

# Government Actuary's Department

Local Government Pension Scheme (England and Wales)

Actuarial valuation as at 31 March 2016 Valuation Report (before allowance for McCloud) by the Scheme Actuary

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### 1 Executive summary

This **valuation report** (before allowance for McCloud) is addressed to the Secretary of State for Levelling Up, Housing and Communities and provides a key intermediate result required for the cost control mechanism of the Local Government Pension Scheme (England and Wales).

The final 2016 **cost cap valuation results** are stated in the 2016 **cost cap valuation report**. No action is required on the basis of this pre-McCloud **valuation report**.

#### Background

- 1.1 The Government established a cost control mechanism for public service pension schemes to ensure a fair balance of risks between scheme members and the taxpayer.
- 1.2 The *employer cost cap* for the LGPS was set at 14.6% of pay, following the 2013 valuation. If at subsequent valuations the cost of the scheme is outside a corridor above / below the *employer cost cap*, the Public Service Pensions Act 2013 requires action to be taken to bring costs back to the target cost.
- 1.3 The cost of the scheme is tested against the *employer cost cap* for the first time at the 2016 valuation. The final 2016 *cost cap cost of the scheme* is calculated as the sum of two intermediate results in accordance with HM Treasury Directions:
  - > Employer contribution correction cost, which is set out in this pre-McCloud valuation report
  - Transitional protection remedy cost, which arises following the McCloud judgment, and is set out in the cost cap valuation report

#### Purpose of this pre-McCloud valuation report

- 1.4 This separate pre-McCloud *valuation report* reflects that the cost control process was paused following the McCloud judgment. The purpose of this pre-McCloud *valuation report* is to set out the intermediate value in the first bullet above: the *employer contribution correction cost*. The *cost cap valuation report* sets out the final result of the valuation after the consideration of the remedy of the McCloud discrimination. Both reports have been prepared in accordance with the HM Treasury Directions of 7 October 2021.
- 1.5 The Department for Levelling Up, Housing and Communities ('DLUHC') have instructed us to complete this pre-McCloud *valuation report* on the basis of scheme benefits before any adjustments as part of the *transitional protection remedy*, and disregarding new information which emerged after 1 April 2019 (the *implementation date*).

- 1.6 This is consistent with the HM Treasury Directions which require the difference in costs between *pre-remedy benefits* and *post-remedy benefits* to be captured by the *transitional protection remedy cost*, and therefore excluded from the *employer contribution correction cost*. It is also consistent with the approach required by the HM Treasury Directions to disregard pension increases after the *implementation date*.
- 1.7 This approach will also ensure the 2016 LGPS *employer contribution correction cost* can be straightforwardly compared against those for the unfunded public service pension schemes. These were set out in valuations prepared to inform the employer contribution rates payable in those schemes and signed during spring 2019. No LGPS valuation report was needed at that time, because employer contributions in the LGPS are paid in accordance with rates and adjustments certificates issued by each administering authority under Regulation 62 of the Local Government Pension Scheme Regulations 2013, not by the actuarial valuation under HM Treasury Directions.
- 1.8 This pre-McCloud *valuation report* also presents the other information required by the latest HM Treasury Directions.

#### **Conclusions and next steps**

- 1.9 The *employer contribution correction cost* has been determined as 11.8% of pensionable pay.
- 1.10 The *employer contribution correction cost* is combined with the *transitional protection remedy cost* in the *cost cap valuation report* in order to determine the *cost cap cost of the scheme*. If the *cost cap cost of the scheme* set out in the *cost cap valuation report* lies within the ±2% corridor above / below the *employer cost cap*, then no changes to benefits or member contributions are required.
- 1.11 No action is required on the basis of this pre-McCloud *valuation report*.

# 2 Key points from the valuation

This chapter provides the **valuation results** required by the Directions, along with some commentary about the background, data and assumptions used and the changes from the previous valuation.

#### Introduction

- 2.1 This pre-McCloud *valuation report* sets out a key intermediate result of the actuarial valuation of the combination of the 2014 Scheme established by the Local Government Pension Scheme Regulations 2013<sup>1</sup> ('the Regulations'), and the Earlier Schemes<sup>2</sup> (collectively referred to as the Local Government Pension Scheme or 'the Scheme'). The Scheme provides pensions and other benefits to employees who have worked in local government or for other Scheme employers, and to their dependants. The Scheme is managed and administered locally by the 88 administering authorities<sup>3</sup>. Member contributions are payable in accordance with Regulation 9 of the Regulations for membership after 1 April 2014. Employer contributions are payable in accordance with the rates and adjustments certificates issued under Regulation 62 of the Regulations.
- 2.2 GAD has been appointed as **scheme actuary** by Secretary of State for Levelling Up, Housing and Communities to carry out an actuarial valuation of the Local Government Pension Scheme as at 31 March 2016 (the **effective date**), as required by Regulation 114 of the Regulations. This pre-McCloud **valuation report** is addressed to Secretary of State for Levelling Up, Housing and Communities.
- 2.3 The valuation has been undertaken in accordance with *The Public Service Pensions* (*Valuations and Employer Cost Cap*) *Directions 2014 (as amended)* ('the Directions'). Terms defined in the Directions are shown in **bold italics** when used in this report.
- 2.4 The Department for Levelling Up, Housing and Communities ('DLUHC') have instructed us to complete this pre-McCloud *valuation report* on the basis of scheme benefits before any adjustments as part of the *transitional protection remedy*, and disregarding new information which emerged after 1 April 2019 (the *implementation date*).
- 2.5 This is consistent with approach taken for unfunded public service pension schemes, which calculated the *employer contribution correction cost* in valuations signed during spring 2019. It is also consistent with the approach required by the HM Treasury Directions to disregard pension increases after the *implementation date*.

<sup>&</sup>lt;sup>1</sup> The scheme established and governed by SI 2013 No 2356

<sup>&</sup>lt;sup>2</sup> As defined in the Local Government Pension Scheme (Amendment and Transitional Provisions) Regulations 2014 (SI 2014 No 525)

<sup>&</sup>lt;sup>3</sup>See Regulation 53 and Part 1 of Schedule 3 of the Regulations

- 2.6 The unfunded public service pension schemes valuations were signed in spring 2019 to inform employer contribution rates payable to those schemes from April 2019. No LGPS valuation report was needed at that time, because employer contributions in the LGPS are paid in accordance with rates and adjustments certificates issued by each administering authority under Regulation 62 of the Local Government Pension Scheme Regulations 2013, not by the actuarial valuation under HM Treasury Directions.
- 2.7 In her written ministerial statement<sup>4</sup> ('WMS') made on 30 January 2019 following the McCloud judgment, the then Chief Secretary to the Treasury announced that there would be a pause to the cost cap process until there was certainty about the value of pensions to employees from April 2014 onwards. That pause has now been lifted and amending directions to allow all public service schemes to conclude their valuations by setting out how schemes must carry out the cost control element of those valuations were published<sup>5</sup> on 7 October 2021.
- 2.8 The Directions specify a number of assumptions, of which the use of the **SCAPE** *discount rate* is the most important, to be used for the valuation. In our opinion, the directed assumptions are reasonable to use for the valuation as they meet the Government's policy objectives. The Government Actuary has separately been consulted on the directed assumptions by HM Treasury. The consultation materials can be found online<sup>6</sup>.
- 2.9 The main purposes of the valuation are set out in the Directions. For the Local Government Pension Scheme this primarily is to assess the cost of the LGPS within the cost control mechanism by calculating the *cost cap cost of the scheme* as at 31 March 2016 and then comparing this against the *employer cost cap* set at the actuarial valuation as at 31 March 2013. The *cost cap cost of the scheme* is calculated as the sum of:
  - > Employer contribution correction cost

#### > Transitional protection remedy cost

- 2.10 This pre-McCloud report presents the *employer contribution correction cost* determined at this valuation. The *initial cost cap fund*, set equal to liabilities for contributing members at 31 March 2014, is also set at this valuation and is explained here as it is required to determine the *employer contribution correction cost*.
- 2.11 A final *cost cap valuation report* covers the calculation of the *transitional protection remedy cost* and the comparison of the *cost cap cost of the scheme* to the *employer cost cap*.

 <sup>5</sup> https://www.gov.uk/government/publications/public-service-pensions-completion-of-2016-valuations
 <sup>6</sup> https://www.gov.uk/government/publications/public-service-pensions-actuarial-valuations-and-the-employercost-cap-mechanism-supplementary-documents

<sup>&</sup>lt;sup>4</sup> https://questions-statements.parliament.uk/written-statements/detail/2019-01-30/hcws1286

- 2.12 Directions also require that the valuation determines a notional rate of employer contributions using the same approach used to determine employer contribution rates for unfunded public service pension schemes. Therefore this pre-McCloud *valuation report* also sets out the *uncorrected employer contribution rate* and the *corrected employer contribution rate* and the *corrected employer contribution rate* that (notionally) would be effective from 1 April 2019 (the *implementation date*) for the four-year period from 1 April 2019 (the *implementation period*). Appendix G sets out where all the information that the Directions require a *valuation report* to include can be found (some of which is to be found in the related advice listed in paragraph 2.14 below).
- 2.13 Note that this pre-McCloud *valuation report* does not provide information on the actual required rate of employer contributions. LGPS employer contributions are payable in accordance with the rates and adjustments certificates issued under Regulation 62 of the Regulations as part of actuarial valuations carried out by an actuary appointed by each administering authority.
- 2.14 We have separately provided advice and information on data and assumptions to be used for the results presented in this pre-McCloud *valuation report*. The following documents should be read in conjunction with this report:
  - Local Government Pension Scheme (England and Wales): Actuarial valuation as at 31 March 2016: Report on data as at 31 March 2016 dated 8 July 2020 ('the Data report')
  - Local Government Pension Scheme (England and Wales): Actuarial valuation as at 31 March 2016: Advice on assumptions dated 3 October 2019 ('the Assumptions report')
- 2.15 Please see Appendix I for the limitations of this report.

