-linked gilts returned 5.1% over the year. UK index-linked gilts significantly outperformed UK fixed gilts due to increased breakeven inflation (a market-based measure for expected inflation, calculated as the yield of a fixed interest bond minus the yield of an inflation-linked bond of the same maturity) driven by expectations of more persistent inflation.

Gilt yields fell in Q2 2021 as variant virus risks and worries over a slower pace of global economic recovery arose. Yields then picked up once more over the third quarter of 2021, driving the negative performance of UK fixed gilts. Yields rose on the back of brought-forward interest rate hike expectations against the background of rising inflation and central bank indications of policy rate increases. However, longer-dated yields briefly fell back in Q4 2021 due to heightened uncertainty surrounding Omicron. Short-dated yields later began to factor in potential monetary policy changes and saw notable increases. In Q1 2022, yields rose strongly across maturities due to expectations of future rate hikes.

Credit markets declined over the twelve months with UK investment-grade credit spreads (the difference between the yields on non-government bonds and equivalent maturity government bonds) widening. In Q2 and Q3 2021, credit markets benefited from risk-on investor sentiment, with credit spreads contracting to ever-tighter levels. Credit markets declined and spreads widened over the second half of the 12 months as government bond yields rose. Hard currency emerging market debt underperformed other segments of credit as higher US yields, a stronger US dollar, and growth concerns in the Chinese market proved a headwind to performance.

### **Property**

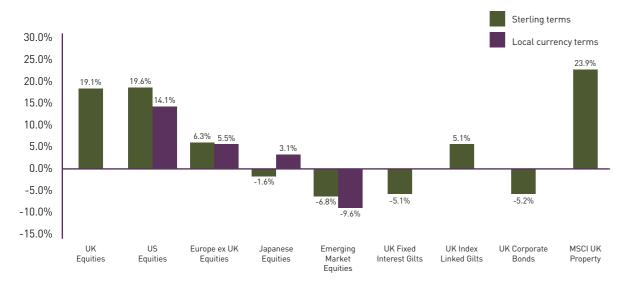
UK commercial property returned 23.9% over the period, supported by an income return of 5.1% and an 18.0% increase in capital values. The MSCI UK Monthly Property index reached an all-time high index level over the period. The easing of lockdown restrictions helped the retail sector as it returned 20.8% over the year. Meanwhile, the office sector returned 6.7% and industrials continued to outperform with a return of 42.3%, boosted by heightened demand for logistics due to the pandemic. Vacancy rates fell by 0.5% over the year to 9.8%, whilst rental growth was positive.

In global property markets, strong leasing activities continued in the residential and logistics sectors. The Covid-19 resurgence due to the Omicron variant disrupted office leasing recoveries, although towards the end of the period there started to be evidence of recovery for high quality sustainable assets. The European office rent growth surprised on the upside in 2021, suggesting the market demand was more stable than anticipated. In the US, residential investment continued to grow in the south east and south west markets, and office and retail sectors reported strong year on year growth albeit from a low base.

### Infrastructure

Infrastructure funds performed in line with their objectives over the year, although diversification across sub-sectors and geographies was critical to returns. Sectors such as communication and utilities saw little or no impact from Covid-19, whilst others such as transportation were impacted more materially. The demand for infrastructure is likely to increase coming out of the pandemic, with a focus on sectors surrounding renewables, the energy transition, and digital infrastructure. Activity across traditional infrastructure assets is likely to continue, but with a reduced focus on crude oil related projects.

The graph below summarises the index returns on the main asset classes/regions for the year to 31 March 2022. Returns are shown in sterling terms and local currency terms.



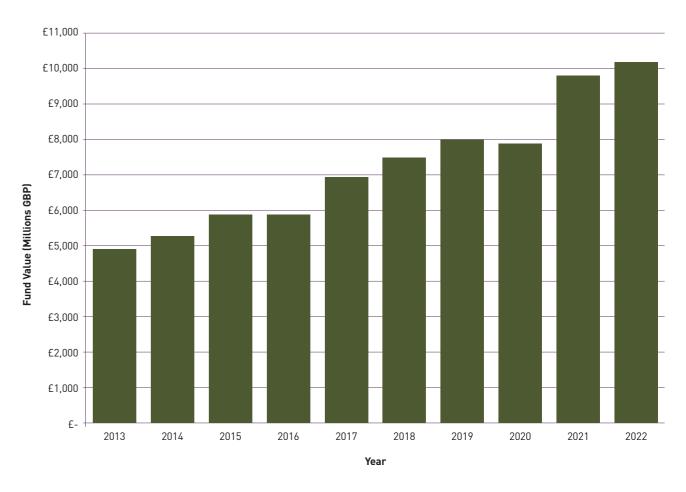
Source: FactSet, MSCI

### **Fund Value**

The value of the Fund at 31 March 2022 has increased by £436m to £10.231bn (2020/21 £9.795bn) or 4.4% on the previous year.

Market values can fluctuate widely over short periods of time, reflecting short-term changes in investment conditions. In contrast, the triennial valuation of the fund is concerned with the long-term and uses actuarial assumptions. The Actuary's report is shown on pages 130 to 132.

### Value of Fund



# NILGOSC Investment Performance 2021/22

Over the year to 31 March 2022, the Fund's overall return on the total assets was 4.32% (gross of asset manager fees). NILGOSC's overall investment objective is to exceed the Consumer Price Index (CPI) by 3.0% per annum, to be measured over three and five year periods. As NILGOSC's objective is to achieve the maximum return on Fund investments over the longer term, having due regard to the liabilities of the Fund and an acceptable level of investment risk, it is important that undue attention is not given to the returns for a single year in isolation.

The Fund outperformed its target by 1.80% on a three year basis and by 0.99% on a five year basis for the period ended 31 March 2022. The comparable statistics for the three and five year periods to 31 March 2022 on an annualised basis are set out in the table below:

	Three Years % p.a.	Five Years % p.a.
Return of Fund	8.30	7.47
CPI + 3.0%	6.53	6.48

The performance of the individual managers is monitored against the corresponding benchmarks and performance target where applicable. These targets are set to allow NILGOSC to meet its overall investment objective, taking into account expected returns and market cycles. In the case of real assets such as the Fund's infrastructure investments, the returns are measured against the overall fund target of CPI+3.0% for consolidated reporting purposes.

NILGOSC monitored its asset managers and mandates on a quarterly basis throughout the year, with a focus on both quantitative and qualitative factors. Given that the focus remains on a 5 year plus investment horizon for most investments, it is important that undue concern is not placed on short term returns and volatility. Instead, a key part of the ongoing monitoring process focuses on consistency with the mandate's core investment philosophy, the retention of suitably skilled personnel, risk management and business strength, as these factors are considered to be the key drivers of future performance. Different managers and mandates have been selected as a result of their overall fit with NILGOSC's investment objective and will perform differently in certain market cycles.

During the year ended 31 March 2022, the value of the Fund increased in absolute terms to £10.231bn, an increase of £436m. Performance across NILGOSC's investment mandates was mixed, as strategies responded differently to the volatile market conditions over the year.

Overall, it was a disappointing year for NILGOSC's two global equity managers despite global equity markets delivering solid positive returns. After eight consecutive years of being NILGOSC's best performing global equity manager, Baillie Gifford's Long Term Global Growth (LTGG) portfolio ended the year down 14.15% in absolute terms and 26.9% behind target. It was a difficult year for the LTGG strategy due to a backdrop of rapid change, volatility and geopolitical uncertainty, however, the manager remains positive about the long-term prospects of the portfolio. Volatility is expected with any concentrated, high conviction strategy with a growth tilt, and despite recent underperformance, the portfolio remains 3.65% ahead of target since inception. As a result of Baillie Gifford's strong outperformance in recent years, a further rebalancing exercise was carried out in February 2022 to help bring the LTGG portfolio closer to its 5.25% target allocation. The redemption was transferred to Legal and General to be held as cash until required to fund other investments.

Unigestion was appointed in September 2016 and the mandate has struggled since inception due to unfavourable market conditions for this type of strategy. This mandate was selected as part of the overall NILGOSC investment strategy because of its defensive nature and is expected to struggle in strongly rising or thematic markets. It seeks to offer downside protection in falling markets by investing in more defensive, less volatile stocks and should come into its own in more volatile market conditions, as has been experienced briefly during 2021/22. Whilst it continued to underperform the target by 3.61% over the year, the portfolio delivered positive absolute returns of 11.68%. Given the downside protection nature of the strategy and expected continued market volatility, this mandate is well placed to demonstrate improved performance going into 2022/23.

William Blair was appointed in April 2021 to manage a £235m segregated emerging markets equities portfolio. Emerging market equities had a difficult year, and as a result the portfolio underperformed, lagging the target and index by 1.16% and 3.56% respectively.

Property provided good diversification for the Fund during 2021/22. The UK core property portfolio, managed by LaSalle, outperformed its target for the year by 1.1%, although it remains slightly behind target on a three and five year basis. Outperformance in the period to 31 March 2022 was driven by industrial assets, however returns were dragged by weaker performance from retail and office assets, as both sectors have been particularly negatively impacted by COVID-19 lockdowns. The index-linked portfolio, also managed by La Salle, outperformed its RPI-linked target over the year by 2.25% and it remains ahead of target since inception. However, index-linked property market conditions have changed considerably since the portfolio was built up in 2012 and it is expected that the shortening leases and yield compression in the market along with higher inflation expectations will result in decreased returns, making the existing RPI+3% per annum target unachievable over the longer term. A revised target of RPI+2% per annum over a rolling 10-year period is effective from 1 April 2022.

CBRE Investment Management (CBRE) was appointed as a global property manager in February 2020 and has been tasked with building a diversified global property portfolio funded with an initial investment of £250m. The manager commenced drawdowns in May 2020, taking a prudent approach to capital deployment as a result of the pandemic. As at 31 March 2022, the mandate was almost fully committed, with 96% of capital committed to underlying holdings, and 64% drawn down and invested in 20 holdings across multiple geographies and sectors. Whilst undue focus shouldn't be placed on short-term performance, the portfolio has performed well to date, with performance returns of 16.9% over the year and 9.7% since inception; both well ahead of the 5-7% performance objective.

NILGOSC's £100m commitment to the M&G UK Residential Property Fund was made in September 2016 and was fully drawn down during 2018/19. During 2021/22 the fund delivered 4.3% return, comprised of 1.3% income return and 3.0% capital return.

As NILGOSC's passive manager, LGIM has a mandate covering global equities, fixed income and cash, and has an objective to track the appropriate market index within stated tolerances for each of the index funds in which NILGOSC is invested. LGIM continued



to perform broadly in line with the various indices throughout the year and there were two changes made to the mandate during 2021/22. Firstly, in May 2021, £235m was disinvested from LGIM passive emerging market equities and transferred to an active emerging market equity mandate managed by William Blair. The second change occurred in February 2022 when £2.8bn of NILGOSC's passive equity holdings were transferred to the LGIM Low Carbon Transition Fund (LGIM LCT), split between the hedged and unhedged version of the funds. The LGIM portfolio also continues to include index-linked gilts holdings in line with the target allocation for the asset class, as well as holdings in the Sterling Liquidity fund.

The Absolute Return Bonds (ARB) and Multi-Asset Credit (MAC) managers were appointed in March 2019. Five year performance is therefore not yet available for the fixed income managers. It was a difficult year for NILGOSC's ARB and MAC managers

with all four managers underperforming their targets over the year. The ARB managers experienced fluctuating performance, but on the whole delivered positive absolute performance that was ahead of the index (RLAM: 0.80% and T. Rowe Price: 0.98%). Both managers underperformed their target with relative returns of -1.86% and -2.27% respectively. The MAC managers had mixed results with BlueBay delivering a positive absolute performance of 0.18% and marginally outperforming the index by 0.06%, but -4.94% behind target. PIMCO's performance was disappointing with returns of -5.07%, which is -2.24% behind index and -4.05% behind target.

During the year, NILGOSC continued to implement its plan to reduce its allocation to equities and increase its investment in a range of infrastructure funds. Further capital was drawn in respect of existing and new infrastructure fund commitments as shown in the following table:

Infrastructure Fund Name	Committed Fund Currency	% Drawn down at 31 March 2022
Primary Funds		
Antin Infrastructure Fund II*	€ 44,160,000	95%
Antin Infrastructure Fund III	€ 75,000,000	84%
Antin Infrastructure Fund IV	€ 75,000,000	58%
Antin Infrastructure Mid Cap Fund I	€ 45,000,000	13%
Copenhagen Infrastructure Fund IV	€ 50,000,000	22%
DIF Infrastructure Fund V	€ 50,000,000	72%
IFM Global Infrastructure Fund**	£100,000,000	0%
KKR Global Infrastructure Investors Fund II	\$60,000,000	96%
KKR Global Infrastructure Investors Fund III	\$50,000,000	74%
Co-investments		
Antin III Carnot Co-Invest LP	€ 20,780,000	81%
Antin III Flight Co-Invest LP	\$20,612,831	100%
Antin IV Gator Co-Invest LP	\$9,200,000	83%
Antin IV Gauss Co-Invest LP	€ 8,000,000	96%
Antin IV Co Investments – remaining commitment	€ 8,731,452	0%
Coral Projects Investment LP	£7,895,932	100%
Equitix MA 10 LP	£7,608,750	100%
Equitix MA 12 LP	£10,000,000	100%
GIP Aquarius Fund LP**	\$20,000,000	100%
KKR Byzantium Co-Invest II LP	€ 9,500,000	100%
Resonance British Wind Energy Income LP	£9,000,000	98%
Waterloo Place (1) LP	£10,500,000	100%
Waterloo Place (2) LP	£9,012,884	100%

Commitment has reduced from prior year as a result of cancellation of undrawn commitments by Fund Manager

The Antin II, Antin III and Antin IV Funds invest primarily in European brownfield infrastructure assets with a focus on the energy and environment, transportation, social and telecommunications sectors. Antin II and Antin III are fully drawn and invested, while Antin IV continued to draw down capital and make investments during 2021/22. The Antin Infrastructure Mid Cap I Fund, to which NILGOSC made a €45m investment in the prior year, invests in the same sectors as its predecessors, but with deal sizes limited to between €50-300m. The KKR II and KKR III funds focus on similar sectors, but with more exposure to North America and other regions globally, providing NILGOSC with geographic diversification. KKR II is almost fully invested, whilst KKR III, which commenced drawdowns in late 2018, is over halfway through its investment period. DIF V is a Dutch Infrastructure Fund with a focus on regulated assets, renewable energy and social infrastructure, and is also substantially invested.

During 2021/22, Copenhagen Infrastructure Partners (CIP) commenced drawing down on the commitment of €50m in their renewables CI IV fund. The strategy focuses on developing and building renewable energy generation assets in Europe, North America and Asia Pacific. During Q1 2022, due diligence was successfully completed on an established open-ended fund, IFM Global Infrastructure Fund, and a new commitment to invest £100m was made, marking NILGOSC's first investment to an open-ended infrastructure fund. The strategy focuses on core, brownfield infrastructure across sectors such as roads, rail, airports, energy, telecommunications and renewables.

As part of its strategic theme of collaboration, NILGOSC continued to work together with likeminded investors in 2021/22 to co-invest in attractive infrastructure opportunities, allowing investors and their stakeholders to gain through benefits of scale and improved commercial terms. In the year to 31 March 2022, alongside Lothian Pension Fund (Lothian) and its partners, NILGOSC entered one new coinvestment opportunity, GIP Aquarius Fund LP, and exited two co-investments due to the completion of sales processes. NILGOSC ended the year committed to a total of eight co-investment infrastructure projects with Lothian, totalling a commitment of £77m. A further £54m was committed to infrastructure coinvestment opportunities directly with Antin. It is intended that the co-investment strategy will sit alongside the core primary infrastructure funds to help NILGOSC build a diversified portfolio of assets in line with its strategic allocation to the asset class.

Details of NILGOSC's equity holdings and other major holdings are made available annually through the Publication Scheme, which can be accessed at <a href="https://www.nilgosc.org.uk">www.nilgosc.org.uk</a>

### Responsible Investment

Like many responsible investors, NILGOSC faces an ongoing challenge to reconcile the need to obtain the best financial return against the desire for sound social, environmental and ethical practices.

NILGOSC believes that environmental, social and governance (ESG) issues can affect the financial performance of investments and considers there to be a risk of underperformance relative to expectations as a result of ESG issues not being reflected in asset prices and/or not considered in investment decision making. Accordingly, NILGOSC believes that these factors should be taken into account when managing the Fund's assets, subject to the overriding fiduciary duty to maximise the financial return on investments.

NILGOSC has set out its approach to ESG issues in its Statement of Responsible Investment, a copy of which is available on the NILGOSC website at www.nilgosc.org.uk.

NILGOSC does not make any investments solely for ESG reasons. Instead, it has instructed its active investment managers to take account of ESG considerations, provided the primary financial obligation is not compromised. NILGOSC also encourages its real asset managers to adopt sustainable asset management practices with respect to its infrastructure and property holdings. When appointing a new manager, NILGOSC assesses their ability to include ESG issues within the investment decision making process. Any manager not able to demonstrate such a capability will be excluded from the next stage of the selection process. After appointment, NILGOSC monitors managers' action in this area and works with investment managers and others in the investment sector to seek sufficient data to aid effective decision making.

NILGOSC believes that the best contribution it can make in the arena of responsible investment is through the targeted execution of voting rights, engagement with companies on ESG issues, and the promotion of ESG within the investment management industry.

<sup>\*\*</sup> New commitments made during 2021/22

Stewardship, as defined by the UK Stewardship Code, is "the responsible allocation, management and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society<sup>1</sup>."

Effective stewardship benefits companies, investors and the economy as a whole. In publicly listed companies, responsibility for stewardship is shared. The primary responsibility rests with the board of the company, which oversees the actions of its management; but investors in the company also play an important role in holding the board to account for the fulfilment of its responsibilities.

The UK Corporate Governance Code identifies the principles that underlie an effective board; while the UK Stewardship Code sets out the principles of effective stewardship by investors. As well as voting, activities can include monitoring and engaging with companies on matters such as strategy, performance, risk, capital structure, and corporate governance, including culture and remuneration. Engagement is a purposeful dialogue with companies on these matters, as well as on issues that are the immediate subject of votes at general meetings.

In July 2010, the Financial Reporting Council (FRC) published the first version of the UK Stewardship Code (the 'Code'). In response, in September 2010, NILGOSC published its first UK Stewardship Code Statement of Adherence, which laid out how the Fund applied the Principles of the Code. Following the publication of a revision to the Code in September 2012, NILGOSC updated its Statement of Adherence and continued to be a signatory until the 2012 Code was discontinued. When the FRC began to assess signatories' Statements of Adherence in 2016, classifying signatories as 'Tier 1' or 'Tier 2', NILGOSC was assessed as a Tier 1 signatory. The tiering distinguished between signatories who reported well and demonstrated their commitment to stewardship (Tier 1), and those to whom reporting improvements were needed. As well as striving for overarching adherence at a Fund level, NILGOSC also required its appointed investment managers share copies of their Statements of Adherence to the Code before appointment and as requested.

The UK Stewardship Code was substantially revised in 2019 and the new UK Stewardship Code 2020 took effect from January 2020. The new Code focuses on the activities and outcomes of stewardship, rather than only policy statements. To become a signatory, organisations are required to produce an annual Stewardship Report explaining how they have applied the Code in the previous 12 months. The FRC will assess each report and if it meets the FRC's reporting expectations, the organisation will be listed as a signatory to the Code. Once listed, organisations must continue to report annually in order to remain signatories.

NILGOSC supports the principles set out in the Stewardship Code and seeks to promote these principles both directly and indirectly through the mandates given to its investment managers. NILGOSC has prepared its first annual Stewardship Report, covering the 12 month-period ending 30 June 2021, and submitted it to the FRC in April 2022. The FRC have six months to issue final decisions.

NILGOSC is also an inaugural member of the Occupational Pensions Stewardship Council (OPSC), which officially launched on 8 July 2021. Established by the Department for Work and Pensions (DWP) in response to the Asset Management Taskforce's 2020 recommendation that a 'dedicated council of UK pension schemes should be established to promote and facilitate high standards of stewardship of pension assets', the OPSC aims to provide schemes with an independent forum for sharing experiences, best practice and research, as well as providing practical support.

### **Voting**

As a responsible investor, NILGOSC has a legitimate interest in the management of the companies in which it invests and uses its voting rights to express concern. Proxy voting is a means of maintaining effective shareholder oversight of directors and company policies, a process on which the current system of UK corporate governance depends. Through the exercise of its voting rights, NILGOSC seeks to improve corporate ESG behaviour in the companies in which it invests, in addition to carrying out the Fund's fiduciary responsibility to add value to its investments.

NILGOSC has a Proxy Voting Policy, which sets out its expectations for good corporate governance in the companies in which it invests. This document outlines NILGOSC's view on what it believes are the most important elements of good corporate governance and the principles which will be used to determine voting decisions on specific issues. It also provides a basis for communicating with investee companies and holding directors accountable for their stewardship of the company. The Policy is reviewed on an annual basis to ensure it is up to date with current best practice. A copy can be obtained from the NILGOSC website at <a href="https://www.nilgosc.org.uk">www.nilgosc.org.uk</a>.

NILGOSC has appointed a third-party proxy voting partner, Minerva Analytics, to provide company research and coordinate its voting activities. NILGOSC currently avails of Minerva Analytics' research and advisory services to highlight areas of potential concern or conflict with its voting policies and as an important source of information on the non-financial aspects of a company's performance.

NILGOSC exercises its voting rights at all company meetings within its actively managed equity portfolios, where possible, and will vote against management if the proposed resolutions are in conflict with NILGOSC's voting policy or where significant ESG failings are identified. In line with the UK Corporate Governance Code, NILGOSC will consider explanations put forward by companies in relation to non-compliance and will also seek the advice of its investment managers, where appropriate, before exercising its vote.

A summary of the Fund's global voting record for the year ended 31 March 2022 is shown in the following table:

	Europe	North America	Rest of World
Annual General Meetings	19	73	43
Other Meetings	1	6	36
Resolutions	355	938	602
Votes For Management	242	509	12
Votes Against Management	113	428	190
No Management Recommendation	-	1	-

Note: For passively managed equities, votes are cast by LGIM and are not included in the figures above

For passively managed equities, votes are cast by NILGOSC's passive investment manager according to its own voting policies. The manager reports to NILGOSC on its voting activities on a quarterly basis.

Further detail on NILGOSC's voting policies and activity can be found on the NILGOSC website at **www.nilgosc.org.uk**.

### **Engagement**

NILGOSC has undertaken to engage with companies on ESG issues, either directly or through its investment managers, and to participate in collaborative engagement activities.

All active managers are instructed to engage, on NILGOSC's behalf, with those companies where ESG policies fall short of acceptable standards and where this is likely to have a detrimental effect on the long-term value of the company. NILGOSC monitors the action taken in this area by its managers, by reviewing the engagement reports provided on a quarterly basis. These reports detail company engagements undertaken, the issues engaged on and any outcomes.

NILGOSC also engages directly with some of the companies in which it invests. For companies listed in Europe, where NILGOSC intends to vote against management at a company's Annual General Meeting, a letter will be issued to the company to advise of the voting decisions and to provide a rationale. It is hoped that by providing this explanation, the flow of information between companies and their shareholders can be improved.

<sup>1</sup> https://www.frc.org.uk/investors/uk-stewardship-code

In 2021/22, NILGOSC issued engagement letters to 19 European companies, where votes were cast against management recommendations.

NILGOSC believes that it can have a larger impact on the ESG practices of companies by participating in collaborative engagements with like-minded investors, rather than by acting alone.

Demonstrating its commitment to responsible investment practices, NILGOSC has been a signatory to the United Nations-supported Principles for Responsible Investment (PRI) since 2007. This global benchmark is applicable across all asset classes and provides a forum for NILGOSC to collaborate with other like-minded investors on engagement initiatives. NILGOSC reports on its implementation of the principles through the PRI reporting framework on an annual basis. The PRI recently undertook an extensive review of its reporting and assessment process, and a new Investor Reporting Framework was launched in 2021. NILGOSC submitted its first assessment under the new framework in May 2021, for the year ended 31 March 2020. However, due to issues with the new framework, assessment reports will not be released until later in 2022 and the PRI has delayed the next reporting cycle until 2023.

NILGOSC also participates in the UK Pension Scheme Responsible Investment Roundtable, a collective group of public and private sector UK pension funds who work together to promote responsible investment, as well as PRI facilitated and other collaborative engagements where appropriate. For example, NILGOSC, along with like-minded investors, representing over £500bn in assets under ownership, wrote to 44 asset managers in December 2021, calling on them to pay more attention to the voting priorities of pension schemes.

### Climate Risk

As a long-term investor, a changing climate presents significant long-term risks to the value and security of pension scheme investments and capital markets more broadly.

The changing climate presents a variety of risks and opportunities for pension fund investors. Investment practices should therefore seek to protect assets from climate risks such as weather events and regulatory change, while simultaneously seizing the new opportunities that a low-carbon economy presents.

NILGOSC believes that climate change presents a material financial risk to the Fund and will therefore take climate risk considerations into account as part of its investment policy. NILGOSC has developed a Climate Risk Statement to sit alongside the Statement of Responsible Investment. The Statement acknowledges the importance of climate risk as an investment issue and sets out the steps which will be taken to address it.

More than half of the Fund's assets are actively managed and NILGOSC only appoints active investment managers who can take climate change risk into account when making investment decisions. A significant portion of NILGOSC's assets are held in passive mandates and following an index, therefore ESG issues, including climate risk, cannot be actively taken into account. However, a decision can be made in the selection of which index to track. Therefore, as a means of mitigating climate risk in the Fund's passive equity portfolio, in February 2022, NILGOSC's passive equities (totalling £2.8bn) were transferred to a fund which tracks a climate-tilted, carbon transition index.

