



Administered by  
**Tameside**  
Metropolitan Borough

# DRAFT

## GMPF 2022 Annual Report



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**Tameside**  
Metropolitan Borough



# Annual Report 2022

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# Annual Report 2022

## Chair's Introduction

Welcome to the 2020/21 Annual Report of the Greater Manchester Pension Fund (GMPF).

This report has been written at a time when the country, and indeed the world, continues to grapple with the coronavirus pandemic. What is very different to last year is that the success of the vaccine roll out by the NHS gives real hope of an end in sight. Nevertheless, it has been an exceptionally difficult year for all, which has seen an outstanding contribution by many key workers to the well-being of the nation. Therefore, I want to take this opportunity to repeat the message of last year and pay tribute to the men and women on the frontline of this struggle. This includes the NHS workers and support staff working in our hospitals and all care settings across the country that have treated the sick, saved lives and provided comfort to those who, unfortunately, could not be saved. It includes the too often unseen army of carers in our care homes, the charity workers and those who are looking after, or informally keeping an eye on, those in our local communities. We also must recognise those workers who have kept the daily services we all depend on running - the supermarket employees, delivery drivers, technicians, cleaners and public servants. Never has the phrase 'key workers' been truer. As last year, a massive thank you must also go out to every single person who has stayed home to help stop this terrible virus from spreading. You have helped protect the NHS and you have helped to save lives.

The past 18 months have been an exceptional time for all of us. We have experienced challenges in our day to day lives that were unforeseeable, testing our resolve and those of our families. However, I hope that after 480 days of lockdown, we will all emerge from this experience stronger and more certain of our resilience. Recent events in cities around the world have taught us that humanity, tolerance and inclusion are vital if we are to create a society we want to live in.

GMPF has shown resilience in the face of the challenge of the pandemic, much of the work of the Pension Fund continues in the home and the virtual world. Services have been maintained for all our stakeholders with these new methods. The changes put in place in the spring of 2020 have served us well through the financial year. When we look back at the risks and the worse possible scenarios that we faced at that dark time and compare to the out-turn, the mitigations put in place have worked.

I am pleased to note that we continue to strengthen the abilities and capacity of GMPF, which has been externally recognised with Room 151 short listing us for Impact Investment of the Year and Pension Age - which cover both private and public pension schemes - nominating us in three categories for their annual Pension Awards;

- Defined Benefit Scheme of the Year
- Pension Scheme Communication Award
- Pension Administration Award.

This is a great achievement and testament to GMPF and only serves to remind us how important it is that during uncertain times we can be relied upon to deliver our pension promises.

Our Investment Strategy, like our staff, has remained resilient despite market headwinds. The past financial year was successful for investments both in absolute and relative terms. We are long-term in our approach and the more pleasing results is that long term returns continue to outperform our liabilities and the peer group of local authority pension funds over the long term which is reflected in our strong funding position.

Period	Main Fund return % pa	Benchmark return % pa
2020/21	22.2%	18.7%
5 years	9.2%	8.7%
10 years	8.0%	7.7%
25 years	7.7%	7.3%

Local Government Pension Scheme (LGPS) pooling continues to be an important priority alongside the sector leading work on infrastructure investment and ESG. Northern LGPS can be accurately described as leading amongst LGPS pools in achieving value for money. The most recent benchmarking exercise placed the Northern LGPS costs around the lowest 25% of its international peer group (which consists of 21 global pension funds ranging from £12.7 billion to £90.7 billion). This is a tremendous result which shows the value that economies of scale and a consistency of approach can deliver.

As was expected, Responsible Investment and Environmental Social and Governance continues to be regular and high priority issue for us. The future is uncertain, yet from that uncertainty has arisen greater clarity: that short term demands for stimulus measures arising from Covid-19 must align with the long term imperative of transitioning to a net zero carbon economy the world over.

The truth is that the pandemic does not make the urgency of addressing climate change any less critical or its potential impact less catastrophic. It is in fact a reminder of the need to build systems for resilience and inclusion in order to mitigate the impacts of future shocks, many of which we predict will be environmental and social in nature.

Now more than ever we need examples of what can work: financial solutions that generate acceptable, risk-adjusted returns; investable policy pathways that are also informed by finance practitioners; and definitions, data and analysis that support financial innovation – all focused on deploying capital where it is needed in the real economy.

Our vision is of a greener future made possible by finance, a society transformed through better investment – and we recognise that the finance sector can only unlock the funding for the transformation of the global economy through collaboration that we can hope to solve our global challenges.

At a high level, through our partnerships and collaborations, we lobby and engage with policy makers, regulators, stakeholders and companies. We added our voice to those of hundreds of other major global investors on the need for a green and sustainable recovery to the pandemic, recognising the need to Build Back Better.

GMPF committed before any GM Authority to achieving net zero carbon emission by 2050 at the latest, in line with the Paris Agreement. We further confirmed in October last year that we were exploring a 2030 target in line with the IPCC's 1.5-degree pathway.

As a Net Zero Asset Owner we are committed to setting objectives and targets, including an interim target for 2030 or sooner and we are currently working within the recently launched Net Zero Investor Framework to do this and look forward to sharing in due course. Richard Curtis, co-founder of Make My Money Matter, said: 'It's exciting to see one of Britain's largest public pension funds working to tackle the climate emergency, commit to partnering with Make My Money Matter to push this vital agenda forward.'

GMPF is one of the first LGPS funds to complete the reporting for the new UK Stewardship Code, co-signing the 2021 Global Investor Statement to Governments on the Climate Crisis, and providing evidence to the All-Party Parliamentary Group for Local Authority Pensions Funds in regards to their inquiry into 'Responsible Investment for a Just Transition'.

We gave our support to the 'Say on Climate' initiative created by Sir Christopher Hohn founder of the Children's Investment Fund Foundation. The initiative encourages all listed companies to develop a climate transition plan and put it to a shareholder vote at their AGM. At the time of writing, 15 companies have had a climate transition plan related vote included in their most recent AGM and all have passed to date with GMPF having a holding in ten of these companies.

GMPF must continue to transition towards a net zero carbon position, whilst ensuring that we uphold our promises to members and taxpayers, with all possible expediency. We believe that using our financial and shareholder power to pick up the mantle of leadership, and rejecting the surrender of agency that divestment will bring, is a better way to drive dramatic and lasting change.



GMPF co-signed the 2021 Global Investor Statement to Governments on the Climate Crisis coordinated by the Institutional Investors Group on Climate Change, which asks governments to raise their climate ambition and implement robust policies by COP26 in November. GMPF has called upon Government to undertake the following five actions urgently:

- Strengthen Nationally Determined Contributions for 2030 in line with limiting warming to 1.5°C.
- Commit to a mid-century net zero emissions target with clear sectoral decarbonisation roadmaps.
- Ensure ambitious pre-2030 policy action including strengthened carbon pricing, phasing out fossil fuel subsidies and thermal coal-based power, avoiding new carbon-intensive infrastructure (no new coal power plants) and developing just transition plans.
- Ensure Covid-19 economic recovery plans support the transition to net zero emissions.
- Commit to implementing mandatory climate risk disclosure requirements.

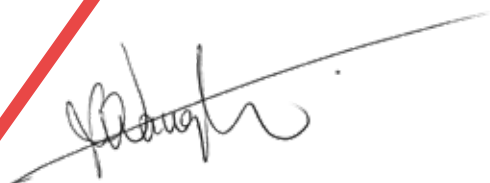
Environmental issues are right at the top of our agenda. But we also want to raise awareness of social issues. With our industrial heritage, we know from previous energy transitions the impact on our communities. That's why we want the transition to a low carbon economy to be a just transition, creating decent jobs and not neglecting the most vulnerable parts of our society, here in Greater Manchester, and also where we invest across the world.

GMPF has used its position on the Executive of the Local Authority Pension Fund Forum, a collaboration of over 80 local authority pension funds representing over £200 billion of assets, to challenge companies in which we have an interest on not just Climate Change, but on a wide variety of other concerns such as working conditions and human rights.

The Good Economy Project, Impact Investing Institute and Pensions for Purpose joint report on place-based impact investing that can mobilise capital to help build back better and level up the UK found that GMPF is the only LGPS fund to have an approved allocation to invest some of its assets locally to achieve this.

Since the beginnings of the Fund in 1891, and as we celebrate 100 years as a statutory Fund - we have successfully navigated stormy global financial crashes and other geopolitical challenges spanning over three very different centuries by staying true to our beliefs and public sector principles. We have never let our members down whilst ensuring low cost, sustainable contribution rates for employers and taxpayers alike, and we have no intention of starting now.

Whatever challenges and opportunities the next twelve months bring, know that GMPF will remain at its members side as we face the future together.

Greater Manchester Pension Fund (Chair)  
Cllr Brenda Warrington

# Annual Report 2022

## Management structure

Tameside Metropolitan Borough Council (TMBC) became Greater Manchester Pension Fund's (GMPF) administering authority in 1987, and established a management structure, which is still the backbone of the operation today.

### Pension Fund Management Panel

The Management Panel carries out a similar role to the trustees of a pension scheme. They are the key decision makers for:

- investment strategy
- monitoring investment activity and performance
- overseeing administrative activities
- guidance to officers in exercising delegated powers.

Each local authority within Greater Manchester is represented on the Management Panel, as is the Ministry of Justice.

### Pension Fund Advisory Panel

The Pension Fund Advisory Panel works closely with the Management Panel and advises them in all areas. Each local authority is represented on the Advisory Panel, and there are six employee representatives nominated by the North West TUC.

The members of the Panels as at 31 March 2022 are listed on the following page.

### Local Board

The GMPF Local Pensions Board was established early in 2015 and became operational from April 2015. The role of the Local Board is to assist TMBC in its role as administering authority, in particular, to assist with:

- securing compliance with the Regulations, any other legislation relating to the governance and administration of the Scheme, and requirements imposed by the Pensions Regulator in relation to the Scheme; and
- ensuring the effective and efficient governance and administration of the Scheme.

### External advisors

Three external advisors assist the Advisory Panel, regarding investment related issues.

The advisors are:

**RS Bowie**, Guardian Partner, Hymans Robertson

**P Moizer**, Professor and Dean of Business School, University of Leeds

**M Powers**, Retired Investment Manager

## Management Panel

Councillor B Warrington	<i>Tameside (Chair)</i>
Councillor M Smith	<i>Tameside</i>
Councillor GP Cooney	<i>Tameside</i>
Councillor J Naylor <i>(until 05.10.21)</i>	<i>Tameside</i>
Councillor G Newton	<i>Tameside</i>
Councillor T Sharif	<i>Tameside</i>
Councillor VP Ricci	<i>Tameside</i>
Councillor E Wills	<i>Tameside</i>
Councillor J Homer	<i>Tameside</i>
Councillor D Ward	<i>Tameside</i>
Councillor C Patrick	<i>Tameside</i>
Councillor J Taylor	<i>Stockport</i>
Councillor P Joinson	<i>Rochdale</i>
Councillor J Grimshaw	<i>Bury</i>
Councillor M Barnes	<i>Salford</i>
Councillor K Cunliffe	<i>Wigan</i>
Councillor A Jabbar	<i>Oldham</i>
Councillor A Mitchell	<i>Trafford</i>
Councillor Samantha Connor <i>(until 22.11.21)</i>	<i>Bolton</i>
Councillor Stuart Hartigan <i>(from 22.11.21)</i>	<i>Bolton</i>
Councillor P Andrews	<i>Manchester</i>
P Herbert	<i>Ministry of Justice</i>

## Fund Observers

Councillor JN Pantall
Councillor O Ryan

## Advisory Panel

Councillor B Warrington	<i>Tameside (Chair)</i>
Councillor Samantha Connor <i>(until 22.11.21)</i>	<i>Bolton</i>
Councillor Stuart Hartigan <i>(from 22.11.21)</i>	<i>Bolton</i>
Councillor J Grimshaw	<i>Bury</i>
Councillor P Andrews	<i>Manchester</i>
Councillor A Jabbar	<i>Oldham</i>
Councillor P Joinson	<i>Rochdale</i>
Councillor M Barnes	<i>Salford</i>
Councillor J Taylor	<i>Stockport</i>
Councillor A Mitchell	<i>Trafford</i>
Councillor K Cunliffe	<i>Wigan</i>

### Employee representatives

A Flatley	<i>GMB</i>
M Fulham <i>(until 30.11.21)</i>	<i>UNISON</i>
G Blackburn <i>(from 30.11.21)</i>	<i>UNISON</i>
S Caplan <i>(from 10.08.21)</i>	<i>UNISON</i>
K Drury	<i>UNITE</i>
F Llewellyn	<i>UNITE</i>
J Thompson	<i>UNITE</i>

## Local Board

### Employer representatives

Councillor W Fairfoull	<i>Tameside (Chair)</i>
Councillor J Naylor <i>(from 05.10.21)</i>	<i>Tameside</i>
J Hammond	Representative of GM Monitoring Officers
M Cullen	Representative of GM Treasurers
P Taylor	Representative of non-local authority employers

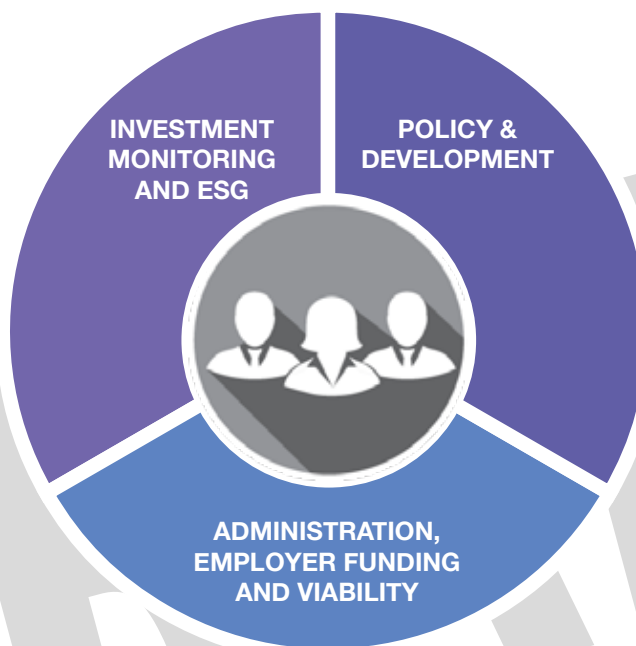
### Scheme Member representatives

D Schofield	<i>GMB</i>
C Lloyd	<i>UNISON</i>
M Rayner	<i>UNISON</i>
C Goodwin	<i>UNITE</i>
P Catterall	Pensioner representative

## Working Groups

GMPF has three permanent working groups which consider particular areas of its activities and make recommendations to the Management Panel. Activities include overall governance, investment monitoring, administration, funding, viability and risk considerations.

- Policy and Development
- Investment Monitoring and Environmental, Social and Governance (ESG)
- Administration, Employer Funding and Viability



## Frequency of meetings

The Panels and working groups typically meet quarterly, where the performance of GMPF's active investment managers is reviewed. Managers attend the Investment Monitoring and ESG working group annually to report on corporate governance and responsible investment matters.

## Officers to GMPF 2021/2022

The Director of Governance and Pensions is GMPF's administrator and acts as the link for members, advisors and investment managers between meetings.

The Chief Executive and the Director of Governance and Pensions provide legal and secretarial services to the Management and Advisory Panels. The Section 151 Officer, TMBC, is responsible for the preparation of GMPF's Statement of Accounts.

S Pleasant MBE	<i>Chief Executive, (Head of Paid Service), Tameside MBC</i>
SJ Stewart	<i>Director of Governance and Pensions and Solicitor to the Fund, Section 5 Monitoring Officer, Tameside MBC</i>
K Roe	<i>Director of Finance, GMPF's Section 151 Officer to the Fund during the period of completion of the accounts, Tameside MBC</i>

## Consulting Actuary

GMPF's Consulting Actuary is Hymans Robertson.



# Annual Report 2022

## Attendance and training 2021/22

The following section shows attendance at the various Management Panel and working group meetings and includes a list of training events and conferences attended.

Attendance at meetings				
	Pension Fund Management Panel	Working Groups		
Councillor B Warrington (Tameside MBC)	16 July 2021 17 September 2021 10 December 2021 18 March 2022	Policy and Development 24 June 2021 2 September 2021 25 November 2021 3 March 2022		
Councillor G Cooney (Tameside MBC)	16 July 2021 17 September 2021 10 December 2021 18 March 2022	Policy and Development 24 June 2021 2 September 2021 25 November 2021 3 March 2022	Administration and Employer Funding Viability 16 April 2021 30 July 2021 1 October 2021 21 January 2022	Investment Monitoring and ESG 16 April 2021 30 July 2021 1 October 2021 21 January 2022
Councillor J Naylor <sup>1</sup> (Tameside MBC)	16 July 2021			
Councillor J Homer (Tameside MBC)		Investment Monitoring and ESG 16 April 2021		
Councillor G Newton (Tameside MBC)	16 July 2021 17 September 2021	Investment Monitoring and ESG 16 April 2021 1 October 2021		
Councillor C Patrick (Tameside MBC)	16 July 2021 10 December 2021 18 March 2022	Administration and Employer Funding Viability 16 April 2021 30 July 2021 1 October 2021 21 January 2022		
Councillor VP Ricci (Tameside MBC)	16 July 2021 17 September 2021 18 March 2022	Administration and Employer Funding Viability 30 July 2021 1 October 2021 21 January 2022	Investment Monitoring and ESG 30 July 2021 1 October 2021 21 January 2022	
Councillor T Sharif (Tameside MBC)	16 July 2021 17 September 2021 10 December 2021 18 March 2022	Administration and Employer Funding Viability 16 April 2021 30 July 2021 1 October 2021 21 January 2022		
Councillor M Smith (Tameside MBC)	16 July 2021 17 September 2021 10 December 2021 18 March 2022	Policy and Development 24 June 2021 2 September 2021 25 November 2021 3 March 2022	Administration and Employer Funding Viability 16 April 2021 30 July 2021 1 October 2021 21 January 2022	Investment Monitoring and ESG 16 April 2021 30 July 2021 1 October 2021 21 January 2022
Councillor D Ward (Tameside MBC)	16 July 2021 17 September 2021 10 December 2021 18 March 2022	Investment Monitoring and ESG 16 April 2021 30 July 2021 1 October 2021 21 January 2022		
Councillor E Wills (Tameside MBC)	16 July 2021 17 September 2021 10 December 2021 18 March 2022	Administration and Employer Funding Viability 16 April 2021 30 July 2021 1 October 2021 21 January 2022		
Councillor S Connor <sup>2</sup> (Bolton MBC)	16 July 2021			
Councillor S Hartigan <sup>3</sup> (Bolton MBC)	10 December 2021 18 March 2022	Administration and Employer Funding Viability 21 January 2022		
Councillor J Grimshaw (Bury MBC)	16 July 2021 17 September 2021 10 December 2021 18 March 2022	Administration and Employer Funding Viability 16 April 2021 30 July 2021 1 October 2021 21 January 2022		

	Pension Fund Management Panel	Working Groups	
Councillor P Andrews (Manchester CC)	17 September 2021 10 December 2021 18 March 2022	Administration and Employer Funding Viability 16 April 2021 30 July 2021 1 October 2021	Investment Monitoring and ESG 16 April 2021
Councillor A Jabbar (Oldham MBC)	16 July 2021 17 September 2021 10 December 2021 18 March 2022	Administration and Employer Funding Viability 30 July 2021 1 October 2021 21 January 2022	Investment Monitoring and ESG 30 July 2021 1 October 2021 21 January 2022
Councillor P Joinson (Rochdale MBC)	16 July 2021 17 September 2021 10 December 2021 18 March 2022	Administration and Employer Funding Viability 30 July 2021 1 October 2021 21 January 2022	Investment Monitoring and ESG 30 July 2021 1 October 2021 21 January 2022
Councillor M Barnes (Salford CC)	16 July 2021 18 March 2022		
Councillor J Taylor (Stockport MBC)	16 July 2021 17 September 2021 10 December 2021 18 March 2022	Investment Monitoring and ESG 16 April 2021 30 July 2021 1 October 2021 21 January 2022	
Councillor A Mitchell (Trafford MBC)	16 July 2021 17 September 2021 10 December 2021	Administration and Employer Funding Viability 16 April 2021 30 July 2021 1 October 2021 21 January 2022	Investment Monitoring and ESG 16 April 2021 30 July 2021 1 October 2021 21 January 2022
Councillor K Cunliffe (Wigan MBC)	16 July 2021 10 December 2021 18 March 2022	Administration and Employer Funding Viability 1 October 2021 21 January 2022	
P Herbert (Ministry of Justice Representative)	16 July 2021 17 September 2021 10 December 2021 18 March 2022		
A Flatley (GMB)	17 September 2021 18 March 2022	Administration and Employer Funding Viability 16 April 2021	Investment Monitoring and ESG 16 April 2021
M Fulham <sup>4</sup> (UNISON)	16 July 2021 17 September 2021	Investment Monitoring and ESG 16 April 2021	
G Blackburn <sup>5</sup> (UNISON)	10 December 2021 18 March 2022	Administration and Employer Funding Viability 21 January 2022	
S Caplan <sup>6</sup> (UNISON)	17 September 2021 18 March 2022	Investment Monitoring and ESG 1 October 2021 21 January 2022	
K Drury (UNITE)	16 July 2021 17 September 2021 18 March 2022	Administration and Employer Funding Viability 16 April 2021 21 January 2022	Investment Monitoring and ESG 16 April 2021 1 October 2021 21 January 2022
F Llewellyn (UNITE)	16 July 2021 18 March 2022	Administration and Employer Funding Viability 16 April 2021 30 July 2021 1 October 2021 21 January 2022	Investment Monitoring and ESG 16 April 2021 30 July 2021 1 October 2021 21 January 2022
J Thompson (UNITE)	17 September 2021 10 December 2021	Policy and Development 24 June 2021 2 September 2021 25 November 2021 3 March 2022	
JN Pantall (Observer)	16 July 2021 17 September 2021 10 December 2021 18 March 2022	Policy and Development 24 June 2021 2 September 2021 25 November 2021 3 March 2022	Investment Monitoring and ESG 16 April 2021 30 July 2021 1 October 2021
Councillor O Ryan (Observer - Tameside MBC)	18 March 2022		

#### Notes

<sup>1</sup> Left Management Panel prior to September 2021 meeting to join the Local Pension Board

<sup>2</sup> Left Management Panel prior to December 2021 meeting

<sup>3</sup> Joined Management Panel from December 2021 meeting

<sup>4</sup> Left Management Panel prior to December 2021 meeting

<sup>5</sup> Joined Management Panel from December 2021 meeting

<sup>6</sup> Joined Management Panel from September 2021 meeting

## Conferences and training events

Member name	Training events attended			
Councillor B Warrington (Tameside MBC)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022		
Councillor GP Cooney (Tameside MBC)	LGPS Performance Update 16 July 2021	PIRC: How workers and companies are responding to the economy-wide labour shortage crisis 29 November 2021	LAPFF: 'Say on Climate' Seminar 23 February 2022	UBS Introduction to UK Equity Value 18 March 2022
Councillor J Naylor (Tameside MBC) <sup>1</sup>	LGPS Performance Update 16 July 2021	LGE Fundamentals Training Day 1 21 October 2021	LGE Fundamentals Training Day 3 8 December 2021	
Councillor G Newton (Tameside MBC)	LGPS Performance Update 16 July 2021			
Councillor C Patrick (Tameside MBC)	LGPS Performance Update 16 July 2021	FTSE Russell Webinar: Transition Pathway Initiative: State of Transition Summit 2021 13 April 2021	UBS Introduction to UK Equity Value 18 March 2022	
Councillor VP Ricci (Tameside MBC)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022		
Councillor T Sharif (Tameside MBC)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022		
Councillor M Smith (Tameside MBC)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022		
Councillor D Ward (Tameside MBC)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022		
Councillor E Wills (Tameside MBC)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022		
Councillor S Connor (Bolton MBC) <sup>2</sup>	LGPS Performance Update 16 July 2021			
Councillor S Hartigan (Bolton MBC) <sup>3</sup>	UBS Introduction to UK Equity Value 18 March 2022			
Councillor J Grimshaw (Bury MBC)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022		
Councillor P Andrews (Manchester CC)	PRI Digital Forum: Climate & Nature Action Webinar Joining the dots: investor action on climate and nature 11 May 2021	PRI Digital Forum: Climate & Nature Action Webinar Climate policy and net zero: the road to COP26 27 May 2021	UBS Introduction to UK Equity Value 18 March 2022	
Councillor A Jabbar (Oldham MBC)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022		
Councillor P Joinson (Rochdale MBC)	LGPS Performance Update 16 July 2021	LGE Fundamentals Training Day 1 21 October 2021	LGE Fundamentals Training Day 3 8 December 2021	UBS Introduction to UK Equity Value 18 March 2022

Member name	Training events attended				
Councillor M Barnes (Salford CC)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022			
Councillor J Taylor (Stockport MBC)	FTSE Russell Webinar - Transition Pathway Initiative: State of Transition Summit 2021 13 April 2021	PRI Digital Forum: Climate & Nature Action Webinar Joining the dots: investor action on climate and nature 11 May 2021	PRI Digital Forum: Climate & Nature Action Webinar Biodiversity Natural capital: mapping depletion 13 May 2021	PLSA Local Authority Conference – Virtual 18-19 May 2021	PRI Digital Forum: Climate & Nature Action Webinar Deforestation as a systemic risk 20 May 2021
	PRI Digital Forum: Climate & Nature Action Webinar Delivering net zero emissions in Japan 25 May 2021	PRI Digital Forum: Climate & Nature Action Webinar Climate policy and net zero: the road to COP26 27 May 2021	LGPS Performance Update 16 July 2021	PIRC webinar - How workers and companies are responding to the economy-wide labour shortage crisis 29 November 2021	
Councillor J Taylor (Stockport MBC)	UBS Introduction to UK Equity Value 18 March 2022	Hymans LGPS Online Training: Module 1 - An introduction to the LGPS			
Councillor A Mitchell (Trafford MBC)	LGPS Performance Update 16 July 2021				
Councillor K Cunliffe (Wigan MBC)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022			
P Herbert (Ministry of Justice Representative)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022	Hymans LGPS Online Training: Module 1 - An introduction to the LGPS	Hymans LGPS Online Training: Module 2 - LGPS Governance & Oversight Bodies	
A Flatley (GMB)	PIRC: How workers and companies are responding to the economy-wide labour shortage crisis 29 November 2021	UBS Introduction to UK Equity Value 18 March 2022			
M Fulham (UNISON) <sup>4</sup>	LGPS Performance Update 16 July 2021	PRI Digital Forum: Climate & Nature Action Webinar Joining the dots: investor action on climate and nature 11 May 2021			
G Blackburn (UNISON) <sup>5</sup>	UBS Introduction to UK Equity Value 18 March 2022	Hymans LGPS Online Training: Module 1 - An introduction to the LGPS			
S Caplan (UNISON) <sup>6</sup>	LGE Fundamentals Training Day 1 21 October 2021	LGE Fundamentals Training Day 2 18 November 2021	PIRC webinar - How workers and companies are responding to the economy-wide labour shortage crisis 29 November 2021	LGE Fundamentals Training Day 3 8 December 2021	LAPFF 'Say on Climate' Seminar 23 February 2022
	UBS Introduction to UK Equity Value 18 March 2022	Hymans LGPS Online Training: Module 1 - An introduction to the LGPS			
K Drury (UNITE)	LGPS Performance Update 16 July 2021	UBS Introduction to UK Equity Value 18 March 2022			
F Llewellyn (UNITE)	LGPS Performance Update 16 July 2021	LAPFF Annual Conference – Bournemouth 8-10 December 2021	UBS Introduction to UK Equity Value 18 March 2022		
J Thompson (UNITE)	Hymans LGPS Online Training: Module 1 - An introduction to the LGPS	Hymans LGPS Online Training: Module 2 - LGPS Governance & Oversight Bodies	Hymans LGPS Online Training: Module 3 - Administration & Fund Management	Hymans LGPS Online Training: Module 4 - Funding and Actuarial Matters	Hymans LGPS Online Training: Module 5 - Investments
	Hymans LGPS Online Training: Module 6 - Current Issues				



Member name	Training events attended				
JN Pantall (Observer)	FTSE Russell Webinar - Transition Pathway Initiative: State of Transition Summit 2021 13 April 2021	PIRC Conference 'WORK' 5 May 2021	SPS Virtual ESG & Impact Investment Strategies for Pension Funds conference 11 May 2021	LGPS Live Training 2 June 2021	Ambition for Ageing Seminar – Healthy Ageing Research Group 16 June 2021
	P&I Webinar – Ensuring first class care is rewarded in retirement 22 June 2021	Barings Webinar – European Estate Debt: A Compelling Market Opportunity 30 June 2021	PLSA ESG Conference 30 June – 2 July 2021	PIRC Webinar – Equal Pay for Equal Work 13 July 2021	LGPS Performance Update 16 July 2021
	Barings LLC European Real Estate Debt: A Compelling Market Opportunity 30 July 2021	LGC Investment & Pensions Summit 9-10 September 2021	PLSA Annual Conference - Virtual 12-14 October 2021	Barings Webinar - Investing Through Climate Risk 1 December 2021	SPS Annual Bonds Seminar – Virtual 11 January 2022
	Hymans Robertson – Keeping the LGPS Connected 27 January 2022	SPS: Conference on Climate Change – virtual 10 February 2022	LAPFF 'Say on Climate' Seminar 23 February 2022	UBS Introduction to UK Equity Value 18 March 2022	
Councillor O Ryan (Observer - Tameside MBC)	UBS Introduction to UK Equity Value 18 March 2022				

#### Notes

<sup>1</sup> Left Management Panel prior to September 2021 meeting to join the Local Pension Board

<sup>2</sup> Left Management Panel prior to December 2021 meeting

<sup>3</sup> Joined Management Panel from December 2021 meeting

<sup>4</sup> Left Management Panel prior to December 2021 meeting

<sup>5</sup> Joined Management Panel from December 2021 meeting

<sup>6</sup> Joined Management Panel from September 2021 meeting

# Annual Report 2022

## GMPF Local Pension Board

### Report of Councillor Bill Fairfoull, Chair, GMPF Local Pension Board.

The Greater Manchester Pension Fund (GMPF) Local Pension Board (the Board) was established following the 2013 Pensions Act, which required all public sector pension schemes to set up representative local pension boards by 1 April 2015.

