



United Kingdom  
Debt Management  
Office

**Commissioners for the Reduction of the National Debt**

**Government Annuities Investment Fund**

**Report and Accounts for the year ended 31 December 2022**

Presented to Parliament pursuant to Section 67(4) of the Government Annuities Act 1929

Ordered by the House of Commons to be printed on 30 March 2023

**30 March 2023**

HC 1192





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## **Foreword**

The Government Annuities Act 1929 (the Act) consolidated a number of government annuity and insurance funds into the Government Annuities Investment Fund (GAIF), to be operated by the Commissioners for the Reduction of the National Debt (CRND). The Act authorised CRND to grant term annuities, immediate life annuities, deferred annuities, and insurances.

In practice, the grant of deferred annuities was discontinued in 1912 and the grant of term annuities in 1918. The grant of insurances was discontinued in 1929 and the grant of immediate life annuities in 1962. New insurance contracts since 1929 are variations of contracts existing in 1929.

The investments of the GAIF were exhausted in 1936. National Savings and Investments (NS&I) pays out insurance claims and applies yearly to CRND for reimbursement of these amounts by the GAIF, which also pays any management expenses. All payments made by the GAIF are met by receipts from the Consolidated Fund. The only transaction during the year was a payment of £180 in relation to audit expenses (2021: £180), which included £30 of irrecoverable VAT.

As at 31 December 2022, 166 life insurance contracts with an aggregate value payable on the deaths of the insured of £3,614 remain open in the records of NS&I, who administer the contracts for CRND.

## **Audit arrangements**

The GAIF is audited by the Comptroller and Auditor General under agreement with HM Treasury (HMT).

## **Date of authorisation for issue**

The date of authorisation for issue is the date on which the Secretary and Comptroller General authorises the accounts for issue. This is interpreted as the date of the Independent Auditor's Report to the Commissioners for the Reduction of the National Debt.

## **Jo Whelan**

Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt  
22 March 2023

## **Statement of Secretary and Comptroller General's responsibilities**

Section 67 (4) of the Government Annuities Act 1929 requires the Commissioners to prepare an account of all monies paid into the GAIF and of the disposal thereof, and of all contracts for the grant of deferred annuities and insurances charged on the fund made in any calendar year.

The GAIF account is prepared on a cash basis and must properly present the receipts and payments for the year and balances held on 31 December.

The Commissioners have appointed the Secretary and Comptroller General to discharge their statutory responsibilities, a role that is analogous to acting as an Accounting Officer. Therefore the Secretary and Comptroller General has responsibility for preparing the annual accounts and for transmitting these to the Comptroller and Auditor General.

In preparing the accounts, the Secretary and Comptroller General is required to comply with the Government Annuities Act 1929 and has elected to be consistent with certain requirements of the Government Financial Reporting Manual (FReM), and in particular to:

- apply suitable accounting policies on a consistent basis;
- make judgements and estimates on a reasonable basis; and
- confirm that the annual report and accounts as a whole are fair, balanced and understandable, and take personal responsibility for the annual report and accounts and the judgements required for determining they are fair, balanced and understandable.

As the role of the Secretary and Comptroller General is analogous to acting as an Accounting Officer, it is considered that the responsibilities of an Accounting Officer, as set out in Managing Public Money published by HM Treasury, apply to the Secretary and Comptroller General. These include responsibility for the propriety and regularity of the public finances for which the Secretary and Comptroller General is answerable, for keeping proper records, and for safeguarding the GAIF's assets.

### **Disclosure to auditors**

The GAIF is audited by agreement with the Comptroller and Auditor General. The Comptroller and Auditor General audits these accounts and provides opinions to CRND on whether the receipts and payments provide a true and fair view.

As the Secretary and Comptroller General I have taken all the steps that I ought to have taken to make myself aware of any relevant audit information and to establish that the GAIF's auditors are aware of that information. So far as I am aware, there is no relevant audit information of which the auditors are unaware.

## **Governance statement**

### **Scope of responsibility**

As Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt, I am responsible for ensuring the operation of a sound system of internal control that supports the achievement of CRND's targets, policies and objectives in managing client investment portfolios whilst safeguarding the public funds for which I am accountable, in accordance with the responsibilities assigned to me.