The fund, which is managed by LGIM, tracks the 'Solactive L&G Low Carbon Transition Developed Market' index. The strategy behind the index is to reduce exposure to carbon emissions over time. The index initially reduces carbon intensity by 70% relative to the starting universe and aims to reach the goal of achieving Net Zero carbon emissions by 2050.

In December 2015, the Financial Stability Board (FSB) established the Task Force on Climate-related Financial Disclosures (TCFD) to improve and increase reporting of climate-related financial information. In 2017, the TCFD released its climate-related financial disclosure recommendations. NILGOSC considers the disclosure of climate risks and opportunities to be essential if shareholders are to determine whether the companies in which they invest are adequately addressing the changing climate, and therefore actively supports the TCFD recommendations. In November 2021, aligned with these recommendations, NILGOSC produced its inaugural Climate-related Disclosures Report for the year ended 31 March 2021. Disclosures are organised around the TCFD's four thematic areas, representing the core elements of how organisations operate: governance; strategy; risk management; and metrics and targets.

NILGOSC considers it to be in the long-term interests of its members to promote climate risk mitigation and adaptation in the implementation of its investment strategy. By working together with like-minded investors, NILGOSC seeks to create an investment environment which contributes to a low carbon economy. NILGOSC is a member of the Institutional Investors Group on Climate Change (IIGCC), which is the European membership body for investor collaboration on climate change. IIGCC represents over 230 investors with £30tn in assets. NILGOSC is also a signatory of Climate Action 100+, an investor initiative to ensure the world's largest corporate greenhouse gas emitters take necessary action on climate change, which, after its launch in 2017, quickly emerged as one of 12 key global initiatives to tackle climate change. The companies include 100 "systemically important emitters", accounting for two-thirds of annual global industrial emissions, alongside more than 60 others with significant opportunity to drive the clean energy transition.

Over the year, NILGOSC took part in a number of climate risk mitigation activities, including:

- signing the 2021 Global Investor Statement to Governments on the Climate Crisis;
- signing an open letter to 50 highly exposed companies urging them to implement IIGCC's "Investor Expectations of Companies on Physical Climate Risks and Opportunities";
- renewing its commitment to CDP (formerly the Carbon Disclosure Project), signing up to their 2022 Climate Change, Forests and Water programmes. NILGOSC supports the CDP's work to improve the management of environmental risk by encouraging listed companies to measure and disclose environmental information, which it does by issuing annual questionnaires on behalf of its investor signatories, requesting standardised climate change, water and forest information;
- participating in CDP's 2021 Non-disclosure campaign, which aimed to engage with previously non-disclosing companies. The campaign focused on companies that had never responded or had not responded to the CDP questionnaire in recent years. In March 2022, NILGOSC renewed its support, signing up to the 2022 Non-disclosure campaign; and
- joining the Investment Association and Pension and Lifetime Savings Association's (PLSA) working group on asset manager data for Taskforce on Climate-related financial disclosures (TCFD) aligned disclosures. The working group's intention is to formulate a template for asset managers to provide emissions data and metrics, that pension schemes can then use in compiling TCFD-aligned reporting.

A list of recent collaborative engagements and initiatives NILGOSC has been involved in is available on the NILGOSC website at www.nilgosc.org.uk.

### **LONG TERM EXPENDITURE TRENDS**

The tables below illustrate key trends for the last five years.

### **Key Financial Information**

	2021/22	2020/21	2019/20	2018/19	2017/18	
	£'000	£'000	£'000	£'000	£'000	
Income						
Contributions received and transfers in	310,277	295,731	318,645	287,224	267,466	
Investment income	132,066	131,877	148,974	97,279	110,634	
Benefits paid						
Retirement Pensions	(217,129)	(209,197)	(198,821)	(186,314)	(173,067)	
Lump sum retirement benefits	(53,644)	(45,127)	(59,525)	(56,408)	(49,711)	
Death Benefits and leavers	(12,910)	(11,253)	(10,305)	(12,562)	(12,554)	
Other expenditure						
Administration expences	(5,527)	(5,061)	(5,268)	(5,545)	(3,090)	
Investment management expenses	(25,720)	(25,473)	(23,580)	(18,472)	(19,823)	
Net Assets						
Net Assets	10,231,058	9,795,486	7,877,906	8,039,944	7,549,197	
Change in market value of investments	304,493	1,788,901	(332,354)	385,094	346,160	

Membership Statistics						
	2021/22	2020/21	2019/20	2018/19	2017/18	
Active members	73,960	70,881	68,153	61,513	56,727	
Deferred members	34,222	31,698	32,316	31,646	30,841	
Current pensioners of whom:	41,557	39,913	38,579	36,788	35,019	
Retired Employees	35,553	33,980	32,752	31,090	29,457	
Widows/widowers/dependants	6,004	5,933	5,827	5,698	5,562	
Total	149,739	142,492	139,048	129,947	122,587	

The membership movement reflects the recruitment and retention strategies of Scheme employers and the status of individuals as they move through the lifecycle of pension scheme membership. The material increase in 'active' membership in 2019/20 is the result of the update of historic records and contributions for one large employer rather than a significant increase in recruitment generally in that year. The increase in membership in the current year is a catch-up for muted employer recruitment generally during 2020/21 due to the impact of COVID.

Following the 2016 actuarial valuation, common contribution rates rose from 18% in 2017/18, and 19% in 2018/19 to 20% in 2020. The decrease between 2019/20 and 2020/21 reflects a reduction in employer contribution rates for the majority of

employers and the cessation of deficit payments following the 2019 actuarial valuation. The Fund returned to a surplus position following the 2019 actuarial valuation and accordingly deficit recovery contributions were no longer required from employers in the main group from April 2020. The 2019 valuation set a fixed employer contribution rate of 19.5% from April 2020 to March 2023. Contributions received and transfers in for the year ended 31 March 2022 show an increase consistent with membership increase and pay settlements.

Investment income is a feature of the individual investment strategies which at present include a mix of growth and income styles and can vary considerably year on year. The 2018/19 decrease is somewhat driven by the reduction in dividend income from

equities but also the transfer of a UK equity mandate to the Legal & General passive fund in March 2018. The strong growth in 2019/20 reflects the full year impact of the strategic move in March 2019 out of equities to fixed income. The absolute return bonds and multi-asset credit mandates contributed to the material increase in fixed interest income from 2019/20. With the termination of two UK equities mandates late in 2020/21 there was an anticipated drop in equity income in 2021/22 however the uplift in fixed interest income has compensated for this, as have the distributions from the new global property fund, categorised as a Pooled investment vehicle.

Retirement pension payments continue to grow in line with the increase in the number of pensioners and also the annual pensions increase applicable in April each year.

Lump sum retirement benefits increased significantly in 2018/19 and 2019/20 as a result of the increase in retirement activity through public sector voluntary exit schemes (VES). Demand for quotations and subsequent retirements dropped significantly during the early stages of the pandemic though this normalised towards the end of 2020/21. Figures for 2020/21 would indicate that early retirement activity was paused based on the increased retirement activity recorded in 2021/22. While the movements are consistent with broad historical patterns of retirement activity, the overall value of lump sum retirement benefits is dependent on the salary and service history of those individual members retiring in the period, and will fluctuate accordingly.

Death benefits and payments to leavers cash outflows are not expected to conform to a predictable pattern as the annual figures reflect the number of member deaths, the number of leavers requesting refunds and the value of death benefits and refunds payable. There is no significant COVID-19 related deviation from the historical pattern of membership death benefits reflected in the uplift in expenditure in either 2020/21 or 2021/22.

Administration expenses have remained reasonably consistent over the past five years after adjustments for one-off employing authority debt writeoff (2018/19) and material non-cash actuarial adjustments for IAS 19 current service pension. (Adjusted figures for administration expenditure for the past decade can be seen on the Cost per Member table on Page 31). The annual increase in administration expenditure, is consistent with staff pay settlements and general inflationary pressures on supplies and services but somewhat mitigated by the reduction in pension costs following the cessation of deficit recovery contributions, the reduction in employer contribution rates from 20% to 19.5% and much lower professional fees and discretionary expenditure in 2020/21 and 2021/22, in large part due to the operational impact of the pandemic.

Investment management expenses vary from year to year as they are based on the market value of investments held. NILGOSC negotiated fee reductions with two of its fund managers in 2017/18 which had a full year impact in 2018/19. The underperformance of one of the global equity managers also contributed to the reduction in investment management expenses in 2018/19. The material increase in investment management expenditure from 2019/20 reflects the annual impact of the move from equities to fixed income mandates from March 2019. The new fixed income mandates are more complex and therefore more expensive strategies to manage, a feature which should be viewed alongside the material uplift in investment income generated by these mandates since 2019/20, as noted previously.

Dand A Musty

David Murphy
Chief Executive and Secretary

22 August 2022

### INTRODUCTION

The Corporate Governance Report explains the composition and organisation of NILGOSC's governance structures and how they support the achievement of the entity's objectives. The report begins with a Chief Executive's Report which sets out the composition of the Management Committee and a Statement of Accounting Officer's Responsibilities in respect of the preparation of the financial statements. It concludes with the Governance Statement which sets out how the Accounting Officer's duties in relation to internal control and the safeguarding of public funds and departmental assets have been carried out through the financial year and includes an assessment of the corporate governance and risk management systems in place within NILGOSC.

# CHIEF EXECUTIVE'S REPORT Chief Executive and Secretary

Mr David Murphy, the Chief Executive and Secretary, is responsible for the administration of the Scheme and reports to the Committee 9 times per year.

The Permanent Secretary for the Department for Communities has designated the Chief Executive and Secretary as the Accounting Officer for NILGOSC. His relevant responsibilities as Accounting Officer, including his responsibility for the propriety and regularity of the public finances for which he is answerable and for the keeping of proper records, are set out in the Accounting Officer Memorandum, issued by the Department for Communities. The Accounting Officer is also responsible for safeguarding the assets of NILGOSC and hence for taking reasonable steps to prevent and detect fraud and other irregularities.

### **Committee Members**

The Management Committee (which is similar to a board of directors or trustees) consists of a Committee chair, five members nominated by employers' organisations, five members nominated by employees' organisations and two independent members. In addition, the Department has appointed an observer who may attend the meetings of the Management Committee and Audit Committee.

The Committee members are appointed by the Minister for Communities for a four year term and may be reappointed for a second four year term at the Minister's discretion. The following table shows the composition and term of office of Committee members during 2021/22.



	Term	Term of Office		
Lindsay Todd	First	1 May 2019 - 30 April 2023		
Mark McBride	First	1 May 2019 - 30 April 2023		
Paul Francey	First	1 April 2020 – 31 March 2024		
Antoinette McMillen	First	1 April 2020 – 31 March 2024		
John (JJ) Tohill	First	1 April 2020 – 31 March 2024		
Michael Rafferty	First	1 April 2020 – 31 March 2024		
Joan McCaffrey	First	1 April 2020 – 31 March 2024		
Alan Law	First	1 October 2020 -30 September 2024		
Kenneth Clayton	First	1 October 2020 -30 September 2024		
Peter Moore	First	1 October 2020 -30 September 2024		
Shane McCurdy	First	1 October 2020 -30 September 2024		
Derek McCallan	First	1 May 2021- 30 April 2025		
Heather McKinstry	First	1 May 2021- 30 April 2025		

The biographies of the Committee members who served throughout the year are set out in the following pages.

### Chair



### Mr Lindsay Todd OBE

Mr Todd is Chair of the NILGOSC
Management Committee and was, until
retirement, an equity partner in PwC.
A former NI Judicial Appointments
Commissioner, he currently serves on
the NI Investment Fund Scrutiny Board
and as Chair of the NI Teachers' Pension
Scheme Pensions Board. He is also a
member of the Investment Committee
at Queens University Belfast and the
Disciplinary Panel of the Chartered
Accountants Regulatory Board.

### **Committee Members**

### **Employee Representatives**



### Mr Kenneth Clayton

Mr Clayton, now retired, was Trade Union co-ordinator at Belfast City Council.
As a Union Branch Chair (Unite), he has experience on committees such as the Local Government Joint Reform Group and the Union's Local Authority Pensions Committee. He holds no other public appointments and has had no recent political activity.



### Mr Paul Francey

Mr Francey has worked within public transport and has been a Trade Union activist for the past fifteen years. He has been a workplace organiser for the GMB Trade Union for the past seven years and has held the position of the Railway Branch Secretary for the past six years. Mr Francey has previous experience of sitting on Trade Union bodies for the GMB within the public transport sector and sits on the Local Government Pensions Advisory Board.



### Mr Alan Law

Mr Law is a Trade Union official with NIPSA and is the Chair of the Trustees of NIPSA's Defined Benefit Pension. This involves extensive experience in the administration of pension schemes, evaluating risk and taking decisions in respect of actuarial reports and investment monitoring. He is the lead negotiator for NIPSA in respect of members employed by the Education Authority. Mr Law is a Department of Education representative on a integrated primary school board of governors.



### Ms Antoinette McMillen

Ms McMillen is an official for the Trade Union NIPSA. She has led Trade Union teams within the Northern Ireland Civil Service and has been instrumental in the formulation, development, and implementation of strategic policy in various areas of the public sector. She serves as a Trustee of the NIPSA Defined Benefit Pension Scheme.



### Ms Heather McKinstry

Ms Heather McKinstry is the Chair of Unison NI Regional Local Government and Education Committee. She works as the Trade Union Side Officer for the Education Authority NI co-ordinating work for the four main Unions. She holds no other public appointments and has had no political activity in the last five years.

### **Employer Representatives**



### Mr Michael Rafferty

Mr Rafferty is a chartered accountant and is currently the Group Director of Finance & Resources for Choice Housing Group. He brings experience relating to financial management and risk management in complex organisational and regulatory environments. Mr Rafferty has extensive experience of corporate finance and has been instrumental in raising over £500m of debt finance for delivery of social and affordable housing.



### Mr JJ Tohill

Mr Tohill is Strategic Director of Corporate Services and Finance and a member of Mid Ulster District Council's Senior Management Team with responsibility for the finance function and governance, and the design and implementation of effective controls. He has experience of using communication and influencing skills in a complex public sector reform environment involving challenging restructuring and cultural issues.



### Mr Shane McCurdy

Mr McCurdy is the Head of Corporate Services at the Controlled Schools' Support Council. Previously he was the Chief Executive and former Chief Finance Officer for the North Eastern Education and Library Board and the Interim Head of Finance for the Education Authority. He holds no other public appointments and has had no political activity in the last 5 years.



### **Mr Peter Moore**

Mr Moore is an accountant for Translink and a member of various project boards. He presents at Translink's monthly executive meeting. He has built effective relationships within Translink and the Department for Infrastructure. He holds no other public appointments and has had no political activity in the last 5 years.



### Mr Derek McCallan

Mr McCallan is immediate past CEO of the Northern Ireland Local Government Association (NILGA) stepping down in December 2021 after a decade of advising and supporting the Association's all-Party political / corporate leaders and its all-council Executive, taking forward policy, lobbying, fiscal and legislation priorities for the 11 local authorities and Stormont. Prior to this he enjoyed 14 years in senior local government leadership, driving strategic partnerships across commercial, community, social / rural economy, elected member development and performance improvement.

### **Independent Members**



### Ms Joan McCaffrey

Ms McCaffrey was previously the Director of Corporate Services and Governance at Fermanagh and Omagh District Council. She is a Fellow of the Chartered Institute of Management Accountants. She holds no other public appointments and has had no political activity in the last 5 years.



### Mr Mark McBride

Mr McBride is a former Head of Finance and Performance at Belfast City Council. He is a Council Member of the Chartered Institute of Public Finance and Accountancy (CIPFA) and is Chair of the Association of Accounting Technicians (AAT) Pension Scheme. Mr McBride is Deputy Chair of NILGOSC Management Committee.

### **Declaration of Interests**

In order to achieve the maximum degree of openness and impartiality, the Committee maintains a register of Committee Members' and Officers' Interests. The register is open for inspection at the Committee's offices and is available on NILGOSC's website at www.nilgosc.org.uk.

### **Personal Data Related Incidents**

NILGOSC records all personal data related incidents and makes an assessment against the Information Commissioner's Office (ICO) guidance to determine whether an incident is significant and/or serious enough to warrant reporting. Following the implementation of GDPR and the Data Protection Act in 2018, the ICO updated its guidance in relation to what should be considered when assessing a data breach. The assessment needs to consider the likelihood and severity of the risk to people's rights and freedoms.

In the year ended 31 March 2022, four data incidents were assessed as reportable in line with the guidance and four minor incidents were assessed as non-reportable. The ICO confirmed that no further action was necessary in relation to any of the reportable incidents as it did not consider the incidents to have met the criteria for regulatory action.

# STATEMENT OF ACCOUNTING OFFICER'S RESPONSIBILITIES

Under the Occupational Pension Schemes
(Requirement to obtain Audited Accounts and a
Statement from the Auditor) Regulations (Northern
Ireland) 1997, as amended, the Department for
Communities has directed the Northern Ireland Local
Government Officers' Superannuation Committee to
prepare for each financial year a statement of accounts
in the form and on the basis set out in the Accounts
Direction. The financial statements are prepared on
an accruals basis and must give a true and fair view
of the state of affairs of the Northern Ireland Local
Government Officers' Superannuation Committee
and of its income and expenditure, recognised gains
and losses and cash flows for the financial year.

In preparing the financial statements, the Accounting Officer is required to comply with the requirements of the Government Financial Reporting Manual and in particular to:

- observe the Accounts Direction issued by the Department for Communities, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis
- make judgements and estimates on a reasonable basis
- state whether applicable accounting standards as set out in the Government Financial Reporting Manual have been followed, and disclose and explain any material departures in the financial statements
- prepare the financial statements on a going concern basis
- confirm that the Annual Report and Accounts is fair, balanced and understandable and take personal responsibility for the financial statements and the judgements required for determining that it is fair, balanced and understandable.

The Department for Communities has appointed David Murphy as Accounting Officer of the Northern Ireland Local Government Officers' Superannuation Committee. The responsibilities of an Accounting Officer, including responsibility for the propriety and regularity of the public finances for which the Accounting Officer is answerable, for keeping proper records and for safeguarding the Northern Ireland Local Government Officers' Superannuation Committee's assets, are set out in Managing Public Money Northern Ireland (MPMNI) published by the Department of Finance.

### GOVERNANCE STATEMENT FOR THE FINANCIAL YEAR ENDED 31 MARCH 2022

### 1. Introduction

As Accounting Officer for the Northern Ireland Local Government Officers' Superannuation Committee (NILGOSC), I am responsible for maintaining a sound system of internal control that supports the achievement of the organisation's policies, aims and objectives, while safeguarding the public funds and departmental assets for which I am personally responsible, in accordance with the responsibilities assigned to me in Managing Public Money NI (MPMNI).

This Governance Statement sets out how these duties have been carried out through the financial year ended 31 March 2022 and includes an assessment of the corporate governance and risk management systems in place within NILGOSC, that have ensured these responsibilities have been met.

This Governance Statement has been prepared in line with guidance issued by the Department of Finance (DAO (DFP) 10/12) and contained within Annex 3.1 of MPMNI.

### 2. The Governance Framework 2021/22

NILGOSC is a non-departmental public body (NDPB) sponsored by the Department for Communities ("the Department"). NILGOSC has worked with the Department during 2021/22 to ensure the specific requirements as a NDPB have been met.

NILGOSC is the corporate body responsible for the administration of the Local Government Pension Scheme in Northern Ireland (the Scheme) and its functions and responsibilities are laid down in the Local Government Pension Scheme Regulations (Northern Ireland) 2014. Since 1 April 2015, the Management Committee has been designated as the Pension Board for the Scheme in accordance with the Local Government Pension Scheme (Governance) (Amendment) Regulations (Northern Ireland) 2015 (the Governance Regulations). On 20 March 2020, the Minister for Communities confirmed this designation for a further period of five years.

A Management Statement (MS) is in place with the Department which sets out the broad framework within which NILGOSC will operate in administering the Scheme and in the exercise of its functions, duties and powers. An associated Financial Memorandum (FM) is also in place with the Department, which sets out certain aspects of the financial framework within which NILGOSC is required to operate, in accordance with MPMNI. NILGOSC complied with the conditions and requirements in the Management Statement and the Financial Memorandum during the financial year ended 31 March 2022.

On 9 December 2019, the Department of Finance issued DAO (DoF) 05/19 'Partnership Agreement Template', which provides departments and ALBs with a new model 'relationship document' in which to set out the partnership arrangements between an ALB and the Department. The Partnership Agreement template supersedes the MS & FM templates. It was anticipated that tailored Partnership Agreements would be phased in from 1 April 2020 after guidance on Proportionate Autonomy was made available, but it was recognised that this process will take time to fully implement and that "not one size fits all". Progress has been delayed by the impact of COVID-19 so the Partnership Agreement between NILGOSC and the Department is not yet in place.

### 2.1 The Management Committee

The Management Committee ('the Committee') is charged with performing the relevant functions assigned to it by the Regulations and ensuring compliance with the provisions set out in both the Management Statement and Financial Memorandum.

As the Pension Board, the Committee's role is to assist with:

- securing compliance with the Governance Regulations;
- securing compliance with any other legislation relating to the governance and administration of the Scheme and requirements imposed by the Pension Regulator (TPR) in relation to the Scheme; and
- the effective and efficient governance and administration of the Scheme.



The Committee is responsible for establishing the organisation's overall strategic direction, ensuring that it operates within the limits of its statutory authority and agreeing corporate targets. The work and responsibilities of the Committee are set out in the Management Committee Terms of Reference and the Delegations of Authority. Standing items considered by the Committee include:

- Management Accounts and summary of investments
- Annual Report and Budget
- Fund Manager performance reports
- Corporate performance reports
- Departmental Assurance Statements
- Reviews of the risk management framework
- Stage II complaints
- New and revised policies
- Secretary's report on operational matters and project updates

A sub-committee structure supports the Committee, comprising the Audit and Risk Assurance Committee (ARAC), the Staffing Committee and the Internal Dispute Resolution Committee (IDRC). The latter was established in August 2021 by the Management Committee to determine Stage II reviews undertaken as part of the Internal Dispute Resolution Procedure. The IDRC has delegated powers to reach a decision on behalf of the Committee. The Committee also has the possibility to establish an ad-hoc Staff Appeals Committee to hear grievance and disciplinary appeals. This sub-committee also has the ability to reach a decision on behalf of the Committee. Following each sub-committee meeting, the relevant Chairperson provides a verbal report to the Committee.

The Committee consists of a Chairperson, five members who are representative of employers' organisations, five members who are representative of employees' organisations and two independent members. The Committee Members are appointed by the Minister via the public appointments process, for a standard four-year term. In May 2021, the Minister appointed an employer representative and an employee representative to the Management Committee. As at 31 March 2022, the Management Committee is at full complement.

Details on terms of membership and re-appointments to the Committee during 2021/22 are set out in the Chief Executive's Report on page 62. A register of Committee Members' interests is maintained and published on the NILGOSC website.

The Committee normally meets on a monthly basis with the exception of April, July and October. The Department has appointed an observer who may also attend meetings of the Committee and the ARAC. Minutes of all Committee and sub-committee meetings are recorded. When approved, copies of the Committee meeting minutes are published on the NILGOSC website at <a href="https://nilgosc.org.uk/about-us/who-we-are/organisational-structure/pension-board/board-meetings/">https://nilgosc.org.uk/about-us/who-we-are/organisational-structure/pension-board/board-meetings/</a>.

The Management Committee formally met nine times during 2021/22. Four Audit & Risk Assurance Committee meetings were held during the year. The Staffing Committee met twice in April 2021 and once in January 2022. The IDRC was established in August 2021 and no meetings were held in the reporting period. A schedule of membership and attendance for the year is shown in the following table:

	Management Committee		Audit & Risk Assurance Committee		Staffing Committee	
	Called	Present	Called	Present	Called	Present
Lindsay Todd	9	9	-	-	-	-
Joan McCaffrey	9	9	4	4	-	-
Mark McBride	9	9	4	4	-	-
Antoinette McMillen	9	8	4	4	-	-
Paul Francey	9	9	-	-	2	2
JJ Tohill	9	9	-	-	2	2
Michael Rafferty	9	9	4	4	-	-
Shane McCurdy	9	9	-	-	2	2
Peter Moore	9	9	-	-	-	-
Kenneth Clayton	9	9	-	-	-	-
Alan Law	9	9		-	2	2
Heather McKinstry	8 <sup>1</sup>	8	-	-	-	-
Derek McCallan	8 <sup>1</sup>	7	-	-	-	-
Average % Attendance		96.6%		100%		100%

<sup>&</sup>lt;sup>1</sup>Term of membership commenced 1 May 2021.

All new Committee Members receive induction training and are provided with a Committee Member Handbook, which contains key documents, policies and guidance relevant to NILGOSC and the role of a Committee Member. The Committee Member Handbook can also be accessed on NILGOSC's website. A Committee Member Knowledge Framework is in place that sets out the skills and knowledge a Committee Member should possess or acquire to be an effective Committee Member. Committee Members are also required to complete The Pension Regulator's Public Service Toolkit.

All Committee Members must attend On-Board training and are encouraged to meet an annual target of 40 hours continual professional development. Relevant training opportunities are highlighted to Committee Members and Committee training is organised to meet training needs identified through the training needs self-assessment. Training records are maintained and updated on a quarterly basis. A training day was held for the Management Committee in October 2021 in relation to a number of NILGOSC functions and services.