The formal remit of local pension boards is to assist the administering authority to secure compliance with all regulations and legislation, and to help ensure the effective and efficient governance and administration of the scheme.

Local pension boards do not have executive powers. We can scrutinise compliance with regulations and call GMPF Officers or the GMPF Management and Advisory Panel to account, but we are not a decision-making body. We aim to focus our discussions on providing scrutiny to the Management Panel's decision-making processes and providing input from a scheme member and employers' perspective.

We ensure compliance with all relevant legislation and regulations. We contribute to the effective and efficient governance and administration of the scheme. We also assist in implementing any new requirements imposed by the Pensions Regulator in relation to the scheme.

We have a duty to report any material breaches of law to the Pensions Regulator, and we have adopted a standardised policy and procedure to deal with these situations should they occur. It's a function we take very seriously to ensure the best standards of administration and governance for GMPF.

### Board membership

The makeup of the Board is determined by Regulation 107(2) of the Act, which states that local pension boards are required to contain an equal number of employer and scheme member representatives. Due to the large number of members and employers participating in GMPF and the scale of assets it holds, we have five scheme representatives and five employer representatives.

The members of the Board at 31 March 2022 and their attendance record at Board meetings during 2021/22 is shown in the table below. We seek to meet on a quarterly basis, however due to scheduling during the meeting cycle, we only met three times during the 2021/22 year.

Local Pension Board Meeting Dates and Attendance			
8 April 2021	29 July 2021	30 September 2021	13 January 2022
Cllr B Fairfoull	Cllr B Fairfoull	Cllr B Fairfoull	Cllr B Fairfoull
J Hammond	Cllr J Naylor*	Cllr J Naylor	Cllr J Naylor
P Taylor	J Hammond	J Hammond	M Rayner
M Cullen	P Taylor	P Taylor	P Taylor
M Rayner	M Rayner	P Catterall	P Catterall
C Goodwin	C Goodwin	C Lloyd	C Lloyd
P Catterall	P Catterall	D Schofield	D Schofield
C Lloyd	C Lloyd	M Cullen	M Cullen
	D Schofield		

\*Cllr J Naylor attended the 29 July 2021 Local Pension Board meeting as an observer before being officially admitted to the Local Pension Board at the following meeting, replacing Cllr J Cooper.

The minutes of meetings, including from previous years, can be found on the [Tameside Metropolitan Borough Council website](#).

The Board has an annual budget of £48,860. During the 2021/22 year, the costs of the Board were £18,560.

## Local Pension Board member development

The Public Service Pensions Act 2013 requires that members of local pension boards have an appropriate level of knowledge and understanding in order to carry out their role. The structure and membership of the Board has been designed to try and ensure there is a broad range of knowledge and experience in all relevant areas.

The Board periodically analyses its level of knowledge and understanding, both on an individual member basis and on a collective basis and training is focused in the areas where improvements can be made to the knowledge and understanding of the Board as a whole.

The table below shows attendance of Board members at training events and conferences over the year. In addition, Board members have completed the Pension Regulator's Public Service Toolkit.

Conferences and Training Events Attendance				
Conference & Training Events	LGPS performance update	LGE fundamentals training day 1	LGE fundamentals training day 3	UBS: Introduction to UK equity value
	16 July 2021	21 October 2021	8 December 2021	18 March 2022
Attendees	Cllr B Fairfoull	Councillor J Naylor	Councillor J Naylor	Cllr B Fairfoull
	Councillor J Naylor			
Conference & Training Events	Hymans Robertson	Hymans Robertson	Hymans Robertson	Local Government Association
*completed August 2021	Keeping the LGPS Connected session 1	Keeping the LGPS Connected session 2	Keeping the LGPS Connected session 3	LGPS Update
	25 February 2021*	1 April 2021*	12 May 2021*	26 January 2021*
Attendees	Mike Cullen	Mike Cullen	Mike Cullen	Mike Cullen

Our actuary, Hymans Robertson, has an online academy for LGPS governing body members. GMPF is subscribed to this service and all GMPF governing body members are encouraged to undertake the learning modules. The table below outlines the completion of these online modules by Local Pension Board members.

LGPS online learning academy modules						
Hymans LGPS online training modules completed	Module 1 - An introduction to the LGPS	Module 2 - LGPS governance & oversight bodies	Module 3 - Administration & Fund management	Module 4 - Funding and actuarial matters	Module 5 - Investments	Module 6 - Current issues
Attendees	J Hammond	J Hammond	J Hammond	J Hammond	J Hammond	J Hammond
	C LLoyd	C LLoyd	C LLoyd	C LLoyd	C LLoyd	C LLoyd
	P Catterall					

Both the Board and the GMPF Management Panel see great benefits in a close working relationship between the Board and the Panel and a culture of openness and transparency between the two bodies.

Board members are encouraged to attend the GMPF Management Panel meetings and to read the Management Panel's reports. The Board considers relevant Panel reports in detail at Board meetings and commissions additional reports from GMPF Officers as appropriate.

The minutes for each Board meeting are noted at the subsequent Management Panel meeting.

# Annual Report 2022

## Local Pension Board Annual Review

### Key achievements

- Won the European Pensions' award for Pension Fund Communication.
- Scrutinised and provided feedback on the new employer flexibilities policy.
- Further strengthened processes to combat pension transfer scams.
- Provided annual allowance and lifetime allowance support to our members.
- Continued refinement of Greater Manchester Pension Fund's (GMPF) risk management processes.
- Improved timeliness of receipt of employer contributions and membership data.

In comparison to the tumultuous year that preceded it, 2021/22 has felt like a year of relative calm. However, for a pension fund as large as GMPF there is always high levels of activity and almost constant evolution. As coronavirus related worries have receded, new concerns have emerged regarding price inflation and a large section of the public will be relying on public sector pension funds to help maintain their standard of living. It is a significant responsibility for all of those involved in ensuring the smooth operation and cost effectiveness of GMPF.

I was delighted to see GMPF win the best Pension Fund Communication category at the 2021 European Pensions' Awards. Over the last couple of years, we have redesigned and adapted our communications and wider administration service to tackle changes in members' needs, due in part to the challenges posed by the Covid-19 pandemic. We introduced more functionality on our member self-service portal (My Pension) and increased our offering of online pension webinars for employers and members. In addition, we introduced online video verification for members who live abroad, we strengthened our telephony service, and have further improvements planned for this year. These developments have allowed GMPF to more efficiently communicate with our members and employers. The award is a testimony to our continual efforts at improvement and making sure we put our members at the centre of what we do.

Since 2019 GMPF has annually benchmarked its administration costs and service levels via the CEM Benchmarking service. The benchmarking exercise compares GMPF to comparable UK pension schemes, both in the public and private sectors. Reassuringly, the results indicate that GMPF is a 'high service, low cost' provider. GMPF's total cost per member was found to be more than £10 lower than the adjusted peer average of around £27, whilst GMPF's service score was above the peer median. Feedback from CEM confirms that GMPF has managed to leverage technology such as self-service functionality and online educational videos to become efficient and cost-effective whilst maintaining strong member outcomes and satisfaction. The strong governance and monitoring arrangements ensures that GMPF can deliver first class administration year after year in a cost-effective manner.

A common theme in previous years has been regulatory and scheme change. This year was no different. In 2021/2022 we implemented our new employer flexibilities policy following the introduction of the 23 September 2020 Local Government Pension Scheme (Amendment No.2) Regulations 2020. These employer flexibilities provide us with additional options to help manage employer exits in order to obtain the best possible outcome for both the exiting employer and all other GMPF employers. The employer flexibilities policy forms part of the Funding Strategy Statement that will be consulted upon with employers as part of the 2022 triennial valuation process, which is currently underway. The Board is looking forward to providing assistance and scrutiny as appropriate to the valuation process, which will set employer contribution rates for the three year period from 1 April 2023.



The Local Pensions Board continues to fulfil its two important functions: offering constructive challenge to the GMPF Management Panel and its officers; and providing valuable member and employer perspectives on GMPF's operation, which will help ensure GMPF's continued success. The Board combines significant expertise drawn from a diverse range of sources, which allows us to effectively engage in the administration and governance of GMPF ensuring positive outcomes for our members and employers.

It pleases me to note that GMPF has continued to receive prompt and full payment of contributions and timely receipt of membership data from the vast majority of employers during 2021/2022. The Local Pension Board's active monitoring of pension contributions payments and constructive challenge to officers has helped develop a robust system of support and enforcement where necessary to ensure employers meet their statutory obligations. The Local Pension Board are alerted to any employers who are late with payment of pension contributions or who have failed to meet other employer obligations and take appropriate action, which can include making a report to the Pensions Regulator.

A core part of the Board's role is to review at each meeting the main risks facing GMPF via consideration of the risk register and to examine reports, including those from GMPF's internal audit function to highlight issues that could potentially hinder the effective functioning of GMPF. Anyone who works in the administration of the LGPS will know it is a very complex scheme with a large number of employers working across an array of different sectors. Our employers need varying levels of support from GMPF and I like to think that the diverse backgrounds of the Local Board's membership provides a useful insight for officers in this area. GMPF's membership, employer base and administration service will continue to evolve, as will the role of the Local Board in provide support and constructive challenge.

Finally, I would like to extend my thanks to all members of the Board for their valuable contributions over the past year. On behalf of the Board I would also like to thank the GMPF Management Panel, officers and advisors for their continued support and assistance.



Cllr Bill Fairfoull  
Chair of the GMPF Local Pension Board

# Annual Report 2022

## Top 20 equity holdings



### Major holdings

GMPF publishes a list of all its equity holdings each year, following completion of its external audit.

This list can be found on GMPF's website at: [www.gmpf.org.uk/about/how-does-GMPF-Invest](http://www.gmpf.org.uk/about/how-does-GMPF-Invest)

# Annual Report 2022

## Investment report

### Investment management

Management of Greater Manchester Pension Fund's (GMPF) assets is determined within the context of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016. These require GMPF to have regard to both the diversification and suitability of its investments and to take proper advice in making investment decisions.

During 1994, the Management Panel decided to separate GMPF's assets into two distinct parts – a Main Fund and a Designated Fund – in order to reflect a major difference between most of GMPF's employers and that of a small number of employers in their liability profiles. The Designated Fund is used for employers who have a very high proportion of pensioner liabilities.

At 31 March 2022, the total Fund value was £29,324 million. Of this total, £28,262 million was held in the Main Fund whilst £1,062 million was held in the Designated Fund, all of which was invested across a broad spread of assets.

The majority of the Designated Fund investments are passively managed by Legal & General Investment Management, whilst the bulk of the cash portfolios are managed internally.

During the course of 2000/01 an extensive review of the external management arrangements of the Main Fund was undertaken and culminated in the adoption of a Fund specific benchmark. UBS Asset Management (UK) act as an active manager and Legal & General Investment Management act as a passive manager. UBS manage a securities portfolio investing in equities, fixed interest and index linked bonds on a multi-asset discretionary basis, whilst Legal & General manage a multi-asset indexed securities portfolio.

In 2014 the Management Panel reaffirmed its decision to introduce two new mandates, a global equity mandate and a debt/credit mandate. The global equity mandate was awarded to Ninety One (formally Investec Asset Management Ltd) and was funded in 2015. The debt/credit mandate was awarded to Stone Harbor Investment Partners and was funded in 2017.

In 2018 the Management Panel adopted recommendations which established a Factor Indexing allocation and portfolio within the Main Fund. Funded in 2019, the portfolio comprises investments in Global Equity (developed markets) tracking a Scientific Beta index with UBS as replicator.

All of GMPF's external managers are signatories to the Scheme Advisory Board's Transparency Code in relation to costs, and the information obtained is used by GMPF for cost benchmarking purposes.

GMPF published a Core Belief Statement in 2009 setting out the key underlying beliefs of the Management Panel in relation to investment issues and GMPF's overall approach to investment matters. These beliefs were reviewed in 2018 and provide the bedrock rationale underpinning GMPF's investment activity. The Core Belief Statement can be found at the back of this report.

The chart on page XX summarises the management arrangements for the Main Fund at the end of the year.

### Custody of financial assets and banking

GMPF uses an independent custodian – currently Northern Trust – to safeguard its financial assets and the rights attaching to those assets. The Custodian is responsible for the safe keeping of GMPF's financial assets, the settlement of transactions, income collection, overseas tax reclamation and other administrative actions in relation to the investments.

GMPF's banker is Royal Bank of Scotland.

**The remaining comments and results in this Investment Report relate solely to the Main Fund.**

## Investment strategy

In December 2000 the Panel adopted a GMPF specific benchmark, which defines the proportion of the Main Fund to be invested in each asset class.

Each year the Management Panel reviews the Main Fund's investment strategy restrictions for the coming year. The benchmark in place at the end of 2021/22 is summarised in [the charts on page XX](#).

Each of the asset managers has been given a specific benchmark reflecting their perceived skills and the relative efficiency of markets. UBS is given a range for each asset class allowing them to make tactical asset allocation decisions. Ninety One and Stone Harbor are relatively unconstrained against Global Equity and absolute return benchmarks respectively.

GMPF's target allocations to private equity, private debt and infrastructure funds are each 5% of Main Fund value which, during the year, were implemented by new commitments to specialised funds of £125 million, £405 million and £320 million per year respectively. The allocation to the 'Special Opportunities Portfolio' (SOP) is limited at 5% of Main Fund value. Current realistic benchmark allocations for private equity, private debt, infrastructure funds and SOP are 5%, 3%, 3.5% and 2% respectively.

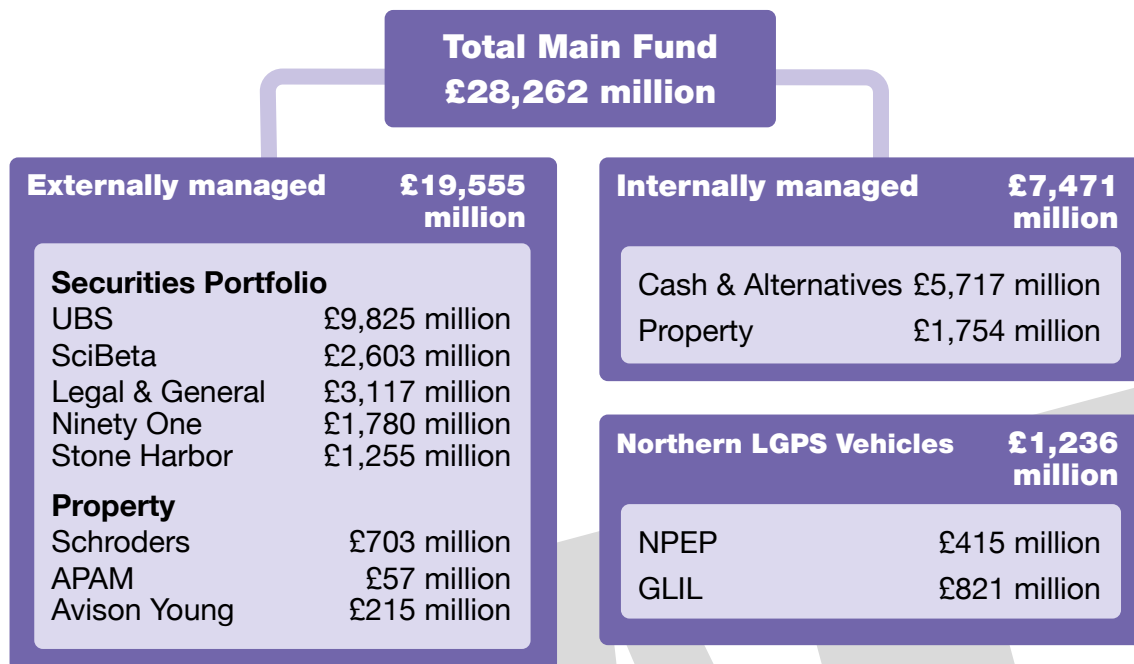
GMPF targets local investment through the Property Venture Fund and other allocations. Such local investment is restricted to 5% of Main Fund value.

The following statements can be found later in this report by clicking on the hyperlinks below. These are also available in hard copy on request:

• <a href="#">Funding Strategy Statement</a>	This statement sets out how the Management Panel balances the conflicting aims of affordability, stability and prudence in the funding basis and is fully compliant with statutory guidance.
• <a href="#">Governance Policy</a>	GMPF is required to maintain and publish a Governance Policy and a Governance Compliance Statement detailing its governance arrangements.
• <a href="#">Governance Compliance Statement</a>	
• <a href="#">Core Belief Statement</a>	This statement sets out the underlying beliefs of the Management Panel in relation to investment issues.
• <a href="#">Investment Strategy Statement</a>	GMPF is required to maintain and publish an Investment Strategy Statement detailing its investment arrangements and is fully compliant with statutory guidance.
• <a href="#">Responsible Investment Policy</a>	This policy sets out GMPF's approach to Responsible Investment activities and includes information on its implementation and GMPF's commitments to reporting and accountability.
• <a href="#">Communications Policy</a>	This policy outlines how GMPF communicates and engages with all its stakeholders.
• <a href="#">Pension Administration Strategy</a>	This strategy recognises that for administration costs to be minimised, and the mutual service to the member be maximised, employers and the administering authority must cooperate closely.

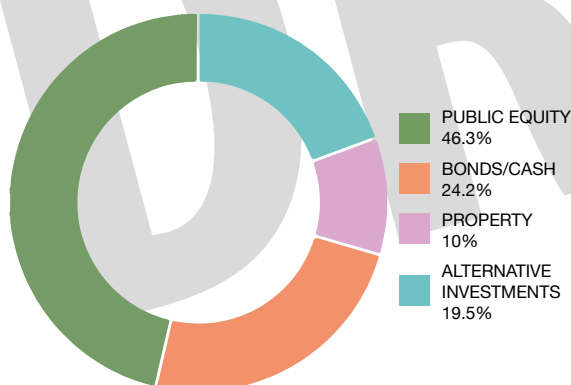


## Management Arrangements

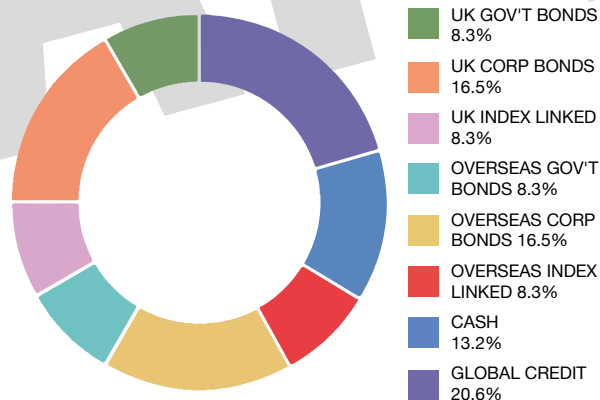


## Benchmark Asset Allocation

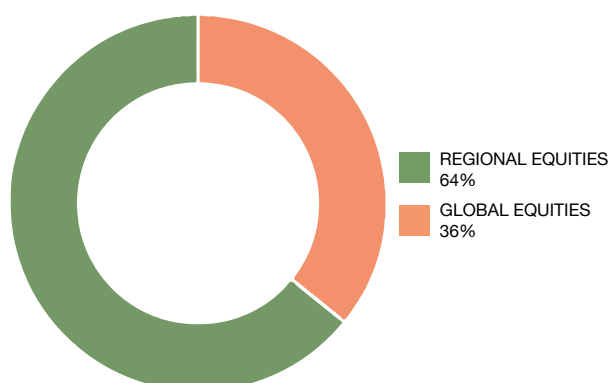
Major asset class split



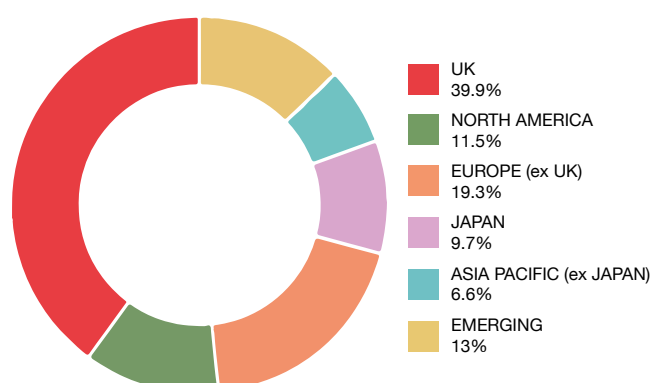
Bonds/cash split



Regional/Global equity split



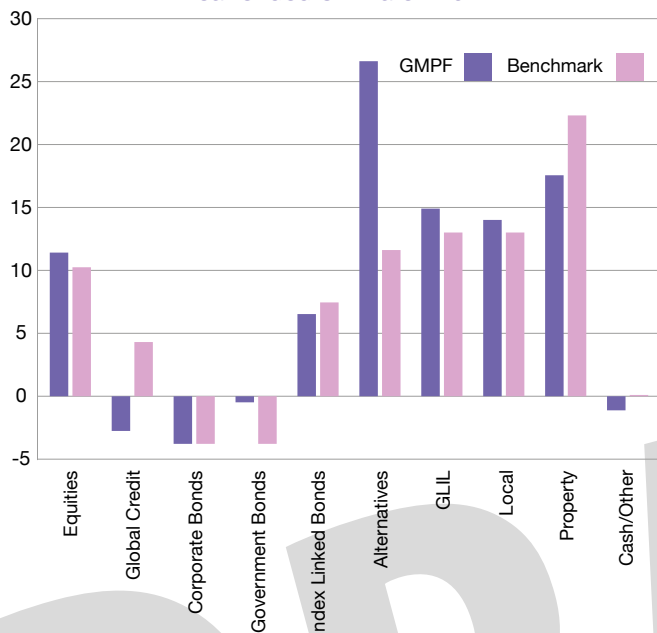
Regional equity split



## Investment Returns

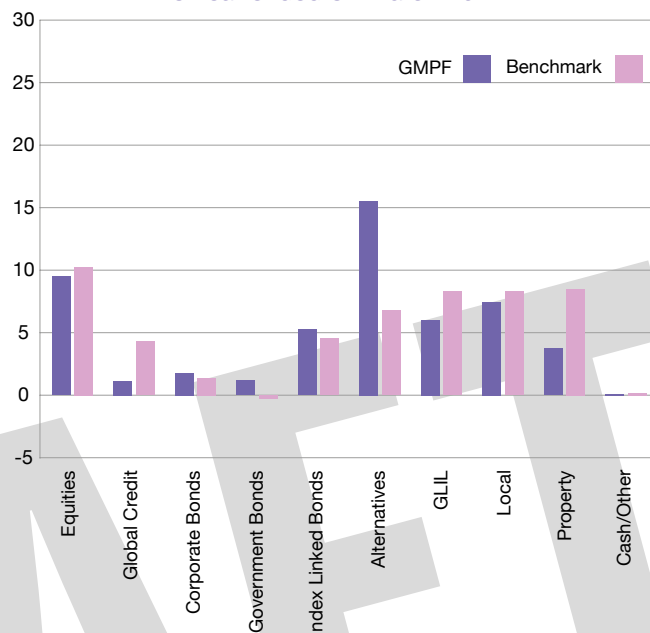
### INVESTMENT RETURNS (%)

1 Year ended 31 March 2022



### INVESTMENT RETURNS (%)

3 Year ended 31 March 2022



Performance for periods over one year is annualised

### Performance

The graphs on this page compare the return achieved by the Main Fund with the benchmark index return in each of the main investment categories during the year, three years and five years to 31 March 2022.

The year saw both positive and negative returns within the categories, with the highest returns being achieved in Alternatives and Property.

The Main Fund realised a return of 11.1% during the year, and outperformed the benchmark index in Equities, Government Bonds, Alternatives, GLIL, and Local and matched the benchmark in Corporate Bonds, but underperformed the benchmark in Global Credit, Index Linked Bonds, Property and Cash.

The three year results saw positive returns within the categories, with the highest returns being achieved in Equities and Alternatives.

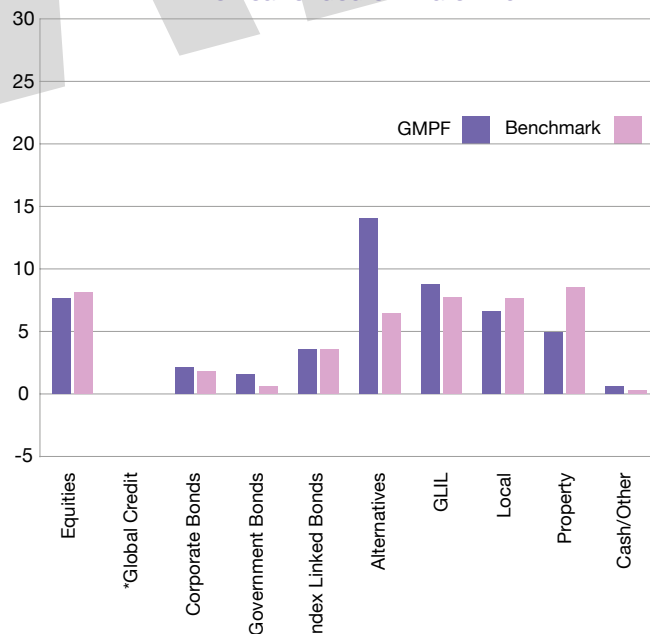
The Main Fund realised a return of 8.2% per year for the three year period, and outperformed the benchmark index in Corporate Bonds, Government Bonds, Index Linked Bonds, and Alternatives, but underperformed the benchmark in Equities, Global Credit, GLIL, Local, Property and Cash.

The five year results also saw positive returns within the categories, with the highest returns being achieved in Alternatives and GLIL.

The Main Fund realised a return of 6.9% per year for the five year period, and outperformed the benchmark in Corporate Bonds, Government Bonds, Alternatives, GLIL, and Cash and matched the benchmark in Index Linked Bonds, but under-performed the benchmark in Equities, Local and Property.

### INVESTMENT RETURNS (%)

5 Year ended 31 March 2022



Performance for periods over one year is annualised

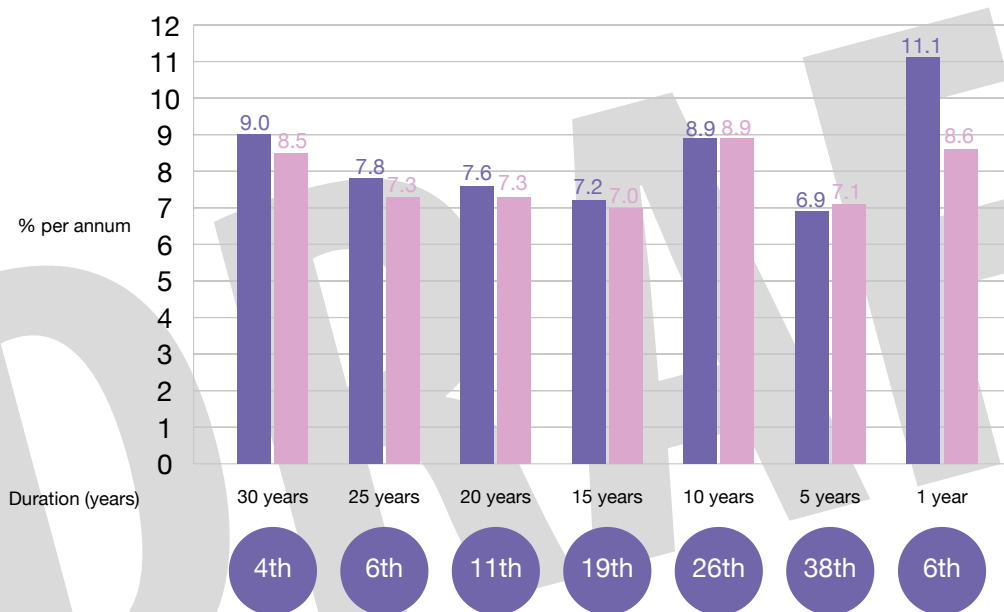
\*Portfolio was not active for the full period

## Pension Fund Returns

Greater Manchester Pension Fund (GMPF) subscribes to PIRC's Local Authority Pension Performance Analytics Service in order to assess its performance relative to other funds which operate under the same regulations. The graph on this page looks at the Main Fund's performance as compared to the local authority average over various durations extending between 1 year and 30 years. Over the periods of 1, 15, 20, 25 and 30 years the Main Fund has outperformed the average local authority and has ranked sixth, nineteenth, eleventh, sixth and fourth of such funds, respectively.