CRND is a separate business entity managed within the control framework of the Debt Management Office (DMO). While I am responsible for CRND's system of internal control, the Accounting Officer of the DMO is responsible for the wider control framework within which CRND is managed. In discharging my own control responsibilities, I take assurance on the continued sound maintenance of the wider control framework from the governance statement for the DMO, although I understand that only reasonable and not absolute assurance can be given that risks have been controlled.

It is also my responsibility to ensure that all CRND fund management activities are conducted with due regard to value for money and operated in line with client instructions. I have put arrangements in place to ensure that there is a proper evaluation of the balance of cost and risk in our operations.

CRND is committed to the highest standards of corporate governance and is guided by the Corporate Governance Code for central government departments (the Code) and the following principles laid down in that Code:

- Parliamentary accountability;
- The role of the Board;
- Board composition;
- Board effectiveness; and
- Risk management.

CRND does not conduct any part of its business with or through arm's length bodies (ALBs) and therefore CRND has not applied principle six which covers departmental governance arrangements with ALBs.

### **Advisory Board**

In June 2021, HMT published a Tailored Review of the DMO. Tailored Reviews aim to assess, amongst other things, an organisation's form and function, its control and governance arrangements, and its relationship with its sponsoring department and other relevant organisations. Overall the review concluded that the DMO is a highly successful and effective organisation.

The review made a series of recommendations regarding the DMO's governance arrangements. In particular, the review recommended that, in terms of its status, the DMO should be regarded as a 'Model 2' Executive Agency as defined in the Cabinet Office guidance. A Model 2 Executive Agency is one which is deemed by the sponsor department to require a greater level of independence from its home department in order to carry out its functions effectively, or one that is considered by its home department to be of sufficient size and importance to require independent assurance. On this basis, the review recommended that the DMO's governance arrangements should be amended accordingly, including the creation of an Advisory Board to replace the existing Managing Board and, as a consequence of this, to introduce a Non-Executive Chair (NEC)



to the Board membership. The process to recruit a NEC was undertaken in the second half of the year and successfully completed as announced on 4 May 2022. The inaugural Advisory Board was held on 13 June 2022.

The Secretary and Comptroller General was supported during 2022 by the DMO Advisory Board (the Board) which, in addition to the Secretary and Comptroller General, is comprised of:

- Dame Sue Owen (from 13 June 2022)

Non-Executive Chair - Dame Sue was a civil servant for 30 years, including 14 years at HM Treasury. Amongst other things, she worked on fiscal policy and debt management policy at HM Treasury. Dame Sue has previously held senior roles at the Foreign and Commonwealth Office, Department for International Development, and Department for Work and Pensions. Most recently she served as the Permanent Secretary at the Department for Digital, Culture Media and Sport, from 2013 to 2019. She has other current roles, including non-executive director at Pantheon International plc and Serco plc.

- Sir Robert Stheeman

DMO Chief Executive and Accounting Officer

- Jim Juffs

Chief Operating Officer

- Jessica Pulay

Co-Head of Policy and Markets

- Tom Josephs (until 13 June 2022)

Non-executive HM Treasury representative

- Ruth Curtice (from 15 September 2022)

Non-executive HM Treasury representative

- Paul Fisher

Non-executive director - During a 26 year career at the Bank of England, Paul Fisher served as a member of the Monetary Policy Committee from 2009 to 2014, the interim Financial Policy Committee from 2011 to 2013 and the Prudential Regulation Authority (PRA) Board from 2015 to 2016. He has a number of current roles including Chair of the London Bullion Market Association.

- Paul Richards

Non-executive director - During a 29 year career at Bank of America Merrill Lynch, Paul was Managing Director of business in fixed income trading, Debt Capital Markets and Corporate Banking across Europe, the Americas and Asia Pacific. Following his retirement from banking, he spent 18 months as a senior consultant to the Financial Conduct Authority (FCA). He is currently chairman of Insignis, a FinTech company he launched in 2015.

Non-executive directors are appointed by the DMO Accounting Officer following a formal process and have fixed terms defined in their contracts of service. All non-executive Board members receive an induction on joining and have access to additional information and training where it is considered necessary for the effective discharge of their duties.

One of the roles of the Board is to advise the Secretary and Comptroller General on any key decisions affecting CRND.

An executive sub-committee of the Board generally meets weekly and supports the Secretary and Comptroller General on operational decisions.

During 2022, in line with good practice, the Board's effectiveness was reviewed through the Tailored Review. The previous Terms of Reference were supplanted by a new Terms of Reference for the Advisory Board.