### 2.2 The Audit and Risk Assurance Committee (ARAC)

The ARAC provides a forum for the scrutiny of NILGOSC's corporate governance, risk and internal control systems and promotes a climate of robust financial discipline and control. It has formally agreed Terms of Reference, which are reviewed every three years. The ARAC comprises nominated Committee Members, at least one of whom is required to have recent, relevant financial expertise. Meetings are held on at least a quarterly basis and are attended by Internal and External Audit, as well as a Departmental representative.

The ARAC has access to all internal audit reports, risk registers and management reports and considers all external financial and governance reporting. Standing agenda items for consideration by the ARAC include:

- Quarterly review of the risk register and system of internal control
- Fraud and Raised Concerns reports
- Internal audit reports and annual opinion
- Progress against internal audit recommendations
- New or revised governance policies
- Departmental Assurance Statements
- Department of Finance (DoF) and Departmental guidance (eg. DAOs)

The ARAC reports on the discharge of its duties to the Committee on an annual basis. It also considers and provides an opinion on the Governance Statement and recommends the Annual Report and Accounts to the Committee for approval.

### 2.3 Risk Management and Internal Control

The system of internal control is designed to manage risk to a reasonable level rather than to eliminate all risk of failure to achieve policies, aims and objectives; it can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievements of the Committee's policies. aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically. A robust system of internal control has been in place in NILGOSC for the year ended 31 March 2022 up to the date of approval of the Annual Report and Accounts, which accords with Department of Finance guidance. A full description of NILGOSC's risk management process and the assessment of risks during 2021/22 is provided in section 6 of this Statement.

### 2.4 Corporate and Business Planning

Like most organisations, NILGOSC has established a strategic planning process which allows it to identify and achieve its long-term strategic objectives. A key part of this process is the triennial strategic review, during which the organisation's vision, mission, values and strategic aims are subjected to a thorough review and stakeholder consultation to ensure that they remain relevant and reflective of the current operating environment. In the intervening period between strategic reviews, NILGOSC reviews and updates its operational business plans annually to help plan resources and measure performance.

NILGOSC commenced its last strategic review in May 2021, to review NILGOSC's Vision, Mission, Values, Strategic Aims and Objectives. The review was issued for stakeholder consultation and the consultation process closed in September 2021. NILGOSC published a summary of consultation responses thereafter and the Management Committee agreed its Vision, Mission, Values, Strategic Aims and Objectives.

The Corporate Plan sets out NILGOSC's objectives over a three-year period together with the appropriate targets and key performance measures. The Senior Management Team (SMT) reviews performance

against objectives and key performance measures on a quarterly basis and this is reported to the Committee and sponsor Department bi-annually. Performance against the Corporate Plan is also reported in the Annual Report at the end of each financial year. The Corporate Plan is reviewed and revised annually and published on the NILGOSC website.

# 3. Compliance with the 'Corporate Governance in Central Government Departments: Code of Practice NI 2013'

On 19 April 2013, DoF issued the updated 'Corporate Governance in Central Government Departments: Code of Practice NI 2013' with DAO (DFP) 06/13. The Code is written for central departments and, as such, is not entirely relevant to NILGOSC as a NDPB. However, all NDPBs are encouraged to consider and adopt the practice set out in the Code wherever it is relevant and practical and suits their business needs. I have considered the principles within the updated Code and confirm that these have been applied in so far as is relevant or applicable to NILGOSC.

No significant actual or potential conflicts of interest were identified during 2021/22. On 29 September 2021, the Department of Finance issued DAO (DoF) 07/21 'Guidance on Conflicts of Interest', which was considered by the Audit & Risk Assurance Committee at its meeting in November 2021. NILGOSC's policy and procedures for managing conflicts of interest was previously set out in the separate Codes of Conduct for staff and Committee Members. The updated guidance has been reviewed in line with these Codes and the current policy and procedures. Whilst there are no significant changes to how conflicts of interest are managed, a new Conflicts of Interest Policy and a revised Code of Conduct for Committee Members was agreed with the Department on 15 April 2022. Both were approved by the Management Committee at its meeting in May 2022.

# 4. Compliance with the 'Corporate Governance in Central Government Departments: Code of Practice NI 2013'

Since 2015, TPR has been responsible for the regulation of Public Service Pension Schemes. The Code of Practice 14 sets out best practice guidance that Schemes are expected to adhere to in relation to governance and administration. NILGOSC aims to comply to the highest standards of governance and

administration and aims to comply with the aspects of the Code, where appropriate. Since implementation of the Code, NILGOSC has completed the TPR's annual Governance and Administration survey, which monitors compliance of Schemes against the requirements of the Code. In addition to this, NILGOSC also submits an annual Scheme return, which provides updated Scheme information to TPR.

One of the requirements of the Code is reporting breaches of the law to TPR. NILGOSC assesses any potential breaches in line with its Breach Reporting Procedure. Any identified breaches were assessed in line with this during 2021/22 but none were considered materially significant, so no breaches were reportable to TPR during the reporting period.

On 17 March 2021, TPR issued its new draft Code of Practice for consultation. TPR plans to replace its existing codes of practice, including Code of Practice 14 for public sector pension schemes, with this single code, which will be web-based. NILGOSC submitted a response to the consultation, which closed on 26 May 2021. It is expected that TPR is likely to lay the Code before Parliament in June/July 2022 with the Code likely to come into force from October 2022. NILGOSC has undertaken a gap analysis for compliance against the new and/or revised requirements for public sector pension schemes based on the draft Code but the final version has not yet been published.

### 5. Departmental Approvals

In line with the DoF Pay Remit approval process NILGOSC received approval for the National Joint Council pay settlement for 2021/22 on 9 March 2022.

The Department provided approval for the contractual element of the 2022/23 pay remit on 14 April 2022. The National Joint Council pay settlement for 2022/23 remains outstanding at the time of writing.

NILGOSC received approval from the Department of Finance on 21 June 2022 for the write-off of bad debts. These write-offs are detailed in the Assembly Accountability Report on page 84.

Under its delegations of authority NILGOSC sought and received approval from its sponsor department, DfC, on 20 May 2022 for the write off of a single pensioner overpayment in excess of £500 (£2,054) as a result of a death which was deemed irrecoverable.

On 30 June 2020 NILGOSC was directed by the Department to undertake all procurement for contracts valued between £5k and £30k through the Department's Central Procurement Team and to use

Central Procurement Directorate as its Centre for Procurement Excellence for other procurements. This has caused some operational difficulties for NILGOSC, which have been raised and discussed by the SMT and communicated onwards to the Department.

### 6. Risk Assessment

NILGOSC's Risk Management Policy sets out the organisation's risk control framework and appetite to risk. NILGOSC has an open/cautious appetite to risk taking, with the exception of compliance risks, where its appetite is risk averse. However, this does not prevent NILGOSC from identifying opportunities to improve and implement efficiencies. Risk appetite is incorporated into NILGOSC's risk management process and risk register.

The risk control framework provided a consistent basis to identify, monitor and report risks and to progress strategies to manage these risks during 2021/22. A dedicated risk owner is assigned at management level to each risk to provide clear lines of accountability across the organisation. Risk owners review the risks that have been assigned to them on a quarterly basis and submit a Statement of Assurance to confirm that the existing controls are still effective and whether or not the risk score needs to be reassessed. The SMT considers these Statements during its quarterly review of the risk register and makes changes to the risk scores, if necessary. A report and any revisions to the risk register are considered by the ARAC prior to submission to the Management Committee for approval.

The outcome of the quarterly risk reviews is also used to inform completion of Departmental Assurance Statements. As required, NILGOSC completed and submitted its Assurance Statements for the 6 months ended 30 September 2021 and 31 March 2022.

In addition to quarterly reviews of the risk register, a comprehensive annual review of the risk register is undertaken at the beginning of the financial year to review the existing risks and also to identify any new or emerging risks. As a result of the 2021/22 annual risk review, new and emerging risks were added to the risk register and some risks were removed. In relation to the ongoing COVID-19 pandemic, it was acknowledged that significant progress has been made over the previous 12 months to manage the impact of the pandemic. It was agreed that, whilst some COVID-19 specific risks remained applicable to the next 12 months, others had not materialised and the long-term risk could be managed within existing risks on the risk register. Therefore, as a result of

the review, the separate COVID-19 risk register was removed, with three COVID-19 specific risks moved to the risk register to be managed in line with standard risk management procedures. The ARAC reviewed the risk register 2021/22 at its meeting on 7 June 2021, which was subsequently approved by the Management Committee on 22 June 2021.

The annual review for 2022/23 was carried out on 26 April 2022. The review included consideration of challenges facing NILGOSC in 2022/23, including the ongoing impact of the COVID-19 pandemic, the impact of staff absence and reliance on key personnel for key processes, ongoing uncertainty of the external political environment, regulatory changes, including the impact of the McCloud judgment and ongoing projects to enhance information systems and business processes. All existing risks were reviewed, and risk scores amended as appropriate.

Therefore, as a result of the review, one COVID-19 related risk was removed from the risk register on the basis that the risk was adequately covered by another risk on the register. No new risks were added to the risk register. The 2022/23 risk register contains 51 risks in total, nine of which have been categorised as strategic and four of which have a "red" risk status.

Despite the continued operational challenges that COVID-19 and associated restrictions continued to place on the organisation during the reporting period, NILGOSC continued to operate and provide a full and effective service to its members and pensioners throughout the last 12 months and made good progress during 2021/22 in managing those risk issues identified at the beginning of the year. Looking forward to 2022/23, NILGOSC will continue to have several challenges to manage as detailed above, particularly with ongoing uncertainty around the long-term impact of the pandemic and the additional administrative burden as a result of the McCloud judgment. These challenges and any new or emerging risks will be reviewed on an ongoing basis through the risk management process set out above and appropriate plans will be put in place to effectively manage any risks within the existing risk and internal control framework.

#### **6.1 Business Continuity**

NILGOSC has a Business Continuity Plan (BCP) and disaster recovery arrangements in place, which it formally tests on an annual basis. NILGOSC has made a number of enhancements to its IT infrastructure in the last number of years to improve disaster recovery.

Since 2020, the ability to continue to operate and deliver a service within the government restrictions was heavily reliant on having the appropriate IT infrastructure systems, hardware and security in place. These systems were thoroughly and successfully tested at the onset of the pandemic in 2020 to provide assurance that critical services could continue to operate in preparation for the potential impact of COVID-19 on the workforce. This risk has continued to be present throughout the last 12 months and so detailed testing was again undertaken and successfully completed as part of the annual business continuity test in March 2022, including the ability to run the monthly pensioner and payroll processes remotely.

In December 2020, NILGOSC signed up to take part in a project with the National Cyber Security Centre for Northern Ireland to attain Cyber Essentials Plus certification. This is a government backed scheme that provides assurance that an organisations' IT infrastructure is set up and configured appropriately to guard against the most common cyber threats. Certification involves a detailed self-assessment followed by independent verification testing and must be undertaken each year to remain certified. NILGOSC successfully completed the re-certification process in February 2022 and was accredited for the second consecutive year with Cyber Essentials Plus on 24 March 2022.

NILGOSC also appoints an external expert to undertake independent penetration tests of its internet facing and other systems within the perimeter network on an annual basis. This is in order to test the robustness of the IT infrastructure in place, including the firewall, to protect NILGOSC's systems from external attack. The scope was further extended for the penetration testing in 2021/22 and no significant issues were identified as a result of the tests undertaken in March 2022.

#### 6.2 Fraud and Whistleblowing

NILGOSC participates in the National Fraud Initiative's (NFI) biennial data matching exercises for the purposes of assisting in the prevention and detection of fraud. NILGOSC took part in the NFI 2020/21 data matching exercise during the year. Matches were received in January 2021 and significant progress has been made in investigating and resolving these matches. No cases of actual or suspected fraud have been identified through the exercise to date. An update in relation to the NFI exercise is provided in the Performance Report on page 25.

All cases of suspected or actual fraud are investigated in line with NILGOSC's Anti-Fraud Policy and all cases

of malpractice, unlawful conduct or wrongdoing are investigated and reported to the PSNI and the Department. During 2021/22, one new case of suspected fraud was reported in line with the Policy and NILGOSC continued to provide updates to the Department on a previously reported case.

There were no raised concerns through NILGOSC's Raising Concerns Policy during 2021/22.

#### **6.3 Information Risks**

NILGOSC takes information security seriously and operates a strong control environment for the handling of personal data to ensure compliance with relevant data protection legislation. A robust Information Security Policy, technical safeguards and procedures are in place to protect the security of information. NILGOSC has a secure email software platform in place to ensure that personal information held by external parties is sent securely and penetration testing is carried out to ensure the security of internal and external connections to NILGOSC systems. Further developments were made during the year to enhance the information security measures in place to protect data, including the replacement of perimeter firewalls and renewal of Cyber Essentials Plus certification.

Data protection and information security is a key part of induction training for all new staff, which is signed off on completion. Refresher training is also provided on a regular basis via an e-learning module. In line with the requirements for a public body, NILGOSC also has a nominated Data Protection Officer who is an accredited GDPR Practitioner.

A number of minor personal data incidents or potential breaches were identified in 2021/22. None of these breaches constituted a significant breach of sensitive data, in accordance with the Information Commissioner's Office guidance. An update in relation to personal data related incidents in 2021/22 is provided in the Accountability Report on page 66.

# 7. Review of Effectiveness of the Governance Framework

As Accounting Officer, I review the effectiveness of the governance framework, including risk management and the system of internal control on at least an annual basis. The review of effectiveness is informed by the work of the senior managers within NILGOSC who have responsibility for the development and maintenance of the control environment, the regular reviews by the Committee of financial and investment performance, the Committee's review of its effectiveness and the information it receives, the

Internal Auditor's Annual Statement of Assurance and the opinion provided by the External Auditor. Assurance reports on internal controls from the auditors of fund managers and the Global Custodian are also considered as part of this review.

#### 7.1 Highlights of Committee and ARAC Meetings

The standing agenda items for Committee meetings have been set out in section 2.1 above. In addition to these, other important areas considered/approved by the Committee during 2021/22 are set out below:

- Staffing Committee Terms of Reference
- Establishment of the Internal Dispute Resolution Committee (IDRC)
- Revised Equality Scheme
- Annual Report of the Staffing Committee
- Custodian Services Contract Extension
- Performance Assessment of Investment Advisors
- Strategic Review of NILGOSC's Vision, Mission, Values, Strategic Aims and Objectives and Consultation
- Investment Legal Advice Tender
- Investment Strategy and implementation
- Climate Related Disclosures Report
- Statement of Investment Principles
- Local Government Pension Scheme (Amendment) Regulations 2022
- Selection of Global Equity Fund
- Business case and procurement process for Investment Tax Advice
- Appointment of ASM to conduct independent analysis of NILGOSC's procurement arrangements with CPD
- Delegations of Authority
- Investment in IFM Global Infrastructure Fund
- Funding Strategy Statement
- Freedom of Information Publication Scheme
- Stewardship Code
- Format of Future meetings
- Business case for continued use of disaster recovery site

The standing agenda items considered by the ARAC have particular importance in ensuring that the risk management and internal control systems in

NILGOSC are sound and operating effectively. The highlights and key issues considered by the ARAC during 2021/22 are set out in its Annual Report, which is provided on pages 136 to 139 of this report.

The ARAC undertakes an annual review of its effectiveness. The review undertaken for 2021/22 demonstrated that, overall, the ARAC had been effective in ensuring that NILGOSC has functioned according to good governance and accounting and auditing standards and has adopted appropriate risk management arrangements during the period under review.

#### 7.2 Committee Performance

NILGOSC has a Committee Effectiveness Framework, which aims to identify areas of Committee performance that are strongest and those that need improvement and to identify priority areas for the Committee to focus on improving effectiveness. A key feature of the Framework is a self-assessment questionnaire, which is completed online anonymously and focuses on the following eight key sections:

- Committee Composition and Function
- Committee Meetings and Support
- Strategic Planning and Performance Measurement
- Financial Management
- · Risk, Audit and Governance
- Pension Administration
- Investment of the Fund
- Communication and Engagement with Key Stakeholders

The outcome of the evaluation for 2021/22 demonstrated that, overall, the Committee is set up and operates effectively in the key areas set out above and that effective processes are in place to ensure robust monitoring of NILGOSC and its performance.

# 7.3 Provision of Information and Data to the Committee

The Committee is provided with detailed papers for every meeting, which include all relevant background information, facts and figures necessary to fully inform Committee Members on each agenda item. Some examples of the types of information provided to the Committee on a routine basis include:

- Management Accounts
- Summary of investments
- Investment performance figures and analysis
- Fund Manager briefing reports
- Quarterly investment reports from the Investment Consultant
- Corporate Plan progress reports and statistics
- Quarterly Risk Review reports
- Scheme and Regulatory updates

Each report has an executive summary that summarises the key issues and meeting papers are issued one week in advance of each meeting. During its review of effectiveness in 2021/22, all Committee members agreed that meeting papers are timely, relevant, and focused on priorities, however one disagreed that they were always concise. All Committee Members also agreed that they are provided with key Scheme and corporate documents.

The Committee reviews its information requirements on a regular basis. Since 2013, the Committee has had electronic access to its meeting papers and has confirmed its satisfaction with this approach.

A Committee Handbook section is also included on the website to provide a single point of access for Committee Members to key Scheme documents and policies, as well as other forms and guidance.

#### 7.4 Internal Audit

NILGOSC outsources its internal audit function to ASM to provide assurance on the effectiveness of the governance, risk management and control environment in the organisation. ASM works to an agreed audit plan, carried out in accordance with the Public Sector Internal Audit Standards. The work of Internal Audit concentrates on areas of key activities determined by analysis of the areas of greatest risk. Findings from work carried out during the year are presented to the ARAC and copies of all final reports are sent to me as Accounting Officer. In addition, Internal Audit provides an annual written statement to the ARAC, setting out a formal opinion on the adequacy and effectiveness of NILGOSC's risk management, control, and governance processes.

In their Annual Assurance Statement, the Internal Auditors stated that, during the twelve month period ended 31 March 2022, NILGOSC's systems in relation to risk management, control and governance were adequate and operated effectively, thereby providing satisfactory assurance in relation to the achievement of NILGOSC's objectives. A list of the audit reviews and outcomes that informed this assurance rating is set out in the Annual Report of the Audit & Risk Assurance Committee, which is provided separately in this document on page 148. Internal Audit did not consider there to be any significant control issues relevant to the preparation of the Governance Statement for the year ended 31 March 2022.

NILGOSC reviews the effectiveness of the internal audit service provided by ASM through pre-agreed key performance indicators (KPIs). Progress against these KPIs is formally reviewed by management on an annual basis and reported to the Audit & Risk Assurance Committee, which was satisfied with the performance in 2021/22.

#### 7.5 External Audit

As a non-departmental public body, NILGOSC is required by statute to use the NIAO for the provision of its external audit service. The Local Government Auditor issued an unqualified audit opinion for the year ended 31 March 2022.

The audit opinion for the year ended 31 March 2022 is included on pages 86 – 89.

#### 8. Significant Governance Issues

No significant governance or internal control issues were identified from the review of the effectiveness of the system of risk, governance and internal control for the year ended 31 March 2022 that requires reporting in this Statement.

#### 9. Assurance Summary

NILGOSC aims to adhere to the highest standards of governance when conducting its business, to ensure that the organisation and the Pension Scheme are run effectively and efficiently and that decisions are taken in the best interests of its stakeholders.

The review of the effectiveness of the systems and processes that comprise the governance framework for 2021/22 demonstrate that key systems are operating soundly and that there are no significant weaknesses or areas for undue concern. Whilst I have noted in this Statement that there are future challenges and some areas where ongoing improvements can be made, these are not considered to pose a significant risk to the achievement of NILGOSC's strategic objectives.

David Murphy

David Murphy

Chief Executive and Secretary

Dand A Musty

22 August 2022

#### INTRODUCTION

The Remuneration and Staff Report sets out NILGOSC's remuneration policy, reports on how it has been implemented and sets out the amounts awarded to the senior officers and members of the Management Committee. In addition details are provided on remuneration and staff that are key to NILGOSC's accountability as a non-departmental public body.

#### **REMUNERATION REPORT**

#### **Remuneration Policy**

The remuneration of all NILGOSC employees, including its chief officers, is determined by the Committee which has adopted the pay scales of the National Joint Council (NJC) for Local Government Services.

The NJC for Local Government Services represents local authorities and their employees across the UK. The principal role of the Council is to reach agreement on a national scheme of pay and conditions for local application. The Council consists of 70 members, 12 employer representatives and 58 employee representatives.

In 1997 the NJC for Local Government Services agreed a national framework to suit local service requirements. This framework is known as The Single Status Agreement and salary scales and conditions of service agreements are as published in the Green Book.

#### **Service Contracts**

All appointments are made on merit, on the basis of fair and open competition.

The officers covered by this report hold appointments which are open ended. The conditions of service including notice periods are those laid down by the NJC for Local Government Services and various local agreements.

For further information on the NJC for Local Government Services and the Green Book please contact NILGOSC at info@nilgosc.org.uk.

#### **Salary and Pension Entitlements**

The following sections provide details of the remuneration and pension interests of senior officers and members of the Management Committee.

#### Senior Management Remuneration and Pension Entitlements (audited)

		202	1/22			202	0/21	
Officers	Salary	Benefits in Kind	Pension Benefits	Total	Salary	Benefits in Kind	Pension Benefits	Total
	£	£	£	£	£	£	£	£
David Murphy Chief Executive and Secretary	95,001- 100,000	-	14,909	110,001- 115,000	95,001- 100,000	-	44,769	140,001- 145,000
Nicola Todd Deputy Secretary	80,001- 85,000	-	17,437	100,001- 105,000	80,001- 85,000	-	39,669	120,001- 125,000
Band of Highest Paid B	mployee's							
Total Remuneration	£95,001 -	£100,000			£95,001 -	£100,000		
% Increase	1.75%				2.75%			
Range of Staff Remuneration	£18,500 –	£100,000			£18,500 –	£97,500		

The value of pension benefits accrued during the year is calculated as (the real increase in pension multiplied by 20) plus (the real increase in any lump sum) less (the contributions made by the individual). Inflation is included in the real increase

in pension benefits accrued during 2020/21. The CPI increase for September 2021 was 3.1%. The inservice revaluation rate for CARE was also 3.1%.

The Chair is the only Committee member in receipt of an emolument, which is a non-pensionable salary.

	202	1/22	202	0/21
Chair	Salary	Benefits in Kind	Salary	Benefits in Kind
	£	£	£	£
Lindsay Todd	14,727	-	14,233	-

#### Salary

Salary includes gross salary, overtime, recruitment and retention allowances, private office allowances and any other allowance that is subject to UK taxation. If bonuses were payable, these are reported separately from the salary amount.

#### **Benefits in Kind**

The monetary value of benefits in kind covers any benefits provided by the employer and treated by HM Revenue and Customs as a taxable emolument.

Total remuneration includes salary, nonconsolidated performance-related pay and benefits-in-kind. It does not include severance payments, employer pension contributions and the cash equivalent transfer value of pensions.

#### **Pay Ratios**

Reporting bodies are required to disclose the relationship between the remuneration of the highest-paid employee in their organisation and the lower quartile, median and upper quartile remuneration of the organisation's workforce.

The banded remuneration of the highest-paid employee in NILGOSC in the financial year 2021/22 was £95,001-£100,000 (2020/21 £95,001-£100,000). The relationship between the mid-point and upper and lower quartile of this band and the remuneration of the organisation's workforce is disclosed below.

2021/22	25th Percentile	Median	75th Percentile
Total renumeration (£)	23,023	25,419	32,798
Pay Ratio	4.23:1	3.84:1	2.91:1

2020/21	25th Percentile	Median	75th Percentile
Total renumeration (£)	20,493	25,419	32,234
Pay Ratio	4.76:1	3.98:1	3.02:1

The ratios for 2021/22 as compared to 2020/21 indicate minimal movement but are consistent with higher than usual turnover in staff at the lower end of the pay scale range and a flat 1.75% NJC pay award settlement across the workforce in 2021/22.

# Management Committee Members' Attendance Allowance

The Committee members, with the exception of the Chairman, receive a meeting fee for attending Management Committee, Audit and Risk Committee and Staffing Committee meetings.

Details of meeting allowances claimed by Committee members, which may differ from meeting attendance reported in the Governance Statement, are captured in the following table:

	2021/22	2020/21
Committee Members	£	£
Joan McCaffrey	4,000	4,500
Mark McBride	4,500	4,500
Paul Francey	4,250	5,250
JJ Tohill	3,750	1,000
Michael Rafferty	4,500	4,500
Antoinette McMillen	3,250	3,750
Peter Moore	2,500	3,000
Shane McCurdy	1,000	-
Alan Law	4,250	2,500
Kenneth Clayton	3,250	3,000
Derek McCallan*	3,750	-
Heather McKinstry*	2,750	-
Linda Neilan**	-	5,500
Sharon McQuillan**	-	5,250
Peter McMurray***	-	1,250
Peter Caldwell***	-	2,500
David Jackson***	-	1,500
Tom Irvine***	-	1,750

- Term of appointment commenced 1 April 2021
- \*\* Term of appointment ended 31 March 2021
- \*\*\* Term of appointment ended 30 September 2020

#### **Pension Benefits (audited)**

Officers	Accrued Pension and Related Lump Sum at Age 65 as at 31/03/22	Real Increase in Pension and Related Lump Sum at Age 65	CETV at 31/03/22	CETV at 31/03/21	Real Increase in CETV
	£	£	£	£	£
David Murphy Chief Executive and Secretary	40,001-45,000 plus lump sum of 55,001-60,000	0 – 2,500 plus lump sum of (2,500)-0	729,000	677,000	21,000
Nicola Todd Deputy Secretary	25,001-30,000 plus lump sum of 20,001-25,000	0-2,500 plus lump sum of (2,500)-0	380,000	348,000	14,000

Pension benefits are provided through the NILGOSC Scheme. This is a statutory scheme that provides benefits on a 'career average revalued earnings' basis at normal retirement age. Benefits accrue at the rate of 1/49th of pensionable salary from 1 April 2015 and were built up at a rate of 1/80th of pensionable salary for each year of service up to 31 March 2009 and 1/60th for each year of service between 1 April 2009 and 31 March 2015. In addition a lump sum equivalent to 3/80ths of pensionable salary for each year of service up to 31 March 2009 is payable on retirement.