### PENSION FUND RETURNS

*PIRC Local Authority Survey - Financial years to 31 March 2022*

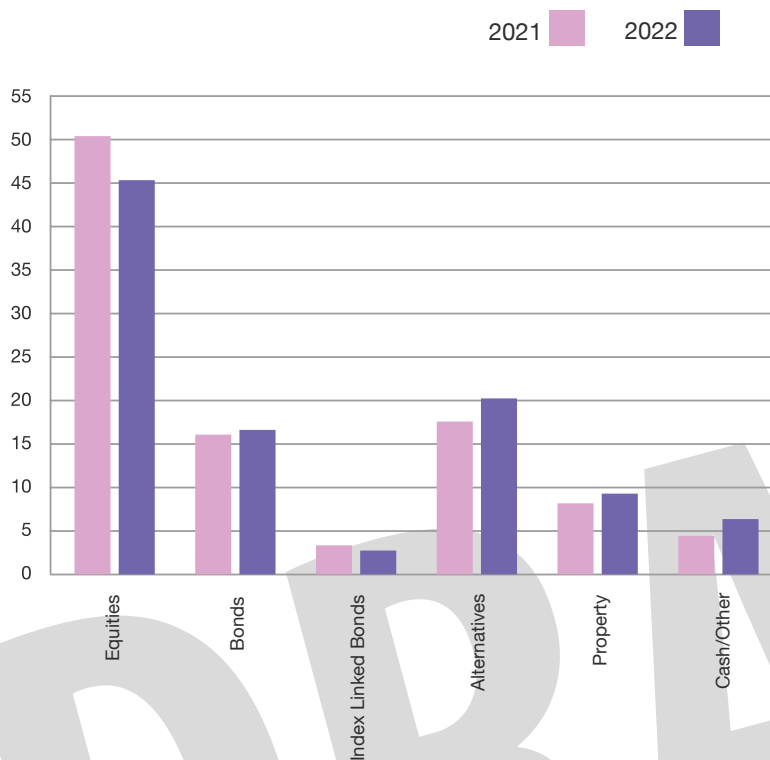


GMPF's rank within Local Authority funds

GMPF Local Authority Average

## PORTFOLIO DISTRIBUTION (%)

Market value at 31 March

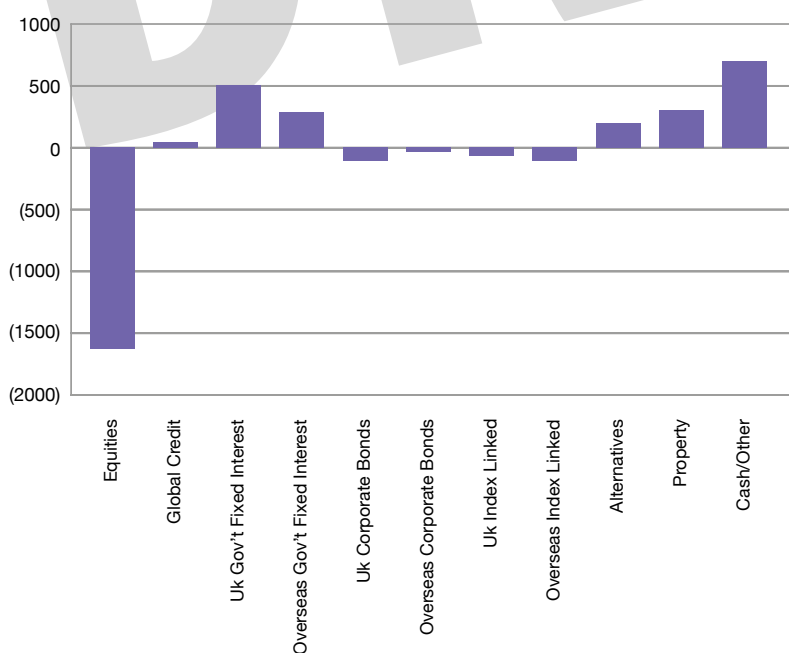


## Portfolio Distribution

The distribution of assets across the main investment categories within the Main Fund changes as a result of the investment strategy followed by the managers and the performance achieved within each investment category. These changes are shown, on a market value basis, in the graph top left.

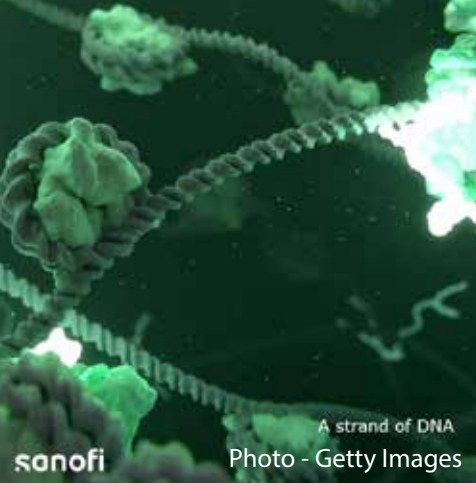
## NET INVESTMENT (£m)

Year ended 31 March 2022



## Net Investment

The graph bottom left shows the net effect, on a market value basis, of the total investment activity of the Main Fund during the year, based on the Panel's restrictions. As can be seen, there has been a switch out of Equities, predominately into UK Government Fixed Interest and Cash/Other.



A strand of DNA

Photo - Getty Images



Natural killer cells

Photo - Getty Images



Photo - Satellite MyLove

## Public Market Equities - Sanofi

**sanofi**

Sanofi originated as a local French enterprise and has grown into a leading innovative global healthcare company.

Sanofi are present in 100 countries, with 70 manufacturing sites and 20 Research and Development sites and currently have around 100,000 dedicated employees. They provide potentially life-changing treatments and the protection of life-saving vaccines to millions of people in more than 150 countries across the world.

Sanofi's activities are articulated around four business units: Specialty Care, General Medicines, Vaccines, and Consumer Healthcare.

Sanofi's Play to Win strategy focuses on developing its pipeline and R&D engine by using the most advanced technology platforms to pioneer new innovative approaches to preventing diseases or stopping them in their tracks. Research and development areas of focus include immunology & inflammation, oncology, neurology, rare blood disorders, rare diseases and vaccines.

The company manufactures more than 80% of their diversified portfolio of biologics, vaccines, injectables, established products and over-the-counter solutions.

Sanofi also aims to use innovative science and technology to address some of society's most challenging healthcare issues, including affordable access and unmet medical need, while accelerating their goals to reduce the environmental impact of their products and worldwide operations.

In 2021, Sanofi was awarded the second highest score in the pharma industry by the Dow Jones Sustainability Index. Recognised for its performance for 15 consecutive years, reflecting Sanofi's long-term commitment to society.

Sanofi has just been recognised with the prestigious double A score for its actions on climate change and water stewardship by CDP 2021, and has joined the Race to Zero initiative, which is a global commitment to net zero carbon emissions by 2050. Sanofi is pursuing the goal of carbon neutrality by 2030.

The company is uniting with nine other global pharmaceutical companies to establish the ENERGIZE program, which will help their shared supply chains adopt 100% renewable electricity and reduce greenhouse gas emissions.



Photo - Vincent Fournier

# Annual Report 2022

## Economic background

Equities rose strongly at the start of the year, supported by earnings recovery, a highly stimulatory macro-economic policy environment and falling perceptions of risk. For the quarter to June, the MSCI All Country World index returned 7.4%, with US stocks delivering 8.5%. Headline inflation started to rise in countries such as the US but was generally still moderate in a global context. Central bank officials attached a high probability that recent rises in inflation would only be temporary. For this reason, central banks signalled that policy tightening remained some way off and would only be gradual. Although the US consumer price index (CPI) continued to increase rapidly, investors seemed convinced by central bank assurances that inflation would fall quickly as yearly base effects and higher energy prices dropped out. Fears that Covid lockdowns would continue to disrupt economic activity eased. With more than half of the US population having been vaccinated, new Covid cases were at their lowest levels since the early days of the pandemic.

In the UK, the final easing of Covid restrictions, scheduled for 21 June, was pushed back four weeks amid concerns about the Delta variant. However, the economic impact of the delay was minimal. As in several other countries, inflationary pressures continued to build. CPI rose to 2.1% in May compared with 1.5% in April due to low base effects and higher energy prices.

In the Eurozone, CPI rose 1.9% in June slightly down from 2% in May. Despite signs of accelerating growth, the European Central Bank (ECB) said it would maintain its 'significantly higher' pace of bond buying under the Pandemic Emergency Purchase Program (PEPP) over the coming months. The Eurozone economy continued to reopen as vaccination programs advanced.

In the quarter to September, the global environment for equities became less positive and performance was more mixed. The UK economy was hit by supply shortages, which limited growth. Inflation rose to 3.2% in August from 2% in July, driven in part by base effects from government incentive schemes which lowered prices temporarily in August 2020. The Bank of England (BoE) did not raise interest rates immediately but signalled an intention to raise interest rates early in 2022. Disputes between UK and EU surrounding the Northern Ireland Protocol continued but this did not prevent another extension to the Protocol being agreed to avoid a damaging trade dispute.

Covid case counts started to rise in the US as the Delta variant spread. The negative impact on economic growth was considerable. Consumer spending in particular disappointed. Job openings soared to record levels as businesses struggled to find workers. Enhanced unemployment benefits ended on 6 September which eased the labour market. Underlying inflationary pressure remained strong due to supply side bottlenecks. On 22 September the Fed said it would reduce its Quantitative Easing (QE) asset purchases which were running at \$120 billion a month.

In the Eurozone, although the production side of the economy suffered from supply chain disruptions, both manufacturing and services continued to expand. Eurozone inflation reached 3% in August, the highest level for a decade. In September, the ECB announced it would reduce its monthly bond purchases to 2021 levels.

China's economic momentum slowed in September with worrying signs from macro data. Lockdowns due to Covid infections were a major reason for the sluggish retail spending, while property investment suffered from strict cooling measures and infrastructure investment struggled to rise from last year's high base.

In the quarter to December, headline inflation around the world continued to rise. There was growing evidence supporting the view that this was broad based and more likely to be persistent. UK inflation reached a ten year high in November with CPI rising 5.1% on an annual basis. The labour market remained tight with strong wage growth and falling unemployment. Against this backdrop, the UK became the first G7 economy to raise interest rates. The rise surprised markets and increased traders' conviction of more aggressive interest rate rises to follow in 2022.

Covid remained a problem with new variants emerging that could infect even those who had been vaccinated against the disease. Case counts rose quickly due to the Omicron variant despite a nearly 70% vaccination rate. Daily infections peaked in December with a seven-day average increase of 150,000.



The US economy accelerated in the quarter to December as negative effects linked to the Delta variant waned and Omicron failed to drag on activity until late in the quarter. Amid rising inflation and a recovering labour market, the Fed signalled the removal of monetary accommodation. In December the central bank accelerated the reduction of asset purchases and raised its forecasts for growth and inflation in 2022. Congress passed an infrastructure bill providing \$550 billion of new investment (Infrastructure Investment and Jobs Act), which was part of a \$1.2 trillion spending package agreed in November. However, progress towards an even larger fiscal package ('Build Back Better') was halted because Democratic Senators Manchin and Sinema came out against the bill.

The persistence of the pandemic, supply chain stress and government mobility restrictions weighed on activity in the Eurozone throughout the quarter. Shortages and cold weather led to a surge in energy prices that dragged on industrial production. Geopolitical tension rose as 100,000 Russian troops massed along the Ukraine border in December amid provocative rhetoric from Vladimir Putin. The US and its allies discussed possible retaliation should Russia invade Ukraine.

At the start of 2022 global economic activity was recovering from Omicron as Russia invaded Ukraine on 24 February. Russia's stated initial goals were the demilitarisation of Ukraine and an overthrow of its government. In response, much of the international community introduced sanctions against Russian corporations, most notably in the financial system, and high-ranking individuals. Some countries moved to ban Russian energy imports but noticeably the European Union did not. The strong outlook for European growth was abruptly halted. Market sentiment, as measured by the Sentix index of investors' economic expectations, suffered its biggest one-month drop on record. Energy shortages constrained industrial production with the threat of even more draconian reductions if Europe was unable to access Russian gas.

The UK's GDP rose to pre-pandemic levels in January, with the Omicron variant having only a small impact on activity. Near the end of the quarter, Rishi Sunak announced tax cuts for workers and fuel after Russia's invasion prompted a cut in the UK's growth forecast to 3.8% from 6%. However, in the face of rising inflation the BoE raised interest rates twice over the quarter and began the process of unwinding its QE program.

The US economy turned down as Omicron weighed on activity in the early part of 2022 but US labour supply subsequently recovered as public health recovered. The Fed raised rates by 25 bps in March 2022, with Chair Jerome Powell saying that monetary accommodation would be reduced 'expeditiously' due to high inflation and a 'tight' labour market.

As the year came to an end, headwinds to the growth outlook became more prominent but the risk of recession remained low in the near term. Labour income grew strongly, supporting consumption, and businesses increased capacity in the face of strong demand with most countries progressing towards pre-pandemic patterns of spending.



## Private Equity

Greater Manchester Pension Fund (GMPF) has been an investor in private companies through pooled partnership vehicles for nearly four decades and currently has interests in over one hundred active partnerships, creating a portfolio that is very well diversified by stage of investment - from early-stage growth investments to large buyout investments – and by geography – with portfolio companies spread across the United Kingdom, Continental Europe, North America and Asia.

In 2018, the three funds that comprise Northern LGPS formed Northern Private Equity Pool (NPEP), a joint venture that combines the private equity investing activities of the three funds. In the 12 months to 31 March 2022, through its involvement in the NPEP joint venture, GMPF added seven funds to its portfolio, representing total commitments of approximately £125 million.

At the end of 2019, Northern Private Equity Pool took a significant step towards its objectives through the establishment of a co-investment partnership with a leading global alternatives asset manager aimed at reducing the costs of private equity investment through partnering more directly with its preferred managers in certain transactions. The early stages of the partnership's operation have been a positive experience with a good flow of investment opportunities reviewed and completed.

The Private Equity portfolio was valued at approximately £2.1 billion at 31 March 2022 and performance of the portfolio to the end of December 2021 continued to be very strong, in line with the trend for much of the past decade. Percent per annum rates of return for mature funds invested in during the last decade have been approximately 20% led by software and related digital businesses, healthcare investments and business services.

The economic outlook and the environment for corporate finance appears to have changed materially in the first half of 2022, with inflation at rates not seen for several decades, interest rates set to rise further and Russia's invasion of Ukraine all creating a challenging environment for investment returns. After a decade and more as one of the highest returning asset classes, Private Equity returns may well moderate quite significantly in the near future as these adverse economic developments feed into business valuations.

## Northern Private Equity Pool LP (NPEP)

Private equity has been one of the best performing asset classes over recent decades and has been an area of successful investment for all Northern Local Government Pension Scheme (LGPS) funds, who are each amongst the most well-established private equity investors in the UK.

Investment in private equity is complex and in recognition of the strong cost benefit rationale for combining investing efforts in this area, Northern LGPS established the Northern Private Equity Pool in May 2018; an investment joint venture structured as an English Limited Partnership. The partnership operates as a single legal entity through which the three Northern LGPS funds can invest collectively and collaboratively in private equity assets.

The Northern Private Equity Pool will draw on the combined expertise and experience of the internal teams at each of the respective Northern LGPS funds, and the administration capabilities of Northern LGPS's pool-wide external custodian. The combined scale and resources of the Northern Private Equity Pool will enable funds in Northern LGPS to invest in private equity through lower cost implementation approaches than have been the case historically.

The Northern Private Equity Pool will look to build a global portfolio of private equity assets, diversified across several aspects such as economic sector and geographic location and through a combination of growth financing investments and small, medium and large sized buyout transactions. Northern Private Equity Pool will continue to work with some of the world's leading private equity management groups, as each of the Northern LGPS funds have done previously, to develop effective relationships for the benefit of Northern LGPS and which will complement each fund's historic efforts in this area.

Investment pace since inception has been consistent with targets, with over £1.2 billion committed to 26 investment funds. In addition, 2021 was the second year that Northern Private Equity Pool undertook co-investment activity alongside a major third-party investment services provider, allowing Northern LGPS funds access to a lower cost implementation method for the private equity asset class through investment alongside preferred managers.

Northern LGPS has made good progress to establish Northern Private Equity Pool as one of the pre-eminent investors in private equity with a strategy that provides access to the best opportunities in the market with a cost position that is a material advancement over historic approaches undertaken by each Northern LGPS fund individually.





## Private Equity portfolio – Kersia Group

Through its private equity partner IK Partners, Greater Manchester Pension Fund (GMPF) has invested in Kersia Group.

Kersia is a global leader in food safety, providing value-added solutions that prevent animal and human contamination at all stages of the food chain.

This includes all the Food Supply Chain from Farm to Fork: the Farming industry, essentially on the dairy segment and the pig & poultry segment with a complete solution range in the area of biosecurity, animal feed dietary and aerial surface disinfection; and for the Food processing industry addressing mainly milk transformers, meat producers and ready meal producers.

The group also offers differentiated niche solutions to the human health sector, including a hand hygiene range specifically designed for farms, the food industry and catering and healthcare settings, alongside providing emergency water purification in disaster zones and surface disinfection in hospitals.

Kersia operates in more than 120 countries with a workforce of more than 2,100 people and turnover of more than €420 million.

In just over six years, Kersia has quadrupled in size with a unique positioning as a pure player in food safety. The group's tremendous growth has significantly expanded their international reach, and changed the challenges related to their environmental and societal impacts.



On the strength of its mission to help safely feed a world population that will likely exceed eight billion in the next ten years, Kersia has committed to a sustainable development and Corporate Social Responsibility (CSR) strategy. The group's CSR project 'ACT for a positive impact' aims to take concrete action by implementing initiatives with a measurable long-term effect on the three cornerstones, People (social performance), Planet (environmental performance) and Profit (economic performance).

Kersia's goal is for their business and all their production to be part of a fully circular economy, to move towards a situation of zero impact on the planet. Reflecting the Group's four values, Transparency, Sharing, Proficiency and Foresight.



## Infrastructure Funds

Greater Manchester Pension Fund (GMPF) has invested in private infrastructure partnerships for two decades and has continued to grow its portfolio over the past 12 months. Four new fund commitments were made, totalling £320 million in capital.

Further growth in the size of the Infrastructure portfolio is envisaged through an annual programme of new fund commitments, mainly with existing managers that have shown specific competences in infrastructure investing.

At 31 March 2022 the value of the Infrastructure funds portfolio was approximately £1.1 billion. The last 12 months have seen those sectors most impacted by Covid-19 lockdowns recover in terms of both trading volumes and equity valuation. This has been seen mostly in transport and energy sectors.

Overall, the portfolio has proved to be relatively resilient given the essential nature of the services and assets held, which will continue to be important with the outlook for the global economy beset by slowing growth and rising prices. The performance of the portfolio continues to be consistent with its objectives, delivering annual investment returns in the high single digit percentages.



The Special Opportunities portfolio consists of investments in funds that fall under the headings of Credit Opportunities (13 funds) and Real Assets (two funds investing in Agriculture and Timberland). At 31 March 2022, the value of the investments within the Special Opportunities portfolio was £534 million.

## Special Opportunities portfolio

The Special Opportunities portfolio exists to broaden the range of assets in which Greater Manchester Pension Fund (GMPF) invests with the aim of increasing diversification and reducing returns variability. It also exists to take advantage of opportunities as they arise or as market conditions allow.

The Special Opportunities portfolio consists of investments in funds that fall under the headings of Credit Opportunities (13 funds) and Real Assets (two funds investing in Agriculture and Timberland).

Two new Credit Opportunities fund commitments were made in 2021/22, resulting in a portfolio of 15 active investments. Several potential opportunities are under active consideration at the year end and officers continue to evaluate the future potential of both the existing investment types, as listed above, and also new investment types which may, in time, replicate the success of Private Debt and Factor Based Investing, both of which were piloted in the Special Opportunities portfolio, before becoming separate allocations within GMPF.

At 31 March 2022, the value of the investments within the Special Opportunities portfolio was £534 million.



## Private Debt portfolio

Greater Manchester Pension Fund (GMPF) established the Private Debt portfolio in July 2018 to separate from the Special Opportunities portfolio, commitments made to funds targeting investments in private senior secured loans to privately owned, typically private equity backed companies.

The target allocation is 5% of main fund assets by value and is to be achieved over time by making new commitments to private investment funds at an appropriate annual rate.

Three new fund commitments totalling £405 million were made by GMPF over the last 12 months, resulting in a total portfolio of 13 active investments. A total of approximately £1.8 billion has been committed since the portfolio's inception, of which £1 billion has been drawn down by managers with £120 million returned through loan repayments or interest. Further investments within the portfolio remain under active consideration.

The value of the investments within Private Debt portfolio was approximately £945 million at 31 March 2022. The short lifespan of the portfolio does not lend itself to meaningful performance commentary although the portfolio demonstrated resilience through the lockdown phases of the Covid-19 virus pandemic, a property which looks set to be tested again as the global economy responds to issues caused by inflation and the Russian invasion of Ukraine.



## Direct Infrastructure

In April 2015, Greater Manchester Pension Fund (GMPF) and the London Pensions Fund Authority formed a joint venture to invest directly in infrastructure assets, with a focus on the UK. The joint venture is structured as a limited liability partnership and has been named GLIL Infrastructure LLP (GLIL). As part of the Local Government Pension Scheme (LGPS) pooling discussions, West Yorkshire, Merseyside and Lancashire County Council pension funds joined GLIL in December 2016 and in March 2018 GLIL was restructured as an open ended fund to facilitate potential new members. The existing members made additional commitments in October 2018, and December 2020. In March 2021 GLIL achieved another significant milestone by admitting its first third party investor in the form of NEST, who committed £150 million. GLIL now has committed capital approaching £2.5 billion. GMPF remains the largest participant in the venture.

GLIL began investing in October 2015 and has completed 13 transactions with a total value in excess of £2.0 billion. GLIL's investments cover a wide range of sectors, including rail, regulated utilities, public/private partnerships (PPP) and ports. However, the largest sector exposure is renewable energy, which makes up almost 40% of the portfolio.

One of GLIL's earliest transactions was the purchase from SSE of a 21.7% stake in Clyde wind farm for £150 million, with a further £118 million invested throughout 2017 and 2018. At the time of the investment, Clyde had 152 operational turbines capable of generating 350 megawatts (MW) and a further 54, more powerful turbines, under construction. Clyde now has a total generation capacity of 522 MW, making it one of the largest onshore windfarms in Europe. In 2019 GLIL acquired a 49% stake in Cubico's portfolio of 250 MW of solar and wind assets across the UK.

The focus on renewable generation and energy transition continued throughout 2021 and into 2022 with a further £500 million invested or committed to three further investments in those sectors, being: GLIL's first non-UK transaction to acquire a controlling majority in a portfolio of 11 Irish windfarms; a 50% position in Smart Meter Assets; and the establishment of a new company, Flexion, to deploy a 300MW pipeline of utility-scale battery storage sites across the UK. Combined with Clyde and Cubico, GLIL now has exposure to over 1.3 gigawatts of renewable energy.

Early in 2022 GLIL also took the rare opportunity to increase its exposure to operational UK PPP assets by acquiring a further position in Semperian.



Aerial view of the 43MW Megheramore Wind Farm in County Mayo, Ireland, part of GLIL's acquisition of a majority stake in Invis Energy's portfolio of 11 operational onshore sites. With an installed capacity of 453MW and accounting for 11% of Ireland's onshore wind the portfolio makes a major contribution to Ireland's decarbonisation goals. This transaction represents GLIL's first non UK investment.



Smart Meter Assets is an independent provider of ownership and funding solutions for the smart meter roll out undertaken by energy suppliers and is an important contributor towards net zero transition. By giving consumers real time consumption data that they have not previously had access to, customers can realise energy savings and reduce fuel poverty.

## Property portfolio

At 31 March 2022, Greater Manchester Pension Fund's (GMPF) total UK property portfolio was valued at £1,922.7 million comprised of a direct UK property portfolio and an indirect UK property portfolio valued at £833.2 million and £1,089.5 million respectively.

The direct UK property portfolio comprised 33 directly owned assets (one of which is owned through a joint venture). A strategic review of the portfolio and the La Salle Investment Management mandate was undertaken by officers last year, with recommendations made to Management Panel in March 2021. As a result, the direct property portfolio has been divided into two portfolios a 'care and maintenance; and a 'bad bank'. Following a procurement exercise conducted in November 2021 using the recently established Northern LGPS Property Framework, two new investment managers, Schroders and APAM, were selected for the respective mandates.

The care and maintenance portfolio managed by Schroders is valued at £703 million. It is a largely core, stabilised and diverse portfolio of 22 assets. The key objective is management of the existing assets with a degree of capital recycling permitted.

The bad bank portfolio, valued at £130 million, consists of a number of assets with long standing asset management initiatives that have not yet been completed and which have significantly impacted upon performance. APAM, appointed to the mandate, is a specialist asset manager with a track record in turnaround assets. The key focus of the portfolio is on management of distressed, challenging assets to maximise their value and creating liquidity. The expected timeline to stabilisation is three to five years. Once business plans are delivered and assets are stabilised, they will either be sold or transferred to the core UK stabilised direct portfolio which will also include the initial 'care and maintenance' portfolio assets.

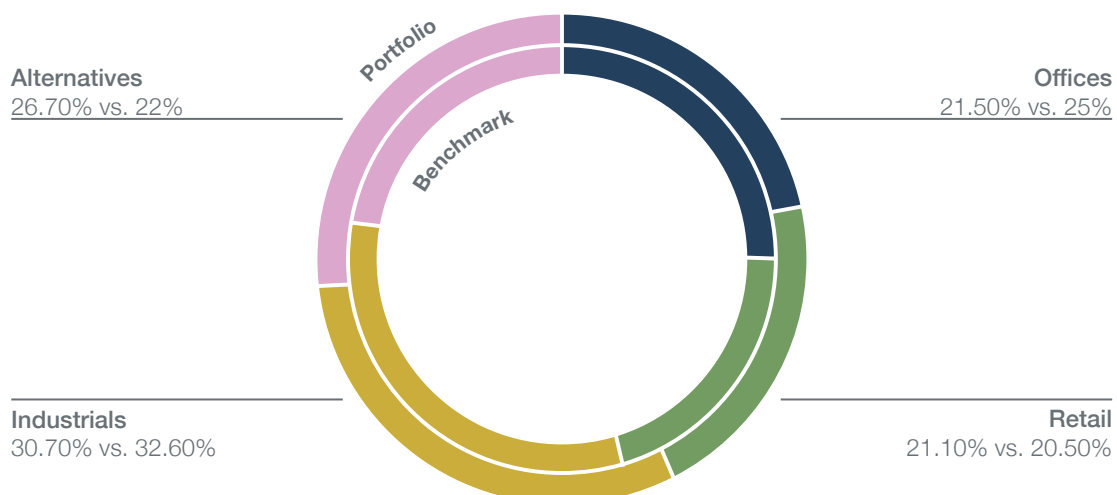
There were two asset sales during the year for a total consideration of £13 million which continued our strategy of disposing of small, secondary assets once stabilised. One acquisition has been completed in 2021 representing the remaining share of the Chantry Place shopping Centre in Norwich.

The indirect UK property portfolio represents £1,089.5 million invested in pooled property vehicles. These are a mix of diversified balanced strategies that seek to obtain the broad characteristics of the UK real estate asset class and specialist funds that provide exposure at scale to alternative asset classes.

The balanced fund portfolio comprises eight UK balanced funds totalling £796.7 million. In the financial year 2021-2022 £229 million has been invested into two balanced funds.

The specialist fund portfolio comprises eleven alternative or sector specialist funds totalling £236 million. Throughout the year, officers identified five specialist / value add opportunities, making total commitments of c. £126 million. These include a £30 million commitment to a healthcare specialist fund with a diversified portfolio of carehome assets in the UK and an investment into a life science campus development strategy. Both of these investments obtain exposure to sectors with strong macro tailwinds and demonstrate a strong 'Social' factor within ESG considerations of GMPF's investments. A further £50 million has been committed to a UK property fund focused on logistics asset development, with a highly specialised and experienced manager providing exposure at scale to one of the best performing sectors.

In terms of sector weightings, the total UK property portfolio is closely aligned to its respective benchmark. Alternative sector allocation is higher and more diversified than the benchmark given exposure to specialist funds but well within acceptable ranges to the benchmark. Main target for investment going forward will be in diversified balanced funds as well as specialist funds, with a particular focus on residential.



Portfolio metrics are broadly in line with the benchmark. The higher average lease length of the benchmark is due to the broad selection of property investments it tracks and its higher exposure to long income type assets such as hotel and residential. Leasing risk is being well controlled by the specialist managers of each portfolio. Lower vacancy rate across the total UK property portfolio is due to lower than benchmark rates registered across the direct and balanced funds' portfolios.

Metric	Direct Portfolio	Balanced Funds Portfolio	Specialist Funds Portfolio	Total UK Property Portfolio	Benchmark
Initial yield	4.61%	4.49%	3.76%	4.45%	4.1%
Equivalent yield	4.8%	5.29%	5.67%	5.12%	5.1%
Vacancy rate	5.15%	4.78%	14%	6.12%	7.5%
Development exposure	0%	1.70%	28.33%	4.31%	4.93%
Average lease length	9.82 years	7.55 years	4.58 years	8.19 years	13.1 years

In 2021, the aggregate total return for the UK direct portfolio was 13.1%, slightly lower than the MSCI benchmark of 15.3%, due to the portfolio's slightly higher weighting to retail that generally registered poor results and underperformance of select office and student accommodation assets that were particularly affected by the Covid pandemic.

Positive performance was largely driven by capital value appreciation of 31.7% within the industrial sector across all sub portfolios, which mainly came from sector allocation as valuation increases were witnessed in all segments of the industrial sector. Retail asset valuations continued to decrease albeit at a much reduced scale and pace than in previous years.