#### Data and assumptions

- 2.16 Data was received from the administering authorities for the 2016 valuation. This was generally adequate for the purposes of the valuation calculations. However, some aspects of the data were incomplete and/or unreliable for certain elements of our valuation calculations. Appendix F of the Data report sets out the uncertainty in valuation results arising from known deficiencies in the data, primarily those associated with incomplete data as at 31 March 2014 used to calculate the *initial cost cap fund*.
- 2.17 To accurately calculate the *cost cap net leavers liability* ('CCNLL') in accordance with the Directions requires full movement data for all members who were active in 2014 and are no longer active at the 2016 valuation. The data available was not suitable for calculating the CCNLL and it was not possible to make assumptions to adjust the data available to provide for a reasonable estimate of the CCNLL to be calculated. There have been some difficulties for all schemes in using the valuation data to determine the CCNLL, and these difficulties are particularly acute for the Local Government Pension Scheme where members may have multiple employments, and re-joining and aggregation of benefits occur.

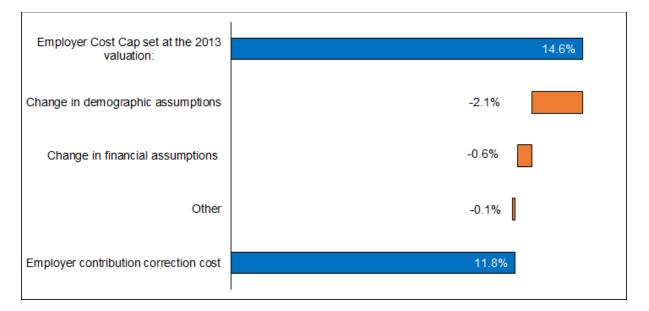
- 2.18 It has not been possible to fully resolve these data issues. Therefore, calculating results for the 2016 valuation of the Scheme requires assumptions in respect of incomplete and/or unreliable individual member records and movements data. In particular, for the purposes of determining the 2016 valuation results, the approach adopted implicitly assumes that there is no unidentified experience gain or loss arising over the period 2014 to 2016. Appendix C of the Assumptions report contains full details of the approaches taken in respect of missing and unreliable data.
- 2.19 We expect that the uncertainty introduced by the approach above is not more than 0.5% of pay. We would not expect significant unidentified experience gains or losses to arise over the two-year period 2014 to 2016; and although some uncertainty remains, we would not expect any item as large as 0.5% of pay.
- 2.20 For the 2016 valuation, the CCNLL calculation period is only two years, rather than a full four-year *inter-valuation period*. Given the short period over which any gain or loss may have arisen it might reasonably be concluded that the lack of data for the CCNLL calculation is not critical for this valuation. The cost control mechanism reforms to be introduced ahead of the next valuation in 2020 are expected to mean that no *cost cap net leavers liability* will need to be calculated as part of that valuation.

#### Employer contribution correction cost

- 2.21 The cost control mechanism was introduced via the Public Service Pensions Act 2013 and relevant Directions with the aim of ensuring that the risks associated with pension provision are shared with scheme members and the costs remain sustainable in the future.
- 2.22 The results in this report have been prepared under the approach specified in the Directions, as they apply at the date of signing, and DLUHC's instructions to complete this valuation: on the basis of scheme benefits before any adjustments as part of the *transitional protection remedy*, and disregarding new information which emerged after 1 April 2019 (the *implementation date*).
- 2.23 The *initial cost cap fund* is a notional pot of assets equal to the liabilities of contributing members as at 31 March 2014 and includes all benefits prospectively payable from the Scheme to those members in respect of service completed to that date. Liabilities arising from future pay inflation, or in-service benefit revaluation, to the assumed future date of cessation of pensionable service are included.
- 2.24 The *initial cost cap fund* has been calculated as part of this valuation as £98.5bn.
- 2.25 The *employer contribution correction cost* is a measure of the cost to employers of providing benefits under the 2014 Scheme to all currently contributing members, with an allowance for past service effects for members who were contributing to the Scheme as at 31 March 2014. Based on the scheme benefits before any adjustments arising as an outcome of the McCloud judgment, the *employer contribution correction cost* for the *implementation period* (1 April 2019 to 31 March 2023) is 11.8% of pensionable pay. This compares to the *proposed employer cost cap* of 14.6% set following the 2013 valuation.

2.26 Chart 2.1 summarises the key reasons for the change in the *employer contribution correction cost* compared with the *proposed employer cost cap* which was calculated in the 2013 valuation. Further explanation of the change is provided in section 3.

# Chart 2.1: Employer contribution correction cost compared with the proposed employer cost cap

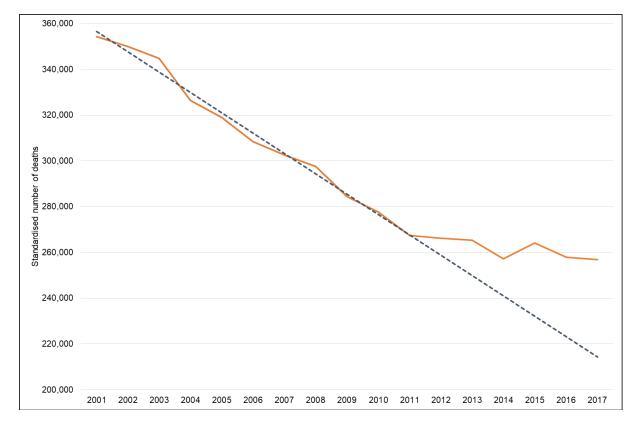


2.27 The change in demographic assumptions item in Chart 2.1 reflects the impact of a number of items including changes in scheme specific assumptions. However, the main driver behind this reduction of costs is a reduction in assumed future improvements in life expectancy under the ONS-2016 projections when compared with the ONS-2012 projections which were used in the 2013 valuation. The use of these projections is set out in the Directions.

Government Actuary's Department	Local Government Pension Scheme (England and Wales): Actuarial valuation as at 31 March 2016 Report (before allowance for McCloud) by the Scheme Actuary
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2.28 Chart 2.2 shows the UK population experience which resulted in the revision of ONS projections of future life expectancy between the 2012 and 2016 projections. The number of standardised<sup>7</sup> deaths over time is shown by the solid orange line. The dotted line is the trend that was observed up until 2012. This shows that in the intervening years the number of deaths increased above the trend that was seen before 2012. This experience resulted in a downwards revision of future improvements in life expectancy with Scheme members being assumed to receive benefits for a shorter period of time than assumed at the previous valuation.

Chart 2.2: Age standardised number of deaths per calendar year, Males, UK

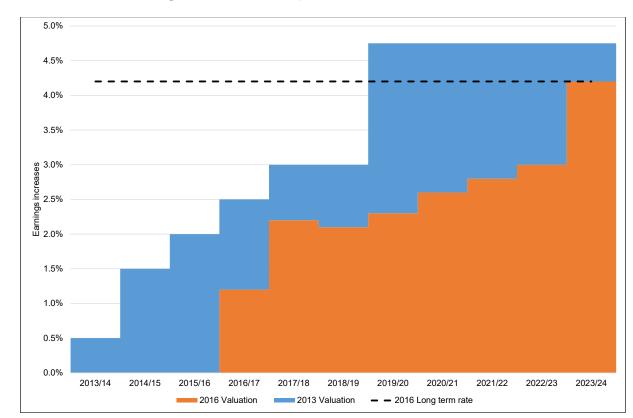


2.29 The change in financial assumptions item in Chart 2.1 is primarily due to the change in directed earnings assumptions, which were based on OBR forecasts. The **cost cap fund** is currently primarily made up of final salary benefits and therefore the level of future earnings increases has a significant impact on the expected future size of those benefits. The **initial cost cap fund** was set using the 2013 valuation earnings assumptions which are shown in blue in Chart 2.3. These assumptions anticipated some short-term pay restraint in the public service before reversion to a long-term rate of increase.

<sup>&</sup>lt;sup>7</sup> This is the number of deaths each year adjusted to remove the impact due to the population having different ages

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2.30 The 2016 valuation Directions anticipated public sector pay restraint continuing for a longer period than was assumed for the 2013 valuation. The 2016 valuation earnings assumptions are shown in orange in Chart 2.3. The value of the **cost cap liabilities** at 31 March 2016 takes account of this longer period of pay restraint. This has the effect of assigning a lower value to the **cost cap liabilities** for this valuation compared to that based on the 2013 valuation assumptions.



#### Chart 2.3: Short-term earnings increase assumptions

- 2.31 The change in the rate of assumed earnings growth between the current and previous valuations means that the value of the *cost cap liabilities* as at 31 March 2016 is lower than the *cost cap fund* at the same date which results in a cost cap surplus. This leads to a reduction in the *employer contribution correction cost* compared to a balanced position.
- 2.32 The change in **SCAPE discount rate** and long-term earnings assumptions described in paragraph 2.37 does not have a significant impact on the **employer contribution correction cost** because the Directions operate to largely remove the impact of the change.
- 2.33 Further details regarding the calculations are provided in section 3 and Appendix A.

#### Employer contribution rate

- 2.34 The Directions require two separate (notional) measures of employer contribution rate to be calculated and disclosed. (Note that, as set out in 2.9, neither represent the actual contributions paid by employers into the LGPS.)
  - The uncorrected employer contribution rate effective over the implementation period (1 April 2019 to 31 March 2023) is 17.0% of pensionable pay. This represents the cost of accrual over the implementation period based on the scheme's current regulations plus an allowance for correcting any surplus or deficit in the scheme.
  - > The corrected employer contribution rate effective over the implementation period (1 April 2019 to 31 March 2023) is 19.8% of pensionable pay. This rate is calculated in the same way as the uncorrected employer contribution rate except that the accrual rate of the 2014 Scheme is assumed to be improved from 1 April 2019 to the extent necessary such that the employer contribution correction cost equals the target cost of the scheme.
- 2.35 Chart 2.4 summarises the key reasons for the change in the *uncorrected employer contribution rate* from the previous valuation. Further explanation of the change is provided in section 3.