Employees currently pay contributions of between 5.5% - 10.5% of pensionable earnings. Pensions increase annually in line with the Consumer Price Index. On death, pensions are payable to the surviving spouse, nominated co-habiting partner or civil partner. On death in service, the Scheme will pay a lump sum benefit of three times pensionable pay and will also provide a service enhancement on computation of the spouse's pension.

The accrued pension quoted is the pension the member is entitled to receive when they reach pension age, or immediately on ceasing to be an active member of the Scheme if they are at or over pension age.

Pension age is age 65 or state pension age if higher.

#### Cash Equivalent Transfer Values

A Cash Equivalent Transfer Value (CETV) is the actuarially assessed capitalised value of the

pension scheme benefits accrued by a member at a particular point in time. The benefits valued are the member's accrued benefits and any contingent spouse's pension payable from the Scheme. A CETV is a payment made by a pension scheme or arrangement to secure pension benefits in another pension scheme or arrangement when the member leaves a scheme and chooses to transfer the benefits accrued in his/her former scheme.

The pension figures shown relate to the benefits that the individual has accrued as a consequence of his/her total membership of the pension scheme, and not just to his/her service in a senior capacity to which disclosure applies. The CETV figures and the other pension details include the value of any pension benefit in another scheme or arrangement which the individual has transferred into the NILGOSC Scheme and for which NILGOSC has received a transfer payment commensurate with the additional pension liabilities being assumed. They also include any additional pension benefits accrued as a result of the member purchasing additional years of pension service in the Scheme at his/her own cost.

CETVs are calculated within the guidelines and framework prescribed by the Institute and Faculty of Actuaries and in accordance with the Occupational Pension Schemes (Transfer Values) (Amendment and Revocation) Regulations 2015. They do not



take account of any actual or potential reduction to benefits resulting from Lifetime Allowance Tax which may be due when pension benefits are taken.

#### Real increase in CETV

This reflects the increase in CETV effectively funded by the employer. It does not include contributions paid by the employee (including the value of any benefits transferred from another pension scheme or arrangement) and uses common market valuation factors for the start and end of the period. However, the real increase calculation uses common actuarial factors at the start and end of the period so that it disregards the effect of any changes in factors and focuses only on the increase that is funded by the employer. The real increase in CETV and pension benefits accrued can be negative, i.e. there can be a real decrease. This happens when inflation is higher than pay increases, which is the case for the factors used in 2021/22. (3.1% inflation -v- 1.75% salary increase). For thecomparator year in 2020/21 the real increase was positive (0.5% inflation -v- 2.75% pay increase).

#### McCloud Remedy

Discrimination identified by the courts in the way the 2015 pension reforms were introduced must be removed by the Department for Communities. It is expected that, in due course, eligible members with relevant service between 1 April 2015 and 31 March 2022 may be entitled to different pension benefits in relation to that period. This is known as the 'McCloud Remedy' and will impact many aspects of the LGPS(NI). At this stage allowance has not yet been made within CETVs for this remedy.

More information on the McCloud remedy can be found on the NILGOSC website:

https://nilgosc.org.uk/employers/administeringthe-scheme/mccloud-remedy/

#### STAFF REPORT

#### Staff Numbers and Related Costs (audited)

Staff costs comprise:

	Permanently employed staff	Others	2021/22 Total	2020/21 Total
	£'000	£'000	£'000	£'000
Wages and salaries	2,260	105	2,365	2,322
Social security costs	198	8	206	192
Other pension costs	1,211	20	1,231	831
Total	3,669	133	3,802	3,345

Average number of persons employed

			2021/22	2020/21
	Permanently employed staff	Others	Total	Total
Directly employed	73	3	76	79
Total	73	3	76	79

The figures recorded for the average number of persons employed uses the whole-time equivalent persons employed during the year.

The decrease in the average number of whole-time equivalent persons employed during the year is mainly as a result of recruitment challenges following a larger than typical number of leavers in 2021/22. Most positions had been filled, but not until the end of the year. This is reflected in the disparity between the whole time equivalent as at 31 March 2022 as compared to the average figure recorded above.

NILGOSC provides pension arrangements for the benefit of its employees through the NILGOSC Scheme. The NILGOSC Scheme is known as the Local Government Pension Scheme (Northern Ireland) and is a funded defined benefit scheme. Benefits earned up to 31 March 2015 are linked to final salary. Benefits earned after 31 March 2015 are based on a Career Average Revalued Earnings Scheme.

The large increase in pension costs as compared to 2021/22 is as driven by the actuarial charge estimated for past service costs £773k (2021: 386k).

For 2021/22, employers' contributions were payable to the NILGOSC Scheme at 19.5% of pensionable pay. The Scheme's Actuary reviews employer contributions every three years following a full scheme valuation. The last valuation was conducted during 2019/20 and the contributions to be paid until 31 March 2023 resulting from that valuation are set out in the Fund's Rates and Adjustment Certificate within the report on the Actuarial Valuation as at 31 March 2019.

The NILGOSC Scheme is a multi-employer scheme. Note 18 to the Financial Statements sets out the net defined benefit liability attributable to NILGOSC specifically as a participating employer.

#### **Staff Composition**

An analysis of the composition of staff members as at 31 March 2022 and 31 March 2021 on a whole-time equivalent basis is provided in the following table:

	Male	Female	31/3/22 Total	Male	Female	31/3/21 Total
Secretariat	1	1	2	1	1	2
Senior Manager	-	5	5	-	5	5
All Other Emplyees	25	48	73	25	46	71
Total	26	54	80	26	52	78

#### **Sickness Absence**

#### Expenditure on consultancy

The average number of days lost to sickness absence by all staff in 2021/22 was 11.1 days (2020/21: 7.3 days).

There was no expenditure on consultancy services during 2021/22 (2020/21: nil).

#### **Staff Turnover**

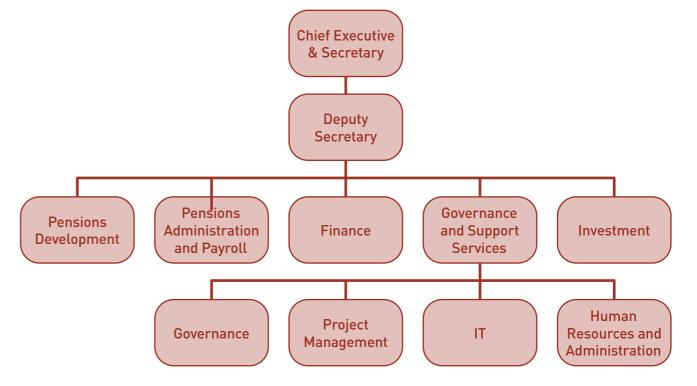
The staff turnover rate in NILGOSC during 2021/22 was 20.24% (2020/21: 11.98%).

#### **Equality and Diversity**

It is the policy of NILGOSC to ensure that equality of opportunity is provided to all employees and those seeking employment. A welcome statement is used on recruitment advertising to encourage recruitment from a diverse range of applicants and from groups under-represented in the workforce; and full and fair consideration is given to all applicants, including disabled applicants. It is also NILGOSC's policy to make all reasonable adjustments to support the employment, training and development and retention of those with a disability. NILGOSC's commitment to the promotion of equality of opportunity and diversity within its workforce is reflected across all of its staff policies.

#### Staff

Day to day administration of the Scheme is performed by the Secretariat, who report to the Committee on a monthly basis. Led by the Chief Executive and Secretary and Deputy Secretary, over 80 experienced staff are responsible for the administration of retirement benefits and the monitoring of investments and operate within the functions shown in the following chart:



NILGOSC recognises that one of its greatest assets is its professional and experienced staff and is committed to developing every employee to their full potential. NILGOSC recognises the Northern Ireland Public Service Alliance (NIPSA) as its Trade Union and all members of staff have the right to join should they wish to do so.

#### **Staff Development**

Training and development of staff is a key priority for NILGOSC and in 2021/22 a budget of 2.5% of salary costs was allocated to this particular area. Significant emphasis is placed on training and developing staff through a structured training programme. A needs analysis is carried out every year as part of the appraisal process and an organisation wide training programme is prepared.

In addition to maximising the ability of staff to carry out their duties competently and efficiently, the NILGOSC training and development policy is designed to support individual opportunities for personal and career development.

In 2021/22 training and development opportunities continued to be somewhat curtailed by pandemic

related restrictions, however providers of training and development services largely accommodated for the prevailing conditions by providing options for virtual training with 'live' and recorded sessions available online.

#### **Employees' Involvement**

Staff communication and involvement continues to be a key objective and NILGOSC communicates with its staff about its objectives, progress and activities through various channels – team meetings, briefings, circulars and the staff intranet. NILGOSC continued its quarterly staff newsletter throughout 2021/22 as an additional means of internal communication. Staff are encouraged to take part in project groups where possible to promote employee engagement and to develop knowledge and skills. In addition, staff are involved in the preparation of the annual Corporate Plan. The employees have also an elected Staff Forum which can bring concerns or suggestions for improvement directly to senior management.

All these initiatives give staff the opportunity to contribute constructively to the development and progress of NILGOSC in its aim to develop staff, improve systems and satisfy its stakeholders' needs.

#### INTRODUCTION

The Assembly Accountability Report provides details of losses and special payments, fees and charges and remote contingent liabilities.

#### **LOSSES AND SPECIAL PAYMENTS** (audited)

#### **Losses Statement**

Losses incurred on the sale of investments are disclosed within "Change in Market Value" in Note 9 to the financial statements and "Gains/losses arising from changes in fair value of Investment Properties" in Note 10 to the financial statements.

Losses incurred during the year in respect of pension overpayments total £9,212. This figure reflects pensioner overpayments as a result of death which are not considered recoverable and includes one overpayment of £2,054. Write-off approval was sought and received from DfC on 20 May 2022 for this irrecoverable pension overpayment.

A suspected pension payroll fraud of £6,737, related to the unreported death of a member was detected during 2021/22. This case was reported to the Department for Communities on 21 October 2021 and is currently the subject of a criminal investigation. This debt has been provided for in 2021/22, while NILGOSC continue to pursue recovery through the civil courts.

Bad debts written off during the year total £1,081,072. This write-off relates to investment property rental debt on a number of investment properties.

Write-offs of losses and bad debts of this nature exceeding £5k per case require Department of Finance approval which was received on 21 June 2022.

#### **Special Payments**

There were no special payments during the year.

#### **Charitable Donations**

NILGOSC made no charitable donations during the year.



#### FEES AND CHARGES (audited)

NILGOSC had no material fees and charges income during 2021/22 (2020/21: nil).

#### **REMOTE CONTINGENT LIABILITIES** (audited)

In addition to contingent liabilities reported within the meaning of IAS 37 (see Note 22 to the Financial Statements) NILGOSC also reports liabilities for which the likelihood of a transfer of economic benefit in settlement is too remote to meet the definition of a contingent liability.

NILGOSC has no remote contingent liabilities as at 31 March 2022 (2020/21: no remote contingent liabilities).

David Murphy **Chief Executive and Secretary** 

22 August 2022

#### **AUDIT REPORT**

NORTHERN IRELAND LOCAL GOVERNMENT OFFICERS' SUPERANNUATION COMMITTEE

# THE CERTIFICATE AND REPORT OF THE LOCAL GOVERNMENT AUDITOR TO THE DEPARTMENT FOR COMMUNITIES

#### Opinion on financial statements

I have audited the financial statements of the Northern Ireland Local Government Officers' Superannuation Committee ("NILGOSC") for the year ended 31 March 2022 under Regulation 63 of the Local Government Pension Scheme Regulations (Northern Ireland) 2014. The financial statements comprise: the Fund Account, Net Assets Statement, Statement of Cash Flows and the related notes, including significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and 'UK adopted international accounting standards as interpreted and adapted by the Government Financial Reporting Manual'.

I have also audited the information in the Accountability Report described in the report as having been audited. In my opinion the financial statements:

- give a true and fair view of the state of the NILGOSC's affairs as at 31 March 2022 and of the net increase in the Scheme during the year and of the amount and disposition at that date of its assets and liabilities other than liabilities to pay benefits after the Scheme year end; and
- have been properly prepared in accordance with the Regulation 63 of the Local Government Pension Scheme Regulations (Northern Ireland) 2014 and Department for Communities (DfC) directions issued thereunder.

#### Opinion on regularity

In my opinion, in all material respects the expenditure and income recorded in the financial statements have been applied to the purposes intended by the Assembly and the financial transactions recorded in the financial statements conform to the authorities which govern them.

#### **Basis for opinions**

I conducted my audit in accordance with International Standards on Auditing (ISAs) (UK), applicable law and Practice Note 10 'Audit of Financial Statements of Public Sector Entities in the United Kingdom'. My responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of this certificate.

My staff and I are independent of NILGOSC in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK, including the Financial Reporting Council's Ethical Standard, and have fulfilled our other ethical responsibilities in accordance with these requirements.

I believe that the audit evidence obtained is sufficient and appropriate to provide a basis for my opinions.

#### Conclusions relating to going concern

In auditing the financial statements, I have concluded that NILGOSC's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

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

The going concern basis of accounting for NILGOSC is adopted in consideration of the requirements set out in the Government Reporting Manual, which require entities to adopt the going concern basis of accounting in the preparation of the financial statements where it anticipated that the services which they provide will continue into the future.

My responsibilities and the responsibilities of the Management Committee and the Accounting Officer with respect to going concern are described in the relevant sections of this report.

#### Other Information

The other information comprises the information included in the annual report other than the financial statements, the parts of the Accountability Report described in that report as having been audited, and my audit certificate and report. The Management Committee and the Accounting Officer are responsible for the other information included in the annual report. My opinion on the financial statements does not cover the other information and except to the extent otherwise explicitly stated in my report I do not express any form of assurance conclusion thereon.

My responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the audit or otherwise appears to be materially misstated. If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.

#### Opinion on other matters

In my opinion, based on the work undertaken in the course of the audit:

- the parts of the Accountability Report to be audited have been properly prepared in accordance with Regulation 63 of the Local Government Pension Scheme Regulations (Northern Ireland) 2014 and DfC directions issued thereunder; and
- the information given in the Performance Report and Accountability Report for the financial year for which the financial statements are prepared is consistent with the financial statements.

#### Statement about contributions payable

In my opinion the contributions payable to NILGOSC during the year ended 31 March 2022 have in all material respects been paid in accordance with the rules of the Scheme and with the recommendations of the actuary.

#### Matters on which I report by exception

In the light of the knowledge and understanding of the NILGOSC and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance Report and Accountability Report. I have nothing to report in respect of the following matters which I report to you if, in my opinion:

- adequate accounting records have not been kept; or
- the financial statements and the parts of the Accountability Report to be audited are not in agreement with the accounting records; or
- certain disclosures of remuneration specified by the Government Financial Reporting Manual are not made; or
- I have not received all of the information and explanations I require for my audit; or
- the Governance Statement does not reflect compliance with the Department of Finance's guidance.

#### Responsibilities of the Management Committee and Accounting Officer for the financial statements

As explained more fully in the Statement of Accounting Officer Responsibilities, the Management Committee and the Accounting Officer are responsible for:

- the preparation of the financial statements in accordance with the applicable financial reporting framework and for being satisfied that they give a true and fair view;
- such internal controls as the Accounting Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud of error;
- assessing the NILGOSC's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Accounting Officer anticipates that the services provided by NILGOSC will not continue to be provided in the future.

#### Auditor's responsibilities for the audit of the financial statements

My responsibility is audit the financial statements in accordance with the Local Government Pension Scheme Regulations (Northern Ireland) 2014.

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

I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of non-compliance with laws and regulation, including fraud.

#### My procedures included:

- obtaining an understanding of the legal and regulatory framework applicable to the NILGOSC through
  discussion with management and application of extensive public sector accountability knowledge. The
  key laws and regulations I considered included governing legislation and any other relevant laws and
  regulations identified;
- making enquires of management and those charged with governance on NILGOSC's compliance with laws and regulations;
- making enquiries of internal audit, management and those charged with governance as to susceptibility
  to irregularity and fraud, their assessment of the risk of material misstatement due to fraud and
  irregularity, and their knowledge of actual, suspected and alleged fraud and irregularity;
- completing risk assessment procedures to assess the susceptibility of NILGOSC's financial statements to
  material misstatement, including how fraud might occur. This included, but was not limited to, an
  engagement director led engagement team discussion on fraud to identify particular areas, transaction
  streams and business practices that may be susceptible to material misstatement due to fraud. As part
  of this discussion, I identified potential for fraud in the following areas: management override of
  controls;
- engagement director oversight to ensure the engagement team collectively had the appropriate competence, capabilities and skills to identify or recognise non-compliance with the applicable legal and regulatory framework throughout the audit;

- documenting and evaluating the design and implementation of internal controls in place to mitigate risk of material misstatement due to fraud and non-compliance with laws and regulations;
- designing audit procedures to address specific laws and regulations which the engagement team
  considered to have a direct material effect on the financial statements in terms of misstatement and
  irregularity, including fraud. These audit procedures included, but were not limited to, reading board and
  committee minutes, and agreeing financial statement disclosures to underlying supporting
  documentation and approvals as appropriate;
- addressing the risk of fraud as a result of management override of controls by:
  - o performing analytical procedures to identify unusual or unexpected relationships or movements;
  - o testing journal entries to identify potential anomalies, and inappropriate or unauthorised adjustments;
  - o assessing whether judgements and other assumptions made in determining accounting estimates were indicative of potential bias; and
  - o investigating significant or unusual transactions made outside of the normal course of business.

A further description of my responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website <a href="www.frc.org.uk/auditorsresponsibilities">www.frc.org.uk/auditorsresponsibilities</a>. This description forms part of my certificate.

In addition, I am required to obtain evidence sufficient to give reasonable assurance that the expenditure and income recorded in the financial statements have been applied to the purposes intended by the Assembly and the financial transactions recorded in the financial statements conform to the authorities which govern them.

#### Report

I have no observations to make on these financial statements.

Colette Kane

**Local Government Auditor** 

Plette Kane

Northern Ireland Audit Office 106 University Street BELFAST BT7 1EU

8 September 2022

#### **FUND ACCOUNT**

#### Year ended 31 March 2022

	Note	2021/22	2020/21
		£'000	£'000
Contributions and benefits			
Contributions receivable	4	302,292	288,900
Transfers in		7,985	6,831
		310,277	295,731
Benefits	5	(279,227)	(260,361)
Payments to and on account of leavers	6	(4,455)	(5,216)
Administration expenses	7	(5,527)	(5,061)
		(289,209)	(270,638)
Net additions from dealings with members		21,068	25,093
Return on investments			
Investment income	8	132,066	131,877
Change in market value of financial investments	9	213,412	1,792,043
Gains/(losses) arising from changes in fair values of investment properties	10	91,080	(3,142)
Investment management expenses	11	(25,720)	(25,473)
Net return on investments		410,838	1,895,305
Net increase in the Scheme during the year		431,906	1,920,398
Remeasurement gains/(losses) on the retirement benefit obligation	18	3,666	(2,818)
		3,666	(2,818)
Opening net assets of the Scheme		9,795,486	7,877,906
Closing net assets of the Scheme		10,231,058	9,795,486

The notes on pages 94 to 129 form part of these financial statements.

#### **NET ASSETS STATEMENT**

#### As at 31 March 2022

	Note	2021/22	2020/21
		£'000	£'000
Non-current assets			
Financial assets	9	9,397,271	9,047,447
Investment properties	10	792,300	715,355
Intangible assets	12	182	165
Property, plant and equipment	13	1,338	1,241
Revaluation reserve	14	(110)	-
Total non-current assets		10,190,981	9,764,208
Current assets			
Trade and other receivables	15	56,709	52,188
Cash and cash equivalents	16	15,918	9,940
Total current assets		72,627	62,128
Total assets		10,263,608	9,826,336
Current liabilities			
Trade and other payables	17	(26,739)	(22,330)
Total current liabilities		(26,739)	(22,330)
Non-current assets plus net current assets		10,236,869	9,804,006
Non-current liabilities			(
Retirement benefit obligations	18	(5,811)	(8,520)
Total non-current liabilities		(5,811)	(8,520)
Total net assets of the Scheme		10,231,058	9,795,486

The financial statements summarise the transactions of the Scheme and deal with the net assets at the disposal of the Committee. They do not take account of obligations to pay pensions and other benefits which fall due after the end of the Scheme year. The actuarial position of the Scheme, which does take account of such obligations, is dealt with in Note 20 and the Actuarial Statement on pages 130 to 132 and these financial statements should be read in conjunction with it.

The notes on pages 94 to 129 form part of these financial statements.

David Murphy Secretary

22 August 2022

#### STATEMENT OF CASH FLOWS

#### For the Year Ended 31 March 2022

	2021/22		2020/21	
	£'000		£'000	
Cash flows from operating activities				
Net increase in the Scheme during the year	431,906		1,920,398	
Adjustments for non-cash transactions				
Change in market value of investments and (gains)/losses				
arising from changes in fair value of investment properties	(304,492)		(1,788,901)	
Depreciation/amortisation	169		177	
IAS 19 pension cost less contributions payable	956		501	
(Gain)/Loss on revaluation of property, plant & equipment	(29)		29	
Adjustments for movements in working capital				
Increase in trade and other receivables	(4,521)		(7,532)	
Increase/(decrease) in trade and other payables	4,409		(2,123)	
Net cash inflow from operating activities		128,398		122,549
Cash flows from investing activities				
Purchase of property, plant & equipment and				
intangible assets	(143)			
Durchage of investment proporties			(283)	
Purchase of investment properties	(11)		(283) (2,766)	
Purchase of investment assets	(11) (11,419,049)			
···			(2,766)	
Purchase of investment assets	(11,419,049)		(2,766) (14,644,973)	
Purchase of investment assets  Proceeds of disposal of investment properties  Proceeds of disposal of investment assets	(11,419,049) 14,146		(2,766) (14,644,973) 9,734	
Purchase of investment assets  Proceeds of disposal of investment properties	(11,419,049) 14,146	(122,420)	(2,766) (14,644,973) 9,734	(126,292)
Purchase of investment assets  Proceeds of disposal of investment properties  Proceeds of disposal of investment assets	(11,419,049) 14,146	(122,420) 5,978	(2,766) (14,644,973) 9,734	(126,292)
Purchase of investment assets  Proceeds of disposal of investment properties  Proceeds of disposal of investment assets  Net cash outflow from investing activities	(11,419,049) 14,146	<u> </u>	(2,766) (14,644,973) 9,734	<u> </u>
Purchase of investment assets  Proceeds of disposal of investment properties  Proceeds of disposal of investment assets  Net cash outflow from investing activities	(11,419,049) 14,146	<u> </u>	(2,766) (14,644,973) 9,734	<u> </u>
Purchase of investment assets  Proceeds of disposal of investment properties  Proceeds of disposal of investment assets  Net cash outflow from investing activities  Net increase/(decrease) in cash and cash equivalents	(11,419,049) 14,146	5,978	(2,766) (14,644,973) 9,734	(3,743)

The notes on pages 94 to 129 form part of these financial statements.

# NOTES TO THE FINANCIAL STATEMENTS

#### For the Year Ended 31 March 2022

#### 1. Financial Statements Preparation

#### 1.1. Basis of accounting

The financial statements have been prepared in accordance with the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations (Northern Ireland) 1997, as amended, the Local Government Pension Scheme Regulations (Northern Ireland) 2014, as amended, guidance set out in the 2020/21 Government Financial Reporting Manual (FReM) issued by the Department of Finance, and the Accounts Direction issued by the Department for Communities.

The accounting policies contained in the FReM apply International Financial Reporting Standards as adapted or interpreted for the public sector context. Where the FReM permits a choice of accounting policy, the accounting policy which is judged to be most appropriate to the particular circumstances of the Northern Ireland Local Government Officers' Superannuation Committee for the purpose of giving a true and fair view has been selected. The particular policies adopted by the Northern Ireland Local Government Officers' Superannuation Committee are described below. They have been applied consistently in dealing with items that are considered material to the financial statements.

The financial statements are prepared on an accruals basis.

#### 1.2. Going concern

The Committee have no intentions to wind up the scheme. The time period that the Committee have considered in evaluating the appropriateness of the going concern basis in preparing these financial statements is a period of twelve months from the date of approval of these financial statements.

It is expected that cash inflows from contributions and other receipts will be sufficient to cover scheme outlays for a period of at least 12 months from the date of signing the financial statements. In addition, as noted on page 92, the scheme has significant investment assets which can be liquidated, if required. As such it is considered appropriate to prepare the financial statements on a going concern basis.

#### 1.3. Functional and presentation currency

These financial statements are presented in sterling, which is the Fund's functional currency. All amounts have been rounded to the nearest thousand, unless otherwise indicated.