Medium and long term performance remains behind the MSCI benchmark as demonstrated in the table below, however one year performance is close to benchmark which reflects the strategic changes made with the portfolio in respect of new investment manager mandates and current deployment focus.

Duration	GMPF	Benchmark (MSCI Annual Index)
1 year	13.1%	15.3%
3 years	0.4%	4.5%
5 years	2.3%	5.6%

GMPF commenced its overseas real estate programme in 2015 with the investment thesis based upon increasing the investable universe whilst also providing for opportunities to outperform UK property returns and benefit from diversification. As of 31 March 2022, GMPF had made 17 commitments to discretionary funds across the US, Europe and Asia Pacific. The portfolio provides a balance of risk profiles and currently has only a modest level of leverage. As at 31 December 2021, over £721 million had been committed (translated as at the subscription date). Of this, £592 million had been drawn down against these commitments, representing over 80% of committed capital.

The overseas portfolio, whilst still immature, delivered an annualised GBP return of 19% as at 31 December 2021, comfortably in excess of its strategic target of MSCI UK Index + 2%. Two new commitments were made in the year totalling £93.8 million, \$50 million and \$75 million across a US core and a US core plus fund.



CareUK, Basingstoke



Autolus Building  
Forge Life Sciences Development, Stevenage

## Greater Manchester Property Venture Fund (GMPVF)

GMPVF has an allocation of up to £800 million and creates property investments by a process of site acquisition, building design, direct property development and property letting/management, in order to generate state of the art office, residential, retail and industrial/workshop accommodation. GMPVF also provides debt finance to projects, generating a commercial rate of return and supporting a broader range of developments than could be carried out by GMPVF alone.

Since its establishment in 1990, GMPVF has developed more than one million square feet of commercial buildings within the Greater Manchester area.

GMPVF has the twin aims of generating a commercial rate of return and supporting the local area. GMPVF also seeks to make an environmental impact through regeneration. To date, all completed developments have generated a profit.

The target area for GMPVF is the Northern Pool region (being North West England and West Yorkshire), with a particular focus on Greater Manchester. Avison Young, a firm of international property consultants, is the advisor to GMPVF.

The year saw continued disruption arising from Covid-19, with the emergence of the Omicron variant. This adversely impacted the leisure and hospitality sectors in particular and slowed down the return to the office. However, the expectation is for these effects to be short lived and for the long term trends to revert to increased office working and social activity, which helps to underpin much of Manchester city centre's vitality.

Nonetheless, the property market continued to exhibit strong activity and demand in certain sectors, notably Logistics. The residential market remained strong, with the Manchester city centre residential market showing continued developer activity and occupier/purchaser demand – such demand does however vary depending on the quality of the location and the development.

GMPVF's existing development portfolio continues to make progress, while the income-producing assets are performing in line with expectations. Avison Young has been actively pursuing further opportunities in the industrial sector. GMPVF has maintained a strong level of progress and activity over the past year. Notable activity includes;

- The acquisition for £20 million of an existing industrial site which provides stable income and medium term development potential - British Vita, Middleton.
- Continued legal due diligence on the acquisition of a 300,000 sq ft industrial development on a 25 acre site in Leeds.
- Commencement of construction at the Island site, a 100,000 sq ft new office building in Manchester city centre.
- The proposed marketing and sale of Circle Square – 683 unit build-to-rent building developed in Manchester city centre.
- Commencement of the developer selection process at Chorlton Shopping Centre, for a new development of 200 residential units plus shops, restaurants and car parking.





Leonardo Hotel, Adair St, Manchester.

A £23 million development loan was provided in the year, for the construction of a new 13 storey, 275 room hotel, close to Manchester Piccadilly Station. The hotel has been forward purchased by the Fattal Hotel Group and will operated as part of their Leonardo brand.

A development loan has also been provided for the refurbishment and new build at the Crusader Mill site, in Manchester City Centre. This development will provide 201 apartments, which are being marketed for sale to local residents.

Site works completed in the year for the joint venture with Urban & Civic to develop three apartment buildings at Princess Street, Manchester City Centre. The development has provided 351 apartments, which are being offered for sale, together with ground floor retail/leisure space.

The conversion of offices and building of new homes continues at the former office site owned by GMPVF in Didsbury, Manchester. This is being carried out via a development agreement with an experienced house builder. All 82 homes are now sold or reserved, with the final phase due to reach practical completion Autumn 2022.



Crusader Mill, Piccadilly, Manchester.

Other sites owned by GMPVF, on which development plans are being progressed, include:

- A 0.38 acre cleared site at Old Haymarket, Liverpool city centre.
- Soapworks Phase 2, Salford.

GMPVF is a minority partner with Manchester Airport Group, Columbia Threadneedle Investments and Beijing Construction and Engineering Group, to develop Airport City, on land within the Enterprise Zone adjacent to Manchester Airport. This £800 million project will develop offices, advanced industrial, hotel and logistics accommodation, over the next 10 – 15 years.

## Local Investments

### Invest 4 Growth

The objective of the Invest 4 Growth portfolio was to make investments that provided a commercial return, but also had a beneficial economic, social or environmental impact. These aims followed and implemented the ideas of a significant report, of the same name, authored by the Smith Institute, and commissioned by local authority funds. This is consistent with the twin aims applied successfully over many years to local investment. Greater Manchester Pension Fund (GMPF) approved an allocation of £50 million in the initiative in March 2014.

Invest 4 Growth was a collaborative project with several other Local Government Pension Schemes (LGPS), where a number of participating funds pooled resources to carry out due diligence and negotiate investment management fees with external managers. This resource sharing and the economies of scale enabled GMPF and the other funds to make savings on the investment costs and achieve a diversified portfolio.

GMPF is the largest participant of the Invest 4 Growth initiative and has now fully committed its allocation of £50 million. As at 31 March 2022, £38 million of capital had been drawn and invested by fund managers.

It is still too early to judge investment performance overall, but to date the managers are making satisfactory progress against the initial objectives.



New Reflexions, a business invested in by one of GMPF fund managers (Bridges Evergreen), which provides residential care, education and therapy for young people.

## Impact Portfolio

Following on from the Invest 4 Growth initiative, GMPF has approved an allocation of up to £465 million into an Impact Portfolio. This portfolio has the same twin aims of generating a commercial return and delivering a positive local impact. GMPF is seeking to collaborate with other pension funds, specifically the Northern Pool members, to develop a diversified portfolio and achieve cost benefits from greater economies of scale.

As at 31 March 2022, total commitments of £583 million have been made into a number of investments, with £229 million cash drawn down. Areas of investment include: the provision of supported living accommodation, renewable energy, loans to small and medium sized businesses and private equity with a focus on impact investing. Alongside investments into nationally focused pooled funds, GMPF will seek co-investment opportunities to enhance the impact in the North West and reduce the overall investment management costs.



Little Hulton Medical Centre, a primary care centre invested in by one of GMPF fund managers (Alpha Real Capital) won the above award at the Partnerships Awards 2021 – 'Healthcare Project of the Year'.



GMPF has invested £10 million into the Resonance Homelessness Property Fund, which seeks to provide accommodation to homeless individuals and families in Greater Manchester.



# Annual Report 2022

## Northern LGPS Pool

### Northern LGPS Pool Report of the Chair



As Chairman of the Northern LGPS Pool Joint Committee I am delighted to update everyone on the progress made by the Northern LGPS Pool over 2021/2022 and highlight some key achievements.

It was a great source of pride for pool members that our GLIL direct infrastructure vehicle won the LGPS Investment Strategy of the Year award at the Local Authority Pension Fund Investments Awards 2021. The Local Authority Pension Fund Awards celebrate outstanding achievements among the local government pension scheme community. The judges stated that GLIL “demonstrated the ability to invest in assets with good ESG credentials, providing sustainable returns for investors and creating value for local communities”. It was noted by the awards that GLIL had led the way with significant UK green energy investments in Flexion Energy, the specialist utility and energy storage infrastructure company, global renewable energy investor Cubico and energy infrastructure provider Smart Meter Assets. GLIL was also lauded for its partnership with Nest, the government-established defined contribution workplace pension provider, a landmark partnership in the infrastructure world.

We unveiled our new Responsible Investment policy in October 2021 which outlines the pool’s approach to environmental, social and governance (ESG) matters. ESG is vitally important to the Northern LGPS for many reasons, in particular, achieving sustainable, long-term financial returns underpins the ability to pay pensions. A focus on ESG issues reduces risks to the Pool and its beneficiaries. Our approach to responsible investment has been informed by a number of important initiatives. The Northern LGPS fully supports the aims and objectives of the Stewardship Code and member funds are signatories of the Code. Pool members are also signatories of the Principles for Responsible Investment and as such the Pool aspires to harmonise the six responsible investment principles with how it implements its investment beliefs. We have also considered guidance from the Law Commission, Department of Work and Pensions and Ministry of Housing, Communities and Local Government in developing our policy, which I would recommend all stakeholders to read and consider.

It's imperative we remember that our beneficiaries live in a society that is affected by the behaviour of investee companies. Therefore, we expect high standards from those businesses we invest in. Consistent with the Northern LGPS fund’s fiduciary duty to their beneficiaries, we will ensure that the businesses in which we invest are both financially and environmentally sustainable, have high standards of governance and are responsible employers. As far as possible the Northern LGPS will seek to invest in a way that is financially and socially beneficial for the North of England.

I would like to thank my colleagues on the Joint Committee and also the pensions committees, local pension boards and officers from each of the partner funds for their support and hard work over the year. Despite the global economic challenges which will impact us all over the coming months, I am confident we will carry on thriving by adhering to our cost-effective approach to LGPS investment pooling which delivers sustainable financial returns to the benefit of members, employers and taxpayers.

*Gerald P. Pacey*





## Background

The Northern LGPS Pool is a partnership between the Greater Manchester (GMPF), Merseyside (MPF) and West Yorkshire (WYPF) LGPS funds (the 'partner funds'). The combined assets of the funds stood at approximately £57.8bn as of 31 March 2022, which is invested on behalf of over 850,000 members and 1,250 contributing employers.

The Northern LGPS Pool's purpose is to facilitate via a simple and democratic governance structure, the pooling of assets and the sharing of services in order to achieve sustainable improved net investment returns for the partner funds.

## History

The Northern LGPS Pool was formed in response to the Government's LGPS pooling agenda, which was first announced in 2015. The Government sought to increase the scale of LGPS investment mandates in order to reduce investment management costs and facilitate infrastructure investment to help drive growth in the UK economy.

Due to the existing scale of the three partner funds, the vast majority of the benefits of pooling for the funds are in respect of alternative assets where there is greatest scope to generate further economies of scale and to combine resources to make increasingly direct investments.

Therefore, the focus of the Pool has been on establishing vehicles which can make collective investments in alternative assets, in particular infrastructure and private equity.

The partner funds are the major investors in the GLIL direct infrastructure vehicle and also established a collective private equity vehicle, known as 'NPEP', in 2018.

The Pool selected Northern Trust as its FCA regulated custodian to ensure all listed assets of the pool (i.e. internally and externally managed equities and bonds) are held within a single permanent FCA regulated entity. The custodian acts as 'master record-keeper' for all assets of the partner funds and manages the calls and distributions in NPEP.

## Governance

The Northern LGPS Pool is not a standalone legal entity. It is a Local Government Joint Committee structure supported administratively by a Host Authority (currently Tameside MBC), which provides all administrative resources and facilities that may be necessary, such as clerking services for the Joint Committee meetings.

The Pool is governed by an inter-authority agreement signed by the three constituent Administering Authorities. The agreement sets out the terms of reference for the Northern LGPS Joint Committee, which is the decision-making body for the Pool. The Joint Committee has been appointed under S102 of the Local Government Act 1972, with delegated authority from the Full Council of each Administering Authority to exercise specific functions in relation to the pooling of pension fund assets.

The Joint Committee may delegate certain functions to the Officer Working Group which is composed of the Directors of the partner funds. The Officer Working Group has the necessary technical skills to advise the Joint Committee on technical investment matters and is a central resource for advice, assistance, guidance, and support for the Joint Committee.

The Administering Authorities retain full control of their individual funds' asset allocations and nominate members to the Joint Committee.

## Northern LGPS Pool – 31 March 2022 position at a glance

Fund	Assets £bn
GMPF	29.3
WYPF	17.7
MPF	10.8
<b>Total Assets</b>	<b>57.8</b>

## Northern LGPS Pool – Total costs and savings

The table below sets out the total costs and savings of the Northern LGPS Pool up to 31 March 2022.

	Up to 31 March 2018 £m	2018-19 £m	2019-20 £m	2020-21 £m	2021-22 £m	Total to 31 March 2022 £m
Annual running costs	0	0	0.1	0.16	0.01	0.28
Other service provider fees	0	0.13	0.78	1.17	1.21	3.28
Transition costs	0	0	0	0	0	0
Set up costs	0.22	0.18	0.09	0	0	0.49
<b>Total costs</b>	<b>0.22</b>	<b>0.31</b>	<b>0.97</b>	<b>1.33</b>	<b>1.22</b>	<b>4.05</b>
Investment management fee savings	7.63	12.21	22.24	31.63	41.79	115.49
Service provider savings	0	0	0.06	0.15	0.15	0.36
<b>Total savings</b>	<b>7.63</b>	<b>12.21</b>	<b>22.31</b>	<b>31.77</b>	<b>41.93</b>	<b>115.85</b>
<b>Total savings net of costs</b>	<b>7.41</b>	<b>11.90</b>	<b>21.33</b>	<b>30.45</b>	<b>40.71</b>	<b>111.80</b>
<b>Total costs (including set up, transition and running costs) as at 31 March 2022</b>						<b>£4.05m</b>
<b>Total savings, net of costs, as at 31 March 2022</b>						<b>£111.80m</b>

Over the summer of 2021, the Northern LGPS Pool worked in collaboration with the other seven LGPS pools to develop a standardised approach to the measurement of costs and savings, which will allow Government and other stakeholders to better analyse the impact of LGPS asset pooling and assist in future policy. The figures in the table above have been calculated using the agreed standardised approach.

## Responsible Investment

Environmental, social and governance (ESG) matters are crucially important to the Pool for a number of reasons. Appropriate consideration of ESG factors is part of the assessment and monitoring of investments in all asset classes and this helps achieve sustainable, long-term financial returns, underpinning the ability for LGPS funds to pay pensions. A detailed focus on ESG issues reduces risks to the Pool and its beneficiaries. These risks might be financial, such as the underperformance or failure of an investee company, or reputational, resulting from poor corporate behaviour.

In addition, the Pool's beneficiaries live in a society that is affected by the behaviour of investee companies. Therefore, we expect high standards from those businesses. Consistent with the partner fund's fiduciary duty to their beneficiaries we will ensure that the businesses in which we invest are both financially and environmentally sustainable, have high standards of governance and are responsible employers. As far as possible, the Pool will seek to invest in a way that is financially and socially beneficial for the North of England.

Northern LGPS frequently engages with companies the Pool invests in and challenges them where a component of their operations seems deficient. The updates on the Pool's activity can be seen in the quarterly [Stewardship Reports](#).

Our full approach to Responsible Investment can be seen in our [Responsible Investment Policy](#) which, at the time of writing, was being updated to reflect the further strengthening of the Pool's approach.



## GLIL Direct Infrastructure Vehicle

In April 2015, GMPF and the London Pensions Fund Authority formed a joint venture to invest directly in infrastructure assets, with a focus on the UK. The joint venture was structured as a limited liability partnership and was named GLIL Infrastructure LLP (GLIL). As part of the Local Government Pension Scheme (LGPS) pooling discussions, West Yorkshire, Merseyside and Lancashire County Council pension funds joined GLIL in December 2016.

In March 2018 GLIL was re-structured as an open-ended fund to facilitate potential new members; which include Nest, one of the UK's biggest Defined Contribution Pension Schemes. Additional commitments made by new and existing members means GLIL now has committed capital of £3.6 billion, of which over £2.4bn is from the Northern LGPS funds. The Net Asset Value of GLIL has increased significantly over the year, with the Northern LGPS funds' share standing at almost £1.8bn.

GLIL currently has 13 investments that include equity stakes in Anglian Water, Clyde Wind Farm, Iona Capital, Rock Rail, Forth Ports, Semperian, Cubico Sustainable Investments, Agility Trains East, Smart Meter Assets, and Flexion Energy.

One of GLIL's more recent transactions, and GLIL's first foray into foreign infrastructure, has seen GLIL acquire a majority investment in Invis Energy's portfolio of 11 operational onshore wind farms that provide around 11% of the Republic of Ireland's installed wind capacity. The portfolio is currently operating 453 MW of installed wind capacity and, in its lifetime, has generated enough electricity to power 350,000 homes and prevented 480,000 tonnes of CO2 emissions per year, compared to non-renewable energy generation.

## Northern Private Equity Pool LP

Northern LGPS established the Northern Private Equity Pool in May 2018; an investment joint venture structured as an English Limited Partnership. The partnership operates as a single legal entity through which the three Northern LGPS funds can invest collectively and collaboratively in private equity assets.

The Northern Private Equity Pool draws on the combined expertise and experience of the internal teams at each of the respective Northern LGPS funds, and the administration capabilities of Northern LGPS's pool-wide external custodian. The combined scale and resources of the Northern Private Equity Pool enables the partner funds to invest in private equity through lower cost implementation approaches than have been the case historically.

Investment pace since inception has been consistent with targets, with over £1bn committed to 17 investment funds. As at 31 March 2022 the Net Asset Value of NPEP stood at £734m.

At the end of 2019 an investment commitment was concluded with HarbourVest Partners that specifically addressed the co-investment aims of Northern LGPS. The target is for co-investment to constitute 20% of the NPEP portfolio, providing additional fee savings for the Northern LGPS partner funds.

## Other Northern LGPS Investments

Call-offs have been made from the Pool property framework which was established in 2020/21. The framework will deliver efficiencies in the management of property investments and related services, and covers a wide range of services. Pool Collective housing investments are on track to deliver the timely construction of new homes in the North of England, with good returns expected. The Pool remains committed to finance over 10,000 new homes.

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## Objectives for 2022/23

- Assessing, alongside the partner funds, the recently released consultation on implementing Task Force on Climate-Related Financial Disclosures ('TCFD') in the LGPS
- Continue to collaborate with Government, other LGPS funds and pools and global benchmarking services to help achieve a consistent approach to measuring costs, savings and ESG metrics across LGPS pools
- Seek to expand the Pool's local investment activity in line with the objectives for the LGPS set out in the Government's white-paper on 'levelling-up'; and support other LGPS pools and funds in this area where possible

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# Annual Report 2022

## Approach to Climate Risk

Greater Manchester Pension Fund (GMPF) actively supports the recommendations of the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD) and sets out below its approach to managing climate risk within the TCFD's four thematic areas of governance, strategy, risk management and metrics and targets.

### GOVERNANCE

#### Recommended disclosure (a)

Describe the Board's oversight of climate-related risks and opportunities.

The Pension Fund Management Panel (the Panel) is responsible for managing climate-related issues as part of its remit of having responsibility for GMPF's investment strategy. The approach is codified in the ISS and RI Policy. The Investment Monitoring and ESG (Environmental, social and governance) Working Group, a specialist subcommittee of the Panel, also considers issues relating to climate change. The Panel and Working Group consider climate change issues across GMPF and specifically in areas such as strategic asset allocation, investment strategy and risk management with the aim of minimising adverse financial impacts and maximising the opportunities for long term economic returns on our assets.

In recognition of the risks and opportunities of climate change, GMPF has committed to undertake an annual carbon footprint of applicable assets. The results of these are reported to the Panel and are publicly available.

#### Recommended disclosure (b)

Describe management's role in assessing and managing climate-related risks and opportunities.

Day to day management of GMPF's climate change strategy is delegated to the external Fund Managers, who operate under GMPF's policies on ESG. The external Fund Managers are regularly monitored by officers from GMPF and they also present the processes they have in place to implement GMPF's RI Policies which includes GMPF's approach to climate risk to the Investment Monitoring and ESG Working Group. An annual carbon footprinting exercise is used to assess both the risks from climate change, but also areas of opportunity. Officers report quarterly to the Panel GMPF's responsible investment related activity which is also publicly available. GMPF employs a specialist advisor, PIRC, to instruct its voting activity on active equity holdings, including on areas such as climate change. GMPF also incorporates Voting Alerts from the Local Authority Pension Fund Forum on climate change within its policy. As the Panel members are ultimately responsible regular training is arranged for both Panel members and GMPF Officers to ensure they are kept abreast of latest developments. The Working Group meetings, officer reports and training all ensure the Panel are well informed to be able to assess and manage climate related risks and opportunities.

## STRATEGY

### Recommended disclosure a)

Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.

GMPF considers climate-related issues across multiple timeframes and has strategies to help address these. GMPF identifies climate-related issues through collaboration with its external Fund Managers, and organisations such as the Local Authority Pension Fund Forum, the Institutional Investor Group on Climate Change, the Transition Pathway Initiative, Climate Action 100+, Investing in a Just Transition and the Principles for Responsible Investment. This has led to co-filing and supporting resolutions for action related to climate change and better disclosures of climate-related issues.

GMPF has identified a number of risks and opportunities including regulatory risk as governments use their legislative powers to decarbonise economies, the physical risks of climate change, technological advancements and changes in consumer behaviours that will arise over different timeframes.

GMPF has signed up to the 'Investing in a Just Transition' initiative recognising that delivering a just transition will be key to the UK's success in building a zero carbon and resilient economy. GMPF understands this needs to be done in a sustainable way that supports an inclusive economy, with a particular focus on workers and communities across the country. Analysis shows that unless a transition is effected carefully, there will be significant impacts on workers and communities in the North.

### Recommended disclosure b)

Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning.

GMPF's ESG policies and considerations, including climate change, are incorporated into the mandates of the external Fund Managers via their respective Investment Management Agreements. External Fund Manager appointments also take ESG considerations into account, and these are monitored on an ongoing basis.

GMPF also makes several investments with positive impacts on climate change; these are only made where an acceptable level of financial return is also expected. Climate-related investment opportunities are available in areas such as energy efficiency, choice of energy sources, products and services and new markets. GMPF considers that currently there are relatively limited climate related investment opportunities in the public markets with more opportunities existing in the private markets across private equity, private debt, infrastructure and real assets. This has asset allocation implications due to the illiquidity and complexity of some of these asset classes. Property is a significant asset class allocation and GMPF is aware that buildings are responsible for over one-third of total greenhouse gas emissions in the UK. For directly held properties, GMPF works with its property management teams on focus areas such as energy management and owner-occupier relations to reduce these emissions, and indirectly held property managers do likewise.

GMPF has increased its long term strategic allocation to infrastructure to 10%, unlocking almost £3 billion of assets for this purpose. A key strategy within this allocation is investments in low carbon and renewable energy opportunities. For example, GMPF has invested directly in UK operational wind and solar assets, smart meters and energy storage.

GMPF via the GLIL infrastructure vehicle, acquired a preferred equity stake in Smart Meter Assets (SMA). SMA was incorporated in January 2014 and is a leading UK independent Meter Asset Provider. Apart from enabling accurate billing, SMA's smart meters play a role in the UK's energy transition and net zero emissions ambitions. They have a direct positive impact on end energy consumers by improving their ability to monitor energy usage, helping them achieve energy cost savings and improving overall user experience.

GLIL infrastructure announced a joint venture with ion Ventures to invest in Flexion, the specialist utility and energy storage infrastructure company. The aim is to have 1GW of operational assets within five years, to scale up UK energy storage and support a just transition to net zero. This is GLIL's eleventh investment, and will allow Flexion to develop, build, own and manage energy storage systems, particularly large scale batteries servicing the grid. It will help stabilise the UK's energy system, enable further

## STRATEGY

national electrification to meet net-zero targets and in doing so advance a just transition that ensures the economy and livelihoods are not swept away by climate goals.

By investing in low carbon and clean energy projects and ventures with the twin aims of a commercial return as well as a positive environmental and social impact, GMPF has identified opportunities in the medium to long term which complement GMPF's ambition of a just transition to a low carbon economy. These investments are made from the dedicated Impact Portfolio.

### Recommended disclosure c)

Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a two degree or lower scenario.

GMPF has compared several of its portfolios against a two-degree benchmark using the Paris Agreement Capital Transition Assessment (PACTA) tool. The tool is a free, open source methodology tool which measures a portfolio's alignment with various climate scenarios consistent with the Paris Agreement. The tool compares what needs to happen in climate-relevant sectors in order to minimise global temperature rises, with a portfolio's exposure to companies in these sectors. It employs a dynamic, forward-looking approach, based on the five year production plans of companies to which a portfolio is exposed. The climate-relevant sectors currently covered by the tool are power, coal mining, oil and gas upstream sectors, auto manufacturing, cement, steel and aviation. Collectively, these sectors account for about 75% of global greenhouse gas emissions.

GMPF's actuary, Hymans Robertson, undertakes climate analysis in conjunction with their Asset Liability Modelling analysis. Hymans looked at GMPF's investment decision making process that is underpinned by key investment beliefs and carried out their analysis under three scenarios. The results of the analysis supported the work GMPF has been doing on integrating Responsible Investment best practices, GMPF's intention of being net carbon neutral by 2050, its implementation of the low carbon multi factor Scientific Beta mandate and the infrastructure allocation to renewables.

## RISK MANAGEMENT

### Recommended disclosure a)

Describe the organisation's processes for identifying and assessing climate-related risks.

GMPF believes that each of the following categories of risks, as outlined by the TCFD, pose a material financial risk, and are thus each a cause for concern:

- Market and technology shifts (eg reduced market demand for higher carbon products).
- Reputation (eg growing expectations for responsible conduct from stakeholders).
- Policy and legal (eg increased input/operating costs for high carbon activities).
- Physical risks (eg chronic changes and more frequent and severe extremes of climate).

Day to day management of GMPF's climate change strategy is delegated to the external Fund Managers, who operate under GMPF's policies on ESG issues. This means that the external Fund Managers fully integrate any climate-related risks when making their investment decisions. The decisions and thinking behind them is presented by the Fund Managers to the Investment Monitoring and ESG Working Group. This Working Group meeting provides a forum for the Panel to scrutinise the Fund Managers' approaches and assess whether their processes and activities are aligned to GMPF's policies.

GMPF conducts an annual review of its investment strategy to ensure the appropriateness of its approach. This involves questioning the external Fund Managers, GMPF's advisors and investment consultant on a range of issues requesting their thoughts, feedback and any recommendations they may have. Amongst the questions asked each year is the question of whether they see if there are any reasons GMPF should change its benchmark allocation in light of ESG risks or opportunities. GMPF Officers consider the responses and formulate an appropriate strategy which is reported to the Panel for their approval.

## RISK MANAGEMENT

### Recommended disclosure b)

Describe the organisation's processes for managing climate-related risks.

GMPF's annual carbon footprinting exercise, coupled with the use of the Transition Pathway Initiative (TPI) toolkit, also help assess climate-related risks, including the identification of companies to engage with. GMPF's involvement in forums such as the Local Authority Pension Fund Forum, Climate Action 100+ and the Institutional Investor Group on Climate Change further provide an understanding of the climate-related risks that GMPF faces.

A significant pillar of GMPF's efforts to manage climate change risk is through engagement with companies, both through the external Fund Managers and in collaboration with wider industry groups such as the Local Authority Pension Fund Forum, the Institutional Investor Group on Climate Change, the Transition Pathway Initiative, Climate Action 100+, the Net Zero Asset Owner Alliance, Investing in a Just Transition, Say on Climate and the Principles for Responsible Investment. For example, through collaborative activities, GMPF aims to support 1.5 to 2 degree business model scenarios and participate in:

- engagement with companies to improve their approaches to climate change as well as encourage them to report on their actions for future business model scenarios;
- escalation of issues where GMPF feels progress is not being made. This may be done collaboratively, directly or via GMPF's Responsible Investment advisor;
- influencing policy makers; and
- promotion of relevant research projects in areas such as developing standardised carbon intensity measures, and investment initiatives that improve information flow and investment opportunities.

GMPF's external Fund Managers also implement the Fund's ESG policies in their management of the portfolios. GMPF's commitment to an orderly transition to a low economy is demonstrated by the replacement of £2.5 billion of passive, index tracking investments, with an enhanced Factor Based Investing approach that has significantly reduced GMPF's exposure to carbon emissions and intensity. Factor Based Investing lends itself to incorporating ESG constraints. GMPF worked with Scientific Beta, and commissioned research for a bespoke GMPF version of their flagship indices that offers GMPF a diversified multi-factor exposure to developed market Global Equity, coupled with a significantly reduced carbon exposure, together with the incorporation of other important risk control design features. The index construction methodology developed by Scientific Beta allows for the creation of low carbon indices that substantially reduces GMPF's footprint, whilst maintaining well-diversified exposure to rewarded factors and preserving our expectations around long term returns. The results are a reduction in the Carbon Footprint of the Index (vs the market cap weighted Index) of around 40%, and a reduction in the Weighted Average Carbon Intensity of the Index (vs the market cap weighted Index) of around 40%.

### Recommended disclosure c)

Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management.

Climate change is included within GMPF's risk register in the context of the risk of the strategic allocation underperforming. Relevant controls and mitigating actions are also documented. The risk register is reviewed by the Management Panel. The risks of climate change and GMPF's approach to managing this risk are also addressed in GMPF's Investment Strategy Statement and Responsible Investment Policy.

GMPF has a Business Plan that is updated annually that formally incorporates an objective of enhancing stewardship activities and sets desired outcomes. The objectives include areas such as governance of GMPF, collaboration, local investments and integration of ESG factors. The ESG outcomes include the encouragement of suppliers and investee companies to work towards a just transition to a net zero emissions economy by c2050 and to minimise the environmental impact in delivering GMPF's ultimate objective of paying its pensioners.