Chart 2.4: Difference between uncorrected employer contribution rate and employer
contribution rate at previous valuation (% of pensionable pay)

2013 Employer contribution rate:	14.5%
Change in demographic assumptions	-1.2%
Change in financial assumptions	+3.6%
Other changes	0.0%
Un-attributed	+0.1%
Uncorrected employer contribution rate:	17.0%

- 2.36 The explanation for the change in demographic assumptions item is as described in paragraphs 2.19 to 2.20. The impact on the *uncorrected employer contribution rate* is different from that for the *employer contribution correction cost* because, unlike the *employer contribution correction cost*, the *uncorrected employer contribution rate* does not take account of any (notional) past service liabilities.
- 2.37 The change in financial assumptions item is primarily due to changes in the **SCAPE** *discount rate*. This is the rate used to discount future payments from the Scheme. A lower rate leads to a higher assessment of the value of the payments. *The SCAPE discount rate* is based on the OBR's forecast for long-term GDP growth and so aims to reflect the cost of the pension scheme obligations being made relative to the future size of the economy. By 1 April 2019, OBR had reduced the long-term forecast since the 2013 valuation. Accordingly, the *SCAPE discount rate* was updated to reflect these changes and was reduced from 3.0% pa above CPI to 2.8% pa above CPI from April 2016 to April 2019 and was subsequently reduced to 2.4% pa above CPI. The reductions in the *SCAPE discount rate* result in a higher cost of accruing benefits.
- 2.38 Other financial assumption changes include changes in the assumed level of short-term earnings (see paragraph 2.22), pension increases, and the rate of long-term earnings increases. These changes offset the change in *SCAPE discount rate* to some extent but have a much smaller impact.

#### **Future valuations**

2.39 Our final *cost cap valuation report* provides comments on the main uncertainties which could result in some variations in the *valuation results* at subsequent valuations.

# 3 Analysis of results

This chapter provides further details on the **valuation results** and how these have changed since the previous valuation.

#### **Employer contribution correction cost**

#### A(i) Cost cap fund balance sheet – past service position

- 3.1 The *initial cost cap fund* is determined in accordance with direction 30 and represents a notional pot of assets equal to the liabilities of contributing members as at 31 March 2014 and includes all benefits prospectively payable from the Scheme to those members in respect of service completed to that date. Liabilities arising from future pay inflation, or in-service benefit revaluation, to the assumed future date of cessation of pensionable service are included. The *initial cost cap fund* has been calculated as part of this valuation as £98.5 billion.
- 3.2 The *employer contribution correction cost* is a measure of the cost to employers of providing benefits under the 2014 scheme to all currently contributing members, with an allowance for past service effects for members who were contributing to the Scheme as at 31 March 2014. The *employer contribution correction cost* for the *implementation period* (1 April 2019 to 31 March 2023) is 11.8% of pensionable pay. This compares to the *proposed employer cost cap* of 14.6% set following the 2013 valuation.
- 3.3 The **cost cap fund** and **cost cap liabilities** at the **effective date** calculated in accordance with the Directions, and otherwise as specified in this report, are set out in Table 3.1. The initial (prior) value of the **cost cap fund** was set as part of this valuation (as the position as at 31 March 2014), so there are no comparative figures at the previous valuation date. The derivation of both the prior value of the **cost cap fund** and the **cost cap fund** at this valuation is set out in Appendix D.

	31 March 2016 £ billion	Direction
Cost cap liabilities	86.2	39
Relating to benefits accrued in the pre-2014 schemes and for members in service at the <i>valuation date</i>	71.8	39(2)(a)
Relating to benefits accrued in the post-2014 scheme	14.4	39(2)(b)
Cost cap fund	92.2	37
Cost cap surplus (shortfall)	5.9	

#### Table 3.1: Cost cap fund valuation balance sheet

3.4 The value of the **cost** *cap liabilities* includes the value of all liabilities for contributing members of the aggregate scheme as at 31 March 2016 and the value of all benefits currently or prospectively payable to pensioners and deferred pensioners from the 2014 Scheme only as at 31 March 2016. For currently contributing members the value of the liabilities comprises the value of all benefits prospectively payable from the aggregate scheme to those members in respect of service completed to that date, including the value of liabilities arising from future pay inflation, or in-service benefit revaluation, to the assumed future date of cessation of pensionable service.

# A(ii) Employer contribution correction cost – past service impacts and accrual cost

- 3.5 Whilst the *effective date* of the actuarial valuation is 31 March 2016, the cost cap contribution rates determined are those (notionally) applicable in respect of the period 1 April 2019 to 31 March 2023 (the *implementation period*).
- 3.6 The *proposed employer cost cap* (set at the 2013 valuation) and the *employer contribution correction cost* over the *implementation period* are set out in Table 3.2.

	2016 % pa		Direction
Proposed employer cost cap	14.6	Α	Set in 2013
Employer contribution correction cost	11.8	В	42
Difference	2.8	A-B	

#### Table 3.2: Employer cost cap summary

3.7 The *employer contribution correction cost* over the *implementation period* is determined from several components, which are summarised in Table 3.3. The table also shows a comparison with the *proposed employer cost cap*.

#### Table 3.3: Employer contribution correction cost

	% pa		Direction
<i>Proposed employer cost cap set at 2013 valuation</i>	14.6		Set in 2013
<b>Cost cap future service cost</b> (Contribution rate required to cover expected cost of benefits accruing between 1 April 2019 and 31 March 2023 by reference to assumptions in Direction 40)	23.4	A	40
Plus <b>cost cap past service cost</b> (Contribution rate required to be paid for 15 years from 1 April 2019 to correct cost cap shortfall as at 31 March 2016)	(1.4)	В	41
Less <b>cost cap contribution yield</b> (Contribution yield expected from members between 1 April 2019 and 31 March 2023)	6.5	С	31
Less cost cap difference <sup>8</sup>	3.7	D	42A
Employer contribution correction cost	11.8	A+B-C-D	42
Difference between target cost of the scheme and employer contribution correction cost	2.8		

<sup>&</sup>lt;sup>8</sup> This is the difference between the employer cost cap (after SCAPE adjustment) which is 18.3%, and the original *proposed employer cost cap* (set at the 2013 valuation) of 14.6%

3.8 Table 3.4 shows how the *employer contribution correction cost* has changed from the *proposed employer cost cap* as determined in the previous valuation. The past service impacts and accrual cost impacts are shown separately and have been considered in the order listed. Using a different order could change the allocation between items shown.

	Past service	Accrual cost	Note
Change in financials	(0.6)%	n/a	1.
Change in mortality assumptions	(0.6)%	(0.8)%	2.
Changes in demographic assumptions	(0.3)%	(0.4)%	3.
Change in average age	n/a	(0.1)%	4.
Change in average State Pension age (SPa)	n/a	(0.2)%	5.
Identified experience loss	0.1%	n/a	6.
Mortality improvements: improvement due to elapsed time	n/a	0.2%	7.
Change to PSTC allowance	n/a	(0.1)%	8.
Change in expected member contribution yield	n/a	0.2%	9.
Unexplained	(0.0)%	(0.2)%	10.
Total difference between <i>employer contribution correction cost</i> and <i>target cost of the scheme</i> (past service/accrual cost)	(1.4)%	(1.4)%	
Total difference between employer contribution correction cost and target cost of the scheme		(2.8)%	
Employer contribution correction cost		11.8%	

#### 3.9 Table 3.5 provides further information on the items identified.

Note	Explanation
1.	Whilst any change in long-term assumptions is outside the cost control mechanism, this item reflects the impact of the changes in short-term assumptions between the 2013 and 2016 valuation directions.
2.	This relates primarily to the change in directed mortality improvements resulting from the change from ONS 2012 to 2016, which results in a reduction in expected future life expectancy. Assumed future life expectancy is also affected by the change to assumed LGPS E&W specific current mortality rates.
3.	There were a number of other demographic assumption changes, although the impact of each in isolation is small.
4.	The average age decreased since 2013, which decreases the cost of accrual.
5.	Although there has been no change in the timetable of SPa used for the valuation, the passage of time means that current members (with similar average age as the 2013 membership), have, on average, later SPa than the previous membership set. The later SPa results in cost savings in the 2014 scheme.
6.	The experience loss shown relates mainly to pay.
7.	The passage of time and the nature of the directed assumption for mortality improvements means that a member now aged 45 will have a different future life expectancy to a member aged 45 at the 2013 valuation. The figures shown reflect the impact of the passage of time on future life expectancy between successive <i>implementation periods</i> . The impact shown is after allowance for the change in improvement basis described in note 2.
8.	The expected cost to the scheme of the Public Sector Transfer Club has reduced since the previous valuation. This reflects a projected reduction of Club transfers into the Scheme.
9.	The Member contribution yield based on the current regulations (but assuming no members opt for the 50:50 scheme) over the period 1 April 2019 to 31 March 2023 is expected to be 6.5% of pay, compared with 6.7% of pay at the 2013 valuation.

10. The unexplained item is nil in respect of past service because, due to data limitations, the net effect on the cost cap fund arising because of members holding pre-2014 benefits joining and leaving active service during the intervaluation period has been set to ensure there is no unexplained item.

#### Analysis of change in employer contribution rate

#### B(i) Whole scheme valuation balance sheet – past service position

3.10 The assets and past service liabilities of the aggregate scheme as at the *effective date* calculated in accordance with the Directions, and otherwise as specified in this report, are set out in Table 3.6. Corresponding figures at the previous valuation date are shown for comparison purposes.