#### 2. Accounting policies

#### 2.1. Contributions

Normal contributions, both from members and employers, are accounted for on an accruals basis at the rate certified by the Scheme Actuary in the payroll period to which they relate.

Employers' deficit funding contributions are accounted for on the due date on which they are payable as certified by the Scheme Actuary.

Employers' augmentation contributions and pensions strain contributions are accounted for in accordance with the agreement under which they are being paid.

Employers' special contributions are accounted for in accordance with the agreement under which they are being paid, or in the absence of such an agreement, when received.

Employers' cessation contributions are accounted for in the period in which the liability arises and are reported net of any approved bad debt write-off.

#### 2.2. Additional Voluntary Contributions (AVCs)

NILGOSC provides an AVC Scheme for its contributors, the assets of which are invested separately from those of the fund. AVCs are not included in the financial statements in accordance with 5(2)(b) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations (Northern Ireland) 2000 (SRNI 2000/178) but are disclosed as a note to the financial statements (see Note 9).

#### 2.3. Payments to members

Benefits are accounted for in the period in which they fall due for payment. Where there is a choice, benefits are accounted for in the period in which the member notifies the Fund of his/her decision on the type or amount of benefit to be taken or, if there is no member choice, they are accounted for on the date of retirement or leaving. Pensions in payment are accounted for on an accruals basis.

#### 2.4. Transfers to and from other schemes

Individual transfers in/out are accounted for on a receipts and payments basis.

Bulk transfers in/out are accounted for in accordance with the bulk transfer terms signed by the appointed actuaries.



#### 2.4. Transfers to and from other schemes (continued)

Transfers in from members wishing to use the proceeds of their additional voluntary contributions to purchase scheme benefits are accounted for on a receipts basis, and are reported within transfers in.

#### 2.5. Administration and other expenses

Administration and other expenses are accounted for on an accruals basis.

#### 2.6. Investment income

Income from equities is accounted for on the basis of the "ex-dividend" date with outstanding dividends (quoted "ex-dividend") at 31 March being included as income for the financial year. Income from equities is net of irrecoverable withholding tax.

Income from fixed income and index-linked securities, cash and short-term deposits is accounted for on an accruals basis.

Property related income consists primarily of rental income. Rental income from investment properties has been taken into account by reference to the periods to which the rents relate and is shown net of related expenses. Any lease incentives granted are recognised as an integral part of the total rental income, over the term of the lease.

#### 2.7. Investment management expenses

Investment management expenses are accounted for on an accruals basis.

External investment management and custodian fees are agreed in management or custody agreements governing the administration of the individual mandates

Fees are generally based on the valuation of the underlying investments and, as such, will fluctuate as the valuations change.

Performance related fees were introduced for one investment manager in January 2021. There were no performance related fees due in 2021/22.

Investment costs that are deducted from the value of an investment are recognised as a cost in the Fund Account rather than as a reduction in the change in market value of investments.

#### 2.8. Investment transaction costs

Investment costs deducted at source are recognised within investment management expenses within the Fund Account.

Any indirect costs incurred through the bid-offer spread on some pooled investment vehicles are not treated as an expense. Such costs are accounted for as part of the acquisition costs or sale proceeds.

#### 2.9. Taxation

The Scheme is a Registered Public Service Scheme under Chapter 2 of Part 4 of the Finance Act 2004. It has received automatic registration by virtue of Part 1 of Schedule 36 of that Act.

#### 2.10. Valuation of financial assets

Investments are included in the Net Asset Statement on a fair value basis at the reporting date.

- a) Quoted investments are stated at bid value, excluding any accrued income, or if the bid value is unavailable, at the value of the most recent transaction.
- b) Fixed income securities and index linked securities are valued on a bid price basis excluding accrued interest. Accrued interest is included within investment income due.
- c) The valuation of unquoted private equity and private debt investments is based on the latest investor reports and financial statements provided by the fund managers of the underlying funds, adjusted for transactions arising after the date of such reports. Fund Manager valuations are developed in accordance with generally accepted guidelines.
- d) The valuation of unquoted infrastructure investments is based on the latest fund manager valuations, adjusted for transactions arising after the date of such valuations. Fund Manager valuations are developed in accordance with generally accepted guidelines.
- e) Pooled investments are stated at the manager's unit value on a bid price basis if published, or, if single priced, at the closing single price.
- f) Derivatives are stated at fair value.
- Exchange traded derivatives are stated at fair value determined using market quoted prices.
- Swaps are valued taking the current value of future cash flows arising from the swap determined using discounted cash flow models and market data at the reporting date.
- Over The Counter (OTC) derivatives are stated at fair value using pricing models and relevant market data as at the year end date.
- Forward foreign exchange contracts are valued by determining the gain or loss that would arise from closing out the contract at the reporting date by entering into an equal and opposite contract at that date.
- All gains and losses arising on derivative contracts are reported within 'Change in Market Value'. Receipts and payments arising from derivative instruments are reported as sale proceeds or purchase of investments.

#### 2.11. Investment properties

Investment properties are valued annually by independent chartered surveyors (BNP Paribas Real Estate), in accordance with the RICS Appraisal and Valuation Manual, who have recent experience of the types of properties held by the Scheme, taking account, amongst other things, of the current estimate of rental values and market yields.

The carrying amounts of these assets approximate the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

#### 2.12. Intangible assets - software intangibles

Where computer software is not an integral part of a related item of computer hardware, the software is treated as an intangible asset.

#### 2.13. Property, plant and equipment

Property is carried at fair value and is valued on the basis of open market value at the reporting date by the independent chartered surveyors BNP Paribas Real Estate in accordance with the RICS Appraisal and Valuation Manual.

Non-property assets are carried at cost less accumulated depreciation and impairment losses where applicable.

#### 2.14. Depreciation of property, plant and equipment

Depreciation is provided so as to write down the assets to their residual values over their estimated Useful Economic Life (UEL). Property assets have a UEL of 25 years, plant and equipment have a UEL of 5 years and computer equipment a UEL of 3 years.

#### 2.15. Financial instruments

(i) Recognition and initial measurement

Financial assets and liabilities at Fair Value Through Profit/Loss (FVTPL) are initially recognised on the trade date, which is the date on which NILGOSC becomes a party to the contractual provision of the instrument. Other financial assets and liabilities are recognised on the date on which they are originated.

(ii) Classification

#### Financial assets

On initial recognition financial assets are classified as measured at amortised cost or FVTPL.

A financial asset is measured at amortised cost if it meets both of the following conditions and is not designated as at FVTPL:

#### 2.15. Financial instruments (continued)

- it is held within a business model whose objective is to hold assets to collect contractual cash flows; and
- its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI).

All other financial assets of the Fund are measured at FVTPL.

In making an assessment of the objective of the business model under which a financial asset is held, all of the relevant information about how the Fund is managed is considered. This includes how performance is evaluated and reported, the risks that affect the performance of the business model and how those risks are managed, and the frequency, volume and timing of sales of financial assets in prior periods.

It has been determined that the Fund operates two business models as follows:

- a) Held-to-collect business model: this includes cash and cash equivalents and trade and other receivables. These financial assets are held to collect contractual cash flows: and
- b) Other business model: this includes fixed income securities, equity instruments, derivatives and unlisted infrastructure/private equity investments. These financial assets are managed and their performance is evaluated, on a fair value basis, with frequent sales taking place.

In assessing whether contractual cash flows are SPPI the contractual terms of the instrument are considered, including assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition.

#### Financial liabilities

A financial liability is classified as at FVTPL if it is classified as held-for-trading, it is a derivative or it is designated as such on initial recognition. All other financial liabilities are measured at amortised cost. This includes trade and other payables.

(iii) Subsequent measurement

Subsequent measurement details are set out in the following table:

Financial assets at fair value	Subsequently measured at fair value, net gains and losses including any interest or dividend income and expense and foreign exchange gains and losses, are recognised in profit or loss. These instruments include:
	Debt securities; equity investments; investments in infrastructure funds; investments in unlisted private equities; and derivative financial instruments
Financial assets at amortised cost	Subsequently measured at amortised cost using the effective interest method less any impairment losses. These instruments include:
	Cash and cash equivalents, trade and other receivables
Financial liabilities at amortised cost	Subsequently measured at amortised cost using the effective interest method. These instruments include:
(; ) F. i	Trade and other payables

(iv) Fair value measurement

'Fair value' is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal or, in its absence, the most advantageous market to which the pension fund has access at that date.

When available, the fair value of an instrument is measured using the quoted price in an active market for that instrument.

A market is regarded as active if transactions for the asset or liability take place with sufficient frequency and volume to provide pricing information on an ongoing basis. Instruments quoted in an active market are measured at bid price.

If there is no quoted price in an active market, then valuation techniques are used that maximise the use of relevant observable inputs and minimise the use of unobservable inputs.

#### 2.15. Financial instruments (continued)

#### (v) Amortised cost measurement

The 'amortised cost' of a financial asset or financial liability is the amount at which the financial asset or liability is measured on initial recognition minus the principal repayments, plus or minus the cumulative amortisation using the effective interest method of any difference between that initial amount and the maturity amount and, for financial assets, adjusted for any loss allowance.

#### (vi) Impairment

Loss allowances for Expected Credit Losses (ECLs) are recognised on financial assets measured at amortised cost and are deducted from the gross carrying amount of the assets in the Net Assets Statement.

NILGOSC holds only trade and lease receivables with no financing component and which have maturities of less than 12 months at amortised cost and, as such, has chosen to apply the simplified approach for expected credit losses under IFRS 9 to all its trade and lease receivables.

Changes in credit risk are not tracked but instead a loss allowance based on lifetime ECLs at each reporting date is recognised.

Allowances for ECLs are based on historic experience of non-recovery of trade and other receivables.

#### (vii) Derecognition

A financial asset is derecognised when the contractual rights to the cash flows from the asset expire, or the rights to receive the contractual cash flows are transferred in a transaction in which substantially all of the risks and rewards of ownership of the financial asset are transferred or in which the Fund neither transfers nor retains substantially all of the risks and rewards of ownership and does not retain control of the financial asset. On derecognition of a financial asset, the difference between the carrying amount of the asset and the consideration received is recognised in the Fund Account.

A financial liability is derecognised when the contractual obligations are discharged, cancelled or expire. On derecognition of a financial liability, the difference between the carrying amount extinguished and the consideration paid is recognised in the Fund Account.

#### 2.16. Foreign currencies

Transactions denominated in foreign currencies are translated at the exchange rate at the date of the transaction. Investments and monetary assets and liabilities held at the reporting date are translated at the exchange rate applicable at the reporting date.

#### 2.17. Retirement benefit obligations

NILGOSC employees are members of the NILGOSC Scheme. The cost of providing benefits to those individuals is determined using the Projected Unit Credit method.

Formal actuarial valuations are carried out every three years and updates are carried out at the end of each reporting period. The difference between the fair value of the assets held and the liabilities are recognised in the Net Assets Statement as an asset or liability as appropriate. Changes in the retirement benefit obligation are charged immediately to the Fund Account. The actuarial liability recognised in the net asset statement represents NILGOSC's share of the actuarial liability attributable to NILGOSC in its capacity as a participating employer to the overall scheme.

# 2.18. Actuarial present value of promised retirement benefits

The financial statements summarise the transactions of the Scheme and report on the net assets at the disposal of NILGOSC. They do not take account of obligations to pay pensions and benefits which fall due after the end of the Scheme year.

The actuarial position of the Scheme, which does take account of such obligations is dealt with in Note 20 on page 126 and the Actuarial Statement on pages 130 to 132. The actuarial present value of promised retirement benefits, valued on a basis consistent with IAS 19, is disclosed in Note 20 of these financial statements.

#### 2.19. Use of estimates and judgements

The use of estimates and assumptions is required in the preparation of the financial statements. Where estimates and assumptions are required, the techniques used are considered appropriate and are consistently applied. Actual results may however differ from those assumptions and estimates used.

Despite the COVID-19 outbreak moving towards the endemic phase, volatility in global financial markets continued through-out 2021/22, exacerbated by Russia's invasion of Ukraine in February 2022.

#### 2.19. Use of estimates and judgements (continued)

Management has considered all information currently available, including the exposure of underlying assets and sensitivity of valuations to both COVID-19 and recent Russian sanctions, and concluded that the valuations provided by third party experts as at 31 March 2022 are appropriate for financial statement purposes.

#### IFRS 9 Application Judgements

The application of IFRS 9 Financial Instruments requires a degree of judgement and the use of estimates and assumptions in relation to the classification, measurement and impairment of financial assets and liabilities.

Judgement is applied in making an assessment of the objective of the business model in which financial assets are held along with the assessment of whether contractual cash flows are SPPI. Considerations are set out in Note 2.15.

The ECLs for financial assets are based on assumptions about risk of default and expected loss rates. Judgement is used in making these assumptions and selecting the inputs to the impairment calculation and therefore there is a risk that expected credit losses may be under or overstated in the financial statements. Given the limited exposure to credit risk, this is not expected to have a material impact on the financial statements

# Unquoted Private Equity and Infrastructure Investments

The valuation of unquoted private equity and private debt investments is based on the latest investor reports and financial statements provided by the fund managers of the underlying funds, adjusted for transactions arising after the date of such reports. The valuation of unquoted infrastructure investments is based on the latest fund manager valuations, adjusted for transactions arising after the date of such valuations. There is a risk that these investments may be under or overstated in the financial statements.

NILGOSC reviews the performance and independent audit opinion in respect of each infrastructure investment as part of its own periodic NAV assessment.

This NAV assessment includes consideration of each underlying non-traded asset in each infrastructure fund in terms of the valuation method, liquidity of same and any independent corroboration of NAV to comparable traded valuations or disposal receipts.

#### Fair Value of Investment Properties

The fair value of investment properties is determined by independent valuation experts on the basis of open market value. The valuations are primarily derived from comparable market transactions on arms-length terms. Such valuations will be affected by uncertainties in the comparable information available, current and future market conditions and property specifics.

#### Investment Management Performance Fees

Investment management performance fees are calculated based on observed performance to the year end date. The actual performance fee will depend on the outturn for the performance year (which is not always co-terminus with the Scheme year end) and as such may differ from estimated amounts.

#### IAS 19 Retirement Benefit Obligation

The retirement benefit obligation for NILGOSC as administrator is calculated by the appointed Actuary based on the assumptions set out in Note 18. The methodology used is in line with accepted guidelines and in accordance with IAS 19, however this estimate is subject to variances based on changes to the underlying assumptions.

# 2.20. Application of new and revised International Financial Reporting Standards in future accounting periods

The International Accounting Standards Board has issued a number of new standards applicable for 2022/23. The following standards have been reviewed and have been given consideration as to their impact on NILGOSC's financial statements.

IFRS 16 Leases (effective 1 January 2019 with FReM application from 1 April 2022): IFRS 16 introduces a single on balance sheet lease accounting model for lessees. NILGOSC has considered its operating lease commitments and has concluded that the adoption of IFRS 16 is not expected to have a material impact on the financial statements.

#### 3. Segmental information

NILGOSC has only one operating segment. NILGOSC monitors and controls its operation through review of income and expenditure information on a portfolio basis. NILGOSC looks at the Scheme in totality as it cannot be disaggregated into any separate segments. Please refer to the Fund Account on page 91 and the Net Assets Statement on page 92.

#### 4. Contributions Receivable

	2021/22	2020/21
	£'000	£'000
Employers		
normal	224,506	213,939
deficit recovery *	2,603	2,540
early retirement funding **	4,053	4,877
special contributions ***	184	75
Employees		
normal	70,946	67,469
	302,292	288,900

- \* Deficit recovery streams ceased for all employers in the Main group of the LGPS(NI) from 1 April 2020 reflecting the net surplus position of the Fund following the latest triennial actuarial valuation as at 31 March 2019.
- \*\* Movement on early retirement funding is a product of the function of the service and final salary of the retiring member rather than a decrease in the number of early retirements
- \*\*\* Special contributions include payments made to the Fund by specific employing authorities in addition to the minimum % contribution certified by the Actuary and include strain on fund payments, deficit recovery on closure or staff transfers and cessation payments.

#### 5. Benefits

2021/22	2020/21
£'000	£'000
217,129	209,197
53,644	45,127
8,454	6,037
279,227	260,361
	£'000 217,129 53,644 8,454

<sup>\*</sup> In addition, £3.940m of compensation pensions were paid on an agency basis and recharged to employing authorities (2020/21: £4.083m). These payments relate to compensation benefits which, under applicable regulations, cannot be paid from the Fund and for which NILGOSC acts as a paying agent only. Accordingly, these transactions have not been reflected in these financial statements.

#### 6. Payments to and on account of leavers

	2021/22	2020/21
	£'000	£'000
Refund to members leaving service	1,141	899
Payment for members joining state scheme	(2)	(19)
Transfers to other schemes	3,316	4,336
	4,455	5,216
7. Administration expenses		
	2021/22	2020/21
	£'000	£'000
Staff costs	3, 802	3,345
Office overheads	812	794
Depreciation and amortisation (notes 12 & 13)	169	177
Communication	168	192
Other administration	157	141
Templeton House revaluation (note 14)	(29)	29
Actuarial fees	38	7
Internal audit fees	26	30
External audit fees	35	36
Legal and other professional fees	89	122
Medical fees	85	73
IAS19 net interest cost (note 18)	175	115
	5,527	5,061

#### 8. Investment income

	2021/22	2020/21
	£'000	£'000
Interest income from fixed income securities	74,108	67,398
Dividends from equities	13,181	19,609
Index linked securities	929	790
Derivatives *	(1,359)	2,210
Pooled investment vehicles	6,478	2,999
Infrastructure/private equity investment distributions	3,235	2,232
Net rents from properties	35,520	36,477
Interest on deposits	(550)	199
Stock lending income	926	543
Other income	329	68
	132,797	132,525
Irrecoverable withholding tax	(731)	(648)
Total Investment Income	132,066	131,877

<sup>\*</sup> Derivative instruments generate cash flows, either positive or negative, depending on the direction of the trade. Income from derivatives is the net cash flow position for the year.

#### Stock lending income

The Fund's securities lending programme continued during the year ended 31 March 2022. The main features of the programme are:

- Lending maximum of 35% of total investment assets;
- Global Custodian acts as securities lending manager and collateral manager; and
- Collateral comprises mainly of UK and overseas equity and Government debt.

As at 31 March 2022, there were securities amounting to £286,556,043 on loan against collateral of £303,960,565 (2020/21: securities amounting to £346,575,121 were on loan against collateral of £367,239,985).

#### 9. Financial assets

#### Movement in investments and derivatives

	Value at 01 04 2021	Purchases at cost		Change in market value	Value at 31 03 2022
	£' 000	£' 000	£' 000	£' 000	£' 000
Fixed income securities	2,079,375	3,555,768	(3,564,726)	(98,591)	1,971,826
Equities	1,540,288	761,177	(892,889)	(106,262)	1,302,314
Index-linked securities	363,763	1,567,722	(1,577,887)	23,084	376,682
Pooled investment vehicles	4,425,071	4,862,476	(4,652,779)	338,021	4,972,789
Derivative contracts	35,501	438,566	(510,034)	(23,891)	(59,858)
Infrastructure/Private Equity	313,463	69,623	(84,322)	73,141	371,905
	8,757,461	11,255,332	(11,282,637)	205,502	8,935,658
Other investment balances:					
Cash and Cash Equivalents	267,809	164,221*	-	7,910	439,940
Investment income due	22,177	(504)*	-	-	21,673
Net financial assets	9,047,447	11,419,049	(11,282,637)	213,412	9,397,271

<sup>\*</sup> Net movement (inclusive of cash deposits made in foreign currencies)

In the preceding table, the change in market 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 during the year, reinvested income arising on the Legal & General Pooled investments and exchange gains and losses on investments denominated in foreign currencies.

The new global equity mandate was funded from the World Emerging markets equities fund under passive management in May 2021. Global equity gains during 2020/21 of £380m were crystallised and transferred to the passive fund to rebalance the portfolio and fund the new global equity mandate. Finally, £2.8bn of passive equities were transferred to the passive manager's Low Carbon Transition Fund.

In addition to the transaction costs disclosed in Note 11, indirect costs are incurred through the bid-offer spread on fixed income securities, investments within pooled investment vehicles and also infrastructure investments. The amount of indirect costs is not shown separately and is included in the cost of purchases and sales proceeds.

#### 9. Financial Assets (continued)

Cash balances held by NILGOSC's custodian for the purposes of trading by the investment managers are classified as investment cash deposits within Financial Assets. The £7,910k change in market value in respect of cash deposits reflects foreign exchange gains/(losses) on foreign currency cash.

The cash deposits held at 31 March 2022 include £77.6m ringfenced as collateral in relation to derivative contracts (31 March 2021: £31.7m).

#### Financial assets and liabilities

	2021/22	2020/21
	£'000	£'000
Financial assets at fair value through profit or loss		
Fixed income securities	1,971,826	2,079,375
Equities	1,302,314	1,540,288
Index linked securities	376,682	363,763
Pooled investment vehicles	4,972,789	4,425,071
Derivative contracts:		
Futures	11,713	7,393
Swap contracts	53,786	31,549
Options	9,736	153
Forward currency contracts	36,372	47,657
Private equity/infrastructure	371,905	313,463
Cash deposits	439,940	267,809
Investment income due	21,673	22,177
Total financial assets	9,568,736	9,098,698
Financial liabilities at fair value through profit or loss		
Derivative contracts:		
Futures	(9,238)	(5,684)
Swap contracts	(83,311)	(13,495)
Options	(946)	(1,128)
Forward currency contracts	(77,970)	(30,944)
Total financial liabilities	(171,465)	(51,251)
Net financial assets	9,397,271	9,047,447

#### 9. Financial Assets (continued) Analysis of financial assets

	2021/22	2020/21
	£,000	£'000
Fixed income securities		
UK public sector	73,457	107,713
UK corporate	126,117	175,907
Overseas public sector	747,143	699,912
Overseas corporate	1,025,109	1,095,843
	1,971,826	2,079,375
Equities		
UK quoted	-	3,052
Overseas quoted	1,302,314	1,537,236
	1,302,314	1,540,288
Index-linked securities		
UK	169,136	7,225
Overseas	207,546	356,538
	376,682	363,763
Pooled investment vehicles		
Residential Property Fund	108,751	104,278
Global Property Fund	188,756	76,691
Unit trusts	4,666,230	4,236,722
Other	9,052	7,380
	4,972,789	4,425,071
Derivative contracts		
Futures	2,475	1,709
Swap contracts	(29,525)	18,054
Options	8,790	(975)
Forward foreign exchange contracts	(41,598)	16,713
	(59,858)	35,501
Infrastructure/Private Equity		
Global Infrastructure	371,905	313,463
	371,905	313,463

#### 9. Financial Assets (continued)

#### **Analysis of Derivatives**

#### Objectives and policies for holding derivatives

Derivatives are held for hedging purposes to reduce risk in the Fund. In addition, derivatives may be used for speculative purposes to enhance returns.

The use of derivatives is managed in line with the investment management agreements in place between the Fund and the various investment managers.

None of the derivatives held during the year were designated as hedging instruments for hedge accounting purposes.

#### a) Futures

Futures are held to express a view on a particular market, within a particular market or within asset classes in a particular market and also to manage the overall duration exposure of the fund.

#### b) Swap Contracts

Interest rate swaps are held to gain interest rate exposure and to express a view on the market pricing of interest rate expectations of a market.

Credit default swaps are held to provide flexibility in adjusting the credit-risk sensitivity of portfolios and as a more efficient means of gaining credit exposure than physical nominal bonds.

Inflation swaps are held to express a view on the market pricing of inflation expectations of a market and/or to take advantage of pricing dislocations between the cash (bond) and derivative (swaps) markets in inflation space.

#### c) Options

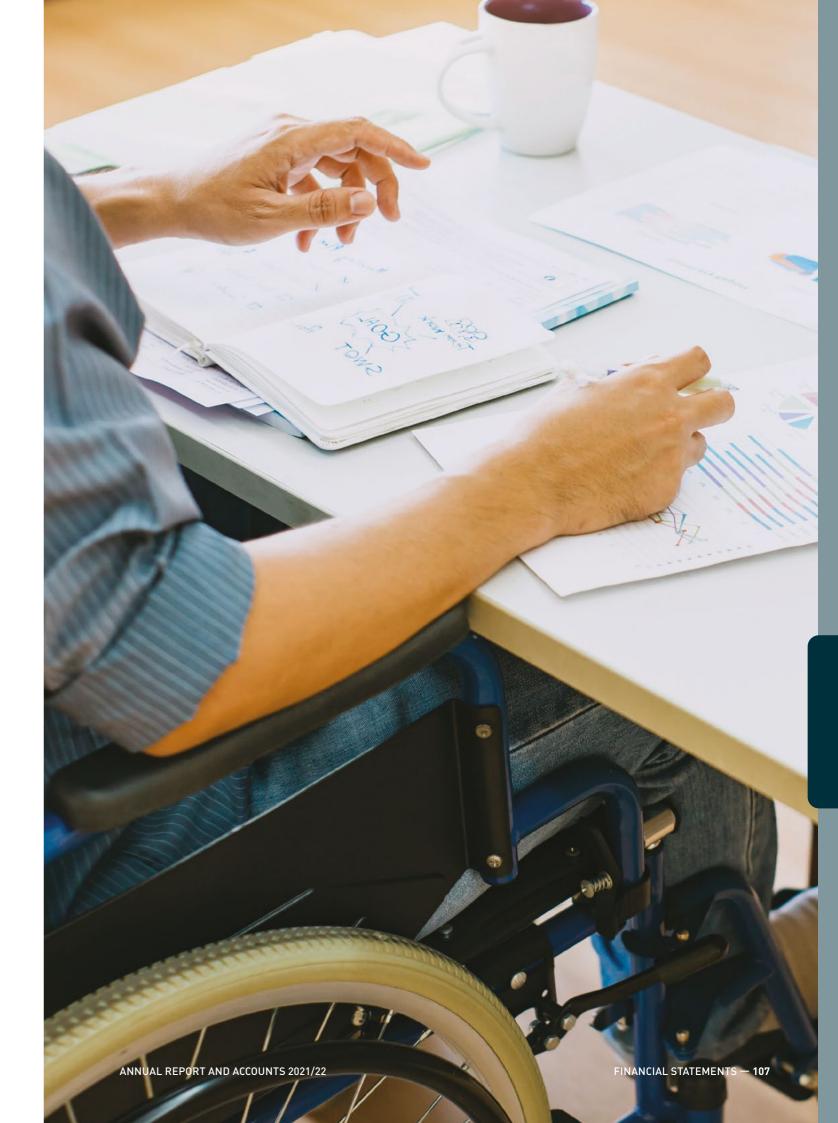
Options are held to protect portfolios from expected market falls as well as for active management purposes using long and short positions.