## RISK MANAGEMENT

In addition, as set out above, the external Fund Managers have GMPF's ESG policies incorporated into their Investment Management Agreements. Day to day management of climate change strategy is delegated to the external Fund Managers. This means that the external Fund Managers consider any climate-related risks when making their investment decisions.

## METRICS AND TARGETS

### Recommended disclosure a)

Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.

GMPF monitors the voting and engagement of all its external Fund Managers and proxy voting advisor on issues including climate change.

The 'two degrees' analysis measures GMPF's alignment with various climate scenarios consistent with the Paris Agreement in relation to electric power generation, fossil fuel reserves and vehicle production.

GMPF also undertakes an annual carbon footprint and measures three established measures of carbon intensity. This allows for easy comparison between portfolios and to better track progress towards net zero over time. A description of the three measures is below.

Carbon to Revenue (C/R) – Expresses the volume of carbon emitted per million pounds of sales generated. This reflects the portfolio's carbon efficiency in relation to generating revenue.

Carbon to Value invested (C/V) – Expresses the volume of carbon emitted per million pounds of investment. This reflects the carbon efficiency in relation to amount invested. This measure can be more volatile than the carbon to revenue measure due to fluctuations in the share price of a company and so can appear markedly different one year to the next.

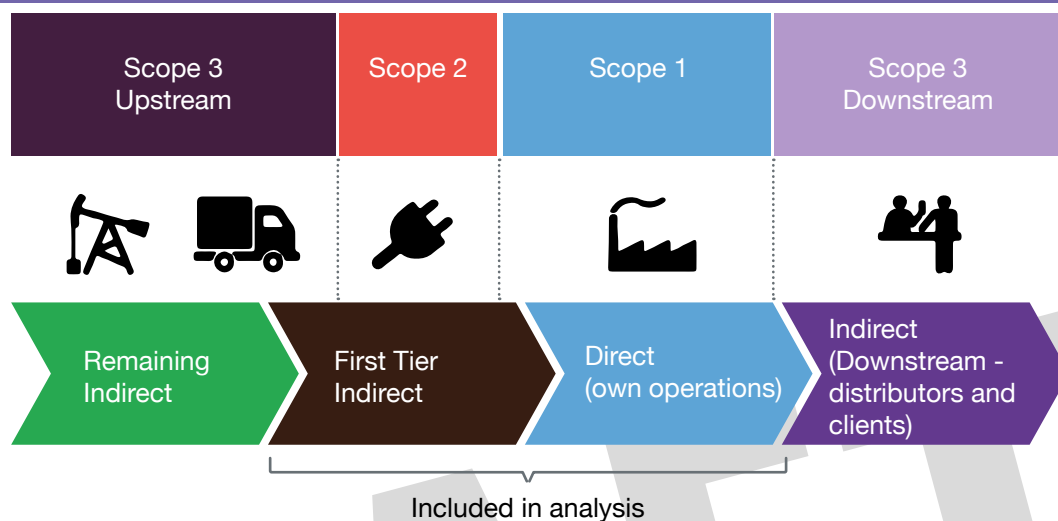
Weighted Average Carbon Intensity (WACI) – Expresses the weighted average of the carbon to revenue metric and thus an investor's exposure to carbon intensive companies. This method is recommended by the TCFD, of which the GMPF is a supporter.

### Recommended disclosure b)

Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.

GMPF uses the services of an independent, external provider to measure its carbon footprint annually. GMPF acknowledges that there are a number of limitations to carbon footprinting as the process relies on data being disclosed by companies, and where this is not, data from third parties, modelled data or estimates are used. Additionally, carbon footprinting is still a relatively new discipline and continues to evolve and methodological differences exist between data providers consequently results can vary across service providers. The nature of the outputs from the exercise is a backward-looking measure that does not take into consideration future changes and therefore should not be viewed in isolation. GMPF has considered Scopes 1 and 2 in their entirety and Scope 3 upstream emissions partially in its analysis as at the time of measurement, Scope 3 data was not considered sufficiently robust to incorporate.

## METRICS AND TARGETS



Scope 1 – CO<sub>2</sub>e emissions from company-owned and controlled resources

Scope 2 – Indirect CO<sub>2</sub>e emissions generated by purchased electricity, heat, steam and cooling

Scope 3 – Indirect CO<sub>2</sub>e emissions that are linked to a company's operations that occur in the value chain. These can be upstream or downstream

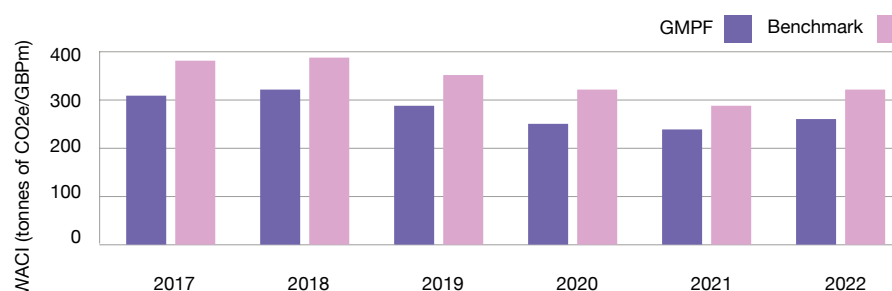
Upstream – The emissions associated with the production, processing, transmission, storage and distribution of raw materials beginning with extraction and ending with delivery to the site of use

Downstream – The emissions associated with a product or service after it leaves the company's control or ownership

First Tier Indirect – Scope 2 emissions plus the company's first-tier scope 3 upstream emissions

The chart below shows the historical intensity relative to the benchmark for the weighted average carbon intensity metric, as recommended by TCFD. GMPF's carbon footprinting exercise found that as at 31 March 2022, the active equity holdings were 16% more efficient than the combined benchmark. This compares with a figure of 20% as at 31 March 2021.

### GMPF WEIGHTED AVERAGE CARBON INTENSITY (WACI)





## METRICS AND TARGETS

In order to understand the quality of the results GMPF tracks the carbon data disclosure rates which feed into the analysis. A higher level of disclosure would lead to more accurate results. The level of carbon disclosures are based on each company's Scope 1 emissions and are classified as fully disclosed, partially disclosed or modelled. Through its membership of CDP, GMPF calls for greater disclosure from companies on their carbon emissions.

GMPF, via the Northern LGPS, is a signatory to the Transition Pathway Initiative (TPI) which is a global, asset-owner led initiative that assesses companies' preparedness for the transition to a low carbon economy. The TPI enables assessment of how companies are managing climate change and the risk it poses to their business. Based on company disclosures, TPI's company assessments are divided into two parts. Firstly, Management Quality which covers companies' management/governance of greenhouse gas emissions and the risks and opportunities arising from the low-carbon transition and secondly, a Carbon 'Performance Assessment', which involves quantitative benchmarking of companies' emissions pathways against international targets and national pledges made as part of the 2015 UN Paris Agreement. In turn, this enables better informed investment processes and decisions, and can shape engagement activities and proxy voting decisions.

The TPI tool enables the assessment of companies' Management Quality based only on publicly available information, by analysing 477 of the largest corporations in a variety of high-emitting sectors. The companies within a selected sector appear on a management quality 'staircase' with their relative position from Level 0 to 4, with Level 4 being the highest rating. The 4STAR rating is given to companies with a 'perfect' score for the TPI indicators.

Level 0 – Unaware of or not Acknowledging Climate Change as a Business Issue

Level 1 – Acknowledging Climate Change as a Business Issue

Level 2 – Building Capacity

Level 3 – Integrated into Operational Decision-making

Level 4 – Strategic Assessment

GMPF annually maps its holdings to the TPI's list of target companies. As of 31 March 2022, GMPF was invested in 122 companies that appeared in the TPI's universe of high emitters. GMPF's investment in these companies totalled £2.6 billion.

TPI Rating	Number of Companies	GMPF Holding (£m)	% of Equity Analysed
0	1	3	0%
1	2	36	1%
2	7	30	1%
3	55	542	21%
4	51	1,379	53%
4STAR	6	623	24%

## METRICS AND TARGETS

### Recommended disclosure c)

Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.

GMPF's long term goal is for 100% of assets to be compatible with the net zero emissions ambition by c2050 in line with the Paris Agreement.

As part of the Paris Aligned Investment Initiative's Net Zero Asset Owner commitment, GMPF as a member of the Northern LGPS has set an intermediate target to reduce its WACI by 50% by 2030 relative to its 2019 benchmark for its listed equity and corporate bond assets.

As of 31 March 2022, GMPF had an estimated £660m invested in climate solutions within its infrastructure allocation. GMPF has the intention of increasing its investment in climate solutions by a further £470m by 2030.

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# Annual Report 2022

## Voting activity

Greater Manchester Pension Fund's (GMPF) approach to proxy voting is described at Section 10 of the Investment Strategy Statement.

GMPF has delegated the exercising of voting rights attached to its direct holdings to Pensions & Investment Research Consultants Ltd (PIRC). PIRC are an independent corporate governance and shareholder advisory consultancy that advises and provides research to GMPF on governance and other ESG issues. This will mean that GMPF's votes are typically cast in line with PIRC's voting policy. This aligns GMPF's approach with that of its pooling partners, Merseyside Pension Fund and West Yorkshire Pension Fund, enabling a shared voice on corporate governance issues.

With this delegation, GMPF's voting record is provided online, and can be found at this link.

[Voting Disclosure \(pirc.co.uk\)](https://www.pirc.co.uk)

In order to track the performance of various regional equity indices, the appointed external passive securities manager, Legal & General, holds shares in thousands of companies around the world. In the normal course of events, Legal & General typically implements its own voting policy for GMPF but may vote the relevant holding according to GMPF's instructions on a case by case basis should GMPF so require.

More information on Legal & General's voting policy and records can be found at this link [www.lgim.com](https://www.lgim.com)



# Annual Report 2022

## Financial performance report

### Key financials

	£m	£m	£m
<b>GMPF value at 31 March 2021</b>			<b>26,890</b>
<b>Contributions and benefits</b>			(290)
Employee contributions	168		
Employer contributions	461		
Pension benefits paid		941	
Net transfers	22		
<b>Management costs</b>			(120)
Investment		113	
Administration		6	
Oversight		1	
<b>Investments</b>			2,884
Income	587		
Change in market value of investments	2,257		
<b>Total change in value of GMPF</b>			<b>2,434</b>
<b>GMPF value at 31 March 2022</b>			<b>29,324</b>

## Out-turn against medium term financial plan

The table below shows the financial out-turn against the prediction for the year 2021/22 as agreed by the Management Panel at its meeting in March 2021. The main variance was that, Investment returns were significantly higher than the long term average this year as markets were positive for the period creating a rise in valuation of assets.

	2020/22 prediction £m	2021/22 actual £m	Variance £m
<b>GMPF size at start of year</b>	<b>26,890</b>	<b>26,890</b>	
<b>GMPF size at end of year</b>	<b>27,890</b>	<b>29,324</b>	<b>1,434</b>
Pensions paid	917	941	24
Contributions received	551	629	78
Transfers	0	22	22
<b>Net cashflow</b>	<b>-366</b>	<b>-290</b>	<b>76</b>
Management costs	113	120	7
Investment income	548	587	39
Increase in value of investments	931	2,257	1,326
<b>Net return from investments</b>	<b>1,479</b>	<b>2,844</b>	<b>1,365</b>
<b>Net change in value of GMPF</b>	<b>1.000</b>	<b>2.434</b>	<b>1.434</b>



## Out-turn against prediction for management costs 2021/22

The table below shows the out-turn for expenditure against budget (ex-investment management external fees) for 2021/22.

The main variances are due to:

- significant development items initiated during the year incur expenditure in future years
- saving on Northern Trust fees
- significant savings on pooling, website consultants, external legal fees, investments advice and employer service costs
- saving on Altair annual fee (paid in 20/21), hardware maintenance and infrastructure licenses and development
- savings due to restricted use of building. (Rent costs understated - deferred to 2022/23)
- cost of changing postal services to Adare, not as significant as expected in first year. On-going savings on travel and subscriptions.
- increased divorce and admission fee income offset by reduced legal recharges.

	Total Out-turn 2021/22	Total Budget 2021/22	Variance Fav (Adv)
Staffing	7,109,594	7,113,117	3,583
Leadership & development	91,899	589,900	498,001
Governance	206,684	269,120	62,436
Custody	440,379	488,620	48,241
Actuarial fees	289,775	275,500	(14,275)
Professional fees	738,382	2,080,010	1,341,628
IT and equipment	445,704	1,295,640	849,936
Premises	731,093	1,011,760	280,667
Other general costs	343,118	794,309	451,191
Income	(743,615)	(1,230,000)	(486,385)
	9,653,013	12,688,036	3,035,023
Central establishment charges	458,435	478,067	19,632
<b>Total pre-investment management fees</b>	<b>10,111,448</b>	<b>13,166,103</b>	<b>3,054,655</b>

## External investment management fees

The table below shows investment fees paid directly by GMPF against forecast, variances will be due to changes in asset valuations and fee negotiation by investments team from that projected at start of the year, notably an excellent result with UBS.

	Original annual budget 2021/22	Actual out-turn 2021/22	Variance fav (Adv)
<b>External Managers</b>			
UBS (incl designated fund)	13,220,000	10,095,856	3,124,144
L&G	2,400,000	2,041,213	358,787
91 (formerly Investec)	1,830,000	1,879,990	(49,990)
Sci Beta	1,200,000	1,140,998	59,002
Stone Harbour (credit manager)	3,850,000	4,168,888	(318,888)
	<b>22,500,000</b>	<b>19,326,945</b>	<b>3,173,055</b>
<b>Property</b>			
Main portfolio investment management	2,329,000	932,772	1,396,228
Main portfolio other	110,000	72,789	37,211
Local portfolio investment management	115,000	115,000	0
Local portfolio other	0	3,303	(3,303)
	<b>2,554,000</b>	<b>1,123,864</b>	<b>1,430,136</b>

## Investment fees private markets

Certain investments in pooled vehicles, predominantly in private markets, alternatives and property have investment costs charged directly by the investment managers from either asset values or capital calls/payments. These costs are allocated directly to the Fund Account where information is available to the Custodian by the investment manager, on an as paid rather than on an accruals basis. This is a change in policy for 2022.

Where costs are charged by these managers and not disclosed to the Custodian, they are included in the fair value adjustments applied to assets concerned within the Fund Account and corresponding notes; in previous years all of these costs were treated this way

The table below shows an estimate of a fuller charge to these private market funds on an accruals basis including performance related fees for 2021/22 and 2020/21. The material variance is the performance fees which reflects the strong performance achieved by these assets during the period.

31 March 2021 £000		31 March 2022 £000
	<b>GMPF Private market and alternative investments</b>	
89,516	- performance related	182,440
66,417	- non-performance related	67,604
	<b>GMPF Indirect investment property</b>	
10,078	- performance related	15,502
20,098	- non-performance related	19,149
	<b>Northern LGPS investments (NPEP/GLIL)</b>	
4,669	- performance related	17,621
10,580	- non-performance related	12,634
<b>201,358</b>	<b>Total</b>	<b>314,950</b>

## Three year financial plan

The table below shows the financial forecast for period 2021-2024 as approved by GMPF Management Panel on 16 September 2022. Key issues remain consistent with previous years.

- The net negative cash-flow from contribution income less benefits whilst accelerating due to the maturity of the Fund, is offset by investment income meaning that GMPF is not going to be a forced seller of assets for the foreseeable future.
- These figures are based on long term projected average investment performance of 5.2% taken from and short term volatility may cause significant variations to the figures in this forecast.
- GMPF has changed the way in which it discloses some costs for private market assets, (those specifically reported to the custodian) that were previously deducted at source by investment managers, effectively netting against investment performance. These were previously disclosed as note to accounts but not expensed through accounts. is something missing here to finish off the sentence? This does not affect the projected change in fund value for the three year period.
- Due to the general uncertainty, specific forthcoming issues with how costs from pooled investments are treated, and a desire to review budgets on a zero-based basis, the Management Panel has not approved a three year budget for management costs with the exception of AUM movements for external management fees.

	2022/23 £m	2023/24 £m	2024/25 £m
<b>GMPF size at start of year</b>	<b>29,324</b>	<b>30,408</b>	<b>31,437</b>
<b>GMPF size at end of year</b>	<b>30,408</b>	<b>31,437</b>	<b>32,459</b>
Pensions paid	945	1,052	1,107
Contributions received	629	629	629
Transfers	0	0	0
Net cashflow	<b>-316</b>	<b>-423</b>	<b>-478</b>
Management costs	125	130	135
Investment income	618	650	683
Increase in value of investments	907	932	951
<b>Net return from investments</b>	<b>1,525</b>	<b>1,581</b>	<b>1,635</b>
<b>Net change in GMPF</b>	<b>1.084</b>	<b>1.029</b>	<b>1.022</b>



# *Annual Report* **Scheme Administration**

2022





# *Annual Report 2022*

## **Background to GMPF and LGPS**

Greater Manchester Pension Fund (GMPF) is the largest fund in the statutory Local Government Pension Scheme (LGPS) for England and Wales, Scotland, and Northern Ireland. Tameside Metropolitan Borough Council (TMBC) is the administering authority for GMPF.

Employees of all local and joint authorities in the Greater Manchester area and many other public bodies have automatic access to the LGPS (unless they are eligible to be a member of another public service pension scheme, such as the teachers, police officers, firefighters, Civil Service or NHS pension schemes). Employees of a wide range of other bodies that provide a public service can also join the LGPS if they are covered by a relevant resolution or by an admission agreement.

GMPF also provides the pension service for those employed by the National Probation Service and for former probation employees in England and Wales. This includes those who were employed by the former Probation Trusts, plus those who were transferred to a community rehabilitation company. There are also some councillors who are GMPF members, although due to a change in the LGPS Regulations they have all now stopped contributing to the Scheme.

A list of employers who contribute to GMPF can be found later in this report.

The LGPS is a defined benefit scheme. Benefits up to 31 March 2014 are worked out on a final salary basis, whereby membership up to that date and pay on or near retirement is used to work out members' pension benefits.

Benefits from 1 April 2014 are worked out on a career average basis (sometimes known as a pension build up). Members who have chosen to be in the main section of the career average scheme build up a pension of 1/49 of their pay each year. These benefits are then rolled forward each year and adjusted in line with consumer price inflation. Alternatively, members can opt for the 50/50 section of the career average scheme, whereby they pay 50% of the standard contribution and in return build up 50% of the standard pension for themselves.

Statutory regulations define the benefits to be paid to members. Benefits are not affected by GMPF's investment performance or market conditions. A summary of the LGPS rules can be found later in this report.

Standard employee contributions vary according to levels of pay, ranging from 5.5% to 12.5% of pensionable pay. Employers meet the balance of the cost of the LGPS through variable employer contributions. The employer contribution rates are set by GMPF's actuary every three years following a valuation.

Employer contribution rates can rise or fall depending on the funding position of GMPF and the estimated cost of providing benefits for future membership. The employer contribution rates for 2021/22 are shown later in this report. These were determined for the three years from 1 April 2020 by the valuation that took place as at 31 March 2019. The LGPS is registered with Her Majesty's Revenue and Customs, giving rise to various tax benefits, including tax relief on employee contributions.

GMPF pension administration is carried out by an in-house team, reporting primarily to the Administration and Employer Funding Viability Working Group.

## Our Vision and quality standards

Our aim is to administer GMPF successfully, in a cost effective way, while meeting member expectations and ensuring our statutory duties are met.

We believe that by delivering this aim we will provide a service that is value for money for all pension fund stakeholders.

Our quality standards are:

1. Lawful – meeting our statutory duties and obligations.
2. Cost effective – ensuring we deliver value for money.
3. Customer service – meeting our members' expectations.
4. Efficient – minimising waste, effort, and expense.

### Lawful - Meeting our statutory duties and obligations

We constantly strive to meet all the duties that are required of us as set out in the LGPS regulations and other statutory legislation. Some of the ways in which we do this include:

- being aware of our requirements and any anticipated changes by subscribing to industry news updates, having representation on national boards, attending peer user groups and by taking part in consultation processes
- having regularly audited compliance and checking procedures in place
- following the Pension Regulator's Code of Practice and ensuring our procedures highlight any potential breaches of the law
- taking part in National Fraud Initiative checks and by carrying out mortality screening.

### Cost effective - Ensuring we deliver value for money

We manage and monitor our costs by:

- setting an expected expenditure plan each year in line with setting business plans
- regularly monitoring spending and reporting details of this to the appropriate Working Group
- benchmarking our costs by taking part in national and global (CEM) benchmarking exercises
- reviewing other cost and benchmarking data and making comparisons to identify learning opportunities.

### Customer service - Meeting our members' expectations

We aim to put our members at the centre of everything we do. We look to meet member expectations by:

- having clear and achievable targets for all the administrative tasks and projects that we undertake
- regularly reviewing what we do and asking for feedback to help us to make continual improvements
- ensuring we review all complaints, compliments, disputes and all other feedback to ensure any learning points are identified
- carrying out research, benchmarking and peer review programmes to ensure we are adopting policies and processes that are best practice within our industry.

## Efficient – Minimising waste, effort, and expense

We look to be efficient in several different ways, including:

- having clear and measurable business plans in place
- using project management tools and techniques and squad working methodology when undertaking projects and improvement tasks
- regularly reviewing resource, workloads and planning for the impact of future changes
- holding regular service update meetings for all teams and managers
- submitting comprehensive reports and information to the appropriate Working Groups and the Local Pension Board to enable effective scrutiny to take place
- taking part in peer user groups
- analysing our performance by using benchmarking exercises and measuring against the Pension Regulator's Code of Practice
- outlining expected service standards between GMPF and GMPF employers in the Pensions Administration Strategy
- monitoring the performance of GMPF's employers against service standards, particularly the timeliness of data submissions.

Below are some examples of how we measure our success :

### Internal audit work

A comprehensive risk based Internal Audit Plan is agreed annually. It covers the main administration, finance, and investment systems on a cyclical basis. The Internal Audit Plan also makes provision for an element of advice and support to assist GMPF with specific projects, process improvements and the implementation of new systems.

The table below summarises the levels of assurance given for the Internal Audit reports finalised in 2021/22 relating to the GMPF administration function, including the employer audits carried out. Each report is given a level of assurance being High, Medium, or Low. Consultancy reviews are undertaken on request and the scope and objectives agreed with GMPF. For these audits an assurance level is not given. Recommendations for improvements are made and a post audit review is carried out six months after the issue of the final report if a high or medium level of assurance is given. If the assurance level is low, a post audit review will be carried out after three months.

GMPF Administration Audits	
Audit Title	Level of Assurance
Ill Health Insurance Arrangements	High
My Pension	High
Website Security	High
Treasury Management	High
Specific Admin Project	Medium
Employer Audits	
Salford Council	Consultancy Review
Tameside Council	High
Jigsaw Homes	Low

## Data quality

The table below shows the quality of the member data held by GMPF. The Pensions Regulator sets a target of 100% accuracy for new common data received after June 2010.

Forename	100.00%
Surname	100.00%
Membership status	100.00%
Date of birth	100.00%
NI number	100.00%
Postcode	99.34%
Address	97.37%

Work continues to be undertaken to improve address data and this work will continue over the next twelve months and beyond.

## Compliance checks

The table below shows the number of cross checks that have been completed to ensure benefits are being paid correctly or that pensions are ceased as soon as possible in order to prevent overpayments.

Mortality screening checks	627
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## Complaints, compliments, feedback and formal disputes received

The table below shows a summary of the data collected from GMPF's online feedback zone and associated procedures over the last 12 months, together with the number of formal disputes received where a member is appealing against a decision made by the administering authority during the year.

Compliments received	43
Formal recorded complaints received	49
General feedback, suggestions and comments	22
Formal disputes received	8

## Administration cost per member

**GMPF cost** £17.01 per year

**LGPS average** £27.28 per year

These figures are taken from the LGPS CIPFA benchmarking reports for 2021.

## The number of people working in GMPF Administration

Total number and full time equivalent (fte)	140 / 132.86 (fte)
Employee to GMPF fund member ratio	1:2,888 / 1:3,044 (fte)

## Our commitment to enhancing the level of value for money provided

We believe the level of service we provide for the cost gives all our stakeholders excellent value for money.

However, we are committed to looking at ways to further enhance service delivery and to ensure we review and reduce costs wherever this is viable.

This year, GMPF took part in administration benchmarking with CEM Benchmarking Inc. for the third year running. CEM has carried out administration benchmarking for other non LGPS UK pension funds for several years, with eight LGPS administering authorities supplying data. GMPF's peer group comprised of 14 pension funds in total. The CEM benchmarking report compares both costs and member service, with 'cost per member' and 'member service score' being the two key indicators of comparison.

CEM's analysis shows that GMPF is a high service, low cost provider relative to its peers. GMPF's total cost per member was £17.01. This was £10.27 below the peer average of £27.28. The member service score was 65, which was 1 point above the peer median of 64. GMPF scored well for service in several areas, particularly around the functionality of our website and our service to members who need extra support.

Work currently being carried out by GMPF's administration section on business plan objectives and key projects should lead to future improvements in the service score. Officers will be using the analysis within the CEM report to identify other areas where changes could be made to the way services are provided that might enhance member experience.

## External recognition – European Pension Awards 2021 winner

GMPF was delighted to win the Pension Fund Communication Award at the European Pension Awards 2021. The award recognised multiple aspects of our communication activities, including our website, animated videos, our promotion and use of My Pension, our surveys, and the work of our team customer services champions.



# *Annual Report 2022*

## **Key activities carried out during the year**

The Administration section continued to deliver its services to members effectively despite the issues caused by the pandemic. That said, the effects of the pandemic continued to affect our workloads and priorities for the year. Our main priority over the last 12 months has continued to be to make sure members can interact with us as easily as possible while also ensuring the health, safety and wellbeing of all our colleagues.

Some of the key projects and areas of work undertaken during the year include the following:

### **Online member events programme**

We have continued to develop our online events programme for members, with our events proving more popular than ever. The programme now includes several new 'bite sized' sessions focussing on specific topics of interest.

### **My Pension**

We have continued to expand the number of processes that members can access through their online My Pension account. We have also been working with our software provider and colleagues at other funds to develop new functionality within My Pension that will improve the current online retirement process for contributors and enable members with benefits on hold to claim their pension online too in most circumstances. This new functionality will be available and adopted shortly.

### **New Customer Services contact centre**

We implemented a new contact centre software system during 2021/22 to enable us to better manage calls and emails sent to our Customer Services team. This software contains new functionality, such as a call back facility, which will enhance the customer experience. It is also helping us to better manage the calls and emails we are receiving. We will be continuing to develop and adopt the new features available in this system over the next 12 months.

### **Ministry of Justice Probation changes**

During 2021/22, the Ministry of Justice made some changes to its probation service. These changes led to some probation members changing employer, and a project team was established to ensure these changes were carried out effectively.

### **Training and support for our employers**

We have continued to expand our online training programme for employers this year, offering a comprehensive range of training and support on a wide range of topics. We have also been working with our larger employers to develop an annual 'year in review' report, to provide feedback to them on how we think they are meeting their responsibilities as an LGPS employer.

## Employer Flexibilities

The government amended the Local Government Pension Scheme Regulations in September 2020 introducing new powers for administering authorities to review employer contributions, spread exit payments and set up Deferred Debt Agreements. Whenever we utilise these powers we must report upon their usage in our Annual Report.

This year we have entered into our first ever Deferred Debt Agreement with one of our employers. We agreed with this employer to set a 20-year Deferred Debt Agreement to settle their remaining liabilities in GMPF.

## IT infrastructure upgrade and cyber security

We have continued with our IT infrastructure renewal plans and are currently working on the next phases of the project. We have also continued to look to improve our cyber security resilience, carrying out regular internal training and testing and building enhancements into our processes.

## Our performance data

The pension administration section uses several performance standards to assess whether it is meeting its statutory duties. Indicators are also used to identify changes in key workloads and highlight performance. The table in the next section provides information regarding some of the key indicators used and performance against these during the year, in line with CIPFA guidance.

## Our membership

The overall number of members accounts we administer continues to grow. Figures at the end of March 2022 and those for the two previous years are as follows:

	March 2020	March 2021	March 2022
Employees	111,644	113,937	117,823
Deferreds (all types)	140,914	142,928	147,338
Pensioners (all types)	132,626	135,617	139,771
<b>TOTALS:</b>	<b>385,204</b>	<b>392,482</b>	<b>404,932</b>

The current membership figures broken down according to benefit type are:

Contributors	117,823
Undecided leavers / Leaver awaiting notification	6,322
Deferred pensioners	117,862
Pensioner	119,803
Spouse / dependant	19,968
Frozen refund	23,113
Pensioner deferred benefit	41

The grounds for retirement of new pensioners with a retirement date during the year were:

Retirement Types	Contributors retiring	Deferred benefits into payment	Total
Voluntary early	1,498	2,647	4,145
Late (after normal retirement date)	733	65	798
Redundancy	225	n/r	225
Ill health	211	39	250
Flexible	266	n/r	250
Efficiency	153	n/r	153
Normal (at normal retirement date)	61	417	478
<b>Total</b>	<b>3,147</b>	<b>3,168</b>	<b>6,315</b>

## Our employers

The number of employers contributing to GMPF continues to grow. The number of employers with members who have contributed during the year as at the end of March 2022 and for the two previous years are:

	March 2020	March 2021	March 2022
Employers with contributing members	597	601	605

There are two main types of employers. There are those who in general are required to enrol all new employees into the LGPS, such as Local Authorities. These are generally known as 'Scheme employers'. Some employers can ask to join in order to admit some or all employees into the LGPS. These are generally known as 'Admission bodies'.