## 2022 Advisory Board activities

Board meetings were held throughout 2022 and covered regular agenda items, including risk management, staffing and progress against the operational business plan.

Board and Audit and Risk Committee attendance is outlined in the tables below:

*1 January 2022 to 12 June 2022*

	<b>Managing Board</b>		<b>Audit and Risk Committee</b>	
	Possible	Actual	Possible	Actual
Sir Robert Stheeman	3	3		
Jo Whelan	3	3		
Jim Juffs	3	3		
Jessica Pulay	3	3		
Tom Josephs	3	3		
Paul Fisher	3	3	2	2
Paul Richards	3	3	2	2
Rodney Norman	n/a	n/a	2	2

*13 June 2022 to 31 December 2022*

	<b>Advisory Board</b>		<b>Audit and Risk Committee</b>	
	Possible	Actual	Possible	Actual
Dame Sue Owen	4	4		
Sir Robert Stheeman	4	4		
Jo Whelan	4	4		
Jim Juffs	4	4		
Jessica Pulay	4	4		
Tom Josephs	1	1		
Ruth Curtice	2	2		
Guest*	1	1		
Paul Fisher	4	4	2	2
Paul Richards	4	4	2	2
Rodney Norman	n/a	n/a	2	2

\*One guest attendee

## Audit and Risk Committee

The Secretary and Comptroller General was supported during 2022 by the Audit and Risk Committee (formerly the Audit Committee) on matters relating to risk, internal control and governance. The Audit and Risk Committee covers the activities of the DMO, Debt Management Account (DMA), PWLB lending facility and CRND. The members of the Audit and Risk Committee during 2022 were:

- Paul Fisher (Chairman)
- Paul Richards
- Rodney Norman

Audit and Risk Committee member - Rodney Norman was Finance Director of NS&I until 2018. Prior to that he was the Treasury Accountant at HM Treasury. This was preceded by a career in the City where he qualified as a Chartered Accountant with PWC and was Finance Director of the Banking Division of Close Brothers. He is currently a non-executive member of the Audit and Risk Committee of the Army and a senior advisor to the Bank of England. Until recently he was a non-executive director of the Pension Protection Fund and a member of its Audit and Risk Committee.

Audit and Risk Committee meetings are typically attended by the DMO Accounting Officer, the Secretary and Comptroller General, the Co-Head of Policy and Markets, the Chief Operating Officer, the Head of Internal Audit, the Head of Finance, the Head of Risk, the National Audit Office and KPMG.

One of the Audit and Risk Committee's objectives is to give advice to the Secretary and Comptroller General on:

- The overall processes for risk, control and governance and the governance statement;
- Management assurances and appropriate actions to follow from internal and external audit findings, risk analysis and reporting undertaken;
- The financial control framework and supporting compliance culture;
- Accounting policies and material judgements, the accounts and the annual report and management's letter of representation to the external auditors;
- Whistleblowing arrangements for confidentially raising and investigating concerns over possible improprieties in the conduct of the DMO's business;
- Processes to protect against money laundering, fraud and corruption; and
- The planned activity and results of both internal and external audits.

During the period under review the Audit and Risk Committee paid particular attention to the following areas:

- Credit risk - limit setting, limit monitoring and reporting;
- Third party key supplier risks;
- Public sector fund activities;
- Hybrid working;
- Whistleblowing reporting process;
- Review of past audit reports and management actions taken;
- Application development and testing controls;
- Fraud risk management;

- User access rights and permissions;
- Payment systems continuity arrangements;
- Review of payment systems and continuity arrangements;
- Sustainability review of the contracts management framework;
- High level risks and issues/principal risks and uncertainties;
- Impact of Covid risk;
- IT and cyber security risk;
- Development of risk assurance maps;
- Review of international sanctions; and
- Accounting standards for leases.

The Audit and Risk Committee covers a regular programme of agenda items, together with other current topics, and met four times during the year.

The Secretary and Comptroller General has also been informed by the following operational committees throughout the period under review:

### ***Fund Management Review Committee***

The Fund Management Review Committee monitors CRND activity relating to the performance of the government funds under management, including any reporting on compliance activities undertaken in relation to the funds.

The Fund Management Review Committee met four times in 2022.

### ***Business Delivery Committee***

The Business Delivery Committee reviews the status of the delivery of DMO's business and work plan as a collective cross-functional body, resolving emerging issues in a timely way, and agreeing priorities to ensure the plan stays on track.