#### d) Forward Currency Contracts

Investments denominated in overseas currencies may be hedged into sterling at various times. The purpose of this action is to reduce the Fund's exposure to foreign currencies and fluctuations in exchange rates depending on conditions and expectations in these markets.

#### e) Collateral

Derivative agreements are collateralised to reduce credit risk. Cash ringfenced as collateral as at 31 March 2022, totalling £77.6m, is included within investment cash deposits.



#### 9. Financial assets (continued)

#### The market value of derivative contracts is analysed below:

#### (i) Futures

(i) i didies			2021/22				2020/24	
		Market Value (Asset)	Market Value (Liability)	Market Value (Net)		Market Value (Asset)	<b>2020/21</b> Market Value (Liability)	Market Value (Net)
Type of contract	Exposure	31 March 2022	31 March 2022	31 March 2022	Exposure	31 March 2021	31 March 2021	31 March 2021
(Expiration - Under one year)	£'000	£'000	£.000	£'000	€.000	£'000	£,000	£'000
Overseas Equity Futures	-	-	-	-	[3,226]	-	(20)	(20)
UK Fixed Income Futures	(177,481)	1,355	(30)	1,325	(22,328)	243	-	243
Overseas Fixed Income Futures	179,744	10,290	(9,208)	1,082	(437,087)	7,150	(5,664)	1,486
UK Commodity Futures	(4,640)	68		68	-			
Total		11,713	(9,238)	2,475		7,393	[5,684]	1,709
(ii) Swap contracts								
		Market Value (Asset)	Market Value (Liability)	Market Value (Net)		Market Value (Asset)	Market Value (Liability)	Market Value (Net)
Expiration	<b>Notional Principal</b>	31 March 2022	31 March 2022	31 March 2022	Notional Principal	31 March 2021	31 March 2021	31 March 2021
	£'000	£'000	£'000	£,000	€,000	£'000	£'000	£'000
Up to 1 year	26,128	3,280	(55)	3,225	232,551	3,629	(1,449)	2,180
1 to 5 years	1,411,000	20,923	(36,744)	(15,821)	350,997	8,356	(5,229)	3,127
5 to 10 years	681,028	19,431	(35,072)	(15,641)	125,356	14,375	(3,739)	10,636
10 to 15 years	37,204	-	(2,871)	(2,871)	3,554	9	(160)	(151)
15 to 20 years	31,408	-	(6,766)	(6,766)	27,750	-	(1,975)	(1,975)
Over 20 years	128,754	10,152	(1,803)	8,349	87,121	5,180	(943)	4,237
Total		53,786	(83,311)	(29,525)		31,549	[13,495]	18,054
		Market Value (Asset)	Market Value (Liability)	Market Value (Net)		Market Value (Asset)	Market Value (Liability)	Market Value (Net)
Nature of Swap	Notional Principal	31 March 2022	31 March 2022	31 March 2022	Notional Principal	31 March 2021	31 March 2021	31 March 2021
	£,000	£,000	£'000	£'000	€'000	£'000	£,000	£'000
Interest rate swaps	1,587,560	23,971	(28,170)	(4,199)	555,053	8,761	(4,392)	4,369
Credit default swaps	99,843	8,444	(17,028)	(8,584)	[234,026]	14,968	[4,323]	10,645
Inflation swaps	595,538	18,261	(38,113)	(19,852)	270,684	4,191	(3,333)	858
Other swaps	32,581	3,110		3,110	235, 618	3,629	[1,447]	2,182
Total		53,786	(83,311)	(29,525)		31,549	(13,495)	18,054
(iii) Options								
		Market Value (Asset)	Market Value (Liability)	Market Value (Net)		Market Value (Asset)	Market Value (Liability)	Market Value (Net)
Investment underlying option contract		31 March 2022	31 March 2022	31 March 2022		31 March 2021	31 March 2021	31 March 2021
		£,000	£,000	£,000		€,000	€,000	£'000
Overseas equity		2,097	(394)	1,703		90	(39)	51
Overseas cash		939	- 	939		63	(3)	60
Swaptions		6,700	(552)	6,148			(1,086)	(1,086)
Total		9,736	(946)	8,790		153	(1,128)	(975)
		Market Value (Asset)	Market Value (Liability)	Market Value (Net)		Market Value (Asset)	Market Value (Liability)	Market Value (Net)
Type of contract		31 March 2022	31 March 2022	31 March 2022		31 March 2021	31 March 2021	31 March 2021
		£'000	£'000	£'000		£'000	£'000	£'000
Call options		273	(93)	180		85	(33)	52
Put options		9,463	(853)	8,610		68	(1,095)	(1,027)
Total		9,736	(946)	8,790		153	(1,128)	(975)

108 — FINANCIAL STATEMENTS ANNUAL REPORT AND ACCOUNTS 2021/22 FINANCIAL STATEMENTS — 109

#### 9. Financial Assets (continued)

#### (iv) Open forward currency contracts

The market value of derivative contracts is analysed below.

Number of contracts	Currency Bought	Local Value	Currency Sold	Local Value '000	Asset Value £'000	Liability Value £'000	Net Value £'000
91	EUR	197,547	GBP	(195,588)	1,966	(7)	1,959
27	EUR	324,985	USD	(326,028)	446	(1,488)	(1,042)
53	GBP	377,563	EUR	(381,802)	2	(4,241)	(4,239)
3	GBP	84,865	JPY	(82,789)	2,076	-	2,076
39	GBP	121,736	OTHER	(127,623)	-	(5,888)	(5,888)
125	GBP	2,521,210	USD	(2,569,344)	648	(48,783)	(48,135)
1	JPY	7,252	GBP	(7,267)	-	(14)	(14)
6	JPY	41,566	USD	(42,518)	1	(953)	(952)
26	OTHER	81,769	GBP	(78,454)	3,348	(33)	3,315
102	OTHER	335,880	USD	(333,299)	6,424	(3,843)	2,581
14	USD	604,084	EUR	(600,810)	4,283	(1,009)	3,274
104	USD	434,619	GBP	(431,511)	3,843	(735)	3,108
14	USD	181,265	JPY	(172,261)	9,005	-	9,005
138	USD	485,378	OTHER	(492,024)	4,330	(10,976)	(6,646)
Total					36,372	(77,970)	(41,598)

#### Single Investments Exceeding 5% of the Net Assets of the Scheme

Details of any single investment exceeding 5% of the net assets of the Scheme are provided in the following table.

Security	Market Value 31 March 2022 £'000	% of Total Fund	Market Value 31 March 2021 £'000	% of Total Fund
Legal & General – Over 5y Index-Linked Gilts	1,471,367	14.38%	1,218,770	12.44%
Legal & General – Low Carbon Transition Developed Markets Equity Index Fund	1,440,682	14.08%	-	-
Legal & General – Low Carbon Transition Developed Markets Equity Index Fund – GBP hedged	1,385,998	13.55%	-	-
Legal & General – N. America Equity Index	-	-	546,303	5.58%
Legal & General – N. America Equity Index – GBP hedged	-	-	535,491	5.47%

#### 9. Financial Assets (continued)

#### **Employer-Related Investments**

The Scheme had no employer-related investments as at 31 March 2022 or 31 March 2021.

#### **AVC Investments**

NILGOSC provides an Additional Voluntary Contribution (AVC) Scheme for its members with two AVC providers, Utmost Life and Pensions Limited (Utmost Life) and Prudential Assurance Company Limited (Prudential). The assets of the AVC Scheme are invested separately from the NILGOSC pension fund and therefore these amounts are not included in NILGOSC's net assets.

Members participating in this arrangement each receive an annual statement made up to 31 March confirming the amounts held to their account and the movements in the year.

The following table shows the movement in AVC investments for Utmost Life during the year.

	2021/22			
	Utmost Life	Utmost Life	Prudential	Total
	£'000	£'000	£'000	£'000
Value at start of year	211	204	24,935	25,139
Contributions invested	1	1	5,838	5,839
Sales of investments	(25)	(25)	(5,024)	(5,049)
Change in market value	8	31	2,655	2,686
Value at end of year	195	211	28,404	28,615

Due to a major disruption to Prudential systems and services in 2020/21, which resulted in a backlog of updates to member investment records and annual statements, no annual investment movement information has been made available for inclusion in 2021/22. The above table has been updated with the prior year financial statement received April 2022.

#### 10. Investment property

	2021/22 £'000	2020/21 £'000
Fair Value		
At start of year	715,355	725,465
Additions	11	2,766
Sales	(14,146)	(9,734)
Gains/(Losses) arising from changes in fair values	91,080	(3,142)
At end of year	792,300	715,355

The investment properties were valued as at 31 March 2022 by qualified professional valuers working for BNP Paribas Real Estate, Chartered Surveyors, acting in the capacity of External Valuers. All such valuers are Chartered Surveyors, being members of the Royal Institute of Chartered Surveyors (RICS). The properties are typically valued on the basis of Market Value which is an internationally recognised basis and is defined as 'the estimated amount for which an asset or liability should exchange on the valuation date between a willing buyer and a willing seller in an arm's-length transaction after proper marketing wherein the parties had each acted knowledgeably, prudently and without compulsion'. All valuations were carried out in accordance with the RICS Appraisal and Valuation Standards. The valuation is predominantly informed by prevailing market activity, where available, and referenced to key inputs such as rent rolls and applicable yield rates.

Management has considered all information currently available, including the exposure of underlying assets and sensitivity of valuations to COVID-19, and concluded that the valuations provided by third party experts as at 31 March 2022 are appropriate for financial statement purposes.

NILGOSC received net rental income of £35.3m (2020/21: £36.4m) in respect of these investment properties.

The investment properties are leased to tenants under non-cancellable operating lease agreements. The leases have varying terms, escalation clauses and renewable rights.

The future minimum lease receipts (discounted to present value) under non-cancellable operating leases expiring:

	2021/22 £'000	2020/21 £'000
Not later than one year	36,358	37,823
Later than one year and not later than five years	128,977	128,157
Later than five years	234,288	209,571
	399,623	375,551

#### 11. Investment management expenses

	2021/22 £'000	2020/21 £'000
Administration, management and custody	23,317	22,704
Performance measurement services	42	40
Other advisory fees	393	356
Transaction costs and trading expenses	1,968	2,373
	25,720	25,473

Investment management expenses mainly consist of fees paid to Fund Managers in respect of the management and investment of funds on NILGOSC's behalf. These fees vary from year to year as they are based on the market value of investments held.

Performance fees were introduced for one global equity mandate during 2021. There were no performance related fees due in 2021/22.

In addition, fees paid in respect of investment advice, custody services and property valuations are included within investment management expenses.

Transaction costs and trading expenses include commissions, stamp duty and other trade related charges. In 2021/22 this also includes foreign exchange losses on the funding of global property and infrastructure investments of £360k (2020/21: £400k).

Any indirect costs incurred through the bid-offer spread on some pooled investment vehicles are reflected in the cost of purchases or sales proceeds (see Note 9 – Financial assets).

#### 12. Intangible assets

	Computer software £'000
Cost	205
At 1 April 2021	835
Additions	110
Disposals At 31 March 2022	945
At 31 March 2022	745
Amortisation	
At 1 April 2021	670
Charge for the year	93
Amortisation on disposals	
At 31 March 2022	763
Net book value	
At 31 March 2021	165
At 31 March 2022	182
	Computer software
	£'000
Cost	
At 1 April 2020	732
Additions	112
Disposals	(9)
At 31 March 2021	835
Amortisation	
At 1 April 2020	593
Charge for the year	86
Amortisation on disposals	(9)
At 31 March 2021	670
· · · · · · · · <del>- · - ·</del>	
Net book value	
At 31 March 2020	139
At 31 March 2021	165

Computer software is amortised on a straight-line basis over a period of three years. All the intangible assets are owned by NILGOSC.

#### 13. Property, plant and equipment

	Property £'000	Fixtures, Fittings & Equipment £'000	Total £'000
Cost			
At 1 April 2021	1,200	431	1,631
Revaluation	100	-	100
Additions	12	21	33
Disposals	(12)	(25)	(37)
At 31 March 2022	1,300	427	1,727
Depreciation			
At 1 April 2021	-	390	390
Charge for the year	52	24	76
Revaluation Adjustment	(52)	-	(52)
Depreciation on disposals	-	(25)	(25)
At 31 March 2022		389	389
Net book value			
At 31 March 2021	1,200	41	1,241
At 31 March 2022	1,300	38	1,338
		Fixtures, Fittings &	
	Property	Equipment	Total
	£'000	£'000	£'000
Cost	4.000	101	4 (0)
At 1 April 2020	1,200	426	1,626
Revaluation	-	-	-
Additions	154	17	171
Disposals	(154)	(12)	(166)
At 31 March 2021	1,200	431	1,631
Depreciation			
At 1 April 2020	-	359	359
Charge for the year	48	43	91
Revaluation Adjustment	(48)	-	(48)
Depreciation on disposals		(12)	(12)
At 31 March 2021	<del>-</del>	390	390
Net book value			
At 31 March 2020	1,200	67	1,267
At 31 March 2021	1,200	41	1,241

#### 13. Property, plant and equipment (continued)

The property was valued as at 31 March 2022 by qualified professional valuers working for BNP Paribas Real Estate, Chartered Surveyors, acting in the capacity of External Valuers. All such valuers are Chartered Surveyors, being members of the Royal Institute of Chartered Surveyors (RICS). The property was valued on the basis of Market Value. The valuation was carried out in accordance with the RICS Appraisal and Valuation Standards. All the property, plant and equipment are owned by NILGOSC.

#### 14. Revaluation Reserve

	2021/22 £'000	2020/21 £'000
At 1 April 2021	-	(77)
Revaluation during the year	(122)	(48)
Refurbishment disposal	12	125
At 31 March 2022	(110)	-

The cost and accumulated depreciation in respect of any refurbishment of Templeton House is adjusted through the revaluation reserve. After accounting for refurbishment costs in 2021/22 there is a gain arising from the revaluation of Templeton House sufficient to reverse the loss posted to Administration expenses in 2020/21 (note 7).

#### 15. Trade and other receivables

	2021/22 £'000	2020/21 £'000
Receivables and other current assets *	29,685	29,416
Less: Provision for impairment of receivables	(1,580)	(3,394)
Receivables and other current assets-net	28,105	26,022
Pension contributions due **	22,557	20,034
Prepayments and accrued income	6,047	6,132
	56,709	52,188

<sup>\*</sup> Receivables and other current assets include rental debt.

#### 16. Cash and cash equivalents

Cash and cash equivalents includes short-term deposits with banks and other financial institutions, with an initial maturity of one month or less. The carrying amount of these assets approximates their fair value.

	2021/22 £'000	2020/21 £'000
At 1 April	9,940	13,683
Net change in cash balances	5,978	(3,743)
	15,918	9,940
The following balances at 31 March were held at:		
Commercial banks and cash in hand	15,918	9,940
	15,918	9,940
17. Trade and other payables		
	2021/22 £'000	2020/21 £'000
Trade payables and other current liabilities	35	222
Unpaid benefits	8,945	5,636
Social security and other taxes	2,881	2,345
Accruals and deferred income	14,878	14,127
	26,739	22,330

#### 18. Retirement benefit obligations

NILGOSC provides pension arrangements for the benefit of its employees through the NILGOSC Scheme. The NILGOSC Scheme is known as the Local Government Pension Scheme (Northern Ireland), LGPS (NI), and is a funded defined benefit scheme. Benefits earned up to 31 March 2015 are linked to final salary. Benefits earned after 31 March 2015 are based on a Career Average Revalued Earnings scheme.

The funded nature of the LGPS (NI) requires that the employer and its employees pay contributions into the pension scheme, calculated at a level intended to balance the pension liabilities with investment assets. Information on the framework for calculating contributions to be paid is set out in the Local Government Pension Scheme Regulations (Northern Ireland) 2014 (as amended) and the Fund's Funding Strategy Statement. The last actuarial valuation was at 31 March 2019 and the contributions to be paid until 31 March 2023 resulting from that valuation are set out in the Fund's Rates and Adjustment Certificate within the report on the Actuarial Valuation as at 31 March 2019.

The Fund Administering Authority, Northern Ireland Local Government Officers' Superannuation Committee is responsible for the governance of the Pension Fund.

The NILGOSC Scheme is a multi-employer scheme. The assets allocated to the Employers in the Fund are notional and are assumed to be invested in line with the investments of the Fund for the purposes of calculating the return to be applied to those notional assets over the accounting period. The Fund is large and holds a significant proportion of its assets in liquid investments. As a consequence, there will be no significant restriction on realising assets if a large payment is required to be paid from the Fund in relation to an employer's liabilities.

<sup>\*\*</sup> All contributions due to the Scheme relate to the month of March 2022 and were paid in full to the Scheme within the timescale required by the Local Government Pension Scheme Regulations (Northern Ireland) 2014.

The assets are invested in a diversified spread of investments and the approximate split of assets for the Fund as a whole is shown in this note.

At 31 March 2022 NILGOSC, in its capacity as a participating employer, had 78 active members (2020/21:81), 65 deferred members (2020/21:67) and 22 pensioners (2020/21:24) in the scheme.

#### Net defined benefit liability

	2021/22 £'000	2020/21 £'000
Fair value of assets	17,588	16,134
Present value of funded defined benefit obligation	(23,399)	(24,654)
Net defined benefit liability	(5,811)	(8,520)

The split of the defined benefit obligation at the last valuation date between the various categories of members was as follows:

Active members 51%

Deferred pensioners 20%

Pensioners 29%

The estimated duration of the Fund's liabilities is 23.0 years.

#### Financial assumptions

A full actuarial valuation of the NILGOSC defined benefit scheme was carried out as at 31 March 2019. The financial assumptions have been updated by independent qualified actuaries to take account of the requirements of IAS 19 in order to assess the liabilities of the Scheme at 31 March 2021. The discount rate is based on the duration of liabilities for members employed/previously employed by NILGOSC, and not the NILGOSC fund as a whole, and may differ from the discount rate utilised for the IAS 26 actuarial present value of promised retirement benefits disclosed in Note 20.

	2021/22	2020/21
	%	%
Rate of increases in salaries	4.4	4.2
Discount rate	2.7	2.1
Inflation (CPI) / Pension increase rate	2.9	2.7

The discount rate has increased by 0.6%, the CPI inflation assumption has increased by 0.2% and the salary increase assumption has increased by 0.2%. This has resulted in a more positive balance sheet position than if the financial assumptions at the start of the period had been used. The impact of this change is recognised in the Fund Account.

#### 18. Retirement benefit obligations (continued)

#### **Demographic assumptions**

The mortality assumptions at the accounting date have been set taking account of actual mortality experience of members within the Fund based on analysis carried out as part of the 2019 Actuarial Valuation and allow for expected future mortality improvements.

Sample life expectancies at age 65 in normal health resulting from these mortality assumptions are shown in the following table:

	2021/22	2020/21
	Years	Years
Retiring today:		
Males	21.8	21.9
Females	25.0	25.1
Retiring in 20 years:		
Males	23.2	23.3
Females	26.4	26.5

The next funding valuation of the Scheme is due to be carried out as at 31 March 2022.

The major categories of assets as a percentage of total plan assets are:

	2021/22	2020/21
	%	%
Equities	42.9	46.3
Bonds	26.9	35.7
Multi Asset Credit	13.1	-
Property	10.0	8.9
Cash	4.0	5.3
Other	3.1	3.8

To rection on benefit obtigations (continues)		
	2021/22	2020/21
	£'000	£'000
Operating cost		
Current service cost	1,231	831
Past service cost		
Total	1,231	831
Finance cost		
Interest on net defined benefit liability	175	115
Total	175	115
	2021/22	2020/21
	£'000	£'000
Remeasurement gains and losses		
Return on plan assets in excess of that recognised in net interest	(873)	(2,578)
Actuarial (gains)/losses due to change in financial assumptions	(2,621)	5,565
Actuarial gains due to changes in demographic assumptions	(236)	-
Actuarial losses/(gains) due to liability experience	64	(169)
Net (gains)/losses	(3,666)	2,818
Changes in fair value of the scheme assets are as follows:		
	2021/22 £'000	2020/21 £'000
Fair value of scheme assets at start of year	16,134	13,019
Interest income on assets	341	302
Contributions by members	153	150
Contributions by the employer	449	445
Benefits paid	(362)	(360)
Re-measurement gains on assets	873	2,578
Fair value of scheme assets at end of year	17,588	16,134
· · · · · , · ·		

#### 18. Retirement benefit obligations (continued)

Actuarial losses/(gains) on liabilities – experience

Present value of obligation at end of year

The actual return on assets is as follows:		
	2021/22 £'000	2020/21 £'000
Interest income on assets	341	302
Re-measurement gains on assets	873	2,578
Actual return on assets	1,214	2,880
Changes in the present value of retirement benefit obligation	ns are as follows:	
	2021/22 £'000	2020/21 £'000
Present value of obligations at start of year	24,654	18,220
Current service cost	1,231	831
Interest cost	516	417
Contributions by members	153	150
Benefits paid	(362)	(360)
Actuarial (gains)/losses on liabilities – change in financial assumptions	(2,621)	5,565
Actuarial gains on liabilities – change in demographic assumptions	(236)	-
Past service cost	-	-

64

23,399

(169)

24,654

#### Sensitivity analysis

A sensitivity analysis for each significant actuarial assumption is provided below. This shows the approximate impact of changing the assumption noted on the present value of the funded defined benefit obligation as at 31 March 2022 and 31 March 2021. In each case only the assumption stated is altered; all other assumptions remain the same.

#### Discount rate assumption

·	202	1/22	2020	)/21
Adjustment to discount rate	+0.1% p.a.	-0.1% p.a.	+0.1% p.a.	-0.1% p.a.
Present value of total obligation (£000's)	22,861	23,937	24,087	25,221
% change in present value of total obligation	-2.3%	2.3%	-2.3%	2.3%
Projected service cost (£000's)	1,051	1,135	1,226	1,323
Approximate % change in projected service cost	-3.8%	3.9%	-3.7%	3.9%
Rate of general increase in salaries				
	202	1/22	2020	)/21

<b>.</b>				
	2021/22		2020/21	
Adjustment to salary increase rate	+0.1% p.a.	-0.1% p.a.	+0.1% p.a.	-0.1% p.a.
Present value of total obligation (£000's)	23,516	23,282	24,777	24,531
% change in present value of total obligation	0.5%	-0.5%	0.5%	-0.5%
Projected service cost (£000's)	1,092	1,092	1,273	1,273
Approximate % change in projected service cost	0.0%	0.0%	0.0%	0.0%

#### 18. Retirement benefit obligations (continued)

# Rate of increase to pensions in payment and deferred pensions assumption, and rate of revaluation of pension accounts assumption

,	2021/22		2020	0/21	
Adjustment to pension increase rate	+0.1% p.a.	-0.1% p.a.	+0.1% p.a.	-0.1% p.a.	
Present value of total obligation (£000's)	23,820	22,978	25,098	24,210	
% change in present value of total obligation	1.8%	-1.8%	1.8%	-1.8%	
Projected service cost (£000's)	1,135	1,051	1,323	1,226	
Approximate % change in projected service cost	3.9%	-3.8%	3.9%	-3.7%	
Post retirement mortality assumption					
	202	1/22	2020	0/21	
Adjustment to mortality age rating assumption	-1 year	+ 1 year	-1 year	+ 1 year	
Present value of total obligation (£000's)	24,218	22,603	25,542	23,766	
% change in present value of total obligation	3.5%	-3.4%	3.6%	-3.6%	
Projected service cost (£000's)	1,136	1,049	1,325	1,222	
Approximate % change in projected service cost	4.0%	-3.9%	4.1%	-4.0%	

#### Risks associated with the Fund in relation to accounting

The risks associated with the Fund in relation to accounting are set out below.

#### **Asset Volatility**

The liabilities used for accounting purposes are calculated using a discount rate set with reference to high quality corporate bond yields. If these assets underperform, this yield will create a deficit in the accounts. The Fund holds a significant proportion of growth assets which, while expected to outperform corporate bonds in the long term, creates volatility and risk in the short term in relation to accounting figures.

#### **Changes in Bond Yield**

A decrease in corporate bond yields will increase the value placed on the liabilities for accounting purposes although this will be marginally offset by the increase in the assets as a result.

#### Inflation Risk

The majority of the pension liabilities are linked to either pay or price inflation. Higher inflation expectations will lead to a higher liability value. The assets are either unaffected or loosely correlated with inflation meaning that an increase in inflation will increase the deficit.