	31 March 2016 £ billion	Direction	31 March 2013 £ billion
Aggregate scheme notional assets	241.1	25, 44	213.1
Aggregate scheme liabilities <sup>9</sup> in respect of:			
Active members	83.9		80.7
Deferred pensioners	47.8		35.4
Pensioners	109.4		97.0
Total aggregate scheme liabilities	241.1	24	213.1
Surplus (Shortfall)	0.0		0.0

#### Table 3.6: Whole scheme valuation balance sheet

- 3.11 The liabilities valued include the value of all benefits currently or prospectively payable under the aggregate scheme to pensioners and deferred pensioners as at 31 March 2016 and to active members as at 31 March 2016 in respect of service completed to the *effective date*. In the case of active members, liabilities include those arising from future pay inflation or in-service benefit revaluation to the assumed future date of cessation of pensionable service. Paragraph 44 of the Directions requires that the notional scheme assets are set equal to the liabilities for the Local Government Pension Scheme.
- 3.12 The previous valuation of the Local Government Pension Scheme (England and Wales) under HM Treasury Directions was carried out as at 31 March 2013. Table 3.7 shows how the scheme liabilities have changed since the previous valuation. Some figures have been calculated in an approximate manner but are sufficient to show the general size of the impact. Table 3.8 provides further information on the items identified. Impacts are considered in the order listed. Using a different order could change the intermediate figures, though there is no impact on the total liabilities.

<sup>&</sup>lt;sup>9</sup> Includes liabilities relating to past added years and additional pension and other options paid for by member contributions

	£ billion	Note
Liabilities as at 31 March 2013	213.1	
Cost of accrual	19.5	1.
Past service cost effect from GMP interim solutions	0.4	2.
Enhancements and transfers in	4.7	3.
Benefits paid and transfers out	(31.1)	4.
Interest cost (unwinding of the discount rate)	35.3	5.
Experience effects		
Pension increase experience	(3.9)	6.
Pay increase experience	2.3	7.
Other experience effects	(0.8)	8.
Change in financial assumptions	13.8	9.
Impact of change in demographic assumptions (including change in ONS projection table)	(11.0)	10.
Unattributed	(1.2)	11.
Liability as at 31 Mar 2016	241.1	

#### Table 3.7: Scheme liabilities - Comparison with previous valuation

3.13 Table 3.8 provides further information on the items identified.

#### Table 3.8: Explanation of analysis

Note	Explanation
1.	This is the increase in the scheme liability resulting from employee service between 2013 and 2016. It is assessed on the financial assumptions applying to the 2013 valuation.
2.	The Scheme will now pay CPI increases on guaranteed minimum pension (GMP) for members reaching State Pension age between 6 April 2016 and 6 April 2021.
3.	The scheme liabilities are increased by enhancements (increases to benefits due to payments made by employees or employers, e.g. on redundancy) or transfers in (members transferring benefits into the LGPS from other schemes).
4.	The scheme liabilities are reduced by benefit payments and transfers out (members transferring benefits from the LGPS to other schemes).
5.	The interest cost is the change in the scheme liability that arises from the passage of time. Future payments are three years closer to payment at 31 March 2016 than at 31 March 2013 and so there is three years' less discounting applied in the calculation of the scheme liability.
6.	There is an experience gain because pension increases from April 2014 to April 2016 (2.7%, 1.2% and nil) were lower than assumed at the 2013 valuation (2.7%, 2.2% and 2.1%).

#### Note Explanation

- 7. There is an experience loss because pay increases between 2013 and 2016 were higher than assumed at the 2013 valuation. Although headline pay awards were low during this period, analysis of the change in pay of employee indicates individuals had pay increases above these headline pay awards: see the Advice on assumption report dated 3 October 2019<sup>10</sup>, section 9 for further details.
- 8. There are a number of small experience gains due to more than expected withdrawals, age retirement experience, lower than expected club transfers in, and fewer than expected ill-health retirements.
- 9. The financial assumptions are set by HM Treasury. Appendix F summarises the financial assumptions set for the current and previous valuations. The most financially significant change in the long-term financial assumptions is the reduction in the discount rate from 3% pa above CPI to 2.4% pa above CPI. This item also includes the offsetting impact of a reduction in the expected long-term rate of general pay increases from 4.75% pa to 4.2% pa.

The Directions specify some variation in financial assumptions for the period between the *effective date* and the end of the *implementation period*. The short-term assumptions specified for the 2016 valuation are different to those specified for the 2013 valuation and result in a lower value of assessed liabilities.

- 10. This relates primarily to the change in directed mortality improvements resulting from the change from ONS 2012 to 2016, which results in a reduction in expected future life expectancy. Assumed future life expectancy is also affected by the change to assumed LGPS E&W specific current mortality rates. There were a number of other demographic assumption changes, although the impact of each in isolation is small. Further details on the changes to the demographic assumptions can be found in the Assumptions report.
- 11. Unattributed amount is the balancing item. It may relate to miscellaneous experience items that have not been quantified and improvements to the data, in particular in relation to deferred members' Rule of 85 retirement age and missing data.

<sup>&</sup>lt;sup>10</sup> <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/899584/LGP</u> <u>S\_Valuation\_2016\_Assumptions\_Report.pdf</u>

#### B(ii) Employer contribution rate – accrual cost

- 3.14 Directions also require that the valuation determines a notional rate of employer contributions using the same approach used to determine employer contribution rates for unfunded public service pension schemes. The *uncorrected employer contribution rate* and the *corrected employer contribution rate* that (notionally) would be effective from 1 April 2019 (the *implementation date*) for the four-year period from 1 April 2019 (the *implementation period*) are set out below. Note that as set out in 2.9 this valuation does not report on the actual required rate of employer contributions.
- 3.15 Table 3.9 shows how the *corrected employer contribution rate* has changed since the previous valuation. Some figures have been calculated in an approximate manner but are sufficient to show the general size of the impact on the contribution rate. Impacts are considered in the order listed. Using a different order could change the intermediate figures, though there is no impact on the final contribution rate.

	% of pay
Employer contribution rate determined as at 31 March 2013	14.5%
Change in financials	3.6%
Changes in demographic assumptions (including change in ONS projection table)	(1.2)%
Change in average age	(0.1)%
Change in average SPa	(0.2)%
Mortality improvements: improvement due to elapsed time	0.2%
Change to PSTC allowance	(0.1)%
Change in expected member contribution yield	0.2%
Unexplained	0.1%
Uncorrected employer contribution rate determined as at 31 March 2016	17.0%
Change in scheme accrual rate to align the <i>employer contribution correction cost</i> to the <i>target</i> cost of the scheme	2.8%
Corrected employer contribution rate determined as at 31 March 2016	19.8%

#### Table 3.9: Employer contribution rate - Comparison with previous valuation

- 3.16 Paragraph 44 of the Directions requires that the notional scheme assets are set equal to the liabilities for the Local Government Pension Scheme, and so the employer contribution rates calculated above do not include any adjustment for any surplus or deficit.
- 3.17 The *uncorrected employer contribution rate* (17.0% of pay) is similar to the *cost cap future service cost* net of the *cost cap contribution yield* (see table 3.3 above, 23.4% of pay less 6.5% of pay is 16.9% of pay). A small difference arises because the *cost cap future service cost* is based on assumptions adjusted to reflect members' likely behaviour had they never been members of the Earlier Schemes. This would mean that no members have entitlement to any benefits payable from age 60 without reduction, and so members would be likely to retire later.

### 4 Sensitivity of valuation results to assumptions

This chapter illustrates how the **valuation results** would change if different assumptions were used.

- 4.1 This section illustrates the sensitivities of the *valuation results* to the assumptions adopted<sup>11</sup>.
- 4.2 Table 4.1 shows the sensitivities relative to the *uncorrected employer contribution rate* and the *employer contribution correction cost*. The Secretary of State determined assumptions are set as best estimate based on available evidence (to 1 April 2019). The sensitivities illustrate how the valuation outcomes would change had different evidence been observed, leading to the Secretary of State setting the different assumptions illustrated below. They are not intended to show the possible range of variation in assumptions which might be considered at future valuations and in light of future experience.
- 4.3 Our final *cost cap valuation report* provides comments on the main uncertainties which could result in some variations in the *valuation results* at subsequent valuations.

Table 4.1: Sensitivity	y of valuation results to assumption	5
		-

	Addition to uncorrected employer contribution rate	Addition to employed contribution correction cost <sup>12</sup>	Note
A. Directed assumptions			
Discount rate in excess of CPI (-0.25% pa)	1.6%	(0.2)%	1.
Pension increases as applicable to pensions in payment and deferred pensions (+0.25% pa)	1.1%	(0.1)%	2.
Long-term rate of public service earnings growth in excess of CPI (+0.25% pa)	0.0%	(0.2)%	3.
Short-term rate of public service earnings growth (+0.25% pa to each short-term rate)	0.0%	0.2%	4.
CARE revaluation rate (+0.25% pa to price measure revaluation rates)	0.5%	(0.1)%	5.
CARE revaluation rate (+0.25% pa to earnings measure revaluation rates)	n/a	n/a	

<sup>&</sup>lt;sup>11</sup> Including those set out in Directions and those set by the Secretary of State (as specified in direction 19(e))

<sup>&</sup>lt;sup>12</sup> The sensitivity of the employer contribution correction cost shown in the table allows for any offsetting expected from resulting changes to the cost cap difference, for items defined as 'employer costs' in HM Treasury's 2014 paper Public Service Pensions: actuarial valuations and the employer cost cap mechanism

	Addition to uncorrected employer contribution rate	Addition to employer contribution correction cost <sup>12</sup>	Note
Allowance for future mortality improvements (reduction in mortality improvements such that (period) life expectancy is lower by around 1.25 years over 75 years)	(0.5)%	(0.9)%	
State Pension age (SPa for 2014 scheme one year later than under current directions)	(0.8)%	(0.8)%	6.
Allowance for commutation as directed (additional 2% of pension assumed to be commuted for cash)	(0.1)%	(0.2)%	7.
Shortfall spreading period (spreading period increased by 5 years)	0.0%	0.3%	8.
B. Secretary of State set assumptions			
Membership profile: 2 years older on average over implementation period	1.1%	1.1%	9.
Mortality rates: 5%* heavier rates of pensioner mortality	(0.2)%	(0.5)%	
Age retirement rates: active members retire (on average) one year later than currently assumed	0.0%	0.0%	
Commutation (other than directed) Members commute 2% of pension more than assumed in respect of pre-2008 service, keep 17.5% assumption for post-2008 service	0.0%	(0.2)%	
III-health retirement: 5%* increase to assumed rates	0.1%	0.1%	
Ill-health retirement: 5%* increase in proportion assumed to receive higher tier benefits	0.0%	0.0%	
Proportions partnered: 5%* more members assumed to have qualifying partners at death	0.1%	0.1%	
Resignations and opt outs: 5%* higher numbers assumed to leave voluntarily before retirement (net of re-joiners)	0.0%	0.0%	10.
Promotional pay increases: 0.5% higher promotional pay increases than assumed	0.0%	0.4%	11.