The Business Delivery Committee met regularly (typically weekly) throughout 2022.

### ***Risk Committees***

The Secretary and Comptroller General is informed by two risk committees covering operational risk and material change programmes. More detail on the roles, responsibilities and activities of these committees can be found in the sections below.

## **Risk management and internal control**

The Secretary and Comptroller General is responsible for maintaining a sound system of internal control that supports the achievement of CRND's targets, policies and objectives in managing client investment portfolios whilst safeguarding the public funds for which she is accountable, in accordance with the responsibilities assigned to her in the Managing Public Money document.

CRND is managed within the wider DMO system of internal control which is based upon what the DMO Accounting Officer, with the support of the Board, considers to be appropriate, taking account of the DMO's activities, the materiality of risks inherent in those activities and the relative costs and benefits of implementing specific controls to mitigate those risks. The DMO's position differs to that of a commercial organisation in that it must always be in a position to transact the underlying business required to meet its remit. As a result, the risks associated with this activity cannot be avoided and the system of internal control can only provide reasonable assurance against failure to achieve aims and objectives.

## **The Risk and Control Framework**

The Board has designed and put in place a formal risk management framework covering all the activities conducted and overseen by the DMO. This framework helps ensure that the DMO Accounting Officer is appropriately informed and advised of any identified risks and also allows the management of risks to be monitored. The risk management framework covers both regular operations and new business initiatives, and evolves as the range and nature of the DMO's activities change. The framework is supported by a clear 'three lines of defence' model:

### ***First line of defence:***

Day-to-day management of risk is the responsibility of management staff within business areas. The DMO considers effective risk management to be central to its operations and fosters a risk aware culture in which all members of staff, including Board members, are encouraged to understand and own the risks that are inherent in those operations. In particular, the DMO seeks to promote an environment in which staff feel comfortable to identify new risks and changes in previously identified risks, as well as weaknesses so that these may be assessed and appropriate mitigating actions put in place.

Mitigating actions typically include segregation of duties, staff training, clear lines of management delegation and reporting and robust business continuity arrangements.

### ***Second line of defence:***

Oversight of risk is provided by the Board and risk committees, whose role is to provide regular and systematic scrutiny of risk issues which lie within their remit and to support the DMO Accounting Officer in exercising his overall responsibility for risk management.

The DMO considers that the principal risks it faces arise in three broad areas: credit risk, market risk and operational risk. It has established committees to meet regularly to review the changing risk pattern for each of these areas and to set up appropriate responses. The work of these committees is described in more detail below.

#### *Credit and Market Risk Committee*

The Credit and Market Risk Committee (CMRC) meets on a regular basis, with more frequent meetings held when required, for example during times of market stress. The CMRC monitors and reviews the management of market, credit, and liquidity risk. The CMRC met nine times during 2022.

#### *Operational Risk Committee*

The Operational Risk Committee (ORC) meets regularly to monitor operational risks and to review significant risk issues. The ORC is responsible for reviewing risk incidents identified through the DMO's risk incident reporting process, and for considering whether planned mitigating actions are appropriate. The ORC also reviews and tracks the progress of actions identified by Internal Audit. The ORC's scope includes issues relating to information risk, IT security, business continuity, anti-fraud and key supplier risks.

The ORC has advised the DMO Accounting Officer and the Board, during the year, on significant operational risk concerns, significant risk issues and trends as well as actions to mitigate such risks. The ORC met seven times during 2022.

### *Controls Group*

The Controls Group meets periodically to review issues affecting the DMO's system of internal control and to analyse material changes to the control environment. The Controls Group recommends actions to management to implement changes where appropriate. The Controls Group consists of representatives from Finance, Risk, Compliance and Internal Audit.

The Controls Group has advised the DMO Accounting Officer, the Board and senior management on any significant risk concerns stemming from the introduction of new business activities as well as risks relating to other change management activities. The Controls Group has also advised the DMO Accounting Officer on suitable mitigating actions where appropriate.

### *Risk Management Unit*

The risk committees are supported by the DMO's Risk Management Unit (RMU) which ensures key risk issues arising from these committees are communicated to the DMO Accounting Officer and senior management on a regular basis, with additional ad-hoc reporting if an emerging issue requires it. The RMU also supports the formal risk reporting processes with defined outputs, including regular detailed risk reports which are reviewed by the Board and senior management.