#### Life Expectancy

The majority of the Fund's obligations are to provide benefits for the life of the member following retirement, so increases in life expectancy will result in an increase in the liabilities.

#### **Exiting Employers**

As set out in the Fund's Funding Strategy Statement, NILGOSC seeks to remove as much of the risk as possible of remaining Fund employers being required to make contributions in future to meet the liabilities of departed employers by carrying out a cessation valuation when an employer leaves the Scheme. If the employer (or guarantor) is not able to meet this exit payment the liability may in certain circumstances fall on other employers in the Fund. Further the assets at exit in respect of 'orphan liabilities' may, in retrospect, not be sufficient to meet the liabilities. This risk may fall on other employers. 'Orphan liabilities' are currently a very small proportion of the overall liabilities in the Fund.

#### Future cash flows

An estimate of the expected employer's regular contributions to the Fund for the accounting period ending 31 March 2023 is £468k.

#### 19. Risks arising from financial instruments

Market risk	Market risk or price risk is the risk of capital loss as a result of a fall in the price of investments. Fluctuations in price can arise from a variety of sources including interest rate risk, credit risk, currency risk and liquidity risk.  The Fund is exposed to market risk across all its investment activities. In general, excessive volatility in market risk is managed through the diversification of the portfolio in terms of asset class, geographical and industry sectors and individual securities. To mitigate market risk, the NILGOSC Committee and its investment advisors review each investment manager's performance quarterly and consider the asset allocation of the
	Fund formally by carrying out a triennial review with its Investment Advisers, Fund Managers and Fund Actuary.
Currency risk	Currency risk is the risk that the value of a financial instrument will fluctuate due to changes in foreign exchange rates. The Fund invests in securities and other investments that are denominated in currencies other than sterling. Accordingly, the value of the Fund's assets may be affected favourably or unfavourably by fluctuations in currency rates. The Fund will necessarily be subject to foreign exchange risks. The Fund's investment managers utilise currency swaps, forward exchange contracts and purchased currency options to hedge foreign currency denominated financial instruments. Increases or decreases in the fair values of these instruments are partially offset by gains and losses on the economic hedging instruments.
Interest rate risk	Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate as a result of changes in market interest rates. NILGOSC and its investment advisors monitor the Fund's interest rate exposure and individual investment mandates limit this exposure through the use of derivatives.
Credit risk	Credit risk is the risk that the counterparty to a transaction or financial instrument will fail to discharge its obligation resulting in a financial loss. This risk is generally reflected in the market price of securities, resulting in the risk being implicitly accounted for in the carrying value of the Fund's investments. Cash deposits, derivatives and stock lending are the areas of exposure where credit risk is not reflected in market prices. The Fund is exposed to credit risk in respect of its investment portfolio and this risk is managed through the selection and use of high quality counterparties and financial institutions.
Liquidity risk	Liquidity risk or cash flow risk is the risk that adequate cash resources will not be available to meet commitments such as the payment of benefits or future investment commitments as they fall due. To manage this risk NILGOSC operates a robust treasury management framework and maintains immediate access to its cash holdings.

#### 20. Actuarial Present Value of Promised Retirement Benefits for the Purposes of IAS 26

IAS 26 requires the actuarial present value of the Fund's promised retirement benefits to be disclosed, and for this purpose the actuarial assumptions and methodology used should be based on IAS 19 rather than the assumptions and methodology used for funding purposes.

The actuarial present value of promised retirement benefits at 31 March 2022 was £12,549m (31 March 2021: £12,760m). To assess the value of the benefits on this basis, the following financial and mortality assumptions have been used.

#### Financial assumptions

A full actuarial valuation of the NILGOSC defined benefit scheme was carried out as at 31 March 2019. The financial assumptions have been updated by independent qualified actuaries to take account of the requirements of IAS 19. There has been a change to the financial assumptions over the period. The discount rate has increased by 0.6%, the CPI inflations assumption has increased by 0.3% and the salary increase has increased by 0.3% which will result in a more negative balance sheet position than if the financial assumptions had remained as they were at the start of the period.

	31 March 2022	31 March 2021
	%	%
Rate of increases in salaries	4.5	4.2
Discount rate	2.7	2.1
Inflation / Pension increase rate	3.0	2.7

#### **Demographic assumptions**

The mortality assumptions at the accounting date have been set taking account of actual mortality experience of members within the Fund based on analysis carried out as part of the 2019 Actuarial Valuation and allowance for expected future mortality improvements. Sample life expectancies at age 65 in normal health resulting from these mortality assumptions are shown in the following table:

	2021/22 Years	2020/21 Years
Retiring today		
Males	21.8	21.9
Females	25.0	25.1
Retiring in 20 years		
Males	23.2	23.3
Females	26.4	26.5

The net assets available for benefits are £10,231m giving a shortfall of £2,318m when compared to the actuarial present value of promised retirement benefits of £12,549m calculated on an IAS 19 basis.

#### McCloud/Sargeant and GMP Indexation and Equalisation

The actuarial present value of promised retirement benefits as presented at 31 March 2022 allows for GMP equalisation and full pension increases to be paid on GMPs to individuals reaching SPA after 6 April 2016 which was not allowed for in previous years.

Similarly the impact of the McCloud/Sargeant ruling is included in the estimates where the assumption has been made that the underpin applies to:

- all members in service on 1 April 2012;
- members' benefits on reaching retirement (normal or ill health), or on prior withdrawal; and
- spouse's benefits on death after retirement

Details of the funding position of the Scheme are included in the Actuarial Statement on pages 130 to 132.

#### 21. Performance against key financial targets

The Department for Communities does not consider it appropriate to set key financial targets for NILGOSC.

#### 22. Contingent liabilities

NILGOSC has contingent liabilities where the possibility of a liability crystallising is judged to be possible. Unless otherwise stated, the quantum of the liability can either not be determined with reasonable certainty or to quantify it would jeopardise the outcome of any legal action.

#### McCloud/Sargeant Ruling

In 2019 the UK Court of Appeal ruled that the transitional arrangements in both the Judges' Pension Scheme (McCloud) and Firefighters' Pension Scheme (Sargeant) constituted illegal age discrimination. Following the ruling the government confirmed that the judgment would be treated as applying to all public service schemes including the LGPS (NI) (where the transitional arrangements were in the form of a final salary underpin). The Department of Communities ran a consultation from 11 November to 31 January 2021 consulting on proposals to

- I) remove discrimination in the LGPS(NI) for the future; and
- II) remedy the effect of any discrimination scheme members may have incurred since April 2015.

The proposed approach is to extend the underpin arrangement to all members who were active in the 2009 Scheme on 31 March 2012 and have accrued benefits under the 2015 Scheme. The underpin will cover the period between 1 April 2015 and 31 March 2022, known as the remedy period. These proposals have been developed in conjunction with the Collective Consultation Working Group, which is the recognised forum for consultation on pension policy for devolved schemes and where both public service employers and employees are represented, and with the LGPS(NI) Scheme Advisory Board. Any subsequent changes to the LGPS(NI) will be subject to further scheme level consultation.

The additional 'underpin' liability estimate is included in the current service costs together with an allowance within the balance sheet reflecting service since the Scheme reforms in 2015. The estimates used and method for valuing the McCloud remedy is aligned to that deferred choice underpin and provided for in the retirement benefit obligation estimate in note 18. Any retrospective payments due on benefit recalculations necessary based on the deferred choice underpin will be immaterial at a fund level.

#### Cost Management Process - 2016 cost cap valuations

The 2016 Scheme valuation was paused as a consequence of the McCloud ruling. Following consultation with member representatives, the Department of Finance published revised valuation directions on 22 November 2021 which will enable the 2016 valuation to be completed and the final cost cap results to be determined. These results will take into account the increased value of public service pensions, attributable to the 'McCloud remedy'.

#### **GMP Indexation and Equalisation**

Guaranteed Minimum Pension (GMP) is a portion of pension that was accrued by individuals who were contracted out of the State Second Pension between 6 April 1978 and 6 April 1997.

Prior to 6 April 2016, the State Pension and public sector schemes worked in tandem to ensure LGPS (NI) Pension kept in line with inflation. The LGPS(NI) was not required to pay any pension increases on GMPs accrued before April 1988 and limited increases on those accrued after 1988. In return the Additional Pension (AP) element of the State Pension paid top-up payments to pensioners to give inflation protection on the GMP element not provided by LGPS(NI).

Reforms were made to the State Pension system in April 2016 which scrapped AP and removed the facility for central government to fully index the combined pension through AP. In March 2016 the government introduced an 'interim' solution for the LGPS(NI) to pay full inflationary increases on GMPs for those reaching State Pension Age (SPA) SPA between April 2016 and December 2018. This 'interim' solution has continued to be extended with the latest government response to consultation on full GMP conversion opting to extend the full indexation up to April 2024.

The retirement benefit obligation provides for an indefinite extension of the solution in the estimates included in note 18.

#### 22. Contingent liabilities (continued)

#### **Goodwin Legal Case**

A recent Employment Tribunal decision of June 2020, in the case of Linda Goodwin v Sec of State for Education, found that the Teachers' Pension Regulations 2010 (as amended) directly discriminated on grounds of sexual orientation in relation to the provision of adult survivor pensions and thereby result in a breach of the non-discrimination rule in section 61(1) to the Equality Act 2010.

The impugned Regulations provide for a survivor's pension for all adult survivors of marriages and civil partnerships based on the member's service from 1972 (1978 for post-retirement marriages and civil partnerships), except in respect of a widower of an opposite sex marriage or a male surviving partner of an opposite sex civil partnership which are based on the member's service from 1988.

The Tribunal found this to be discriminatory and ruled that the Regulations should have effect so that Mrs Goodwin's widower or surviving male civil partner would be entitled to the same survivor pension as if he were her widow or surviving female civil partner. This ruling, which has not been challenged by the government, has implications for all public sector pension schemes including LGPS(NI).

Although there is a similar differential treatment under the regulations governing the LGPS(NI), it is more limited in scope. The differential applies only where the marriage or civil partnership is entered into after the member has left the scheme (either as a pensioner or becoming a deferred member). For such post-leaving marriages and civil partnerships service before 6 April 1988 is excluded in the calculation of the survivor's pension for a widower of an opposite sex marriage or a surviving male civil partner of an opposite sex civil partnership. For all other survivors of post-leaving marriages and civil partnerships the calculation excludes membership before 6 April 1978.

Changes to regulations were made on 24 March 2022 and came into effect on 18 April 2022.

Management had reviewed the membership of the female pensioner cohort back to 2005 (date that civil partnerships could first be registered in Northern Ireland). There are less than one hundred female pensioner members in the scheme (current or deceased) who have dates of marriage after their retirement date and therefore need retrospective calculations. Based on the quantum affected, any additional payments due will be immaterial for the LGPS(NI) at a fund level.

#### 23. Contractual commitments

Outstanding capital commitments (investments) at 31 March 2022 totalled £243m (31 March 2021: £205m). These relate to outstanding amounts committed, but not yet paid, to unquoted limited partnership funds held in the private equity/infrastructure part of the portfolio. The amounts requested by these funds are variable in both size and timing over a period of 5-6 years from the date of the original agreement. In addition, NILGOSC has outstanding commitments in relation to a new global property mandate of £89m (31 March 2021: £173m) which will be funded over the next 6-12 months.

#### 24. Related party transactions

NILGOSC is a Non-Departmental Public Body sponsored by the Department for Communities. The Department for Communities is regarded as a related party and transactions were not considered to be material.

Details of allowances paid during the year to members of the Committee are shown in the Remuneration Report on page 78. To capture information on related party transactions, NILGOSC has circularised its Committee Members and Officers. Due to the nature of NILGOSC's operations and the composition of the Committee, it is inevitable that transactions will take place with organisations in which a Committee Member, an officer or a close family member may have an interest. All such transactions are conducted at arm's length and in accordance with NILGOSC's policies and procedures. None of the Committee, Officers or close family members have undertaken any material transactions with NILGOSC during the year.

#### 24. Related party transactions (continued)

#### The following Related Party Transactions were incurred during the year:

NILGOSC's Head of Finance has a close family member who is an employee of BT. A total of £162,624 was paid for a range of supplies and services to this supplier during 2021/22. Neither the NILGOSC Head of Finance nor their close family member were involved in any procurement exercise or decision making process in the award of any contracts.

NILGOSC's HR Manager has a close family member who is an employee of B4B Solutions. A total of £3,683 was paid for a range of supplies and services to this supplier during 2021/22. Neither the NILGOSC HR Manager nor their close family member were involved in any procurement exercise or decision making process in the award of any contracts.

Committee member Ms Joan McCaffrey's close family member is an employee of Deloitte. A total of £6,000 was paid to the supplier for investment related services during 2021/22. Neither the Committee member nor their close family member were involved in any procurement exercise or decision making process in the award of any contracts.

Committee members Mr Alan Law and Ms Antoinette McMillen and are both employees of NIPSA and Trustees of the NIPSA Pension Scheme. Staff union contributions of £3,598 were made to NIPSA during 2021/22.

#### 25. Summary of losses and special payments

#### (i) Losses

Losses incurred on the sale of investments are disclosed within "Change in Market Value" in Note 9 to the financial statements and "Gains/losses arising from changes in fair value of Investment Properties" in Note 10 to the financial statements.

Losses incurred during the year in respect of pension overpayments total £9,212. This figure reflects pensioner overpayments as a result of death which are not considered recoverable and includes one overpayment of £2,054. Write-off approval was sought and received from DfC on 20 May 2022 for this irrecoverable pension overpayment.

A suspected pension payroll fraud of £6,737, related to the unreported death of a member was detected during 2021/22. This case was reported to the Department for Communities on 21 October 2021 and is currently the subject of a criminal investigation. This debt has been provided for in 2021/22, while NILGOSC continue to pursue recovery through the civil courts.

Bad debts written off during the year total £1,081,072. This write-off relates to investment property rental debt on a number of investment properties.

Write-offs of losses and bad debts of this nature exceeding £5k per case require Department of Finance approval which was received on 21 June 2022.

#### (ii) Special payments

There were no special payments during the year.

#### 26. Post Balance Sheet Events

There have been no significant events since 31 March 2022.

The Financial Statements were authorised for issue by the Accounting Officer on 8 September 2022.

# STATEMENT OF THE ACTUARY for Year Ended 31 March 2022

#### Introduction

The Scheme Regulations require that a full actuarial valuation is carried out every third year. The purpose of this is to establish that the Northern Ireland Local Government Pension Scheme (the Scheme) is able to meet its liabilities to past and present contributors and to review employer contribution rates. The last full actuarial investigation into the financial position of the Scheme was completed as at 31 March 2019 by Aon, in accordance with Regulation 68 of the Local Government Pension Scheme Regulations (Northern Ireland) 2014.

#### **Actuarial Position**

- 1. The valuation as at 31 March 2019 showed that the funding level of the Scheme had increased since the previous valuation with the market value of the Scheme's assets as at 31 March 2019 (of £8,039.9M) covering 112% of the liabilities allowing, in the case of pre-1 April 2015 membership for current contributors to the Scheme, for future increases in pensionable pay.
- 2. The valuation also showed that the aggregate level of contributions required to be paid by participating employers with effect from 1 April 2020 was:
  - a. 20.7% of pensionable pay. This is the rate calculated as being sufficient, together with contributions paid by members, to meet the liabilities arising in respect of service after the valuation date,

#### Plus

b. an allowance of 3.2% of pensionable pay for McCloud and cost management (see paragraph 10 below),

#### Less

c. 4.3% of pensionable pay to remove surplus in excess of a funding level of 100% over a recovery period of 20 years from 1 April 2020 (but with an additional monetary amount payable for those employers whose funding position is below 100%).

- 3. A large number of employers are grouped together (in the Main Employer Group) for the purposes of setting employer contribution rates but contributions for other employers are assessed separately. The resulting contributions payable by each employer are set out in Aon's report dated 30 March 2020 (the "actuarial valuation report"). In addition to the contributions certified, payments to cover additional liabilities arising from early retirements (other than ill-health retirements) will be made to the Scheme by the employers.
- 4. The funding plan adopted in assessing the contributions for each employer and the Group is in accordance with the Funding Strategy Statement. Different approaches adopted in implementing contribution increases and employers' recovery periods were agreed with the Northern Ireland Local Government Officers' Superannuation Committee (the Committee) reflecting the employers' circumstances.
- 5. Total contributions payable by all employers over the three years to 31 March 2023 are estimated to be:

Year from 1 April	% of pensionable pay	Plus total contribution amount (£M)
2020	19.7	2.540
2021	19.7	2.604
2022	19.7	2.671

6. The valuation was carried out using the projected unit actuarial method for most employers and the main financial actuarial assumptions used for assessing the funding target and the contribution rates were as follows:

#### In-service discount rate

Main Employer Group funding target	4.1% p.a.
Intermediate funding target	4.1% p.a.
Ongoing orphan funding target	4.1% p.a.
Left- service discount rate	
Main Employer Group funding target	4.1% p.a.
Intermediate funding target	3.1% p.a.
Ongoing Orphan funding target	1.6% p.a.

Rate of pay increases 3.6% p.a. (service up to 31 March 2015 only) (additional allowance made for promotional increases)

Rate of increase to pension accounts 2.1% p.a.
Rate of increases in pensions in payment 2.1% p.a.

In addition, the discount rate for already orphaned liabilities (i.e. where there is no scheme employer responsible for funding those liabilities and employer has exited the Scheme) was 1.3% p.a. in-service and left-service.

The assets were valued at market value.

7. The key demographic assumption was the allowance made for longevity. The post retirement mortality assumption adopted for the actuarial valuation was in line with standard self-administered pension scheme (SAPS) S2P mortality tables with appropriate scaling factors applied based on an analysis of the Scheme's pensioner mortality experience and a Scheme membership postcode analysis using Aon's Demographic HorizonsTM longevity model. This included an allowance for improvements based on the 2018 Continuous Mortality Investigation (CMI) Core Projections Model (CMI2018), with a long term annual rate of improvement in mortality rates of 1.5% p.a. The resulting average future life expectancies at age 65 (for normal health retirements) were:

	Men	Women
Current pensioners aged 65 at the valuation date	21.8	24.9
Current active members aged 45 at the valuation date	23.1	26.3

Further details of the assumptions adopted for the valuation are set out in the actuarial valuation report.

8. The valuation results summarised in paragraphs 1 and 2 above are based on the financial position and market levels at the valuation date, 31 March 2019. As such the results do not make allowance for changes which have occurred subsequent to the valuation date. The Committee, in conjunction with the Actuary monitors the funding position on a regular basis.

- 9. The formal actuarial valuation report and the Rates and Adjustments Certificate setting out the employer contribution rates for the period from 1 April 2020 to 31 March 2023 were signed on 30 March 2020. Other than as agreed or otherwise permitted or required by the Regulations, employer contribution rates will be reviewed at the next actuarial valuation of the Scheme as at 31 March 2022 in accordance with Regulation 68 of the Local Government Pension Scheme Regulations (Northern Ireland) 2014.
- 10. There are a number of uncertainties regarding the Scheme benefits and hence liabilities:

# Increases to Guaranteed Minimum Pensions (GMPs):

On 23 March 2021, the Government published a response to its consultation on the longerterm solution to achieve equalisation for GMPs as required by the High Court judgement in the Lloyds Bank case. The response set out its proposed longer - term solution, which is to extend the interim solution further to those reaching SPA after 5 April 2021. The results of the 2019 valuation already allow for the impact of this proposed longer - term solution since it allowed for the extension of the 'interim solution' which assumed public service schemes would be required to pay full inflationary increases on GMPs for all those reaching State Pension Age (SPA) on or after 6 April 2016 (and not just for those reaching SPA between 6 April 2016 and 5 April 2021).

# Cost Management Process and McCloud judgment:

Initial results from the 2016 cost management process indicated that benefit improvements / member contribution reductions equivalent to 3.2% of pay would be required. However, the cost management process was paused following the Court of Appeal ruling that the transitional arrangements in both the Judges' Pension Scheme (McCloud) and Firefighters' Pension Scheme (Sargeant) constituted illegal age discrimination. Government confirmed that the judgment would be treated as applying to all public service schemes including the LGPS (where the transitional arrangements were in the form of a final salary underpin). and a consultation on changes to the LGPS (NI) was issued by the Department for Communities (DfC) in November 2020.

In England and Wales, MHCLG (now DLUHC) confirmed the key elements of the expected changes to the LGPS to implement the McCloud judgement in a Written Ministerial Statement in May 2021, although a full consultation response has not yet been made, and Regulations are not expected to in force until 2023. It is expected that DfC will follow a similar timescale and the same remedy with respect to the NI LGPS.

After incorporating the potential costs of the McCloud remedy, the 2016 cost management process has concluded, with no benefit improvements or member contribution changes being recommended under that process. However some uncertainty remains as the inclusion of McCloud costs in the cost management process is the subject of a Judicial Review.

The employer contributions certified from 1 April 2020 as part of the 2019 valuation include an allowance of 3.2% of pay in relation to the potential additional costs following the McCloud judgement / cost management process as agreed with the Committee. This will be revisited as part of the 2022 valuation of the Fund.

#### Goodwin:

An Employment Tribunal ruling relating to the Teachers' Pension Scheme concluded that provisions for survivor's benefits of a female member in an opposite sex marriage are less favourable than for a female in a same sex marriage or civil partnership, and that treatment amounts to direct discrimination on grounds of sexual orientation. The chief secretary to the Treasury announced in a written ministerial statement on 20 July 2020 that he believed that changes would be required to other public service pension schemes with similar arrangements, although these changes are yet to be reflected in LGPS (NI) regulations. We expect the average additional liability to be less than 0.1%, however the impact will vary by employer depending on their membership profile.

11. This Statement has been prepared by the Actuary appointed by the Committee, Aon, for inclusion in the accounts of the Scheme. It provides a summary of the results of the actuarial valuation which was carried out as at 31 March 2019. The valuation provides a snapshot of the funding position at the valuation date and is used to assess the future level of contributions required.

This Statement must not be considered without reference to the formal actuarial valuation report which details fully the context and limitations of the actuarial valuation.

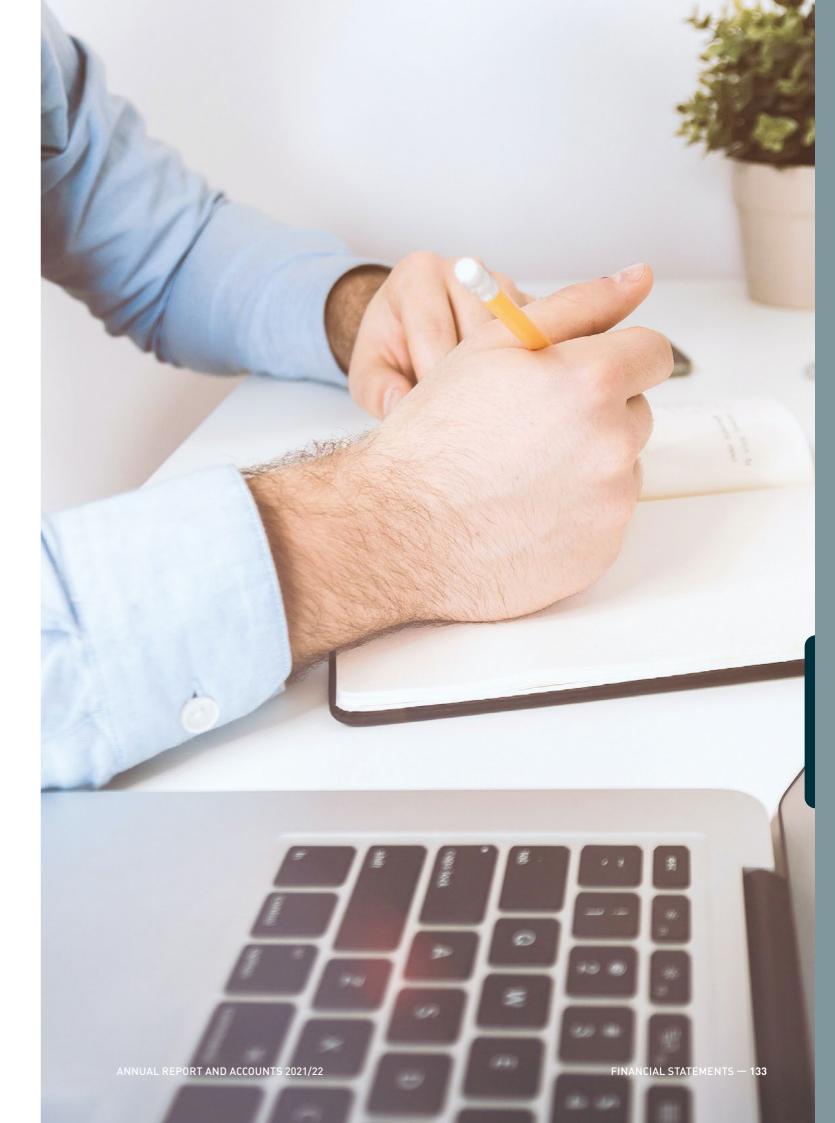
Aon does not accept any responsibility or liability to any party other than the Committee in respect of this Statement.

The report on the actuarial valuation as at 31 March 2019 is available on the Scheme's website at the following address:

https://nilgosc.org.uk/document-category-valuation-reports/

Aon Solutions UK Limited

May 2022



# 

# ANNUAL EQUALITY STATEMENT Year Ended 31 March 2022

NILGOSC's Equality Scheme states that it will report on the progress it has made in the delivery of its Section 75 statutory duties.

#### **Our Commitment**

NILGOSC re-affirms its commitment to the fulfilment of its duties under Section 75 of the Northern Ireland Act 1998 in that it will have due regard to the need to promote equality of opportunity:

- Between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- Between men and women generally;
- Between persons with a disability and persons without; and,
- Between persons with dependants and persons without.