\* All these represent multiplicative increases to rates, i.e. 5% means rates 1.05 times higher.

Note: Opposite changes in the assumptions will produce approximately equal and opposite changes in the valuation results.

#### 4.4 Table 4.2 provides further information on the sensitivity items.

# Table 4.2: Sensitivity of valuation results to assumptions - Explanation of analysis

Note	Explanation
1.	This shows the impact of a 0.25% pa decrease in the <b>SCAPE discount rate</b> with all other financial assumptions remaining unchanged.
2.	This shows the impact of a 0.25% increase in the long-term assumption for the Pension Increase (Review) order to 2.25% with the gross <i>SCAPE discount rate</i> and earnings assumptions remaining unchanged. It reflects a reduction in the <i>SCAPE discount rate</i> to 2.15% above CPI.
3.	This shows the impact of a 0.25% pa increase in the assumed long-term rate of public service earnings increases of 4.2% pa with all other assumptions remaining unchanged.
4.	This shows the impact of a 0.25% pa increase in each of the assumed short-term rates of public service earnings with all other assumptions remaining unchanged. Combined with the long-term rate of public service earnings increases sensitivity, this shows the impact of a change in all earnings assumptions.
5.	This shows the impact of a 0.25% increase to the assumption for the Public Service Pensions Revaluation orders which determines the rate of in-service revaluation with the gross <i>SCAPE discount rate</i> and earnings assumptions remaining unchanged. Combined with the pension increase sensitivity, this shows the impact of a 0.25% increase in the assumption for CPI.
6.	This shows the impact of an increase in State Pension Age of 1 year for all members.
7.	This shows the impact of increasing the proportion of pension commuted for cash from 17.5% to 19.5% for post-2008 benefits (i.e. those benefits with no attaching automatic lump sum).
8.	This shows the impact of spreading any surplus / deficit over a period of 20 years (i.e. five years longer than the current spreading period).
9.	This shows the impact of a two-year increase in average ages caused by the age profile of new joiners.
10.	This shows the impact of an increase in the withdrawal assumption by 5%.
11.	This shows the impact of an increase in the promotional pay increase assumption by 0.5% pa.



- 4.5 In each item in Table 4.1 the sensitivity shown is in relation only to the change in the assumption described. The impact of a combination of assumption changes will not necessarily equate to the sum of the relevant rows above.
- 4.6 The sensitivities shown refer only to the results of this valuation. The sensitivity of the results to certain assumptions is expected to change materially over time. This is particularly the case for the *employer contribution correction cost* as the *cost cap liabilities* reflects only final salary liabilities for contributing members, but over time will reflect only liabilities accrued in the career average scheme and for all categories of member (i.e. including deferred and pensioner members).
- 4.7 The main impact of certain financial assumptions, specifically the **SCAPE discount** *rate* and rate of long-term earnings growth, is explicitly removed from the *employer contribution correction cost* calculations as provided in Directions. There is some residual sensitivity as shown in rows 1 to 3 of Table 4.1 above; these relate to the past service liabilities included within the *employer contribution correction cost* calculations.

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Martin Clarke Government Actuary 20 June 2022

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Michael Scanlon Fellow of the Institute and Faculty of Actuaries 20 June 2020

# Appendix A: Detailed results

#### Background

- A.1 The key results of this valuation can be found in sections 2 and 3 of this report.
- A.2 The Directions require information to be disclosed regarding the *uncorrected employer contribution rate,* calculated assuming that the Scheme's benefit design is unchanged from that as at 31 March 2016 over the *implementation period.*
- A.3 The relevant *valuation results*, expressed as a percentage of pensionable payroll, are summarised in Table A2.

	2016		<b>2013</b> <sup>13</sup>		
	% pa	% pa	% pa	% pa	Direction
Contribution rate required to be paid for 15 years from 1 April 2019 to correct shortfall at 31 March 2016 (A)		0.0		0.0	27(1)(a)
Contribution rate required to be paid for 15 years from 1 April 2019 to correct underpayment of contributions between 1 April 2016 and 31 March 2019 (B)		0.0		0.0	44(1)(g)
Contribution rate required to cover cost of benefits accruing over implementation period	23.5		21.2		27(1)(d)
Less normal member contribution rate expected over implementation period <sup>14</sup>	6.5		6.7		28(c)
Employer contribution rate required for cost of accrual of benefits over implementation period (C)		17.0		14.5	]
Uncorrected Employer contribution rate required over implementation period (A + B + C)		17.0		14.5	29

#### Table A1: Contribution rates

<sup>&</sup>lt;sup>13</sup> Corresponding payment periods all 4 years earlier

<sup>&</sup>lt;sup>14</sup> Assuming employee contribution rates and thresholds over 2019 to 2023 achieve target yield of 6.5% average rate.

# Appendix B: Key inputs

This chapter summarises the calculations that were carried out, including the data, methodology and assumptions used, and the analysis performed on the results.

#### Data

B.1 At the *effective date*, there were 1,967,000 contributors to the Scheme with a total payroll of £33.1bn and 1,585,000 pensions in payment with total annual pensions amounting to £7.7bn. There were a further 1,937,000 ex-contributors who had not yet started to receive their pension. Appendix C provides a summary of the membership data. Further details on the data, including the checks carried out on that data, the limitations of those checks and adjustments made, are provided in the Data report.

#### **Benefits**

- B.2 The benefits provided to members of the Earlier Schemes and the 2014 Scheme are set out in regulations<sup>15</sup>. The 2014 Scheme was introduced from 1 April 2014 and all members transferred to the 2014 Scheme on 1 April 2014. Under transitional arrangements aimed at providing protection for those nearest retirement age, some older members have a final salary underpin to their benefits.
- B.3 Full details on benefits and the membership of the Schemes are provided in the Data report.

#### Assumptions

- B.4 The Directions specify certain assumptions to be used for the valuation whilst requiring certain other assumptions to be set as the Secretary of State's best estimates, after taking the advice of the **scheme actuary**. Actuarial advice on the scheme specific assumptions (including variations appropriate for the purposes of determining the **employer contributions correction cost**), and other relevant information (including an analysis of the Scheme's demographic experience), is set out in the Assumptions report.
- B.5 We have been instructed by the Secretary of State, following consultation with relevant stakeholders, to adopt the best estimate assumptions recommended in our advice. Appendix F summarises the key assumptions made.

<sup>&</sup>lt;sup>15</sup> SI 2013 No 2356

Government Actuary's Department

#### Methodology and calculations

- B.6 The Directions specify that the Projected Unit Methodology should be used. Application of this methodology to determine the *valuation results* as specified requires some assumptions to be made about the size and make-up of the workforce up to the end of the *implementation period*<sup>16</sup>.
- B.7 Since the expected cost of benefits provided to members in the Earlier Schemes differs from the expected cost of providing those members with benefits in the 2014 Scheme, and the expected cost of providing benefits varies for members with differing benefit provisions within the 2014 Scheme (notably for members with differing normal pension ages), projecting the membership gives a materially different estimate of the valuation result.
- B.8 For short-term workforce planning purposes the Department for Levelling Up, Housing and Communities assumes that, overall, a largely stable population will be maintained. We have accordingly assumed that over the period from the *effective date* to the end of the *implementation period* the overall profile of the membership in terms of distribution of headcount and pay by age and gender will remain stable. Because we allow the existing membership to 'run off' in accordance with the assumptions set out in Appendix F over the projection period we are therefore making an implicit assumption about the profile of new joiners to the Scheme over that period. Full details of the membership projection are provided in the Assumptions report.
- B.9 The Directions specify that benefits should be attributed to periods of service in accordance with the requirements of International Accounting Standard 19: Employee Benefits.

#### Scheme benefits

- B.10 First, an estimate is made of the amount of benefit to be received by each Scheme member (and their dependants, where applicable) over each future year of the Scheme, from the *effective date* onwards. In order to do that, it is necessary to make some assumptions about the future service and salaries of the Scheme members, and the length of time over which they will receive benefits.
- B.11 Having estimated the benefits as a stream of projected cashflows from the *effective date* onwards, the second step is to calculate the capital sum which would need to be held at the *effective date* in order to pay all of the benefits. This requires an assumption to be made as to the rate of return which would be earned by the capital sum if it were invested. The approach for this valuation is predicated on the premise that there is a notional fund with a notional investment return, rather than considering the scheme assets.

<sup>&</sup>lt;sup>16</sup> 1 April 2019 to 31 March 2023

B.12 This capital sum is often referred to as the 'present value' of the benefits and is calculated by 'discounting' the future cashflows back to the *effective date* using the valuation discount rate (see Appendix F). The present value can alternatively be considered as the amount of money which would need to be invested at an assumed interest rate (equal to the discount rate) in order to pay all the benefits. The result of the calculation is, by its nature, a planning or budgeting estimate, not a 'valuation' as such.

#### Notional assets

B.13 The cost control mechanism uses a notional fund (the *initial cost cap fund*) which is established as part of the current valuation and is set equal to the value of the liabilities of contributing members as at 31 March 2014 using the assumptions adopted for the 2013 valuation. An account of the notional *cost cap fund* will be maintained for future dates. The initial *cost cap fund* is increased by contributions (as determined for cost cap purposes) and a notional return, and reduced by benefit payments (relating to the 2014 Scheme only) and liability amounts (relating to the Earlier Schemes only) as members leave contributing service.