As well as supporting the risk committee structure, the RMU provides control advice on risks. As part of the second line of defence the RMU is separate from, and independent of, the DMO's trading operations. The RMU conducts risk analysis and provides market, credit and operational risk capability for the DMO.

The identification, monitoring and mitigation of operational risk is facilitated by the RMU via quarterly consultations with heads of business units and functional teams. Significant risk issues are assessed for materiality and probability of occurrence. New risks, and risks to which exposure is increasing, are highlighted and actions are taken to ensure effective management of all risks. The DMO has Senior Risk Owners (SROs) who undertake a cross-functional moderation process to promote better prioritisation of operational risks across the organisation. The RMU maintains a central exception log to record all risk incidents raised, in order to identify control weaknesses and assign actions to improve controls.

### ***Third line of defence***

The DMO's Internal Audit function provides the DMO Accounting Officer with independent and objective assurance on the overall effectiveness of the Agency's system of internal control. It does this through a risk based work programme which is presented to and approved by the Audit and Risk Committee at the start of each year. All audits review the processes in place and where necessary raise findings relating to control weaknesses and management actions are agreed to mitigate any risks and enhance the control structure. Progress against agreed management actions is monitored on a regular basis to ensure issues highlighted by internal audit, as well as any issues raised by the external auditors, and other identified actions to improve the control environment, are managed and progressed within agreed deadlines. The function is independent of the DMO's trading activities and operations and has a direct reporting line to the DMO Accounting Officer. The work of Internal Audit includes assessing the effectiveness of both control design and control performance. With its independence and overall remit, Internal Audit provides a third line of defence against the risks that might prevent the DMO delivering its objectives.

## Risk policies and procedures

The DMO’s risk policies reflect the high standards and robust requirements which determine the way risks are managed and controlled. The DMO Accounting Officer, with the support of the Board, ensures that policies are regularly reviewed to reflect any changes in the DMO’s operations and/or best practice.

Staff are required to confirm that they have read and accepted the DMO’s rules on personal dealing and the DMO’s policy on the use of information systems and technology, and that they are aware of, and will continue to keep up to date with, the DMO’s policies on whistleblowing, anti-fraud, anti-money laundering and information security. The DMO ensures that this exercise is undertaken on an annual basis allowing staff to maintain a good level of awareness of the DMO’s policies in these areas. All members of staff have job descriptions which include reference to the specific key risks they are expected to manage.

Managers in each business function are responsible for ensuring that the operations within their area are compliant with plans, policies, procedures and legislation.

During 2022 no concerns were raised by staff under the DMO’s whistleblowing policy relating to CRND.

## Key Developments

### COVID-19

The government’s plan for removing the remaining legal restrictions while protecting people most vulnerable to COVID-19 and maintaining resilience was set out in the “COVID-19 Response: Living with COVID-19” guidance first published in February 2022 and later revised in May 2022.

The DMO’s COVID-19 risk assessment was transitioned into the health & safety risk assessment, with suitable controls maintained, where appropriate.

## Risk Profile

The Secretary and Comptroller General and the DMO Board believe that the principal risks and uncertainties facing CRND are outlined in the table below together with the key actions taken to manage and mitigate them:

### Principal risks and uncertainties

### Mitigation and management

#### IT systems and infrastructure

CRND relies on a number of IT and communications systems to conduct its operations effectively and efficiently.

During the year the DMO has progressed initiatives to further strengthen the resilience and security of its IT network and infrastructure. The DMO carried out an internal health-check.

The DMO has in place structured business continuity arrangements to ensure it is able to continue market operations in the event of an internal or external incident that threatens business operations.

### **IT and data security**

The DMO could be the subject of an external attack on its IT systems and infrastructure. Through its activities the DMO gathers, disseminates and maintains sensitive information including market sensitive information and personal data about staff and market participants. The DMO seeks to ensure the highest standards of data protection and information management.

The DMO, including CRND, continues to work to maintain the required level of protective security covering physical, personnel and information security and is particularly aware of the growing threat posed by cyber security risk.

Risks to data and information held by the DMO are owned and managed by designated Information Asset Owners. The DMO has a Senior Information Risk Owner (SIRO) who is responsible for the information risk policy and the assessment of information risks. The SIRO is a member of the Board and provides advice to Board members on the management of information risks.

The DMO has put in place several layers to defend against external and internal attacks.