A summary of the number of employers in GMPF analysed by these categories and split between those with contributing members and those with no current contributors but who retain pension liabilities is below:

	With current contributors	With no current contributors but retaining liabilities	Total
Scheme bodies	369	3	372
Admission bodies	236	18	254

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## How we deliver our service

All GMPF administration is carried out in house. We work with several partners who help us to deliver our service, including a print and mailing house, overseas pensions payment service and several additional voluntary contribution (AVC) providers.

Teams within the GMPF administration section are split into four service units, as follows:

### Member Services

Teams within this service focus on delivering tasks for all contributing, leaving and pensioner members of GMPF. This includes work such as calculating retirement benefits and making payments.

### Employer Services

Our Employer Services teams assist GMPF employers and ensure all monthly data returns are processed. This includes work such as admitting new employers into GMPF and facilitating training for those staff at employers who deal with LGPS pensions.

### Communications & Engagement

Our Customer Service team is the first port of call for all stakeholders and leads on all areas of engagement. This includes our member Helpline, website and face to face events such as pre-retirement presentations and My Pension drop-in sessions. Communications focus on all written communications, such as leaflets, newsletters and bulletins.

### Developments & Technologies

Teams within this service focus on ensuring the systems and technology that we currently use is being used as effectively and efficiently as possible. They review and appraise potential new technologies or systems that could be adopted, bring in new technology and are also responsible for ensuring all existing systems are maintained and are compliant.

### Governance and effective decision-making

The GMPF administration section reports directly to the Administration and Employer Funding Viability Working Group and the Pension Fund Management Panel, who take key decisions on how pension administration is delivered.

The Local Pensions Board provides support and guidance to officers and carries out an effective scrutiny role. This includes reviewing how decisions are taken and ensuring that the requirements of the Pensions Regulator are met.

# Annual Report 2022

## Achieving our objectives

### Business planning

Several business plan objectives are set each year. These are reviewed by the administration leadership team each month and progress against them is recorded. Quarterly updates are provided to the Working Group and Local Pension Board.

Several business plan objectives were set for 2021/22, which were either completed or were started during the year and will be carried forward into the next year.

### Communications

We communicate with our members in a variety of different ways. In addition to all the information provided for members on GMPF's website, members can access information about their own pension through the My Pension secure portal. The enhancement of this service for members will remain a focus for GMPF going forward.

The Customer Service team continues to provide a high quality helpline service for all our members with over 68,750 calls being offered during the year with 89% being answered. The team also deliver a popular Events programme, currently consisting of online presentations, drop-in sessions and pension surgeries. 53 events were held during the year with over 2,272 attendees.

### Data Management

We continue to take steps to ensure that the data that we hold remains confidential. All GMPF colleagues have undertaken mandatory data protection training and procedures are in place to ensure that any confidential data that we are required to send or receive is done so securely.

Any near miss data breaches are reported and investigated immediately to identify whether any procedural reviews are required or whether any additional training is needed.

### How stakeholders can contact us or find out more

There are several ways to get in touch with us and to find out more.

You can visit our website at [www.gmpf.org.uk](http://www.gmpf.org.uk). Information about what we do, our feedback zone, how to call our Helpline and what engagement events are currently planned is all available.

You can also find out more by reading our Communications Policy.



# Scheme Administration – Key Performance Information

Key Indicators (as specified within CIPFA guidance)

Process	Total number of cases	GMPF's target	% completed within target
Deaths – Initial letter acknowledgement	4,550	5 days	85.8%
Deaths – Letter notifying amount of dependant's benefit	1,624	5 days	98.4%
Retirements – Letter notifying estimate of retirement benefits (contributing members)	3,319	10 days	83.5%
Retirements – Letter notifying estimate of retirement benefits when requested by the member (benefit on hold members)	6,206	5 days	78.6%
Retirements – Letter notifying actual retirement benefits (contributing members)	3,089	5 days	100%
Retirements – Letter notifying actual retirement benefits (benefit on hold members)	3,959	5 days	87.17%
Retirements – Processed and lump sum retirement grant paid (contributing and benefit on hold members)	7,048	5 days	93.5%
Deferment – Calculate and notify benefits on hold	11,213	10 days	68.2%
Transfers in – Letter detailing transfer in quote	91	10 days	100%
Transfers in – Letter detailing transfer in	50	15 days	100%
Transfers out – Letter detailing transfer out quote	1,752	10 days	97.5%
Transfers out – Letter detailing transfer out	249	10 days	91.5%
Refund – Processed and paid	1,050	10 days	94.7%
Divorce quote – Letter detailing cash equivalent value and other benefits	426	10 days	99.8%
Divorce settlement – Letter detailing implementation of cash equivalent value and application of pension sharing order	33	25 days	51.5%
Member estimates / projections	Members perform their own estimates using My Pension		
Joiners – Notification of joining	19,928	10 days	100.0%
Aggregation – Notification of aggregation options	5,444	10 days	52.2%

\*A further 3,105 benefits on hold were calculated as part of the Community Rehabilitation Centre to National Probation Service transfer. These were processed under a different timescale.



# *Annual Report* **Employer Contributions Rates**

2021/2022



Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
<b>Academies Pool</b>		
Middleton Academy Limited (St Anne's Academy) [to 28.02.21]	18.6	n/a
Great Academies Education Trust	18.6	18.6
Oasis Community Learning (MediaCityUK Academy)	18.6	18.6
Essa Foundation Academies Trust	18.6	18.6
Droylsden Academy	18.6	18.6
The Bishop Fraser Trust (Bolton St Catherine's Academy)	18.6	18.6
Northern Education Trust (Kearsley Academy)	18.6	18.6
St Bede C of E Primary Academy	18.6	18.6
Audenshaw School Academy Trust	18.6	18.6
Urmston Grammar	18.6	18.6
Park Road Academy Primary School	18.6	18.6
Lever Edge Primary Academy	18.6	18.6
Wellacre Technology Academy Trust	18.6	18.6
Wellington School	18.6	18.6
The Hamblin Education Trust (Altrincham Grammar School Boys)	18.6	18.6
Sale Grammar School	18.6	18.6
Fairfield High School for Girls	18.6	18.6
Yesoiday Hatorah MAT	18.6	18.6
Orian Solutions Limited - Fairfield HS for Girls	18.6	18.6
Cranmer Education Trust (St Anne's Academy) [from 01.03.21]	18.6	18.6
Cucina Restaurants - Ex St Anne's Academy Cranmer Educ Trust [from 01.09.21]	n/a	18.6
<b>Archbishop Temple CE Multi Academy Trust Pool</b>		
Archbishop Temple C of E Multi Academy Trust (Bishop Bridgeman) [formerly Bolton & Farnworth C of E Primary MAT (Bishop Bridgeman)]	28.8	27.8
Archbishop Temple C of E Multi Academy Trust (St James Primary) [formerly Bolton & Farnworth C of E Primary MAT (St James C of E Primary)]	28.8	27.8
Archbishop Temple C of E Multi Academy Trust (St Maxentius) [formerly Bolton & Farnworth C of E Primary MAT (St Maxentius Primary)]	28.8	27.8
<b>Ashton Pioneer Homes Pool</b>		
Ashton Pioneer Homes Ltd [Trfd staff]	23.0 + £15k	23.0 + £15k
<b>AQA Pool</b>		
AQA Education	20.5 + £714K	20.5 + £714K

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
<b>Bamford Academy Pool</b>		
Bamford Academy	18.4	18.4
<b>Base Academy Trust Pool</b>		
BASE Academy Trust (Red Lane Primary)	29.2	28.2
BASE Academy Trust (Masefield Primary)	29.2	28.2
<b>Better Choices Pool</b>		
Employment & Regeneration Partnership Ltd	20.9	20.9
<b>Big Life Schools Pool</b>		
Big Life Schools (Longsight Community Primary)	17.2	17.2
Big Life Schools (Unity Community Primary)	17.2	17.2
<b>Bishop Fraser Trust Pool</b>		
The Bishop Fraser Trust (St James's C of E High School)	20.8	20.8
The Bishop Fraser Trust (Canon Slade C of E School)	20.8	20.8
The Bishop Fraser Trust (Bury C of E High School) [from 01.01.22]	n/a	20.8
<b>Bolton At Home Pool</b>		
Bolton at Home Ltd [Trfd staff]	18.3	18.3
Bolton at Home Ltd [New staff]	18.3	18.3
<b>Bolton MBC Pool</b>		
Bolton MBC	20.8	20.8
Bolton Community Leisure Limited	20.8	20.8
Monument Café Limited (Bolton)	20.8	20.8
The Bolton Multi Academy Trust (Smithills School) [formerly Concerted Academies Trust]	20.8	20.8
Agilisys Limited (Ex Bolton)	20.8	20.8
Bolton Cares (A) Ltd	20.8	20.8
<b>Bolton Sixth Form College Pool</b>		
Bolton Sixth Form College	23.4	23.4
<b>Borough Care Pool</b>		
Borough Care Ltd	29.0	29.0
<b>Bright Futures Educational Trust Pool</b>		
Bright Futures Educational Trust (Altrincham Grammar School)	19.8	19.8
Bright Futures Educational Trust (Cedar Mount Academy)	19.8	19.8
Bright Futures Educational Trust (Rushbrook Primary Academy) [formerly Gorton Mount Primary Academy]	19.8	19.8
Bright Futures Educational Trust (Melland High School)	19.8	19.8
Bright Futures Educational Trust (Stanley Grove Primary Academy)	19.8	19.8

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Sodexo - AGGS	19.8	19.8
Bulloughs Cleaning Services Ltd - BFET	19.8	19.8
Taylor Shaw (BFET)	19.8	19.8
Bright Futures Educational Trust (Elmridge Primary School) [from 01.03.21]	22.2	22.2
Bright Futures Educational Trust (Acre Hall Primary School) [from 01.03.21]	22.2	22.2
Bright Futures Educational Trust (Lime Tree Primary Academy) [from 01.03.21]	22.2	22.2
Bright Futures Educational Trust (The Orchards) [from 01.03.21]	22.2	22.2
Bright Futures Educational Trust (Barton Clough Primary School) [from 01.03.21]	22.2	22.2
<b>Bury College Pool</b>		
Bury College	22.2	22.2
<b>Bury College Education Trust Pool</b>		
Bury College Education Trust (Radcliffe Primary School)	20.6	20.6
Bury College Education Trust (Elton Community Primary School)	20.6	20.6
<b>Bury MBC Pool</b>		
Bury MBC	20.5	20.5
Six Town Housing Limited	20.5	20.5
Persona Care and Support Ltd	20.5	20.5
Mellors Catering Svs Ltd - Bury & Whitefield [to 26.11.20]	20.5	n/a
Mellors Catering Services Ltd - Millwood PS (Ex Bury) [from 01.09.20 to 31.08.21]	20.5	20.5
Mellors Catering Services Ltd - St Gabriels [from 01.09.20]	20.5	20.5
<b>CQC Pool</b>		
Care Quality Commission	28.6 plus £515k	28.6 plus £515k
<b>CRC Pool</b>		
Northumbria CRC [to 25.06.21]	16.0	16.0
Durham Tees Valley CRC [to 25.06.21]	16.0	16.0
Humberside, Lincolnshire and North Yorkshire CRC [to 25.06.21]	16.0	16.0
West Yorkshire CRC [to 25.06.21]	16.0	16.0
Cheshire and Greater Manchester CRC [to 25.06.21]	16.0	16.0
Merseyside CRC [to 25.06.21]	16.0	16.0
South Yorkshire CRC [to 25.06.21]	16.0	16.0
Staffordshire and West Midlands CRC [to 25.06.21]	16.0	16.0
Derbyshire, Leicestershire, Nottinghamshire and Rutland CRC [to 25.06.21]	16.0	16.0



Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Warwickshire and West Mercia CRC [to 25.06.21]	16.0	16.0
Hampshire and Isle of Wight CRC [to 25.06.21]	16.0	16.0
Thames Valley CRC [to 25.06.21]	16.0	16.0
Bedfordshire, Northamptonshire, Cambridgeshire and Hertfordshire CRC [to 25.06.21]	16.0	16.0
Norfolk and Suffolk CRC [to 25.06.21]	16.0	16.0
Essex CRC [to 25.06.21]	16.0	16.0
London CRC [to 25.06.21]	16.0	16.0
Kent, Surrey and Sussex CRC [to 25.06.21]	16.0	16.0
Cumbria and Lancashire CRC [to 25.06.21]	16.0	16.0
Third Sector Consortia Management LLP (Trading As 3SC) [to 25.06.21]	16.0	16.0
<b>Christ Church CofE MAT Pool</b>		
Christ Church C of E Multi Academy Trust	18.3	18.3
Christ Church C of E Multi Academy Trust (St John's Primary)	18.3	18.3
Christ Church C of E Multi Academy Trust (Radcliffe Hall C of E/Methodist Primary)	18.3	18.3
<b>Connexions Cumbria Pool</b>		
Inspira Cumbria Limited	24.1 + £156k	24.1 + £156k
<b>Denton West End Primary School Pool</b>		
Denton West End Primary School	18.0	19.4
Mellors Catering Services Ltd (Ex Denton West End)	18.0	19.4
<b>The Dean Trust Pool</b>		
The Dean Trust Wigan	18.0	18.0
The Dean Trust (Ashton On Mersey School)	18.0	18.0
The Dean Trust (Broadoak School)	18.0	18.0
The Dean Trust (Forest Gate Academy)	18.0	18.0
The Dean Trust (Rose Bridge Academy)	18.0	18.0
The Dean Trust (Ardwick)	18.0	18.0
The Dean Trust (Partington Central Academy)	18.0	18.0
<b>The Dunham Trust Pool [formerly Elmridge Academy Trust Pool]</b>		
The Dunham Trust (Elmridge Primary School) [to 28.02.21]	22.2	n/a
The Dunham Trust (Acre Hall Primary School) [to 28.02.21]	22.2	n/a
The Dunham Trust (Lime Tree Primary Academy) [to 28.02.21]	22.2	n/a
The Dunham Trust (The Orchards) [to 28.02.21]	22.2	n/a
The Dunham Trust (Barton Clough Primary) [to 28.02.21]	22.2	n/a

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
<b>Dynamic Framework Employers Pool</b>		
Ingeus UK Ltd (DF ETE South Central) [from 25.06.21]	n/a	18.0
Ingeus UK Ltd (DF ETE East Midlands) [from 25.06.21]	n/a	18.0
Maximus UK Services Ltd (DF ETE London) [from 25.06.21]	n/a	18.0
Maximus UK Services Ltd (DF ETE West Midlands) [from 25.06.21]	n/a	18.0
Nacro (DF Acc East Midlands) [from 25.06.21]	n/a	18.0
Nacro - (DF Acc West Midlands) [from 25.06.21 to 21.09.21]	n/a	18.0
The Nelson Trust (DF Women's Avon & Somerset) [from 25.06.21]	n/a	18.0
Catch 22 Ltd (DF PW Avon & Somerset) [from 25.06.21]	n/a	18.0
Catch 22 Ltd (DF PW Wiltshire) [from 25.06.21]	n/a	18.0
Seetec Business Technology Centre Ltd (DF Acc East England) [from 25.06.21]	n/a	18.0
Seetec Business Technology Centre Ltd (DF ETE East England) [from 25.06.21]	n/a	18.0
Seetec Business Technology Centre Ltd (DF ETE KSS) [from 25.06.21]	n/a	18.0
Seetec Business Technology Centre Ltd (DF PW Kent) [from 25.06.21]	n/a	18.0
<b>Education Learning Trust Pool</b>		
Education Learning Trust (Gatley Primary School)	21.4	21.4
Education Learning Trust (Bredbury Green Primary School)	21.4	21.4
Education Learning Trust (Meadowbank Primary School)	21.4	21.4
Education Learning Trust (The Kingsway School) [from 01.11.20]	26.0	26.0
Education Learning Trust (Werneth School) [from 01.01.21]	21.4	21.4
Cater Link Ltd - Kingsway School (Ex Education Lrng Tst) [from 1.9.18]	26.0	26.0
<b>Education Partnership Trust Pool</b>		
Education Partnership Trust - Atherton High School [from 01.04.20]	19.8	19.8
<b>Enquire Learning Trust Pool</b>		
The Enquire Learning Trust (Manchester Road Primary Academy)	24.3	24.3
The Enquire Learning Trust (Linden Road Primary Academy)	24.3	24.3
The Enquire Learning Trust (Moorside Primary School)	24.3	24.3
The Enquire Learning Trust (Godley Primary)	24.3	24.3
The Enquire Learning Trust (Oakfield Primary School)	24.3	24.3
The Enquire Learning Trust (Flowery Field Primary)	24.3	24.3
The Enquire Learning Trust (Bradley Green Primary Academy)	24.3	24.3
The Enquire Learning Trust (Dowson Primary Academy)	24.3	24.3
The Enquire Learning Trust (Endeavour Primary Academy)	24.3	24.3

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
<b>First Choice Homes Pool</b>		
FCHO Ltd (I & P) [Trfd staff]	27.0	27.0
FCHO Ltd (I & P) [New staff]	27.0	27.0
<b>First Group Pool</b>		
First Manchester Ltd	43.3	43.3
First West Yorkshire Ltd	43.3 + £2.9m	43.3
First South Yorkshire Ltd	43.3 + £3.5m	43.3
<b>Greater Manchester Combined Authority Pool</b>		
Greater Manchester Combined Authority	21.2	21.2
<b>Inspiring Learners Multi Academy Trust Pool</b>		
Inspiring Learners MAT (Tyntesfield Primary School)	21.3	21.3
Inspiring Learners MAT (Bollin Primary School)	21.3	21.3
<b>The Laurus Trust Pool</b>		
The Laurus Trust	19.6	19.6
Aspens Services Limited - The Laurus Trust	19.6	19.6
<b>Leverhulme Academy of CofE &amp; Community Trust Pool</b>		
Leverhulme Academy C of E & Community Trust (Rivington & Blackrod High School)	20.8	20.8
Leverhulme Academy C of E & Community Trust (Harper Green)	20.8	20.8
<b>Loreto Grammar School Pool</b>		
Loreto Grammar School (Academy)	19.0	19.0
<b>Manchester Airport Pool</b>		
Manchester Airport plc [to 09.08.21]	22.2 + £1.646m	22.2 + £1.646m
Manchester Airport Aviation Services Ltd [to 31.07.21]	22.2	22.2
<b>Manchester City Council Pool</b>		
Manchester City Council	#18.5	#18.5
National Car Parks Manchester Ltd [to 31.12.20]	18.5	n/a
Manchester Active Ltd	18.5	18.5
Eastlands Homes Partnership Ltd [Trfd staff]	18.5	18.5
Amey Highways Limited	18.5	18.5
Manchester Working Limited	18.5	18.5
Jigsaw Homes North [formerly Adactus Housing Association Limited]	18.5	18.5
SPIE FS Northern UK Limited (Wright Robinson)	18.5	18.5
Mosscaire St. Vincent's Housing Group Limited [formerly Mosscaire Housing Limited]	18.5	18.5
Community Integrated Care [to 12.10.21]	18.5	18.5

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Inspirit Care Limited [to 31.09.20]	18.5	n/a
Manchester Health Academy [to 31.12.21]	18.5	18.5
The Cooperative Academies Trust (North Manchester) [formerly MCMA]	18.5	18.5
Education & Leadership Trust (East Manchester Academy)	18.5	18.5
Greater Manchester Academies Trust (MCA)	18.5	18.5
The Cooperative Academies Trust (CAM)	18.5	18.5
Greater Manchester Mental Health NHS Foundation Trust [formerly Manchester Mental Health and Social Care Trust]	18.5	18.5
One Education Limited	18.5	18.5
The King David High School	18.5	18.5
Cheetham C of E Community Academy	18.5	18.5
Trinity C of E High School	18.5	18.5
Greater Manchester Arts Centre Limited	18.5	18.5
SS Simon & Jude C of E Multi Academy Trust (St Barnabas) [formerly St Barnabas C of E Primary Academy Trust]	18.5	18.5
Wise Owl Trust (Briscoe Lane Academy)	18.5	18.5
E-ACT (Blackley Academy)	18.5	18.5
Wise Owl Trust (Seymour Road Academy)	18.5	18.5
Prospere Learning Trust (Chorlton High School)	18.5	18.5
Wythenshawe Catholic Academy Trust (St Anthony's)	18.5	18.5
Children of Success Schools Trust (Haveley Hey)	18.5	18.5
Children of Success Schools Trust (The Willows)	18.5	18.5
Webster Primary School	18.5	18.5
Wythenshawe Catholic Academy Trust (St Paul's)	18.5	18.5
Oasis Community Learning (Harpur Mount)	18.5	18.5
Wythenshawe Catholic Academy Trust (St John Fisher)	18.5	18.5
The King David Primary School	18.5	18.5
Oasis Community Learning (Academy Aspinal)	18.5	18.5
Kingsway Community Trust (Green End Primary School)	18.5	18.5
Kingsway Community Trust (Ladybarn Primary School)	18.5	18.5
M20 Learning Trust (Beaver Road Primary School) [formerly Beaver Road Academy Trust]	18.5	18.5
Contour Homes Limited [to 31.03.21]	18.5	n/a
Wythenshawe Catholic Academy Trust (St Elizabeth's Primary)	18.5	18.5
Burnage Academy for Boys	18.5	18.5
Crossacres Primary Academy	18.5	18.5

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Dataspire Solutions Ltd (Our Lady's Catholic High) [to 01.03.21]	18.5	n/a
Education and Leadership Trust (Levenshulme High School)	18.5	18.5
Education and Leadership Trust (Whalley Range High School)	18.5	18.5
Prospere Learning Trust (Piper Hill Special Support School)	18.5	18.5
Greater Manchester Academies Trust (MCPA)	18.5	18.5
Taylor Shaw - Cavendish Primary	18.5	18.5
SS Simon and Jude C of E Multi Academy Trust (St James C of E Primary)	18.5	18.5
Prospere Learning Trust (Newall Green High School) [to 31.08.21]	18.5	18.5
St James & Emmanuel Academy Trust (Didsbury C of E Primary)	18.5	18.5
St James & Emmanuel Academy Trust (West Didsbury C of E Primary)	18.5	18.5
The Cherry Tree Trust (Newall Green Primary School)	18.5	18.5
Biffa Municipal Ltd.	18.5	18.5
Wise Owl Trust (Old Hall Drive Academy)	18.5	18.5
St James & Emmanuel Academy Trust (St Wilfrid's C of E Primary)	18.5	18.5
Essential Hygiene Ltd - Cavendish School [to 04.11.21]	18.5	18.5
Taylor Shaw - St Aidan's Primary School	18.5	18.5
Prospere Learning Trust (Pioneer House High School)	18.5	18.5
Sodexo (Harpur Mount)	18.5	18.5
Greater Manchester Learning Trust (Parrs Wood High School)	18.5	18.5
CLIC Educational Trust (Chorlton Park Primary School)	18.5	18.5
CLIC Educational Trust (Old Moat Primary School)	18.5	18.5
Link Learning Trust (Barlow Hall Primary School)	18.5	18.5
Link Learning Trust (Brookburn Primary School)	18.5	18.5
Time Out Services Limited (Ex MCC) [to 30.11.20]	18.5	n/a
CLIC Educational Trust (Rolls Crescent Primary School)	18.5	18.5
Sodexo Limited (Oasis Aspinall Academy) [to 19.06.20]	18.5	n/a
Integral - Plymouth Grove (Ex MCC)	18.5	18.5
Mears Group Plc (Northwards Housing MCC) [to 02.04.21]	18.5	18.5
Bulloughs Cleaning Services Ltd - Barlow RC (Ex MCC)	18.5	18.5
Dolce Ltd - St Bernard's (Ex MCC)	18.5	18.5
Caterlink Ltd - Heald Place (Ex MCC)	18.5	18.5
Oasis Community Learning (Temple Primary School)	18.5	18.5
Jacobs UK Ltd	18.5	18.5
T(N)S Catering Management Ltd - Mcr Health Academy (Ex MCC)	18.5	18.5



Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Prosper Learning Trust (CHS South)	18.5	18.5
SS Simon & Jude C of E Multi Academy Trust (Gorton Primary)	18.5	18.5
Bulloughs Cleaning Services - Levenshulme High (EL Trust)	18.5	18.5
The Cooperative Academies Trust (Broadhurst Primary School)	18.5	18.5
Dolce Ltd - Ashgate Specialist Support School (Ex MCC) [to 28.05.21]	18.5	18.5
Essential Hygiene - Holy Name RC Primary School	18.5	18.5
Flagship Learning Trust (Wright Robinson College)	18.5	18.5
Manchester Creative Digital Assets Ltd (Ex MCC)	18.5	18.5
Atalian Servest Managed Services Ltd – St Andrew’s (Ex MCC) [to 31.08.21]	18.5	18.5
Prosper Learning Trust (Grange School)	18.5	18.5
Essential Hygiene Ltd - Our Lady’s (Ex MCC)	18.5	18.5
Greenwich Leisure Ltd (GLL) (Ex Manchester CC)	18.5	18.5
Totally Local Company Ltd - Birchfield School (Ex MCC)	18.5	18.5
Aspens Services Ltd (Ex MCC Cheetham Comm Ac)	18.5	18.5
Churchill Contract Services Ltd - Co-op Academies	18.5	18.5
Mellors Catering Svs Ltd - MEA [to 25.06.21]	18.5	18.5
Bulloughs Cleaning Services - MEA [to 31.08.21]	18.5	18.5
Kingdom Services Group Ltd - Oswald Road Primary	18.5	18.5
Sports & Leisure Management Ltd	18.5	18.5
Onward Homes Ltd	18.5	18.5
Aspens Services Ltd (Pike Fold Primary School)	18.5	18.5
Engie Services Ltd (Manchester Working Ltd)	18.5	18.5
Caterlink Ltd (Cravenwood Primary School) [to 06.04.21]	18.5	18.5
Mellors Catering Services Ltd (Benchill Primary School)	18.5	18.5
Career Connect	18.5	18.5
Prosper Learning Trust (Manchester Enterprise Academy) [from 01.04.20]	18.5	18.5
Prosper Learning Trust (Manchester Enterprise Academy Central) [from 01.04.20]	18.5	18.5
Dell Care Ltd [from 02.03.20 to 12.06.20]	18.5	n/a
Prosper Learning Trust (Prospect House Primary SSS) [from 01.09.20]	18.5	18.5
Caterlink Ltd - Abbey Hey Primary (Ex ULT/MCC)	18.5	18.5
Mitie Security Ltd (Ex MCC) [from 01.04.20]	18.5	18.5
Emmaus Catholic Academy Trust (St Chad’s RC Primary School) [from 01.01.21]	18.5	18.5

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Mellors Catering Services Ltd - St Matthew's RC HS (Ex MCC) [from 01.09.20]	18.5	18.5
ABM Catering Ltd - Newall Green Primary (Ex MCC) [from 01.01.20]	18.5	18.5
Emmaus Catholic Academy Trust - St Matthew's RC High School	18.5	18.5
Onward Homes Ltd (Ex Contour Homes) [from 01.04.21]	n/a	18.5
The Cooperative Academies Trust (Belle Vue) [from 01.09.21]	n/a	18.5
Engie Regeneration Ltd - Northwards Housing Ltd [from 03.04.21]	n/a	18.5
Emmaus Catholic Academy Trust (Mount Carmel RC Primary) [from 01.12.21]	n/a	18.5
Dolce Ltd - Broad Oak Primary [from 01.09.21]	n/a	18.5
Dolce Ltd - St Catherine's [from 01.09.21]	n/a	18.5
Dolce Ltd - St Chad's Primary School [from 01.09.21]	n/a	18.5
Dolce Ltd - St Peter's Primary School [from 01.09.21]	n/a	18.5
Dolce Ltd - Varna Community School [from 01.09.21]	n/a	18.5
Taylor Shaw Ltd - Wise Owl Trust (Ex MCC Fayre) [from 01.09.21]	18.5	18.5
Unify Management Solutions Ltd [from 01.12.20]	18.5	18.5
Mellors Catering Services Ltd - Irk Valley School (Ex MCC)	18.5	18.5
<b>Museum of Science and Industry Pool</b>		
National Museum of Science and Industry	22.3 + £153k	22.3 + £153k
<b>Northern Education Trust Pool</b>		
Northern Education Trust (The Ferns)	20.3	20.3
Compass Contract Svs (NET - The Ferns) [to 23.02.22]	20.3	20.3
<b>NPS Pool</b>		
National Probation Service	29.6	29.6
Sodexo Ltd - Ex MOJ	29.6	29.6
OCS Group Ltd - Ex MOJ	29.6	29.6
<b>Oak Learning Partnership</b>		
Oak Learning Partnership (Hazel Wood High School formerly Broad Oak Sports College)	20.5	20.5
Oak Learning Partnership (Unsworth Primary)	20.5	20.5
Oak Learning Partnership (Elms Bank)	20.5	20.5
<b>Oasis Community Learning Pool</b>		
Oasis Community Learning (Broadoak Primary School)	19.4	19.4
Sodexo - Broadoak (Oasis Community Learning)	19.4	19.4