#### Calculations

- B.14 For the valuation, it is necessary to separate the capital sum into two parts: (i) the sum needed to pay out benefits which relate to service *prior to* the *effective date* ('past service'), and (ii) the sum needed to pay out those benefits which relate to service *after* the *effective date* ('future service').
- B.15 For both parts of the calculation we adopt the same assumptions regarding the future service and progression of salaries of the Scheme members and the rate of return which would be earned by the capital sum if it were invested.

#### Past service position

- B.16 In relation to the past service element, we compare the capital sum (or present value) relating to past service with the *notional assets* at the *effective date*. If all the assumptions made during previous reviews had been borne out exactly, and assuming no errors in previous data sets are revealed, the *notional assets* would exactly equal the capital sum now needed to pay for those past service benefits. But, if actual events have differed from the assumptions made, then the *notional assets* will exceed, or fall short of, the capital sum now estimated to be needed.
- B.17 To the extent that the *notional assets* are *less* than the capital sum needed to pay out all the benefits relating to past service, the fund is said to be in *deficit*. This deficit needs to be met by additional contributions. If the *notional assets exceed* the capital sum required for past service benefits, it is said to be in *surplus* and there would be a reduction in the contributions that would otherwise be paid for future service.

#### Future contributions

B.18 To calculate the *uncorrected employer contribution rate*, we have calculated the percentage of total pensionable pay that would need to be paid to meet the benefits accrued over the four-year *implementation period*, and then deducted the member contributions. Paragraph 44 of the Directions requires that the notional scheme assets are set equal to the liabilities for the Local Government Pension Scheme. Accordingly, there is no surplus or deficit at the valuation date.

#### **Employer contribution correction cost**

- B.19 The *proposed employer cost cap* is a measure of the cost of the 2014 Scheme.
- B.20 The *employer contribution correction cost* is intended to capture cost risks associated with both the 2014 Scheme and the operation of the Earlier Schemes for members still in contributing service at the time the 2014 Scheme was introduced. The *employer contribution correction cost* is a measure of these costs and is compared to the *target cost of the scheme*. The calculation of the *employer contribution correction cost* is similar to that of the *uncorrected employer contribution rate*, but the future service elements of the calculations are based on all members being in the 2014 Scheme with assumptions reflecting members' likely behaviour had they never been members of the Earlier Schemes.

Government Actuary's	Local Government Pension Scheme (England and Wales): Actuarial valuation as at 31 March 2016
Department	Report (before allowance for McCloud) by the Scheme Actuary

# Appendix C: Summary of membership data and comparison with data at previous valuation

	Number of records (000's)	Actual pensionable salary £m	FTE pension- able salary £m	Average actual salary £	Average age weighted by actual pensiona ble salary	Average reckon- able service <sup>1</sup>	CARE pension £m
CRA 60	383	9,574	10,630	24,994	47.6	15.9	377
CRA 62	178	3,211	4,009	18,021	54.7	9.4	126
CRA 65	1,406	20,302	28,444	14,438	43.7	2.2	642
Total	1,967	33,088	43,083	16,818	45.9	5.5	1,146

 Table C1: Summary of Actives data as at 31 March 2016

<sup>1</sup> Includes only pre-2014 service in the earlier final salary schemes



#### Table C2: Summary of Actives data as at 31 March 2013 before rating up\*

	Number of records (000's)	Actual pensionable salary £m	FTE pensionable salary £m	Average actual pay £	Average age weighted by pay	Average reckon- able Service	CARE pension £m
CRA 60	496	11,807	13,223	23,788	45.7	16.9	-
CRA 62	244	4,168	5,286	17,054	52.6	12.7	-
CRA 65	920	13,075	18,429	14,220	44.4	4.1	-
Total	1,660	29,050	36,938	17,497	46.1	9.2	-

\* An adjustment (~2.9%) was made to scale up the active membership data for three missing funds. The resulting membership after rating up (as set out in the 2013 valuation report) is as follows:

#### Table C3: Summary of Actives data as at 31 March 2013 after rating up

	Number of records (000's)	Actual pensionable salary (£m)	Average pensionable salary (£)	Average age weighted by actual salary (years)
Total	1,709	29,897	17,497	46.1



#### Table C4: Summary of Deferred pensioner data as at 31 March 2016

Category	Number of records (000's)	Total deferred pension <sup>1</sup> £m	Average pension <sup>1</sup> £	Average age <sup>2</sup>
CRA 60	767	1,786	2,328	49.4
CRA 62	292	445	1,524	54.6
CRA 65	878	587	668	46.5
Total	1,937	2,818	1,455	49.6

<sup>1</sup> Includes pension increase payable in April 2016

<sup>2</sup> Weighted by deferred pension

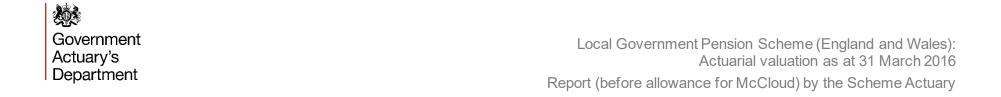
#### Table C5: Summary of Deferred pensioner data as at 31 March 2013\*

Category	Number of records (000')	Total deferred pension <sup>1</sup> £m	Average pension <sup>1</sup> £	Average age <sup>2</sup>
CRA 60	790	1,262	1,597	49.7
CRA 62	233	258	1,106	50.0
CRA 65	673	772	1,148	47.2
Total	1,696	2,292	1,351	48.9

<sup>1</sup> Includes pension increase payable in April 2013

<sup>2</sup> Weighted by deferred pension

\* An adjustment was made to scale up the deferred membership data for three missing funds.



The resulting membership after rating up (as set out in the 2013 valuation report) is as follows:

#### Table C6: Summary of Deferred pensioner data as at 31 March 2013 after rating up

	Number of records (000's)	Total deferred pension £m	Average pension <sup>1</sup> £	Average age <sup>2</sup>
Total	1,739	2,350	1,351	48.9

<sup>1</sup> Includes pension increase payable in April 2013

<sup>2</sup> Weighted by deferred pension



#### Table C7: Summary of Pensioner data as at 31 March 2016

	Number of members (000's)	Total pension <sup>1</sup> £m	Average pension <sup>1</sup> £	Average age <sup>2</sup> (years)
Age Retirement	1,144	5,845	5,108	70.1
III-Health Retirement	222	1,181	5,323	69.4
Total	1,366	7,026	5,143	70.0

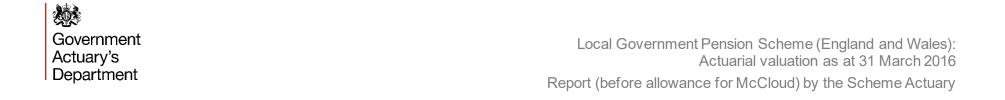
<sup>1</sup> Includes pension increase payable in April 2016 <sup>2</sup> Weighted by current pension in payment

#### Table C8: Summary of pensioner data as at 31 March 2013\*

	Number of members (000's)	Total pension <sup>1</sup> £m	Average pension <sup>1</sup> £	Average age <sup>2</sup> (years)
Age Retirement	962	4,884	5,075	69.5
III-Health Retirement	210	1,077	5,138	67.9
Total	1,172	5,961	5,086	69.1

<sup>1</sup> Includes pension increase payable in April 2013

<sup>2</sup> Weighted by current pension in payment



\* An adjustment (~2.7%) was made to scale up the pensioner membership data for three missing funds. The resulting membership after rating up (as set out in the 2013 valuation report) is as follows:

#### Table C9: Summary of Pensioner data as at 31 March 2013 after rating up

	Number of members (000's)	Total pension <sup>1</sup> £m	Average pension £ <sup>1</sup>	Average age <sup>2</sup> (years)
Total	1,204	6,124	5,086	69.1

<sup>1</sup> Includes pension increase payable in April 2013

<sup>2</sup> Weighted by current pension in payment



#### Table C10: Summary of Dependant data as at 31 March 2016

	Number of members (000's)	Total pension <sup>1</sup> £m	Average pension <sup>1</sup> £	Average age <sup>2</sup>
Spouse	206	619	3,012	76.5
Children	13	21	1,583	19.5
Total	219	640	2,925	74.6

<sup>1</sup> Includes pension increase payable in April 2016

<sup>2</sup> Weighted by current pension in payment

#### Table C11: Summary of Dependant data as at 31 March 2013\*

	Number of members (000's)	Total pension <sup>1</sup> £m	Average pension <sup>1</sup> £	Average age <sup>2</sup>
Spouse	189	520	2,759	76.4
Children	12	17	1,434	18.6
Total	201	537	2,680	74.6

<sup>1</sup> Includes pension increase payable in April 2013

<sup>2</sup> Weighted by current pension in payment

\* An adjustment (~2.7%) was made to scale up the dependant membership data for three missing funds. The resulting membership after rating up (as set out in the 2013 valuation report) is as follows:



#### Table C12: Summary of Dependant data as at 31 March 2013 after rating up

	Number (000's)	Total pension <sup>1</sup> £m	Average pension <sup>1</sup> £	Average age <sup>2</sup> (years)
Total	206	552	2,680	74.6

<sup>1</sup> Includes pension increase payable in April 2013
 <sup>2</sup> Weighted by current pension in payment

### Appendix D: Notional assets and cashflows

- D.1 The Directions specify the calculation of the *notional assets* (for both cost cap and *employer contribution rate* purposes) as at 31 March 2016. Paragraph 44 of the Directions requires that the *notional assets* for the whole Scheme (used for the *employer contribution rate*) are set equal to the liabilities for the Local Government Pension Scheme.
- D.2 The calculation of the *notional assets* for *employer contribution correction cost* purposes, referred to as the cost cap fund, is based on the prior value of the cost cap fund as specified in the Directions. For this valuation an initial value of the cost cap fund has to first be determined. This has been calculated as the value of the liability for contributing members as at 31 March 2014 using the assumptions set for the 2013 valuation (including those specified in the Directions issued for that valuation). The *cost cap fund* for this valuation is calculated by making adjustments to this initial value for income and benefit payments and a notional return is credited each year. A further adjustment, the cost cap net leavers liabilities, is applied to allow for members leaving or re-joining contributory membership during the inter*valuation period*. These adjustments are made in a similar way to those for the whole Scheme notional assets but adapted to encompass only those payments which relate to the liabilities within the cost cap. The figures are set out in Table D1. Income and expenditure are assumed to occur mid-year for the purposes of crediting the notional return.