The DMO has demonstrated compliance with Government security standards through security health-check assessments.

### **Reliance on third parties**

A number of the operational systems and services on which CRND relies are provided or supported by third party suppliers.

To mitigate the risk of failure of a key third party supplier the DMO undertakes regular corporate risk assessments of each key supplier to assess a range of factors including its financial strength and operational capacity, including the reliance on sub-contractors. The DMO has dedicated contract owners who meet regularly with key suppliers and monitor performance against the agreed Service Level Agreements, where appropriate. The procurement manager and the vendor management group have been working to embed consistent standards of supplier management across account managers by improving visibility of key contracts and sharing best practice.

### **Transaction processing**

CRND relies on its operational processes to successfully execute a significant number of high value transactions on a daily basis. Reliance on the

A key component of CRND's control framework is the segregation of duties to ensure independent checking and reconciliation, and to avoid



accurate execution of processes exposes CRND to operational risk arising from process breakdowns and human error.

concentration of key activities or related controls in individuals or small groups of staff. In particular, segregation of duties takes place between front and back office activities.

All teams, including CRND, have documented procedures for their main activities and there are clearly defined authorisation levels for committing the DMO externally.

The RMU conduct regular control and compliance testing of CRND activities, providing the executive sub-committee of the Board with assurance on the effectiveness of operational controls and compliance with relevant Financial Conduct Authority and Prudential Regulation Authority rules in the dealing and settlement areas.

The DMO also maintains a strong audit and control environment which includes a well embedded incident reporting procedure which extends to cover CRND. This promotes the early identification and resolution of risk incidents and provides visibility to the DMO Accounting Officer and Board.

### **Hybrid working**

In light of COVID-19, a change in working arrangements could lead to increased operational risks due to the majority of staff working from home.

During the previous year, remote working controls were put in place when hybrid working was urgently implemented in light of COVID-19. Controls continued to be adapted as new working practices evolved to ensure overall control standards were maintained. The robust control framework was reviewed by Internal Audit. The majority of meetings continued to be conducted via secure conference and video calls to ensure governance and communication was maintained. Whilst office based attendance grew, the same monitoring regime for hybrid working arrangements was maintained. Strategic planning continued for hybrid working to develop a long-term view of working practices and associated controls.

An independent external review confirmed the existing control framework as robust.

## People risk

The DMO, including CRND, relies on maintaining a sufficiently skilled workforce at all levels of the organisation in order to operate effectively and efficiently, ensuring delivery of its strategic objectives.

The DMO is exposed to an increased risk of operational failure if it is unable to compete for, and retain, sufficiently skilled staff over time. Competition for skilled staff is generally against employers from the private financial services sector who have historically offered higher remuneration packages that are not subject to public sector remuneration policies.

DMO recruitment policies help ensure that individuals with the appropriate level of skill and experience are appointed at all levels within the organisation. This helps mitigate the level of human error which could result in process failures.

The DMO's Training and Development policy is designed to help ensure that staff have the right skills to meet its objectives.

The DMO follows the Civil Service Commission's recruitment principles and selection process to ensure vacancies are filled on merit on the basis of fair and open competition.

The DMO has a formal performance appraisal process and all staff are given clear and achievable objectives. Staff are encouraged to engage in activities which promote development and the DMO provides regular training opportunities and support for professional studies to enhance the skills base of its employees. The DMO also provides cross-training for different roles to help improve staffing flexibility and reduce turnover pressure.

Salaries are benchmarked annually to equivalent private sector pay levels in order to keep management aware of any significant disparities that are developing. The DMO has a policy to recognise those staff who have performed well in their roles through the payment of one-off non-consolidated performance related awards. Any awards are assessed annually by the DMO Performance Review Team. They are determined by individual performance and criteria associated with the DMO's performance management process, which are also aligned to the policy for public sector pay.

A Staff Council has met regularly throughout the year and enabled an open exchange of ideas and views between management and staff representatives. This has been an effective conduit for wider communication and consultation with all staff.

On an annual basis all DMO staff are given the opportunity to take part in the Civil Service People survey. Any issues raised via this route, with suggested mitigating action if required, are considered by the DMO Accounting Officer and the Board.

The DMO is a disability confident employer.

## **Review of effectiveness**

I have reviewed the effectiveness of the system of internal control and confirm that an ongoing process designed to identify, evaluate and prioritise risks to the achievement of CRND's aims and objectives has been in place throughout 2022. This review included an assessment of any material risk and control issues identified and reported during the relevant period.