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
<b>Oldham MBC Pool</b>		
Oldham MBC	#20.6	#20.6
Oldham Community Leisure Limited	20.6	20.6
Housing & Care 21	20.6	20.6
Kier Facilities Services Limited	20.6	20.6
The Unity Partnership Limited [to 31.03.22]	20.6	20.6
Bullough Cleaning Services Limited	20.6	20.6
Oasis Community Learning (Oldham Academy)	20.6	20.6
E-ACT (The Oldham Academy North)	20.6	20.6
NSL Limited	20.6	20.6
The Pinnacle Learning Trust (The Hathershaw College)	20.6	20.6
Crompton House C of E Multi Academy Trust [formerly Crompton House C of E School]	20.6	20.6
Sodexo Limited (Oasis Oldham)	20.6	20.6
Cranmer Education Trust (The Blue Coat School)	20.6	20.6
Oasis Community Learning (Limeside Academy)	20.6	20.6
Wates Construction Limited	20.6	20.6
Great Places Housing Association	20.6	20.6
Taylor Shaw Limited (Kier)	20.6	20.6
Sodexo Limited (Limeside Academy)	20.6	20.6
New Bridge Multi Academy Trust (New Bridge School)	20.6	20.6
Oldham Care and Support Limited	20.6	20.6
Focus Academy Trust (UK) Ltd (Roundthorn Primary Academy)	20.6	20.6
Focus Academy Trust (UK) Ltd (Coppice Primary Academy)	20.6	20.6
Sola Fide C of E Trust (St Chad's C of E Primary School)	20.6	20.6
The Harmony Trust Ltd (Greenhill Academy)	20.6	20.6
The Pinnacle Learning Trust (Werneth Primary) [formerly Bright Tribe Trust (Werneth Primary)]	20.6	20.6
The Oak Trust (North Chadderton School)	20.6	20.6
The Harmony Trust Ltd (Alt Academy)	20.6	20.6
The Harmony Trust Ltd (Westwood Academy)	20.6	20.6
The Harmony Trust Ltd (Richmond Academy)	20.6	20.6
Engie Services Limited	20.6	20.6
Focus Academy Trust (UK) Ltd (Freehold Community Primary)	20.6	20.6
Cranmer Education Trust (East Crompton St George C of E Primary)	20.6	20.6
New Bridge Multi Academy Trust (Hollinwood)	20.6	20.6

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Wolseley UK Ltd	20.6	20.6
Cranmer Education Trust (Mayfield Primary School)	20.6	20.6
SMC Premier Cleaning Ltd (Broadfield Primary)	20.6	20.6
Bulloughs Cleaning Services Ltd	20.6	20.6
The Harmony Trust (Northmoor Academy)	20.6	20.6
Kingfisher Learning Trust	20.6	20.6
New Bridge Multi Academy Trust (Springbrook)	20.6	20.6
Focus Academy Trust (UK) Ltd (Lyndhurst Primary School)	20.6	20.6
Sola Fide C of E Trust (St Anne's C of E Lydgate Primary School)	20.6	20.6
The Cooperative Academies Trust (Failsworth School)	20.6	20.6
Servest Food Co Ltd (Ex Royton & Crompton) [to 31.07.21]	20.6	20.6
Sola Fide C Of E Trust (St John's C of E Primary School)	20.6	20.6
Oasis Community Learning (Clarksfield Primary School)	20.6	20.6
The Oak Trust (Fir Bank Primary School)	20.6	20.6
The Oak Trust (Thorp Primary School)	20.6	20.6
New Bridge Horizons Ltd	20.6	20.6
Aspens Services Ltd (Ex E-Act Oldham)	20.6	20.6
Crompton House C of E MAT - Beal Vale Primary School	20.6	20.6
Age UK Oldham Ltd	20.6	20.6
Kingfisher Learning Trust (Medlock Valley Community School)	20.6	20.6
Future Finders Employability College - Newbridge (Ex OMBC)	20.6	20.6
Sodexo Limited - (Clarksfield, Oasis Community Learning)	20.6	20.6
New Bridge Multi Academy Trust - The Springboard Project [from 01.09.19]	20.6	20.6
Early Break (Ex Oldham MBC) [from 01.04.21]	n/a	20.6
Kingfisher Learning Trust (Littlemoor Primary School) [from 01.01.22]	n/a	20.6
Midshire Signature Svs Ltd - The Harmony Trust [from 01.06.21]	n/a	20.6
Essential Hygiene Ltd - South Failsworth PS [from 01.04.20]	20.6	20.6
<b>One Manchester Pool (formerly City South Manchester Pool)</b>		
City South Manchester Housing Trust Limited [Trfd staff]	19.9	18.9
City South Manchester Housing Trust Limited [New staff]	19.9	18.9
Eastlands Homes Partnership Ltd [2009 Trfd]	19.9	18.9

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
<b>Other Local Authorities Pool</b>		
Saddleworth Parish Council	20.0	20.0
Manchester Port Health Authority	20.0	20.0
Horwich Town Council	20.0	20.0
Shevington Parish Council	20.0	20.0
<b>Prestolee MAT Pool</b>		
Prestolee Multi Academy Trust (Prestolee Primary School)	24.3	24.3
Prestolee Multi Academy Trust (Bowness Primary School)	24.3	24.3
Prestolee Multi Academy Trust (Waterloo Primary School)	24.3	24.3
Prestolee Multi Academy Trust (Barton Moss Primary School)	24.3	24.3
Prestolee Multi Academy Trust (Tottington Primary School)	24.3	24.3
<b>Rochdale Boroughwide Housing Pool</b>		
Rochdale Boroughwide Housing Limited (I & P) [Trfd staff]	18.0	18.0
Rochdale Boroughwide Housing Limited (I & P) [New staff]	18.0	18.0
<b>Rochdale MBC Pool</b>		
Rochdale MBC	#20.5	#20.5
Crossgates School	20.5	20.5
Smithy Bridge Foundation Primary School	20.5	20.5
Rochdale Development Agency	20.5	20.5
Healey Primary School	20.5	20.5
Rochdale Boroughwide Cultural Trust	20.5	20.5
Alternative Futures Group Limited	20.5	20.5
E.ON UK plc	20.5	20.5
Grosvenor Facilities Management Limited	20.5	20.5
Great Academies Education Trust (Middleton Tech School)	20.5	20.5
Hollingworth Learning Trust	20.5	20.5
Rochdale Boroughwide Housing	20.5	20.5
PossAbilities CIC	20.5	20.5
Future Directions	20.5	20.5
Balfour Beatty Living Places Ltd [to 31.03.22]	20.5	20.5
The Pennine Acute Hospitals NHS Trust [to 01.10.21]	20.5	20.5
St Teresa of Calcutta Catholic Academy Trust (St Patrick's)	20.5	20.5
St Teresa of Calcutta Catholic Academy Trust (Alice Ingham)	20.5	20.5
N Compass Northwest Ltd (Ex RMBC)	20.5	20.5
Mellors Catering Svs Ltd - St Gabriels (Ex Rochdale MBC) [to 31.08.20]	20.5	n/a



Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
The Big Life Company Ltd	20.5	20.5
Mellors Catering Services Ltd - St Thomas Moore (Ex RMBC)	20.5	20.5
Taylor Shaw Ltd - Elm Wood Primary School	20.5	20.5
Maxim Facilities Management Ltd [to 28.02.21]	20.5	n/a
Hollingworth Learning Trust (Newhouse Academy) [from 01.04.20]	20.5	20.5
Engie Services Ltd - Falinge Park High School	20.5	20.5
Engie Services Ltd - Hollingworth Academy [from 01.03.18 to 05.09.18]	20.5	n/a
Engie Services Ltd - Wardle Academy	20.5	20.5
St Teresa of Calcutta Catholic MAT - Our Lady + St Paul's [from 01.10.20]	20.5	20.5
<b>Roch Valley CE Multi Academy Trust Pool</b>		
Roch Valley C of E Multi Academy Trust (Holy Trinity Primary)	20.5	20.5
Roch Valley C of E Multi Academy Trust (St Thomas Primary)	20.5	20.5
<b>St Ambrose Academy Trust Pool</b>		
St Ambrose College Edmund Rice Academy Trust [formerly St Ambrose College Academy Trust]	17.6	17.6
<b>St John Rigby College Pool</b>		
St John Rigby College	20.0	20.0
Aramark Ltd	20.0	20.0
<b>St Teresa of Calcutta CMAT Pool</b>		
St Teresa of Calcutta Catholic Academy Trust (St Gregory's)	22.7	22.7
St Teresa of Calcutta Catholic MAT - St Monica's RC High [from 01.08.20]	22.7	22.7
St Teresa of Calcutta Catholic Academy Trust - St Gabriel's [from 01.11.20]	22.7	22.7
<b>Salford City College Pool</b>		
Salford City College	20.7	20.7
<b>Salford City Council Pool</b>		
Salford City Council	#19.7	#19.7
St Ambrose Barlow RC High School	19.7	19.7
The Salfordian Trust Company Limited	19.7	19.7
Salford Community Leisure Limited	19.7	19.7
The Working Class Movement Library	19.7	19.7
Mitie PFI Limited [to 01.04.21]	19.7	19.7
Compass Contract Services (UK) Limited	19.7	19.7
SPIE FS Northern UK Ltd (Salford)	19.7	19.7

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
ForHousing Ltd (Ex CWHT) [formerly City West Housing Trust Limited]	19.7	19.7
Community Integrated Care (Inspirit – Ex Salford) (formerly Inspirit Care Limited) [to 11.10.21]	19.7	19.7
RM Education plc	19.7	19.7
SPIE FS Northern UK Limited (Salford 2)	19.7	19.7
The Landing at MediaCityUK Limited [to 29.04.21]	19.7	19.7
Together Housing Association Limited [formerly Chevin Housing Association Limited]	19.7	19.7
Salix Homes Limited	19.7	19.7
Career Connect	19.7	19.7
SPIE FS Northern UK Ltd (St Ambrose & St Patrick)	19.7	19.7
SPIE FS Northern UK Ltd (Moorside)	19.7	19.7
Northern Care Alliance NHS Foundation Trust (ASC Contract) [formerly Salford Royal NHS Foundation Trust (ASC Contract)]	19.7	19.7
Northern Care Alliance NHS Foundation Trust (Equipment) [formerly Salford Royal NHS Foundation Trust (Equipment Contract)]	19.7	19.7
Aspens Services Ltd	19.7	19.7
Aspire For Intelligent Care & Support (CIC) (2)	19.7	19.7
Northern Care Alliance NHS Foundation Trust (The Limes) [formerly Salford Royal NHS Foundation Trust - The Limes]	19.7	19.7
SPIE Ltd - Absolute Catering [from 27.02.17]	19.7	19.7
<b>Salford University Pool</b>		
Salford University	20.6 + £236k	20.6 + £236k
<b>Shaw Education Trust Pool</b>		
The Shaw Education Trust (Unsworth Academy [formerly Castlebrook High School])	20.5	20.5
The Shaw Education Trust (The Westleigh School)	20.5	20.5
The Shaw Education Trust (Tottington High School)	20.5	20.5
The Shaw Education Trust (Woodhey High School) [from 01.10.20]	20.5	20.5
Cater Link Ltd - Shaw Education Tst (Tottington & Unsworth) [from 31.10.20]	20.5	20.5
<b>Small Admitted Bodies Pool</b>		
National Museum of Labour History	24.7	25.1
Wigan Metropolitan Development Co (Inv) Ltd	24.7	25.1
Groundwork Greater Manchester (Ex Oldham & Rochdale)	24.7	25.1
APSE	24.7	25.1

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Greater Manchester Immig Aid Unit	24.7	25.1
Birtenshaw Hall School	24.7	25.1
North West Local Auth Empl Orgn	24.7	25.1
Rochdale CAB	24.7	25.1
Chethams School Of Music	24.7	25.1
Oldham CAB	24.7	25.1
Manchester CAB	24.7	25.1
Centre For Local Economic Strategies Ltd (CLES) [to 16.07.21]	24.7	25.1
UNIAC	24.7	25.1
Sparth Community Centre [to 28.02.21]	24.7	n/a
Marketing Manchester	24.7	25.1
Mechanics Centre Ltd	24.7	25.1
Midas Limited	24.7	25.1
Greater Manchester Sports Partnership	24.7	25.1
Metro Rochdale Employees Credit Union Limited	24.7	25.1
Cash Box Credit Union Ltd	24.7	25.1
Groundwork Greater Manchester (ex MCC) [formerly Groundwork MSSTT Ex-Manchester]	24.7	25.1
Caritas Diocese of Salford	24.7	25.1
<b>South Pennine Academies Pool</b>		
South Pennine Academies (Waterhead Academy)	20.6	20.6
South Pennine Academies (Willowpark Primary Academy)	20.6	20.6
South Pennine Academies (Woodlands Primary Academy)	20.6	20.6
South Pennine Academies (Greenacres Primary Academy)	20.6	20.6
<b>Southway Housing Trust Pool</b>		
Southway Housing Trust (Manchester) Limited [Trfd staff]	22.2	22.2
Southway Housing Trust (Manchester) Limited [New staff]	22.2	22.2
<b>Stagecoach Manchester Pool</b>		
Greater Manchester Buses South Ltd	39.3	39.3
Stagecoach Services Limited	39.3	39.3
<b>Stamford Park Trust [Ashton Under Lyne Sixth Form College Pool]</b>		
Stamford Park Trust (Ashton-Under-Lyne 6th Form College)	17.0	17.0
BaxterStorey Ltd	17.0	17.0
<b>Stockport MBC Pool</b>		
Stockport MBC	#19.8	#19.8
Life Leisure [to 31.03.22]	19.8	19.8

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Pure Innovations Ltd	19.8	19.8
Stockport Homes Ltd	19.8	19.8
Totally Local Company Limited [formerly Solutions SK Limited]	19.8	19.8
Essential Hygiene Ltd - Werneth High School	19.8	19.8
Taylor Shaw - Werneth High School	19.8	19.8
SMC Premier Cleaning Ltd (St Joseph's) [from 29.04.19]	19.8	19.8
<b>Tameside College Pool</b>		
Tameside College	18.8	18.8
<b>Tameside MBC Pool</b>		
Tameside MBC	#21.0	#21.0
Active Tameside [formerly Tameside Sports Trust] [from 01.04.20]	21.0	21.0
Mellors Catering Svs Ltd - Poplar St	21.0	21.0
Robertson Facilities Management Ltd - Project CO1	21.0	21.0
Robertson Facilities Management Ltd - Project CO2	21.0	21.0
Robertson Facilities Management Ltd - Corporate Estates	21.0	21.0
The Harmony Trust Ltd (Greenfield Primary Academy) [from 01.09.20]	21.0	21.0
Midshire Signature Services - The Harmony Trust (Greenfield) [from 01.09.21]	n/a	21.0
<b>The Manchester College Pool</b>		
LTE Group [formerly The Manchester College]	18.1	18.1
<b>The Sovereign Trust Pool</b>		
The Sovereign Trust MAT [formerly Pictor Academy & Manor Academy] [from 01.04.20]	20.6	20.6
The Sovereign Trust MAT (New Park School) [from 01.04.20]	20.6	20.6
The Sovereign Trust (Longford Park School) [from 01.04.20]	20.6	20.6
<b>Trafford College Pool</b>		
Trafford College	23.8	23.8
Caterlink (Trafford College)	23.8	23.8
<b>Trafford MBC Pool</b>		
Trafford MBC	#20.4	#20.4
Sale High School	20.4	20.4
Blessed Thomas Holford Catholic College	20.4	20.4
Go Plant Fleet Services Ltd [formerly Essential Fleet Services Ltd] [to 31.05.20]	20.4	n/a
Market Operations	20.4	20.4
Amey LG Ltd	20.4	20.4

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Trafford Leisure Community Interest Company	20.4	20.4
Floorbrite Cleaning Contractors Ltd (Springfield Primary)	20.4	20.4
RM Education Ltd (Ex Sale High School) [from 15.06.20]	20.4	20.4
<b>Transport for Greater Manchester Pool</b>		
Transport for Greater Manchester	20.4	20.4
<b>United Learning Trust Pool</b>		
United Learning Trust (Manchester Academy)	18.2	18.2
United Learning Trust (Salford Academy)	18.2	18.2
United Learning Trust (Stockport Academy)	18.2	18.2
United Learning Trust (William Hulme's Grammar School)	18.2	18.2
United Learning Trust (Albion High School)	18.2	18.2
United Learning Trust (Dukesgate Primary School)	18.2	18.2
United Learning Trust (Marlborough Road Primary School)	18.2	18.2
United Learning Trust (Abbey Hey Primary)	18.2	18.2
United Learning Trust (Cravenwood Community Primary)	18.2	18.2
Caterlink (Ex United Learning Trust Stockport Academy)	18.2	18.2
United Learning Trust (Irlam and Cadishead College)	18.2	18.2
United Learning Trust (The Lowry Academy) [formerly Harrop Fold School] [from 01.03.21]	18.2	18.2
Cater Link Ltd - Dukesgate Primary School [from 04.04.20]	18.2	18.2
Cater Link Ltd - Manchester Academy [from 01.09.19]	18.2	18.2
Cater Link Ltd - Marlborough Road Primary School [from 01.04.20]	18.2	18.2
Cater Link Ltd - The Albion Academy [from 17.02.20]	18.2	18.2
<b>The University of Manchester Pool</b>		
The University of Manchester	22.9 + £729k	22.9 + £729k
<b>Victorious Academies Pool</b>		
Victorious Academies Trust (Inspire Academy)	19.9	19.9
Victorious Academies Trust (Discovery Academy)	19.9	19.9
Victorious Academies Trust (Poplar Street Primary School)	19.9	19.9
Victorious Academies Trust (Greenside Primary School)	19.9	19.9
Victorious Academies Trust (Yew Tree Primary School)	19.9	19.9
Victorious Academies Trust (Wild Bank Primary School) [from 01.04.20]	19.9	19.9

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
<b>Vision MAT Pool</b>		
Vision Multi Academy Trust (Higher Lane Primary)	20.5	20.5
Vision Multi Academy Trust (East Ward Primary)	20.5	20.5
Vision Multi Academy Trust (Sunny Bank Primary)	20.5	20.5
Vision Multi Academy Trust (Peel Brow School) [from 01.03.22]	n/a	20.5
<b>The Waste Pool</b>		
Suez Recycling & Recovery UK Ltd - Lot 1	20.0	20.0
Suez Recycling & Recovery UK Ltd - Lot 2	20.0	20.0
<b>Watergrove Trust Pool (Previously Wardle Academy Trust Pool)</b>		
Watergrove Trust (Wardle Academy)	21.4	21.4
Watergrove Trust (Kentmere Primary School)	21.4	21.4
Watergrove Trust (St Andrews C of E Primary School)	21.4	21.4
Watergrove Trust (St James C of E Primary School)	21.4	21.4
Watergrove Trust (Matthew Moss High School)	21.4	21.4
Watergrove Trust (Moorhouse Academy) [from 01.04.21]	n/a	21.4
<b>West Hill School Pool</b>		
West Hill School	17.0	17.0
<b>Wigan MBC Pool</b>		
Wigan MBC	19.6	19.6
Wigan Leisure & Culture Trust [to 31.03.21]	19.6	n/a
Leigh Sports Village Ltd	19.6	19.6
Fred Longworth High School [formerly Lateral Academy Trust]	19.6	19.6
Leading Learners MAT (Tyldesley Primary School)	19.6	19.6
The Rowan Learning Trust (Hawkey Hall High School)	19.6	19.6
Wigan and Leigh Carers Centre	19.6	19.6
Makerfield Academy Trust (Byrchall High School)	19.6	19.6
Community First Academy Trust (Platt Bridge)	19.6	19.6
Agilisys Limited	19.6	19.6
Epworth Education Trust [formerly Acorn Trust]	19.6	19.6
The Learning Together Trust	19.6	19.6
Monument Café [to 05.06.21]	19.6	19.6
The Keys Federation	19.6	19.6
The Rowan Learning Trust (3 Towers Alternative Provision)	19.6	19.6
Premier Care Limited	19.6	19.6
The Rowan Learning Trust (Marus Bridge)	19.6	19.6
Greengate Academy Trust (Orrell Holgate)	19.6	19.6



Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Greengate Academy Trust (Orrell Lamberhead Green)	19.6	19.6
The Wings C of E Trust (Atherton St George's C of E Primary)	19.6	19.6
The Wings C of E Trust (St Mark's)	19.6	19.6
Mosaic Academy Trust (Standish Community High School)	19.6	19.6
The Wings C of E Trust (Leigh C of E Primary)	19.6	19.6
Mosaic Academy Trust (Golborne Community Primary School)	19.6	19.6
Caterlink Ltd	19.6	19.6
ISS Mediclean (Hawkley Hall)	19.6	19.6
NPS NW Ltd [to 30.09.20]	19.6	n/a
Taylor Shaw Ltd (Fred Longworth)	19.6	19.6
Mellors Catering Services Ltd - Cansfield High (Ex Wigan) [from 01.04.19]	19.6	19.6
Midshire Signature Svs Ltd - Standish [from 01.08.19]	19.6	19.6
Mellors Catering Services Ltd - Shevington High, Wigan [from 01.09.19]	19.6	19.6
Cater Link Ltd - St Cuthbert's School [from 01.01.20]	19.6	19.6
Compass Contract Svs Ltd (Makersfield AT) [from 01.09.15]	19.6	19.6
Cater Link Ltd - St Marie's Primary School [from 01.01.20]	19.6	19.6
Mellors Catering Services Ltd - Newbridge School [from 01.09.20]	19.6	19.6
<b>Wythenshawe Community Housing</b>		
Wythenshawe Community Housing Group Ltd (Willow Trd staff) [formerly Willow Park Housing Trust]	22.1	22.1
Wythenshawe Community Housing Group Ltd (Parkway Trd staff) [formerly Parkway Green Housing Trust [Trfd staff]]	22.1	22.1
Wythenshawe Community Housing Group Ltd (Parkway New staff) [formerly Parkway Green Housing Trust [New staff]]	22.1	22.1
Wythenshawe Community Housing Group Ltd (Willow New staff) [formerly Willow Park Housing Trust [2nd Agreement]]	22.1	22.1
<b>Woodbridge Trust Pool</b>		
Woodbridge Trust (Firwood High School)	20.8	20.8
Woodbridge Trust (Ladywood School)	20.8	20.8
<b>Individual Employers</b>		
The Chief Constable of Greater Manchester	19.1	19.1
The University of Bolton	23.2	23.2
Manchester Metropolitan University	21.4	21.4
Liverpool Hope University	19.1	19.1
Royal Northern College of Music	18.9	18.9
Borough Care Services Ltd	34.8 + £154k	34.8 + £154k

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Holy Cross College	19.7	19.7
Loreto Sixth Form College	19.6	19.6
Xaverian Sixth Form College	19.0	19.0
Oldham College	16.8	16.8
The Pinnacle Learning Trust (Oldham Sixth Form College)	16.5	16.5
Hopwood Hall College	20.2	20.2
Aquinas College	19.7	19.7
Cheadle & Marple 6th Form College [to 30.04.21]	21.2 + £43k	21.2 + £43k
Wigan & Leigh College	21.7	21.7
Winstanley College	19.1	19.1
New Charter Group (Jigsaw)	23.3	23.3
Positive Steps Oldham	22.4	22.4
Ace Centre (North)	21.7	21.7
Trafford Housing Trust Ltd [to 31.03.21]	31.5 + £357k	n/a
Northwards Housing Limited [to 04.07.21]	17.6	17.6
Altus Education Partnership (Rochdale Sixth Form College)	15.4	15.4
The Cooperative Academies Trust (The Swinton High School)	19.9	19.9
Healthy Learning Trust (Flixton Girls School)	22.0	22.0
Mellor Primary School	21.1	21.1
Broad oak Primary School	21.9	21.9
South Manchester Learning Trust (Reddish Vale Academy Trust)	16.2	16.2
Eagley Infant School	22.2	22.2
Eagley Junior School	24.0	24.0
Harwood Meadows Primary School	24.2	24.2
Kings Academy Trust (Oakwood Academy) [formerly The Oakwood Academy Schools Trust]	21.2	21.2
Broughton Jewish Cassel Fox	18.7	18.7
South Manchester Learning Trust (Altrincham College of Arts)	20.5	20.5
Forward As One C of E Multi Academy Trust	22.5	22.5
SS Simon and Jude C of E Multi Academy Trust	18.8	18.8
St Anselm's Catholic Multi Academy Trust	24.3	24.3
New Bridge Multi Academy Trust (Hawthorns School)	24.3	24.3
The Olive Tree Primary Bolton Limited	18.7	18.7
The Cooperative Academies Trust (Connell 6th Form College)	20.7	20.7
New Islington Free School	18.2	18.2
Park Road Sale Primary	20.2	20.2

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Beis Yaakov Jewish High School	25.0	24.0
Chester Diocesan Academies Trust (St Matthew's C of E Primary)	20.0	20.0
Focus Academy Trust (UK) Ltd (Manor Green Primary Academy)	31.9	30.9
The Kirkstead Education Trust (Hursthead Junior School)	23.7	23.7
Focus Academy Trust (UK) Ltd (Old Trafford Community Primary)	19.7	19.7
Essa Foundation Academies Trust (The Essa Primary)	18.1	18.1
Taylor Shaw Ltd (Moorfield Primary School)	35.5	35.5
Taylor Shaw Ltd (Romiley Primary School)	35.0	35.0
Kingsway Community Trust (Cringles Brook Primary)	18.7	18.7
Focus Academy Trust (UK) Ltd (Deeplish Primary Academy)	24.5	24.5
Ashton West End Primary	26.5	26.5
Sharples School A Multi Academy Trust	28.6	27.6
Lever Academy Trust (Little Lever School)	24.8	24.8
Bolton UTC [to 31.07.20]	15.9	n/a
Aldridge Education (UTC At MediaCityUK) [formerly Creative Industries UTC (UTC@MediaCityUK)]	17.2	17.2
Prosper Multi Academy Trust (Bolton Muslim Girls School) [formerly Bolton Muslim Academy Trust]	20.2	20.2
Taylor Shaw (St Simon's Primary)	33.9	33.9
Taylor Shaw (Marple Hall High School)	28.7 + £13k	28.7 + £13k
Taylor Shaw (Fairway)	29.0 + £1k	29.0 + £1k
Abney Trust (The Kingsway School) [to 31.10.20]	26.0	n/a
The Bolton Impact Trust	25.6	25.6
Career Connect (Achieve North West Contract)	30.0	30.0
Catering Academy (Ex Bolton College) [to 31.03.21]	34.0 +£ 21k	n/a
Chester Diocesan Academies Trust (St Paul's C of E Primary)	22.2	22.2
Taylor Shaw Ltd (Harrytown High School)	29.3	29.3
Consilium Academies (Buile Hill)	24.7	24.7
The Hamblin Education Trust (North Cestrian School)	17.2	17.2
Taylor Shaw (Stockport College)	24.3	24.3
Churchill Contract Services Ltd (Harper Green School)	0.0	0.0
Elite Cleaning & Environmental Services Ltd	24.8	24.8
Chatsworth Multi Academy Trust	18.2	18.2
Aspireplus Educational Trust (Longdendale High School) [to 31.12.20]	20.2	n/a
Aspireplus Educational Trust (Rayner Stephens High School) [to 31.12.20]	19.3	n/a

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
SS Simon & Jude C of E Multi Academy Trust (St Augustine's)	22.9	22.9
Consilium Academies (Ellesmere Park High School)	20.2	20.2
Mulberry Tree C of E Multi Academy Trust (St Catherine's Primary)	20.8	20.8
T(N)S Catering Management Ltd	31.9	31.9
Liverpool Diocesan Schools Trust (St James' C of E Primary)	21.0	21.0
Consilium Academies (Moorside High School)	19.7	19.7
Transport for the North	17.4	17.4
The Aspire Educational Trust (Wilbraham Primary School)	19.1	19.1
Compass Contract Services (Ex NET - Kearsley Academy) [to 23.02.22]	35.4+ £13k	35.4+ £13k
Oasis Community Learning (Leesbrook Academy)	16.7	16.7
E ACT (Royton & Crompton School)	20.6	20.6
Liverpool Diocesan Schools Trust (St Paul's C of E Primary)	21.0	21.0
Taylor Shaw - St Anne's	33.7	33.7
St Ralph Sherwin Catholic MAT (St Mary's CV Academy)	22.6	22.6
St Bede C of E Primary Academy (Tonge Moor PS)	20.8	20.8
Liverpool Diocesan Schools Trust (Highfield St Matthew's C of E)	21.5	21.5
The Wesley Trust (Rosehill Methodist School) [to 31.10.20]	21.0	n/a
The Cooperative Academies Trust (Walkden High School)	19.7	19.7
The Wesley Trust (Wesley Methodist Primary School) [to 31.10.20]	20.5	n/a
The Great Schools Trust - Kings Leadership Academy Bolton	20.8	20.8
Bolton College Limited	22.6	22.6
St James & Emmanuel Acadmey Trust (St Elizabeth's Primary)	19.8	19.8
CLIC Educational Trust (Dane Bank Primary School)	18.5	18.5
Robertson Facilities Management Ltd	25.9	25.9
SS Simon & Jude C of E Multi Academy Trust (St Hilda's)	20.4	20.4
Tenon FM Ltd [to 30.04.20]	27.6	n/a
Chester Diocesan Academies Trust (Bredbury St Mark's)	19.8	19.8
SS Simon & Jude C of E Multi Academy Trust (St Paul's) [from 01.04.20]	19.7	19.7
The Rowan Learning Trust (Prestwich Arts College) [from 01.06.20]	20.5	20.5
Emmaus Catholic Academy Trust - St Antony's Catholic College [from 01.07.20]	20.4	20.4
QUEST - Bolton University Collegiate School [from 01.08.20]	15.9	15.9
Chester Diocesan Academies Trust - St George's C of E Primary [from 01.10.20]	21.0	21.0
Mellors Catering Services Ltd - St Joseph's [to 31.08.20]	35.8	n/a

Scheme employers	Contribution rate	
	2020/21 %	2021/22 %
Emmaus Catholic Academy Trust - St Anne's RC Academy [from 01.11.20]	19.8	19.8
Albany Learning Trust - Chorley New Road Primary Academy [from 01.11.20]	20.8	20.8
Epworth Education Trust - Rosehill Methodist Academy [from 01.11.20]	21.0	21.0
Epworth Education Trust - Wesley Primary School [from 01.11.20]	20.5	20.5
Epworth Education Trust - Summerseat Methodist Primary School [from 01.12.20]	20.5	20.5
Stamford Park Trust - Longdendale High School [from 01.01.21]	20.2	20.2
Stamford Park Trust - Rayner Stephens High School [from 01.01.21]	19.3	19.3
Three Sixty SHG Ltd [from 01.04.21]	n/a	19.8
Altus Education Partnership (Edgar Wood Academy) [from 01.09.21]	n/a	15.4
SMCSM Limited (Ex Bolton MBC) [from 01.05.20]	26.7	26.7
Star Academies (Oulder Hill Leadership Academy) [from 01.03.22]	n/a	20.5
Outwood Grange Academies Trust (Outwood Academy Hindley) [from 01.01.22]	n/a	19.6
Dixons Academies Trust (Brooklands Academy) [from 01.01.22]	n/a	18.5
Altus Education Partnership (Kingsway Park High School) [from 01.02.22]	n/a	15.4
Hutchison Catering Ltd - St Joseph's (Ex Bolton MBC) [from 01.08.20]	39.7	39.7

#These employers can choose to pay all or part of their annual contributions covering the period from 1 April 2020 to 31 March 2023 in advance. Should contributions be paid in advance the contribution rates shown should be multiplied by a factor of 0.997 compounded for each complete month they are paid early (measuring from the actual date paid to the midpoint of the period of contributions being paid in advance) to arrive at the required figures. Prior to making an advance payment, the employer, Administering Authority and the Fund Actuary must agree an estimate of pensionable pay for each year of the Rates and Adjustments certificate being paid in advance. If the actual pensionable pay over any year is higher than the estimated pensionable pay, a balancing payment would be required following the year end.