	£ billion	Direction
<i>Initial cost cap fund</i> as at 31 March 2014	98.5	30
Plus cost cap income	19.1	33
Less <b>cost cap benefits paid</b>	(6.2)	34
Less cost cap net leavers liability	(25.2)	35
Plus cost cap notional investment return	6.0	36
Cost cap fund as at 31 March 2016	92.2	37

#### Table D1: Cost cap fund

#### Notional investment returns

D.3 The actual *notional investment returns* used to roll up the *notional assets* and the *cost cap fund* from the prior value to the *effective date* of the valuation are set out in Table D2 below.

able D2: Notional investment returns					
Cost cap fund*					
3.64%					
2.30%					

\*To note the rate of roll up for the **cost cap fund**, is set as specified in the Directions.

### Appendix E: Events since the 2013 actuarial valuation

#### Introduction of new scheme from 1 April 2014

E.1 A reformed Scheme, the 2014 Scheme, was introduced from 1 April 2014. The main differences compared to the previous arrangements were to provide benefits on a career average basis with normal pension age linked to State Pension age. Transitional arrangements were made under which some older members have a final salary underpin to their benefits. The benefits provided from the Schemes, together with a summary of the transitional provisions, are summarised in the Data report.

#### **Member contributions**

E.2 Changes to member contribution rates were introduced at the same time as the 2014 scheme. The revised rates were earnings-related and are shown in Table E1.

	Member contribution
	rate
Actual pensionable pay	2014/15
≤ £13,500	5.5%
£13,501 - £21,000	5.8%
£21,001 - £34,000	6.5%
£34,001 - £43,000	6.8%
£43,001 - £60,000	8.5%
£60,001 - £85,000	9.9%
£85,001 - £100,000	10.5%
£100,001 - £150,000	11.4%
> £150,000	12.5%

#### Table E1: Member contribution rates 2014/15

#### **Assumption changes**

E.3 Future life expectancy and the *SCAPE discount rate* used have had a major impact on the results of the valuation. Further information on these assumptions and how they impact on the results of the valuation are set out in section 2.

#### Guaranteed Minimum Pension (GMP) increases

E.4 Members of public service schemes who reach State Pension age on or after 6 April 2016 and before 6 April 2021 will receive the same rate of increase on all scheme pensions including GMP. This was announced after completion of the 2013 valuation and the corresponding liability is included in this valuation for the first time.

E.5 The Government has subsequently announced further changes to the treatment of other GMP rights in the Scheme which will result in further liability being included in future valuations.

#### **GMP** overpayments

E.6 Continuing GMP reconciliation work may result in identifying over or underpayments to members. We assume such payments will in aggregate not be material to the valuation.

#### Legal cases

E.7 A number of legal challenges, summarised below, have been brought against public service (and other) pension schemes since the 2013 valuation. We have not made any allowance for these in the current valuation.

#### Brewster: nomination forms for survivor benefits

E.8 In February 2017, the Supreme Court ruled that a regulation requiring a signed nomination form from a member of the Northern Ireland Local Government Pension Scheme, in order to entitle an unmarried partner to survivor benefits in the scheme, was unlawful (the Brewster judgement). The Government has instructed all public service schemes to make appropriate amendments in light of this ruling. The impact of doing this has not been reflected in the data provided for the current valuation and no estimate of the impact has been included.

# Walker: survivor's pension payable to a surviving civil partner or same-sex spouse

E.9 In July 2017, the Supreme Court handed down judgement in the case of Walker vs Innospec Ltd and others. The Supreme Court found that it is unlawful to restrict the survivor's pension payable to a surviving civil partner or same-sex spouse so that it reflects only the member's pensionable service since 5 December 2005 (the date on which the Civil Partnership Act 2004 came into force). The exact implications of the judgement remain unclear.

#### Lloyds Banking Group: GMP equalisation

E.10 In October 2018, the High Court published its judgement in a case, brought by the pension trustees at Lloyds Banking Group, on equalisation of GMPs. They found that pensions must be equalised for the effects of unequal GMPs, and handed down guidance on how to do that in relation to the Lloyds Banking Group schemes. HM Treasury will consider the implications for the public service pension schemes, if any. No allowance has been made in the *valuation results* for any benefit changes required as a result of this ruling.

#### Pension increases and in-service revaluations

E.11 The actual rates of increase awarded to pensions in payment and to those in-service in the 2014 Scheme since the 2013 valuation are set out in Tables E2 and E3

respectively. The known rates of increase awarded since the *effective date* are also shown. These have been taken into account in the valuation.

Table E2: Pension increases since the previous valuation	Table E2: Pensio	n increases sin	ce the previous	s valuation
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Year	Pension Increase
April 2012	5.2%
April 2013	2.2%
April 2014	2.7%
April 2015	1.2%
April 2016	0.0%
April 2017	1.0%
April 2018	3.0%

#### Table E3: 2014 Scheme in-service revaluation since the previous valuation

Year	In-service revaluation
April 2015	1.2%
April 2016	(0.10)%
April 2017	1.00%
April 2018	3.00%

### Appendix F: Summary of assumptions

F.1 The following tables show the financial assumptions and mortality assumptions. The financial assumptions and rate of future improvements in life expectancy are specified in the Directions. The baseline mortality assumption is set by Secretary of State for Levelling Up, Housing & Communities.

 Table F1: Financial assumptions at current valuation and 2013 valuation

		31 March 2016			31 March 2013			
Discount rate								
For liabilities and contribution rate	2.8% pa real until 2019 and then 2.4% pa real thereafter 4.45% nominal from 2020		3% pa real; 5.06% pa nominal			inal		
For cost cap rate	2.4% pa real; 4.45% nominal			3% pa real; 5.06% pa nominal				
Pension increases	2% pa		2% pa					
Long term salary growth	ary 4.2% pa, 2.2% pa in excess of a CPI		assumed	4.75% pa, 2.75% pa in excess of assum CPI			assumed	
	Year	Gross discount rate	Pension increases	Salary growth	Year	Gross discount rate	Pension increases	Salary growth
Short term variations in assumptions	2016/17 2017/18 2018/19 2019/20 2020/21 2022/22 2022/23	3.83% 5.88% 5.06% 4.24% n/a n/a n/a	1.0% <sup>17</sup> 3.0% <sup>18</sup> 2.2% 1.8% n/a n/a n/a	1.2% 2.2% 2.1% 2.3% 2.6% 2.8% 3.0%	2013/14 2014/15 2015/16 2016/17 2017/18 2018/19	5.78% 5.27% 5.16% n/a n/a n/a	2.7% 2.2% 2.1% n/a n/a n/a	0.5% 1.5% 2.0% 2.5% 3.0% 3.0%

<sup>&</sup>lt;sup>17</sup> Order made for 2016/17.

<sup>&</sup>lt;sup>18</sup> Order made for 2017/18.

	2016 valuation		2013 valuation	
Baseline mortality	Standard table <sup>19</sup>	Adjustment	Standard table	Adjustment
Males				
Retirements in normal health	S2NMA	101%	S1NMA	99%
III-health pensioners	S2IMA	107%	S1IMA	104%
Dependants	S2NMA	132%	S1DMA	120%
Females				
Retirements in normal health	S2NFA	92%	S1NFA	93%
III-health pensioners	S2IFA	106%	S1IFA	106%
Dependants	S2NFA	106%	S1DFA	101%

#### Table F2: Mortality assumptions

- F.2 Future mortality improvements are in line with the most recent ONS population projections at the date of each valuation: ONS-2016 projections for the 2016 valuation and ONS-2012 projections for the 2013 valuation.
- F.3 Full details of the demographic assumptions are provided in the Assumptions report.
- F.4 The Directions require us to provide the average expected future pensionable service of the Scheme members in service at the *effective date*. This is shown below, along with the average duration of liabilities for active members and current pensioners (which gives an indication of the timing of future cashflows).

#### Table F3: Duration and average future working lifetime

Member Type	Average expected future pensionable service (years)	Duration of liabilities (years)
Active Member	9.3	24.9
Current Pensioner	n/a	11.5

<sup>19</sup> SAPS (S2) tables are published by the Actuarial Profession and based on the experience of self-administered pension schemes over the period 2004 to 2011. The 'S2' series has separate standard tables based on experience of members retiring in normal health (S2NXA), in ill health (S2IXA) and for dependants (S2DXA). The S3 series of tables were released by CMI on 5 December 2018. These updated mortality tables cover experience between 2009 and 2016. The final tables are unchanged from the working paper issued during 2018, from which GAD concluded that moving to the S3 tables would likely have no material impact on the valuation results as a whole. It therefore remains appropriate to use the S2 tables for the current valuation. F.4 The Directions require this report to provide the pensionable payroll for the Scheme at the *effective date* and that projected to the *implementation date* and the final day of the *implementation period*. These are shown below.