My review has been informed by the advice of the risk committees, the work of the internal auditors and the executive managers within the DMO, who have been delegated responsibility for the development and maintenance of the internal control framework. Comments made by the external auditors in their management letter and other relevant reports have also informed this review.

In my role as Secretary and Comptroller General I have been advised on the implications of the result of my review, of the effectiveness of the system of internal control by the Board and the Audit and Risk Committee.

In 2022, no ministerial directions were given and no material conflicts of interest have been noted by the Board or Audit and Risk Committee members in the Register of Interests.

In my opinion, CRND's system of internal control was effective throughout the financial year and remains so on the date I sign this statement.

### **Jo Whelan**

Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt  
22 March 2023

# Independent Auditor's report to the Commissioners for the Reduction of the National Debt

## Opinion on financial statements

I have audited the financial statements of the Government Annuities Investment Fund for the year ended 31 December 2022.

The financial statements comprise the Receipts and Payments, the Statement of Balances, the Statement of Activity and the related notes.

The financial reporting framework that has been applied in the preparation of the financial statements is applicable law and international accounting standards as interpreted by HM Treasury's Government Financial Reporting Manual.

In my opinion, the financial statements:

- properly present the Government Annuities Investment Fund's receipts and payments for the year ended 31 December 2022; and
- have been properly prepared in accordance with the Government Annuities Act 1929.

## Opinion on regularity

In my opinion, in all material respects, the receipts and payments recorded in the financial statements have been applied to the purposes intended by Parliament 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 (UK) (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 my report.

Those standards require me and my staff to comply with the Financial Reporting Council's *Revised Ethical Standard 2019*. I have also elected to apply the ethical standards relevant to listed entities. I am independent of the Government Annuities Investment Fund in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK. My staff and I have fulfilled our other ethical responsibilities in accordance with these requirements.

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

## Conclusions relating to going concern

In auditing the financial statements, I have concluded that the Government Annuities Investment Fund'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 Government Annuities Investment Fund's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

My responsibilities and the responsibilities of the Secretary and Comptroller General with respect to going concern are described in the relevant sections of this report.

The going concern basis of accounting for the Government Annuities Investment Fund is adopted in consideration of the requirements set out in HM Treasury's Government Financial 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.

## **Other information**

The other information comprises information included in the Annual Report, but does not include the financial statements nor my auditor's report thereafter. The Secretary and Comptroller General is responsible for the other information.

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.

In connection with my audit of the financial statements, 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 information given in the Foreword, Statement of Secretary and Comptroller General's Responsibilities and Governance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and is in accordance with the applicable legal requirements.

## **Matters on which I report by exception**

In light of the knowledge and understanding of the Government Annuities Investment Fund and its environment obtained in the course of the audit, I have not identified material misstatements in the Foreword, Statement of Secretary and Comptroller General's Responsibilities or Governance Statement.

I have nothing to report in respect of the following matters which I report to you if, in my opinion:

- I have not received all of the information and explanations I require for my audit; or
- adequate accounting records have not been kept by the Government Annuities Investment Fund or returns adequate for my audit have not been received from branches not visited by my staff; or
- the financial statements are not in agreement with the accounting records and returns; or
- the Governance Statement does not reflect compliance with HM Treasury's guidance.

## **Respective responsibilities of the Commissioners for the Reduction of the National Debt and the Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt for the financial statements**

As explained more fully in the Statement of Secretary and Comptroller General's Responsibilities, the Commissioners for the Reduction of the National Debt have appointed the Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt to discharge the responsibilities as Accounting Officer. They are responsible for:

- maintaining proper accounting records;
- ensuring that the financial statements, Foreword and Statement of Secretary and Comptroller General's Responsibilities are properly presented in accordance with the applicable financial reporting framework;
- ensuring that the Foreword and Statement of Secretary and Comptroller General's Responsibilities and accounts as a whole is fair, balanced and understandable;
- internal controls as the Secretary and Comptroller General determines is necessary to enable the preparation of financial statement to be free from material misstatement, whether due to fraud or error; and
- assessing the Government Annuities Investment Fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Secretary and Comptroller General anticipates that the services provided by the Government Annuities Investment Fund will not continue to be provided in the future.

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

My responsibility is to audit and express an opinion on the financial statements.

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 report 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.