In addition, without prejudice to its obligations above, NILGOSC shall, in carrying out its functions, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

# Promotion of Equality of Opportunity

NILGOSC has demonstrated its commitment to the promotion of equality of opportunity during 2021/22 and the equality agenda continues to be promoted and supported by the most senior levels of the organisation.

The NILGOSC Corporate Plan for 2021/22 included objectives relating to equality and good relations. The Senior Management Team has monitored the implementation of these objectives on a quarterly basis.

# Implementation of the Equality Scheme

NILGOSC carried out a full review of its approved Equality Scheme in late 2021 which was approved by the Management Committee in December 2021. The next review of the Scheme will be completed in 2026.

NILGOSC carried out its duties in relation to the Equality Scheme throughout 2021/22 to ensure that its policies and procedures are fair and lawful. A number of the actions set out in the Equality Action Plan 1 April 2021-31 March 2022 were progressed during the year, as set out below:

- The Equality Scheme was reviewed in December 2021. In addition, NILGOSC completed an Audit of Inequalities exercise which was issued for consultation on 1 April 2022. The exercise informed the draft Equality Action Plan, which is also out for consultation, closing on 24 June 2022.
- At 31 March 2022 all Committee members have completed the "Equality and Diversity in the Northern Ireland Workplace" e-learning training. All new staff are also required to complete this training.
- Equality and Diversity training was delivered at a staff conference in June 2021.
- There were 61 alternative communications issued between 1 April 2021–31 March 2022. The requests were a mixture of large print, translations and audio CD. All requests for alternative communications were provided to members within agreed timescales.
- Recruitment documentation is now available in an accessible format and applicants are made aware of the reasonable adjustments that are available throughout the recruitment process.
- A Good Relations Survey was issued to all staff and responses received in January 2022.
   There were no areas of concern noted.
- The Disability Action Plan has been drafted and will be issued for consultation in Q2 2022/23.

In line with its Equality Scheme, NILGOSC continues to carry out screening of any new or revised policies for equality impacts. One policy was screened during 2021/22 and no equality impact assessment was required. No equality complaints were received during the year.

NILGOSC continues to provide its publications in alternative formats on request.

Those who require further information about the NILGOSC Equality Scheme or would prefer to receive this document in an alternative format (such as in large print, in Braille, on audio cassette or on computer disc) and/or language, please contact the Equality Officer at:

Address: NILGOSC, Templeton House, 411 Holywood Road, Belfast, BT4 2LP

Telephone: 0345 3197 320

Typetalk: 18001 0345 3197 320 (for people using

a textphone)

Fax: 0345 3197 321

Email: equality@nilgosc.org.uk

Copies of the Equality Scheme and this Annual Equality Statement are also available on the Internet at <a href="https://www.nilgosc.org.uk/equality-scheme">www.nilgosc.org.uk/equality-scheme</a>.

# ANNUAL REPORT OF THE AUDIT AND RISK ASSURANCE COMMITTEE for Year Ended 31 March 2022

#### 1 Purpose

- 1.1 The purpose of this report is to provide the Management Committee with an annual report on the activity of the Audit & Risk Assurance Committee (ARAC) during the year ended 31 March 2022.
- 1.2 This report provides a summary of the main areas and issues considered by the ARAC during 2021/22.

# 2 Constitution of the Audit & Risk Assurance Committee

- 2.1 At 31 March 2022 there were four members on the ARAC. Mark McBride (Chairperson), Michael Rafferty, Joan McCaffrey and Antoinette McMillen were all serving members of the Committee for 2021/22.
- 2.2 The ARAC is charged with advising the Management Committee on:
  - the strategic processes for risk, control and governance, and the Governance Statement.
  - the accounting policies, the accounts, and the annual report of the organisation, including the process for review of the accounts prior to submission for audit, levels of errors identified, and management's letter of representation to the external auditors.
  - the planned activity and results of both internal and external audits.
  - the adequacy of management responses to issues identified by audit activity, including external audit's management letter.
  - assurances relating to the corporate governance requirements for the organisation.
  - proposals for tendering for Internal Audit services.
  - anti-fraud policies, processes relating to raising concerns, and arrangements for special investigations.

- 2.3 Other individuals also regularly attend the meetings of the ARAC including the Chief Executive/Accounting Officer, Deputy Secretary, the Head of Finance, the Head of Governance & Support Services, the Governance Manager, the Internal and External Auditors and a Departmental representative.
- 2.4 Following each meeting, the Chairperson of the ARAC provides a verbal report to the Management Committee, providing an overview of the discussions and highlighting any issues that are considered to be significant. Minutes of the ARAC meetings are also circulated to members of the Management Committee following approval.

#### 3 Financial Reporting

- 3.1 The Annual Report and Accounts 2020/21 were prepared in line with changes to the FReM and relevant accounting guidance. This was presented to the ARAC on 9 August 2021. In line with DAO (DFP) 10/12 'Requirement to Complete a Governance Statement', the Chief Executive prepared his Governance Statement for 2020/21, which was considered and endorsed by the ARAC for inclusion in the 2020/21 Annual Report.
- 3.2 In addition to the Governance Statement, the Annual Report 2020/21 also included the Annual Report of the ARAC. On the recommendation of the ARAC, the Annual Report 2020/21 was approved by the Management Committee at its meeting on 24 August 2021 and laid before the Assembly on 10 September 2021.

#### 4 External Audit

- 4.1 As a non-departmental public body, NILGOSC is required to use the Local Government Auditor for the provision of its external audit service. The Local Government Auditor within the Northern Ireland Audit Office (NIAO) has appointed KPMG to provide the external audit function on its behalf but retains responsibility for signing the audit report and providing an annual opinion.
- 4.2 The NIAO presented its Report to Those Charged with Governance for 2020/21 (RTTCWG) to the ARAC on 9 August 2021.

- 4.3 The External Auditor advised the ARAC that there were no significant issues identified as a result of the audit. One priority 2 recommendation was made in relation to the completion of journal entries. The External Auditor opined that the financial statements had been properly prepared and provided a true and fair statement of NILGOSC's affairs as at 31 March 2021.
- 4.4 The Local Government Auditor issued a clean audit opinion for the year ended 31 March 2021. There were no significant issues reported in the 2020/21 RTTCWG.
- 4.5 The Local Government Auditor presented its Audit Strategy 2021/22 to the ARAC at its meeting on 8 February 2022, which was subsequently approved.

#### **5 Internal Audit**

- 5.1 The Internal Auditor presented the final audit plan for 2021/22 to the ARAC on 7 June 2021.
- 5.2 The internal audit reviews conducted during 2021/22 and the assurance opinion provided in respect of each is set out in the table below:

Review	Assurance Opinion
Other Financial Systems	Satisfactory
Investment Monitoring and Reporting	Satisfactory
Procurement and Contract Management	Satisfactory
Pensions Development	Satisfactory
Human Resources Management	Satisfactory
Pensioners' Payroll	Satisfactory
Follow Up	N/A

- 5.3 'Satisfactory' is the highest level of assurance that can be provided and the ARAC was pleased to note that this had been achieved in all areas and that no significant issues were identified as a result of any of the internal audit reviews undertaken during 2021/22.
- 5.4 The ARAC receives bi-annual reports on the progress against implementation of internal audit recommendations. These reports were provided in August 2021 and February 2022 and the ARAC noted that good progress that had been made during 2022/23.

- 5.5 In her Annual Assurance Report, the Head of Internal Audit (HIA) stated that, during the twelve month period ended 31 March 2022, NILGOSC's systems in relation to risk management, control and governance were adequate and operated effectively, thereby providing satisfactory assurance in relation to the achievement of NILGOSC's objectives.
- 5.6 The HIA did not consider there to be any significant control issues relevant to the preparation of the Governance Statement for the year ended 31 March 2022.

#### 6 Risk, Control and Governance

- 6.1 During the annual review of the risk register in April 2021, the risk register was extensively reviewed. As a result of the review some amendments were made to the register including risk scores and control measures. New and emerging risks were also added, and some risks were removed. In relation to the ongoing COVID-19 pandemic, it was acknowledged that significant progress has been made over the last 12 months to manage the impact of the pandemic and that, whilst some COVID-19 specific risks remained applicable to the next 12 months, others had not materialised and the long-term risk could be managed within existing risks on the risk register. Therefore, as a result of the review, the separate COVID-19 risk register was removed, with three COVID-19 specific risks moved to the risk register to be managed in line with standard risk management procedures. The ARAC reviewed the risk register 2021/22 at its meeting on 7 June 2021, which was subsequently approved by the Management Committee on 22 June 2021.
- 6.2 A quarterly report is also presented to the ARAC summarising the operation of the risk management process. This report includes any significant control issues identified during the quarter together with any proposed changes to the risk register. It also incorporates the review of risks, in line with significant changes in the external environment. The quarterly reports provide the ARAC with assurance that the risk management process is operating effectively and that any internal control weaknesses or irregularities are promptly and adequately addressed. The reports including any approved changes are presented to the Management Committee following review by the ARAC.



- 6.3 The quarterly risk reviews and subsequent reports provided during 2021/22 resulted in the increase of risk scoring for two risks and a reduction in scoring for one risk, that was subsequently increased thereafter. An amendment to the wording of a key strategic risk was also applied to more accurately reflect the concerns underlying the risk score.
- 6.4 The Department for Communities (the Department) requires NILGOSC to regularly complete Departmental Assurance Statements to provide assurance that sound systems of internal control and governance are in place, that key risks are being managed and to highlight any significant issues. These six-monthly Statements were reviewed by the ARAC at its meetings on 7 June 2021 and 15 November 2021 before consideration by the Management Committee and sign off by the Chairperson.

#### 7 Fraud and Raising Concerns

- 7.1 All cases of suspected or actual fraud are investigated in line with NILGOSC's Anti-Fraud Policy and all cases of malpractice, unlawful conduct or wrongdoing are investigated and reported to the PSNI and the Department. During 2021/22, one new case of suspected fraud was reported in line with the Policy and NILGOSC continued to provide updates to the Department on a previously reported case.
- 7.2 There were no concerns raised through NILGOSC's Raising Concerns Policy during 2021/22.
- 7.3 Any cases of raised concerns or fraud are reported to the ARAC through a quarterly Fraud and Raised Concerns Report, presented at each meeting. In 2020/21 NILGOSC participated in the National Fraud Initiative (NFI) data matching exercise. Updates on progress against the investigation of matches identified through this exercise (and previous NFI exercises) and those identified by the General Register Office for Northern Ireland are included in this report.

#### 8 Other

- 8.1 The Terms of Reference for the ARAC are formally reviewed every three years or as required. The Terms of Reference were reviewed and updated at the ARAC's meeting on 15 November 2021 and subsequently approved by the Management Committee at its meeting on 14 December 2021. The approved Terms of Reference are available to view on NILGOSC's website.
- 8.2 A Departmental representative was in attendance at all four ARAC meetings held in 2021/22.

# 9 Effectiveness of the Audit & Risk Assurance Committee

- 9.1 The ARAC met four times during 2021/22 in accordance with the planned work programme.
- 9.2 The following table sets out the attendance record for 2021/22:

Member	Meetings Called	Meetings Attended	Attendance %
Mark McBride	4	4	100%
Joan McCaffrey	4	4	100%
Michael Rafferty	4	4	100%
Antoinette McMillen	4	4	100%

- 9.3 Under its Terms of Reference, the ARAC is required to periodically review its own effectiveness and report the results of that review to the Committee. In accordance with best practice, the ARAC adopted and tailored the National Audit Office (NAO) 'Self-Assessment Checklist' published in November 2017 to assist in undertaking this review.
- 9.4 The ARAC met on 12 May 2022 to discuss the questions on the checklist and review its effectiveness for the reporting period 1 April 2021 to 31 March 2022. The outcome of the assessment demonstrated that the ARAC operated effectively during the reporting period and is compliant with the five good practice principles set out in the checklist.
- 9.5 Following the 2021/22 review of effectiveness, no significant issues were identified.

#### 10 Opinion

10.1 Based on the assurances and information provided during the year ended 31 March 2022, the ARAC is satisfied that the Management Committee can rely on the risk management, internal control and corporate governance arrangements currently in operation.

### **EMPLOYING AUTHORITIES** CONTRIBUTING **TO THE SCHEME** at 31 March 2022

#### Councils

Antrim and Newtownabbey Borough Council

Ards and North Down Borough Council

Armagh, Banbridge and Craigavon District Council

Belfast City Council

Causeway Coast and Glens District Council

Derry City and Strabane District Council

Fermanagh and Omagh District Council

Lisburn and Castlereagh City Council

Mid and East Antrim District Council

Mid Ulster District Council

Newry, Mourne and Down District Council

#### **Education and Library Authorities**

**Education Authority** 

Libraries NI

#### **Restricted Membership**

Amey Community Limited

Apex Housing

Apleona HSG Limited

Capita Managed IT Solutions Limited

Choice Housing Ireland Limited

City of Derry Airport

Graham Asset Management

Mourne Heritage Trust

Northern Community Leisure Trust

Northern Community Leisure Trust 2

Radius Housing Association

South Ulster Housing Association Limited

#### **Associated Bodies**

Arc21 Joint Committee

Ark Housing Association Northern Ireland Limited

Armagh Observatory and Planetarium

Arts Council of Northern Ireland

Belfast Charitable Society

Belfast Visitor & Convention Bureau

Belfast Waterfront and Ulster Hall Limited

Citybus Limited

Coleraine Harbour Commissioners

Comhairle Na Gaelscolaíochta

Community Relations Council

Connswater Homes Limited

Construction Industry Training Board

Controlled Schools Support Council

Council for Catholic Maintained Schools

Council for the Curriculum,

**Examinations and Assessment** 

Derry Visitor and Convention Bureau

General Teaching Council for Northern Ireland

Greenwich Leisure Limited

Grove Housing Association Limited

Habinteg Housing Association (Ulster) Limited

Linen Hall Library

Livestock & Meat Commission for Northern Ireland

Local Government Staff Commission

Middletown Centre for Autism

Millennium Forum

Newington Housing Association (1975) Limited

North Belfast Housing Association

Northern Ireland Co-Ownership

Housing Association Limited

Northern Ireland Council for Integrated Education

Northern Ireland Federation of Housing Associations

Northern Ireland Fire & Rescue Service

Northern Ireland Fishery Harbour Authority

Northern Ireland Hospice

Northern Ireland Housing Executive

Northern Ireland Local Government Association

Northern Ireland Local Government

Officers' Superannuation Committee

Northern Ireland Railway Company Limited

Northern Ireland Screen

Northern Ireland Tourist Board

Northern Ireland Transport Holding Company

Outdoor Recreation (NI)

Probation Board for Northern Ireland

Rural Housing Association

Sports Council for Northern Ireland

St Matthew's Housing Association Limited

Ulsterbus Limited

Woodvale and Shankhill Housing Association

#### Schools and Colleges

Abbey Christian Brothers Grammar School

Acorn Integrated Primary School

Aquinas Diocesan Grammar School

Assumption Grammar School

Ballymena Academy

Bangor Grammar School

Belfast High School

Belfast Royal Academy

Blackwater Integrated College

Braidside Integrated Primary & Nursery School

Bridge Integrated Primary School

Campbell College

Cedar Integrated Primary School

Christian Brothers Grammar School

Coleraine Grammar School

Corran Integrated Primary School

Cranmore Integrated Primary School

Dalriada School

Dominican College - Belfast

Dominican College - Portstewart

**Drumlins Integrated Primary School** 

Drumragh Integrated College

Enniskillen Integrated Primary School

Enniskillen Royal Grammar School

Erne Integrated College

Foyle and Londonderry College

Friends School

Hazelwood College

Hazelwood Integrated Primary School

Hunterhouse College

Integrated College Dungannon

Jordanstown Schools

Lagan College

Larne Grammar School

Loreto College

Loreto Grammar School

Loughview Integrated Primary School

Lumen Christi College

Maine Integrated Primary School

Malone College

Methodist College

Mill Strand Integrated Primary School

Millennium Integrated Primary School

Mount Lourdes Grammar School

New-Bridge Integrated College

North Coast Integrated College Oakgrove Integrated College

Oakgrove Integrated Primary School

Oakwood Integrated Primary School

Omagh Integrated Primary School

Our Lady & St Patrick's College

Our Lady's Grammar School

Phoenix Integrated Primary School Portadown Integrated Primary School

Rainey Endowed School

Rathmore Grammar School

Roe Valley Integrated Primary School

Rowandale Integrated Primary School

Royal Belfast Academical Institution

Royal School, Armagh

Royal School, Dungannon

Sacred Heart Grammar School

Saints and Scholars Integrated Primary School

Shimna Integrated College

Slemish Integrated College

Sperrin Integrated College

Spires Integrated Primary School

St Colman's College

St Columb's College

St Dominic's High School

St Joseph's Grammar School

St Louis Grammar School

St Louis Grammar School Kilkeel

St Malachy's College

St Mary's Christian Brothers

St Mary's Grammar School

St Michael's College

St Patrick's Academy

St Patrick's Grammar School

St Patrick's Grammar School, Armagh

St Ronan's College

Strangford College

Strathearn School

Sullivan Upper School

Thornhill College

Ulidia Integrated College

Victoria College

Wallace High School

Windmill Integrated Primary School

# Further and Higher Education Colleges and Universities

Belfast Metropolitan College

North West Regional College

Northern Regional College

South Eastern Regional College

South West College

Southern Regional College

St Mary's University College

Stranmillis University College

University of Ulster

#### **GLOSSARY**

The following is a glossary of pension terms used throughout this Annual Report:

Term	Definition
Accrual rate	This is the rate at which pension benefits build up for the member e.g. 1/49 <sup>th</sup> times pensionable pay for each year of membership.
Active Member	Current member of the pension scheme who is building up retirement benefits from their present job.
Active Management	A style of investment management whereby the manager seeks to add value to the fund by actively buying and selling shares.
Actuary	Expert on pension scheme assets, liabilities, life expectancy and probabilities. An actuary works out whether enough money is being paid into a pension scheme to pay the pensions when they are due.
Actuarial Valuation	An assessment performed by an actuary, usually every three years, to determine how much money needs to be put into a pension scheme to ensure that there are enough funds available to meet future pension payments.
Additional Voluntary Contributions (AVCs)	Contributions made by an individual over and above the normal contribution level to increase the level of benefits available on retirement. These contributions are paid to an insurance company.
Asset Allocation	The decision as to which mix of assets to buy – shares, bonds, property or cash.
Automatic Enrolment	The process whereby employers must automatically enrol workers that meet specified eligibility conditions into a qualifying pension scheme. Workers have the option to opt out.
Balanced Management	A traditional approach to investment whereby a manager buys a combination of shares and bonds to provide both income and capital appreciation while avoiding excessive risk.
Benchmark	A standard against which investment performance is measured. A common benchmark is the FTSE All-Share Index which includes a large percentage of all quoted shares.
Benefit Statement	A statement showing an individual the pension benefits they have earned so far together with a forecast of what their final pension might be.

Term	Definition
Career Average Revalued Earnings (CARE)	A defined benefit scheme in which pension benefits are based on a career average pay and length of membership in the Scheme and re-valued to retirement.
Cohabiting Partner	Couples who live together but do not marry or enter a civil partnership.
Consumer Price Index (CPI)	CPI forms the basis for the Government's inflation target. It is an index published by the Government each month reporting the change in the price of a 'basket of goods and services' and a measure of inflation within the UK. It excludes housing costs and mortgage interest payments. CPI can be used for revaluing pensions in deferment and increases to retirement income.
Contributions	The money paid by an individual or his/her employer into a pension fund.
Corporate Bonds	Loan stock issued by companies which offer a fixed rate of interest paid over the duration of the loan, together with repayment on maturity at a predetermined rate.
Coupon	The nominal interest a bond will pay at each payment date.
Death Benefit	This may be paid to a member's dependants if the member dies. It may be a pension or a one-off payment.
Deferred Benefits	Benefits which are calculated at the time an individual leaves the scheme and are payable later.
Deferred Member	An individual who has left the scheme but will get pension benefits when they reach their normal retirement age.
Defined Benefit Scheme	A pension scheme which states in advance the level of benefits that will be paid on retirement, usually based on the service and earnings.
Dependant	Someone who is dependent on a member of the pension scheme (or on a pensioner of the scheme) and derives benefits through him/her.

Term	Definition
Eligible Child	A child is an eligible child of a deceased member if, at the date of death they are:  • The natural child of the deceased  • The adopted child of the deceased  • A step-child of a child accepted as a member of the deceased's family and dependent on the deceased at the date of death.  Eligible children must meet one of the following conditions:  • Be under age 18, or  • Be aged between 18 and 22 (inclusive) and be in full-time education or vocational training, or  • Be unable to engage in gainful employment because of physical or mental impairment and either has not reached age 23 or the impairment is in the opinion of NILGOSC's Independent Registered Medical Practitioner, likely to be permanent and the person was dependent on the deceased at the date of death because of that impairment.
Expression of Wish	An Expression of Wish enables a member to tell NILGOSC who they would like to receive any death grant due if they die. NILGOSC does not have to follow the member's wish but will take it into account.
Final Pensionable Pay	The pensionable earnings on which the final salary benefits are calculated. This may be based on how much an individual is earning when they retire or the best pensionable earnings in the last three years.
Final Salary Scheme	A defined benefit scheme where the pension benefits paid on retirement are based on how much an individual is earning when they retire.
Fund Manager	A professional manager of investments often employed by a pension scheme to manage assets on their behalf.
Gilts	Bonds issued by the Government.
Guaranteed Minimum Pension (GMP)	This is the minimum pension that an occupational pension scheme had to provide as a condition of contracting out for pre-6 April 1997 service. The Government is currently considering how to equalise scheme benefits to take account of the differences in the way that GMPs are calculated for men and women.
Ill-health retirement	If a member meets the qualifying criteria for ill-health retirement, their benefits will be brought into payment early. Active members receive enhanced pension benefits, depending on the severity of their medical condition.
Index	In the stock market, an index is a device that measures changes in the prices of a basket of shares, and represents the changes using a single figure. The purpose is to give investors an easy way to see the general direction of Shares in the index.

Term	Definition
Index Linked Gilts	A type of bond where the interest payment is guaranteed to rise in line with the Retail Prices Index.
Index Tracking Fund	Investments are made to match closely the performance of a market index such as the FTSE All-Share Index. It does not aim to outperform the market like active management does.
Inflation	The general rate of increase in prices and wages over a period.
Occupational Pension Scheme	A pension scheme established by an employer to provide pension benefits to its employees on their retirement.
Opting Out	This is when an employee leaves a pension scheme or chooses not to join one.  Under automatic enrolment a member must be signed up to the Scheme before he/she can opt out. If a member opts out within two years of joining they are entitled to a refund of contributions; an opt-out after two years entitles them to deferred pension benefits payable from their normal retirement age.
Passive Management	A style of investment management where no active management is required, instead investments are made in line with an index.
Pension	A regular income paid to an individual on their retirement.
Pensions Increase	In April each year NILGOSC increases pensions to reflect rises in the cost of living.
Pensionable pay	These are the earnings used to work out a member's benefits and contributions. They might not include overtime.
Pensionable Service	The period of employment that is considered when calculating final salary pension benefits.
Retail Prices Index (RPI)	An index published by the Government each month reporting the change in the price of a 'basket of goods, commodities and services' and is the accepted measure of inflation within the UK. This is a slightly different 'basket of goods, commodities and services' from those used to calculate CPI as it includes housing costs such as mortgage interest payments. RPI can be used for revaluing pensions in deferment and increases to retirement income.
Revaluation	In April each year NILGOSC will apply CARE revaluation in accordance with the Public Service Pensions Revaluation (Prices) Order (Northern Ireland).

Term	Definition
Rule of 85	The Rule of 85 refers to a provision of the Scheme which allowed members who retired early to take their pension entitlements without penalty if the sum of their age and length of membership equalled 85 years or more. This rule was abolished on 1st October 2006 however members who joined before this have some protections:  All existing members at 30 September 2006 are protected until 31 March 2008 i.e. the benefits they built up to 31 March 2008 will be protected under the 85 year rule.  Those existing members at 30 September 2006 who will be 60 or over and meet the 85 year rule by 31 March 2016 are fully protected i.e. the benefits they built up to 31 March 2016 will be protected under the 85 year rule.  Those existing members at 30 September 2006 who will be 60 or over and meet the 85 year rule between 1 April 2016 and 31 March 2020 will have full 85 year rule protection to 31 March 2008 and have some 85 year rule protection, on a sliding scale, to 31 March 2020.
Securities	A general name for shares, stocks and bonds issued to investors.
Shares	Sold by companies looking to raise money. Shares give the holders an interest in the company and a right to share in the profits.
State Pension Age	This is the age people normally start getting the basic state pension. From November 2018 this was equalised at age 65 for men and women. State pension age is then to increase to age 66 by October 2020, age 67 between 2026 and 2028 and to age 68 between 2044 and 2046.  The Pensions Act 2014 provides for a regular review of the State Pension Age, at least once every five years. The first review was published in July 2017 and proposes a new timetable for the rise to 68. It proposes that the State Pension Age will increase to 68 between 2037 and 2039. Any proposals will need to go through Parliament before becoming law.
Stock Selection	The process of selecting which individual shares and bonds to buy and sell.
Superannuation	A term used to describe contributions made to a pension scheme, particularly in the public sector.
Transfer Value	The value of an individual's pension rights which may be transferred, subject to conditions, to another pension scheme to provide alternative benefits if they have left the Local Government Pension Scheme.