#### Table F4: Projected pensionable payroll

Date	Pensionable Payroll (£ billion)
Effective date (31 March 2016)	33.1
First year of implementation period (2019/20)	34.4
Last year of implementation period (2022/23)	37.2

# Appendix G: Location of material required by Directions

Direction	Description	Location
21 (1) (a) (i) and (ii)	Summary of membership data and checks carried out	Data report
21 (1) (a) (iii)	Adjustments made to data	Data report
	Projections made	Assumptions report
21 (1) (b)	Average age of active members	Appendix C1, Table C1
21 (1) (c)	Average expected future pensionable service of active members	Appendix F, Table F3
21 (1) (d)	Total projected pensionable payroll	Appendix F, Table F4
21 (1) (e)	Statement of compliance with Directions	Section 2, Paragraph 2.3
21 (1) (f)	Summary of regulations, Directions, and professional standards	Section 2, Paragraphs 2.1 and 2.5 Appendix H GAD <u>website</u>
21 (1) (g)	Summary of main provisions of the schemes	Data report
21 (1) (h)	Analysis of demographic experience	Assumptions report
21 (1) (i) (i) and (ii)	Statement of assumptions, including rationale	Section 2, Paragraph 2.4 Assumptions report See also Appendix F
21 (1) (i) (iii)	Illustration of sensitivity to assumptions set by the Secretary of State	Section 4, Table 4.1
21 (1) (j)	Other liabilities valued	None
21 (1) (k)	Any other matters scheme actuary feels relevant	None
21 (2)	Illustration of sensitivity to specific assumptions set in the Directions	Section 4, Table 4.1
22 (a), (b)	Valuation balance sheet	Section 3, Table 3.6
22 (c)	Notional asset cashflows	Appendix D, Table D2
22 (d), (e), (f), (g)	Contribution rates	Appendix A, Table A2

22A (a) and 30 (1)	The prior value of the cost cap fund	Appendix D, Table D3
22A (b)	The cost cap contribution yield	Section 3, Table 3.3
22A (c)	The cost cap income	Appendix D, Table D3
22A (d)	The cost cap benefits paid	Appendix D, Table D3
22A (e)	The cost cap net leavers liabilities	Appendix D, Table D3
22A (f)	The cost cap notional investment returns	Appendix D, Table D3
22A (g)	The cost cap fund	Section 3, Table 3.1
22A (h)	The cost cap liabilities	Section 3, Table 3.1
22A (i)	The cost cap future service cost	Section 3, Table 3.3
22A (j)	The cost cap past service cost	Section 3, Table 3.3
22A (k)	The employer contribution correction cost	Section 3, Table 3.3
22A (I)	The cost cap difference	Section 3, Table 3.3
48 (h)	Cost cap analysis	Section 3, Table 3.4
27 (1)	Breakdown of contribution rate	Appendix A, Table A2
28 (c) and 31 (1)	Member contributions expected over the implementation period	Appendix A, Table A2

# Appendix H: Glossary

- H.1 This report contains several terms with which you may not be familiar. Many of these terms come directly from the Directions or are specified in regulations, and paragraph 2 of the Directions gives some explanation of their meaning. This appendix is not intended to repeat the definitions of these terms from the Directions, rather to add further information to aid understanding of some of those terms and some other general pensions terms.
- H.2 The *valuation report* is this pre-McCloud report, prepared by the scheme actuary in accordance with the Directions for the purpose of calculating the *employer contribution correction cost*.
- H.3 The *cost cap valuation report* is the report to be prepared by the scheme actuary in accordance with the Directions for the purpose of determining the *cost cap cost of the scheme*.

Terms relating to the calculation of the employer contribution correction cost

- H.4 The *employer contribution correction cost* means the contribution rate which is compared against the *target cost of the scheme* at the first and each subsequent valuation of a scheme. It is calculated in four parts:
  - > The cost in respect of future service over the *implementation period* (H14), calculated as if all active members are in the 2014 Scheme and have no pre-2014 Scheme service; plus
  - > the cost in respect of past service, which is the difference between the cost cap fund (H4) and the cost cap liabilities (H5) converted to a contribution rate payable over 15 years; minus
  - > the **cost cap contribution yield**, which is the expected average contribution rate payable by members over the implementation period; minus
  - > the cost cap difference, which is the difference between the employer cost cap as set out in regulations and the proposed employer cost cap (H3) which would have been calculated in 2012 had updated financial assumptions been assumed. It acts to remove the impacts of changing the discount rate and long-term earnings assumptions from the cost control mechanism (in accordance with the policy aim contained in HM Treasury's policy document Public service pensions: actuarial valuations and the employer cost cap mechanism).
- H.5 The *proposed employer cost cap* is the contribution rate, that was determined at the 2012 valuation, to cover the cost of benefits accruing over the *implementation period* as if all active members were in the 2014 Scheme and had no pre-2014 Scheme service, minus the expected average contribution rate payable by members over the implementation period.

- H.6 The cost cap fund is a notional amount of money, initially set as the value at 31
   March 2014 of the active members' past service liabilities. It has been updated to 31
   March 2016 to take account of cost cap income (H6), cost cap benefits paid (H8), cost cap net leavers liabilities (H9) and cost cap notional investment returns (H10).
- H.7 The *cost cap liabilities* are the value of the past service liabilities for all active members of the Scheme and all deferred and pensioner members of the 2014 Scheme as at the valuation date.
- H.8 The *cost cap income* represents money received by the Scheme, for example through employee contributions and transfer values received to the scheme. Employer contributions are also included, but these are set as the amount that would have been received if employer contributions were paid at the *cost cap fund contribution rate* (H7).
- H.9 The *cost cap fund contribution rate* is the contribution rate required to cover the cost of benefits accruing to members of the Scheme from 1 April 2014 to 31 March 2016, less member contributions. It is calculated under the same updated assumptions that are used in the calculation to determine the *cost cap difference*.
- H.10 The *cost cap benefits paid* are the pension and lump sum benefits, and transfer and other sums paid out to members of the 2014 Scheme.
- H.11 The *cost cap net leavers liabilities* are liabilities relating to benefits accrued in one of the pre-2014 schemes by members who have left, or re-joined, active service in the Scheme since the previous valuation. This item is needed because the cost control mechanism only captures costs relating to pre-2014 Scheme benefits while members are in active service and so such liabilities need to be removed from the *cost cap fund* (H4) when pre-2014 Scheme members cease active service.
- H.12 The *cost cap notional investment returns* are notional amounts added to *the cost cap fund* (H4) which represent the returns that might have been received on the *cost cap fund* (H4). The investment returns are set in line with the *SCAPE discount rate* (H19).

#### General valuation terms

- H.13 The *uncorrected employer contribution rate* is the percentage of pensionable pay that the employer would (notionally) need to pay to the Scheme over the *implementation period* (H14) in respect of active members of the Scheme to cover the cost of benefits accruing over the *implementation period* and includes allowance for any surplus or shortfall.
- H.14 The *corrected employer contribution rate* is calculated in the same way as the *uncorrected employer contribution rate*, except that the accrual rate of the 2014 Scheme is assumed to be improved from 1 April 2019 to the extent necessary such that the *employer contribution correction cost* equals the *target cost of the scheme*.
- H.15 The *employer contribution correction cost* is a measure of how the cost of the scheme has changed relative to the *target cost of the scheme*.
- H.16 The *implementation period* for this valuation is 1 April 2019 to 31 March 2023.
- H.17 The *inter-valuation period* is the three-year period 1 April 2013 to 31 March 2016.
- H.18 The *notional assets* are a notional amount of money, initially set as the value of all members' past service liabilities at a specific date (as set out in Schedule 2 of the Directions). It is updated at each valuation to take account of all actual Scheme income and benefits paid, plus an allowance for notional investment returns which are set in line with the *SCAPE discount rate* (H19).
- H.19 Past service liabilities are the benefit promises (pensions, lump sums, survivor pensions, etc.) that have been made to members over their period of active membership of the Scheme prior to the *effective date* of the valuation. For active members, these liabilities include allowance for future salary inflation or in-service benefit revaluation until the assumed date of cessation of pensionable service.
- H.20 **Pensionable pay** is the part of pay that is included for the purposes of determining contribution requirements and benefit payments.
- H.21 The term SCAPE is short for the Superannuation Contributions Adjusted for Past Experience. The **SCAPE discount rate** is the Government's measure for determining the present value of future payments. It is currently set equal to the rate of expected long-term GDP growth. Further detail can be found in in the consultation documentation published by HM Treasury in December 2010 and April 2011<sup>20</sup>.

<sup>&</sup>lt;sup>20</sup> <u>https://www.gov.uk/government/consultations/the-discount-rate-used-to-set-unfunded-public-service-pension-contributions</u>

# Appendix I: Limitations

- H.1 This report is intended solely for the use of Secretary of State for Levelling Up, Housing and Communities and the Department for Levelling Up, Housing and Communities, for the purpose of calculating the *employer contribution correction cost*. The information and advice in this report should not be relied upon, or assumed to be appropriate, for any other purpose or by any other person. GAD does not accept any liability to third parties, whether or not GAD has agreed to the disclosure of its advice to the third party.
- H.2 We are content for the Secretary of State for Levelling Up, Housing and Communities to release this report to third parties, provided that:
  - > it is released in full
  - > the advice is not quoted selectively or partially
  - > GAD is identified as the source of the report
  - > GAD is notified of such release
- H.3 Third parties whose interests may differ from those of the Secretary of State for Levelling Up, Housing and Communities should be encouraged to seek their own actuarial advice where appropriate. GAD has no liability to any person or third party for any act or omission taken, either in whole or in part, on the basis of this report.
- H.4 GAD is not responsible for any decision taken by the Department for Levelling Up, Housing and Communities, except to the extent that the decision has been made in accordance with specific advice provided by GAD. Advice provided by GAD must be taken in context and is intended to be read and used as a whole, not in parts. GAD does not accept responsibility for advice that is altered or used selectively. No significant action should be taken based on oral advice alone. Clarification should be sought if there is any doubt about the intention or scope of advice provided by GAD.
- H.5 GAD relies on the accuracy of data and information provided by the administering authorities. GAD does not accept responsibility for advice based on wrong or incomplete data or information provided by the administering authorities or the Department for Levelling Up, Housing and Communities.
- H.6 This work has been carried out in accordance with the applicable Technical Actuarial Standards: TAS 100 and TAS 300 issued by the Financial Reporting Council (FRC). The FRC sets technical standards for actuarial work in the UK.
- H.7 Throughout this report the totals given for summed data may not be exactly the same as the sum of the components shown due to rounding effects.