### ***Extent to which the audit was considered capable of detecting non-compliance with laws and regulations including fraud***

I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of non-compliance with laws and regulations, including fraud. The extent to which my procedures are capable of detecting non-compliance with laws and regulations, including fraud is detailed below.

### ***Identifying and assessing potential risks related to non-compliance with laws and regulations, including fraud***

In identifying and assessing risks of material misstatement in respect of non-compliance with laws and regulations, including fraud, we considered the following:

- the nature of the sector, control environment and operational performance including the design of the Government Annuities Investment Fund's accounting policies.

- Inquiring of management, the Commissioners for the Reduction of the National Debt's head of internal audit and those charged with governance, including obtaining and reviewing supporting documentation relating to the Government Annuities Investment Fund's policies and procedures relating to:
  - identifying, evaluating and complying with laws and regulations and whether they were aware of any instances of non-compliance;
  - detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected or alleged fraud; and
  - the internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations including the Government Annuities Investment Fund's controls relating to the Government Annuities Investment Fund's compliance with the Government Annuities Act 1929 and Managing Public Money;
- discussing among the engagement team regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.

As a result of these procedures, I considered the opportunities and incentives that may exist within the Government Annuities Investment Fund for fraud and identified the greatest potential for fraud in the following areas: revenue recognition, posting of unusual journals, and complex transactions. In common with all audits under ISAs (UK), I am also required to perform specific procedures to respond to the risk of management override of controls.

I also obtained an understanding of the Government Annuities Investment Fund's framework of authority as well as other legal and regulatory frameworks in which the Government Annuities Investment Fund operates, focusing on those laws and regulations that had a direct effect on material amounts and disclosures in the financial statements or that had a fundamental effect on the operations of the Government Annuities Investment Fund. The key laws and regulations I considered in this context included Government Annuities Act 1929 and Managing Public Money.

### ***Audit response to identified risk***

As a result of performing the above, the procedures I implemented to respond to identified risks included the following:

- reviewing the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described above as having direct effect on the financial statements;
- enquiring of management and the Audit and Risk Committee concerning actual and potential litigation and claims;
- reading and reviewing minutes of meetings of those charged with governance and the Board and internal audit reports;
- in addressing the risk of fraud through management override of controls, testing the appropriateness of journal entries and other adjustments and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

I also communicated relevant identified laws and regulations and potential fraud risks to all engagement team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

A further description of my responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of my report.

***Other auditor's responsibilities***

I am required to obtain evidence sufficient to give reasonable assurance that the receipts and payments reported in the financial statements have been applied to the purposes intended by Parliament and the financial transactions conform to the authorities which govern them

I communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that I identify during my audit.

**Report**

I have no observations to make on these financial statements.

**James Edmands**

**For and on behalf of the Comptroller and Auditor General**

23 March 2023

National Audit Office  
157-197 Buckingham Palace Road  
Victoria  
London  
SW1W 9SP



## Accounts of the Government Annuities Investment Fund

### Receipts and Payments

For the year ended 31 December 2022

	2022 £	2021 £
<b>Cash receipts</b>		
From the Consolidated Fund	180	180
<b>Cash payments</b>		
Expenses	180	180
<hr/>		
<b>Excess of receipts over payments</b>	-	-
<hr/>		

### Statement of balances

There were no assets or liabilities at 31 December 2022 or 31 December 2021.

**Statement of activity**

For the year ended 31 December 2022

	<b>Number</b>	<b>Amount £</b>
<b>Payments made on contracts</b>		
Deferred annuities	-	-
Insurances	-	-
<b>New contracts entered into</b>		
Deferred annuities	-	-
Insurances	-	-
<b>Current contracts at the end of the year</b>		
Deferred annuities	-	-
Insurances	166	3,614
	<b>166</b>	<b>3,614</b>

The following information is given in accordance with the Act.

The premiums charged for annuities and insurances were calculated on the below basis:

Interest            2½% per annum, except for deferred annuities granted by the Commissioners for the Reduction of the National Debt under the Government Annuities Act 1929, in which case the rate depended upon the price of the public funds on the date the annuity was purchased.

Mortality

Deferred annuities      Table as set out in Parliamentary Paper No. 8 of 1884.

Insurances                Mortality of healthy males insured with life insurance companies as shown in the table published by the Institute of Actuaries in 1872.

**Jo Whelan**

Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt  
22 March 2023

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