# Annual Report 2022

## The LGPS at a glance

The information below describes the Local Government Pension Scheme (LGPS) as it was during 2021/2022.

For information as it is now and other general information, please see our website [www.gmpf.org.uk](http://www.gmpf.org.uk)

### Eligibility for membership

Membership is generally available to employees of participating employers who have contracts of employment of three months or more, are under the age of 75 and who are not eligible for membership of other statutory pension schemes. Membership of the LGPS is therefore not open to police officers, firefighters, civil servants and others who have their own pension schemes. Employees of admission bodies and designating bodies such as a town or parish council can only join if their employer nominates them for membership of the LGPS.

### Employee contributions

The rate of contribution payable by members of the main scheme varies according to pay, ranging from 5.5% to 12.5%. The pay ranges to which each contribution rate applies are adjusted each April in line with changes in the cost of living. Members of the 50/50 option pay half the main scheme contributions and build up half the normal main scheme pension.

### Extra benefits

Members can pay additional pension contributions (APCs) to increase their pension. They can also pay money purchase additional voluntary contributions (AVCs) into a scheme operated in conjunction with the Prudential, to provide extra pension, extra lump sum, extra death benefits or a combination of these. Both APCs and AVCs attract tax relief in most cases.

### Retirement benefits

For each year of membership in the main scheme, an employee member builds up a pension of 1/49 of the pay received during that year. This pension is then increased each year in line with inflation, to maintain its value in real terms. Someone in the 50/50 option builds up a pension of 1/98 of the pay received during that year, which is again protected against inflation. Ill health pensions can also be awarded, based on one of three tiers, for those that satisfy the Scheme's criteria for permanent incapacity. Those in the 50/50 option have full ill health and death cover. Membership that was built up before 1 April 2014 continues to provide benefits as it did at the time. Membership from 1 April 2008 to 31 March 2014 therefore provides final salary benefits based on 1/60. Membership before that also provides final salary benefits, based on 1/80. Members can normally exchange some annual pension for a larger lump sum at a rate of 1:12, in other words, every £1 of annual pension foregone produces £12 of lump sum. HMRC limits apply.

Generally, a minimum of two years membership is required to give entitlement to retirement benefits.

### Age of retirement

Normal pension age is age 65 or State Pension age, whichever is the later, but:

- Pension benefits are payable at any age if awarded due to ill health;
- Members may retire with unreduced benefits from age 55 onwards if their retirement is on the grounds of redundancy or business efficiency;
- Members may retire early at their own choice from 55 onwards and employer approval is not required. But early



retirement reductions will generally apply;

- Members who have left employment can request payment of benefits from age 55 onwards, but actuarial reductions will apply where benefits come into payment before normal pension age;
- Members who remain in employment may also ask to retire flexibly from age 55 onwards if they reduce their hours of work or grade. Employer consent is required, and actuarial reductions may apply;
- Payment of benefits may be delayed beyond normal pension age but only up to age 75.

There are also various protections regarding membership that are linked to earlier normal retirement ages that applied in earlier versions of the Scheme.

## Benefits on death in service

A lump sum death grant is payable, normally equivalent to three years assumed pay. The administering authority has absolute discretion over the distribution of this lump sum among the deceased's relatives, dependants, personal representatives or nominees. Pensions may also be payable to the member's spouse, civil partner, eligible cohabiting partner and eligible dependent children.

## Benefits on death after retirement

A death grant is payable if less than ten years pension has been paid and the pensioner is under age 75 at the date of death, in which case the balance of ten years pension is paid as a lump sum. Pensions are also normally payable to the member's spouse, civil partner, eligible cohabiting partner and any eligible dependent children.

## Cost of living increases

Career average pensions that are being built or are on hold are adjusted each year in line with the Consumer Prices Index (CPI). This is to protect them from inflation, but they can go down as well as up. Final salary benefits on hold and all pensions in payment are also adjusted each year in line with CPI but are protected meaning they will not reduce when CPI is negative.



# *Annual Report* **Glossary**



# Annual Report 2022

## Glossary

### 50/50 scheme

In the Local Government Pension Scheme (LGPS), contributing members are given the option of earning half of the standard LGPS benefits and paying half the standard member contribution rates.

### Actuarial valuation

An investigation by an actuary into the ability of a pension fund to meet its liabilities. At the actuarial valuation, Greater Manchester Pension Fund's (GMPF) actuary will assess the funding level of each participating employer and agree contribution rates with the administering authority to fund the cost of new benefits and make good any existing deficits.

### Ad valorem

A payment or rate which is calculated according to the price of a product or service, rather than at a fixed rate. External asset managers usually have an ad valorem component as part of their fees.

### Administering authority

A body listed in Part 1 of Schedule 3 of the LGPS Regulations who maintains a fund within the LGPS. Administering authorities are typically councils based in England and Wales. GMPF's administering authority is Tameside Metropolitan Borough Council (TMBC).

### Admission body

An admission body is an employer admitted to the LGPS by way of an admission agreement. Admission bodies must primarily work in areas related to local government to be admitted.

### Additional voluntary contributions (AVCs)

Additional voluntary contributions are additional contributions made on top of the main LGPS member contributions with the aim of building up an additional pension separate to the main LGPS benefits.

### Benchmark

A measure against which fund performance is to be judged.

### Bonds

Loans made to an issuer (often a government or a company) which promises to repay the loan at an agreed later date. The term refers generically to corporate bonds or government bonds (gilts).

### Career average revalued earnings (CARE) scheme

With effect from 1 April 2014, benefits accrued by members in the LGPS take the form of CARE benefits. Every year members will accrue a pension benefit equivalent to 1/49 of their pensionable pay in that year. Each annual pension accrued receives inflationary increases (in line with the annual change in the consumer prices index) over the period to retirement.

### Consumer prices index (CPI)

CPI is a measure of inflation with a basket of goods that is assessed on an annual basis. Pension increases in the LGPS are linked to the annual change in CPI.

### Coronavirus

A type of virus that infects humans, typically leading to respiratory complications.

## Covid-19

The infectious disease caused by the new strain of coronavirus that was discovered in 2019. The spread of Covid-19 led to most governments introducing lockdown measures and placing restrictions on economic activity to curb its spread.

## Deficit

A fund has a deficit when its actuary calculates that it does not currently have enough assets to pay all future commitments. Deficits are typically corrected over periods of time by the payment of additional contributions by employers.

## Discount rate

The rate of interest used to estimate the amount of money needed to be held now to meet a benefit payment occurring in the future.

## Employer covenant

The degree to which an employer participating in the LGPS can meet the funding requirements of the Scheme

## Employer's future service contribution rate (primary rate)

The contribution rate payable by an employer, expressed as a percentage of pensionable pay, as being sufficient to meet the cost of new benefits being accrued by contributing members in the future. The cost will be net of employee contributions and will include an allowance for the expected level of administrative expenses.

## Environmental, social and governance (ESG)

ESG criteria are a set of standards for a company's operations that socially conscious investors use to understand their environmental, social and governance facets. GMPF has a Working Group which monitors the ESG issues of GMPF's investments.

## Funding level

The ratio of a fund's assets to the estimated value of its past service liabilities. This is expressed as a percentage. If a fund has a funding level of 110% it owns 10% more assets than it currently requires to meet its liabilities.

## Funding Strategy Statement

This is a key governance document that outlines how the administering authority will determine employers' contributions to GMPF and manage its funding risks.

## Funding target

An assessment of the assets required to be held now in order to meet the benefits to be paid in the future. The desired funding target is to achieve a funding level of a 100% ie assets equal to the past service liabilities assessed using appropriate actuarial assumptions.

## Government's Actuary Department (GAD)

The GAD is responsible for providing actuarial advice to public sector clients. GAD is a non-ministerial department but works closely with HM Treasury.

## Investment Strategy

The long term distribution of assets among various asset classes; it takes into account GMPF's objectives and attitude to risk.

## Local Government Pension Scheme (LGPS)

An occupational pension scheme for Local Government workers and other related workers made up of 87 individual funds located across England and Wales. GMPF is 1 of the 87 individual funds. GMPF administers the LGPS on behalf of the ten Greater Manchester councils and their related public sector bodies.

## Northern Local Government Pension Scheme Pool (NLGPS)

An investment pool comprising of the Greater Manchester Pension Fund, Merseyside Pension Fund and West Yorkshire Pension Fund. NLGPS is one of eight LGPS investment pools in England and Wales. LGPS investment pools aim to increase pension fund investment efficiency and make it easier to access more asset classes.

### Past service liabilities

This is the total amount of benefits that the fund is required to pay to its members in the future. The actuary places a value on this at the actuarial valuation.

### Private equity

Private equity is the ownership of companies that are not listed on a public stock exchange.

### Public equity

Public equity is an asset class where individuals and/or organisations can buy ownership in the shares of companies that are recorded on a public market such as the London Stock Exchange.

### Prudent assumption

An assumption where the outcome has a greater than 50% chance of being achieved. Legislation requires the assumptions (when considered collectively) adopted for an actuarial valuation to be prudent.

### Real return or real discount rate

A rate of return or discount rate net of inflation.

### Scheme employer

A Scheme employer is an employer that is legally obliged to take part in the LGPS by virtue of the LGPS Regulations. This includes councils of all types, academy schools and certain public sector bodies.

### Section 13 Valuation

Section 13 of the Public Service Pensions Act 2013 requires that all public service pension schemes, like the LGPS, undertake an actuarial valuation that ensures their solvency and their long term cost efficiency.

### Task Force on Climate-related Financial Disclosures (TCFD)

TCFD provide climate-related financial disclosure recommendations designed to help companies and pension funds provide clear, comparable and consistent information about the risks and opportunities presented by climate change to their operations. GMPF is a signatory of TCFD.



# *Annual Report 2022*

## **Policy Statements**

- Funding Strategy Statement
- Governance Policy
- Governance Compliance Statement
- Core Belief Statement
- Investment Strategy Statement
- Responsible Investment Policy
- Communications Policy
- Pension Administration Strategy Statement







# Funding Strategy Statement

April 2020 to date



## 1. Introduction

This is the Funding Strategy Statement (FSS) of the Greater Manchester Pension Fund (GMPF), which is administered by Tameside MBC (the Administering Authority). It has been prepared by the Administering Authority in collaboration with the GMPF Actuary, Hymans Robertson LLP, and after consultation with GMPF's employers and investment advisors.

The FSS was first approved by GMPF's Management Panel in January 2020 in preparation for the 2020 - 2023 triennial period. For point of reference the [FSS applicable to the previous triennial period](#) is also available on our website.

### 1.1 Regulatory Framework

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

The FSS forms part of a framework which includes:

- the Local Government Pension Scheme Regulations 2013 and other LGPS Regulations;
- the Rates and Adjustments Certificate, which can be found appended to GMPF's most recent Actuarial Valuation report;
- actuarial factors for valuing early retirement costs and the cost of buying extraservice;
- GMPF's policy on admissions; and
- the Investment Strategy Statement

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

The key requirements relating to the FSS are that:

- After consultation with all relevant interested parties, the administering authority will prepare and publish its funding strategy.
- In preparing the FSS, the administering authority must have regard to:
  - FSS guidance produced by CIPFA
  - Its Investment Strategy Statement.
- The FSS must be revised and published whenever there is a material change in either the policy on the matters set out in the FSS, or the Investment Strategy Statement.
- The revised FSS should be completed and approved by the Management Panel prior to the completion of each valuation.
- The actuary must have regard to the FSS as part of the fund valuation process and when making any subsequent amendments to the Rates and Adjustments Certificate in respect of individual employers who exit or are considered likely to exit GMPF.

### 1.2 Reviews of FSS

The FSS has historically been reviewed in detail at least every three years in line with triennial valuations being carried out. However, changes to the valuation cycle are expected (and have been subject to consultation) in order to move the LGPS valuation cycle into line with those of the unfunded public service schemes in the mid-2020s.

GMPF will continue its approach of reviewing the FSS as part of the actuarial valuation process or whenever there is a material change in policy.

The FSS is a summary of GMPF's approach to funding liabilities. It is not an exhaustive statement of policy on all issues. If you have any queries please contact the GMPF Employers team in the first instance at [employersupport@gmpf.org.uk](mailto:employersupport@gmpf.org.uk).

## 2. Purpose

### 2.1 Purpose of FSS

The statutory requirement to have an FSS was introduced in 2004. The then Office of the Deputy Prime Minister (ODPM) [now the Ministry of Housing, Communities and Local Government (MHCLG)] stated that the purpose of the FSS is:

- to support the regulatory framework to maintain as nearly constant employer contribution rates as possible and to set contributions so as to ensure the solvency and long term cost efficiency of LGPS funds are met
- to establish a clear and transparent fund-specific strategy which will identify how employers' pension liabilities are best met going forward and reflect the different characteristics of different employers in determining contribution rates
- to take a prudent longer term view of funding those liabilities.

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

This statement sets out how the Administering Authority has balanced the conflicting aims of affordability of contributions, transparency of processes, stability of employers' contributions, and prudence in the approach to funding the liabilities across the range of employers participating in GMPF.

### 2.2 Purpose of GMPF

GMPF is a vehicle by which LGPS benefits are delivered. GMPF:

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

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

The roles and responsibilities of the key parties involved in the management of the LGPS are summarised in the Annex.

### 2.3 Aims of the Funding Policy

The objectives of GMPF's funding policy include the following

- to ensure the long term solvency of GMPF as a whole and the solvency of each of the notional sub-funds allocated to individual employers
- to ensure that sufficient funds are available to meet all benefits as they fall due for payment
- to ensure that employers are aware of the risks and potential returns of the investment strategy
- to help employers recognise and manage pension liabilities as they accrue, with consideration as to the effect on the operation of their business where the Administering Authority considers this to be appropriate
- to try to maintain stability of employer contributions
- to use reasonable measures to reduce the risk to other employers and ultimately to the Council Tax payer from an employer defaulting on its pension obligations
- to address the different characteristics of the disparate employers or groups of employers to the extent that this is practical and cost-effective
- to maintain the affordability of GMPF to employers as far as is reasonable over the longer term.

## 3. Target Funding Levels and Calculation of Contribution Rates

### 3.1 Target Funding Levels

GMPF's funding target for most ongoing employers is a 'funding level' of 100% at the end of an appropriate time horizon, calculated using the Actuary's ongoing funding basis (see section 3.2 below). The funding level is the ratio of the value of assets compared to the present value of the expected cost of meeting the accrued benefits.

### 3.2 Ongoing funding basis

#### 3.2.1 Demographic assumptions

The demographic assumptions are intended to be best estimates of future outcomes within GMPF as advised by the Actuary, based on past experience of GMPF and other pension funds. It is acknowledged that future life expectancy and, in particular, the allowance for future improvements in longevity, is uncertain. Employers should be aware that their contributions are likely to increase in future if longevity exceeds the funding assumptions.

The approach taken is considered reasonable in light of the long term nature of GMPF and the statutory guarantee underpinning members' benefits. The demographic assumptions vary according to individual member characteristics and so reflect the different member profiles of employers.

#### 3.2.2. Financial assumptions

The key financial assumption for setting the funding target is the anticipated return on GMPF's investments. Given the long term nature of the liabilities, a long term view of prospective returns from growth-seeking assets is taken. In setting this assumption, the Actuary has modelled the annual returns over the next 20 years on GMPF's investment portfolio under 5,000 different economic scenarios. The investment return assumption has then been set such that 75% of the scenarios produce a return in excess of the investment return assumption. There is, however, no guarantee that GMPF's assets will out-perform the investment return assumption. The risk of under-performance is greater when measured over short periods such as the time between formal actuarial valuations, when the actual returns and assumed returns can deviate sharply.

For the 2019 valuation, the assumption is that GMPF's investments will deliver an average return of 3.6% a year over a 20 year period.

The same investment return assumptions are adopted in the calculation of the funding target for the majority of employers. The anticipated future return on investments may vary from those set out above for employers who no longer admit new entrants to GMPF or who follow different investment strategies. In general, only variations which reduce the anticipated returns compared to the position of the majority of employers are allowed. In order to maintain GMPF's economies of scale, it is not possible to offer bespoke investment strategies for every individual employer even if their membership deviates materially from the typical GMPF employer.

Pensions in payment, deferment and the pensions of active members accrued since 1 April 2014 increase in line with the Pensions Increase Order, as set out in the Pensions (Increase) Act 1971, which is currently pegged to the Consumer Price Index (CPI). The assumption for future increases in CPI is set with reference to market estimates for increases in the Retail Prices Index (RPI), less 1% p.a. to reflect the differences in the calculation of the two measures of inflation.

Salary growth is generally becoming a less material assumption due to the move to a career-average benefit structure in the LGPS from 1 April 2014. At the 2016 valuation, there were some employer-specific short-term salary growth assumptions, reflecting known Government policy on public sector pay awards. At this valuation, long-term salary growth is assumed to be consistent across all employers and equal to the future increase in CPI plus 0.75%.

### 3.3 Funding targets for non-typical employers

For admission agreements that are closed to new entrants (and in particular those with no guarantor), liabilities may be valued on a more prudent basis (ie using a lower investment return assumption). The target in setting contributions for any employer in these circumstances is to achieve full funding on an appropriate basis by the time the agreement terminates or the last active member leaves active service in order to protect other GMPF employers. This policy will typically increase regular contributions and reduce, but not entirely eliminate, the possibility of a final deficit payment being required when a cessation valuation is carried out.

Please refer to Section 4 for the treatment of exiting employers.

GMPF may also adopt the above approach in respect of admission bodies with no guarantor but where there is no immediate expectation that the admission agreement will cease. The Actuary agrees the financial and demographic assumptions to be used for each such employer with the Administering Authority.

### 3.4 Asset share calculations for individual employers

The Administering Authority does not formally account for each employer's assets separately. However, with effect from 31 March 2013, GMPF has operated a system of 'unitisation' where GMPF's assets are apportioned between employers on a monthly basis using contribution and benefit expenditure figures for each employer. This process also adjusts for transfers of members' assets and liabilities between employers participating in GMPF. The methodology adopted means that there will still be some difference between the asset shares calculated for individual employers and those that would have resulted had they participated in their own ring-fenced section of GMPF. However, this is greatly reduced compared to the "analysis of surplus" method that was used previously. As part of previous valuation processes, the Administering Authority's internal audit function has provided assurance on the operation of the unitisation system.

### 3.5 Derivation of employer contributions

Under the Regulations in force the Actuary is required to prepare a rates and adjustment certificate specifying:

- a) the primary rate of the employer's contribution; and
- b) the secondary rate of the employer's contribution,

for each year of the period of three years beginning with the 1 April in the year following that in which the valuation date falls (ie 1 April 2020 to 31 March 2023 in the case of the 2019 actuarial valuation). However, please note the potential changes to the valuation cycle set out in section 1.2.

The primary rate of an employer's contribution is equivalent to the cost of future benefits being accrued. The primary rate is calculated separately for all employers participating in GMPF. This is expressed as a percentage of the pay of their employees who are active members of GMPF.

The secondary rate of an employer's contributions is any percentage or amount by which, in the Actuary's opinion, contributions at the primary rate should be increased or reduced by reason of any circumstances specific to that employer, for example any additional contributions required to recover a deficit over an appropriate period. The sorts of specific factors which are considered are discussed in Section 3.6.

Employers are required to pay the total of the primary rate and the secondary rate. This is referred to as the 'total employer contribution rate'.

In calculating the total employer contribution rate the actuary must have regard to -

- a) the existing and prospective liabilities arising from circumstances common to all those employers
- b) the desirability of maintaining as nearly constant a common rate as possible
- c) the current version of the administering authority's funding strategy statement
- d) the requirement to secure the solvency of the pension fund and long term cost efficiency.

It is noted that securing solvency and long term cost efficiency is a regulatory requirement whereas a constant contribution rate remains only a desirable outcome.

For some employers it may be agreed by all relevant parties to pool contributions (see section 3.9.5.)

### 3.6 Risk-based contribution rates

The Actuary will need to assess the risk associated with the proposed contribution rate. Risk in this context means the likelihood that the employer will not achieve their funding target by the end of an appropriate time horizon with regard to the characteristics of the employer.

The GMPF Actuary will be using a 'risk-based' approach, which allows for thousands of possible future economic scenarios, when assessing the likelihood of contributions being sufficient to meet both the accrued and future liabilities over a given time horizon for each employer.



Setting contribution rates using a risk-based approach requires GMPF and the Actuary to consider for each employer:

- a) The employer's funding target (see sections 3.1-3.3 above)
- b) How long the employer has to reach the funding target (the 'time-horizon' – see Section 3.9.2 below)
- c) An appropriate likelihood of meeting the funding target by the end of the time horizon ('likelihood of success') e.g. 67%.

Setting an appropriate likelihood for each employer requires an analysis of the risk posed to GMPF. Factors considered include:

- Individual employer liability profile including funding level, net cashflow (i.e. contributions received less benefits paid) and whether new members are being admitted;
- Individual employer security provided to GMPF in the form of a guarantee or an additional asset; and
- The sector in which the employer operates and/or the financial strength of the employer, which may influence an employer's ability to make good any deficit which may arise in future.

More detail on the calculation of contribution rates is provided in the Actuary's report on the valuation.

Contribution rates will include expenses of administration to the extent that they are borne by GMPF.

### 3.7 Presentation of employer contribution rates

Contribution rates are expressed as a percentage of pensionable salary for most employers. The Administering Authority may choose to specify that part of the contributions are payable as periodic lump sum cash amounts. This approach is generally applied for employers where the workforce/payroll is expected to decline in order to ensure sufficient contributions are made towards repaying any deficit.

Employers' contributions are expressed as minima, with employers able to pay additional contributions should they wish to do so. In addition, some employers may be permitted to pay contributions in advance of the date on which they would otherwise be due. Employers should discuss with the Administering Authority before electing to make one-off capital payments.

### 3.8 Allowance for early retirements

Under the LGPS Regulations 2013, section 35, an LGPS member whose employment is terminated on the grounds of ill health, or infirmity of mind or body, before that member reaches normal pension age, is entitled to, and must take, early payment of a retirement pension if that member satisfies the necessary conditions.

These 'ill health retirements' can give rise to significant unexpected additional costs. The trend in recent years has been for the relative frequency of these occurrences to decrease, but where they do occur, the costs have increased. As such, the previous practice of providing many GMPF employers (in particular smaller employers) with an early retirement budget is no longer considered to be the most effective method of funding these costs.

Therefore, to protect employers from incurring potentially unaffordable costs, GMPF is intending to operate an internal 'insurance-type' arrangement to meet the cost of ill-health retirements. Any ill health retirement costs that occur are funded through the insurance, with these costs split amongst participating employers via a charge to asset shares (see Section 3.4) on a monthly basis.

Unless otherwise agreed with the Administering Authority, for employers that do not participate in the ill health insurance arrangement, the cost of all non-ill-health early retirements are met by separate lump sum employer contributions.

In addition, larger employers may request to have an allowance for non ill health early retirements built into their contribution rates.

Costs in excess of the allowances are required to be met immediately by separate lump sum employer contributions. Any unspent allowances are reflected within each employer's asset share.



## 3.9 Solvency and long term cost efficiency

### 3.9.1 Solvency issues and target funding levels

Under Section 13(4)(c) of the Public Service Pensions Act 2013, The Government Actuary's Department (GAD) (as the person appointed by the responsible authority) must, following an actuarial valuation, report on whether the rate of employer contributions to the pension fund is set at an appropriate level to ensure the solvency of the pension fund and long term cost efficiency. The definitions of these terms in the CIPFA guidance are provided in Section 7.

In developing the funding strategy, and in particular, the level of solvency being targeted for each employer, the Administering Authority has had regard to the potential outcomes of the subsequent review under Section 13(4) (c) and has considered the implications for its Key Performance Indicators as determined by the Scheme Advisory Board in England and Wales.

A key challenge for the Administering Authority is to balance the need for stable, affordable employer contributions with the requirement to take a prudent, longer term view of funding and ensure the solvency of the GMPF. With this in mind, there are a number of strategies that the Administering Authority may deploy in order to maintain employer contribution rates at as nearly a constant rate as possible. These include:-

- use of extended time horizons; [3.9.2]
- phasing in of contribution increases / decreases; [3.9.3– 3.9.4]
- the pooling of contributions amongst employers with similar characteristics and/or a community of interest [3.9.5]

In addition to these strategies for improving the stability of employer contributions, the Administering Authority may, at its absolute discretion, permit greater 'flexibility' around the employer's contributions provided that the employer has provided additional "security" to the satisfaction of the Administering Authority. Such greater 'flexibility' may include setting contribution rates assuming a reduced likelihood of meeting the target funding position and/or an extended time horizon, or permission to join a pool with another body (eg a relevant and agreeable Local Authority). Additional 'security' may include, but is not limited to, provision of a suitable financial bond, a legally binding guarantee from an appropriate third party, or security over an employer owned asset of sufficient value.

The degree of greater 'flexibility' extended to a particular employer is likely to take into account factors such as:

- the funding position of that employer's section of GMPF
- the amount and quality of the security offered
- the employer's financial security and business plan
- whether the admission agreement is likely to be open or closed to new entrants.

Including investment income, GMPF currently has positive net cash flow. Therefore, GMPF can take a medium to long term view on determining employer contribution rates to meet future liabilities through operating an investment strategy that reflects this long term view. This allows short term investment markets volatility to be managed in order to reduce volatility in employer contribution rates.

### 3.9.2 Appropriate time horizons

Following discussion with the Administering Authority, the actuary adopts specific time horizons for employers to achieve their funding target when calculating their contributions.

The Government Actuary's Department monitors compliance with Section 13 of the Public Service Pensions Act 2013 on behalf of the Ministry of Housing, Communities and Local Government and has placed some restraints on the ability of the Administering Authority and actuary to set time horizons under certain circumstances. In particular, the Government Actuary's Department has set an expectation that employer contributions should not reduce unless time horizons are also reducing.

The time horizon starts at the commencement of the revised contribution rate (1 April 2020 for the 2019 valuation). For employers that continue to admit new entrants, the Administering Authority would normally expect to follow the principles set out by the Government Actuary's Department, but reserve the right to propose alternative periods, for example to improve the stability of contributions.

Type of Employer	Maximum Length of Time Horizon
Employers listed under Part 1 or Part 2 of Schedule 2 to the 2013 LGPS Regulations (generally Statutory Bodies with tax raising powers and other Government 'supported' employers)	a period not exceeding 20 years
Admission Bodies with funding guarantees, subject to the approval of the Administering Authority or agreement of the guarantor	a period not exceeding 20 years
Admission Bodies with time limited contracts and/or no guarantee	the period from the start of the revised contributions to the end of the employer's contract or as otherwise determined by the Administering Authority in consultation with the awarding authority letting the contract
All other types of employer	a period equivalent to the expected future working lifetime of the remaining scheme members or such other period approved

### 3.9.3 Phasing in of contribution rises and reductions

The Administering Authority may elect to phase in any material changes to contribution rates. Phasing in periods will be influenced by the perceived credit worthiness of the employer.

### 3.9.4 The effect of opting for longer spreading or phasing in

Employers in deficit that are permitted to use a longer time horizon, or to phase-in contribution changes, will be assumed to incur a greater loss of investment returns due to the fact that their assets will build up at a slower rate by opting to defer repayment. Thus, deferring the payment of contributions is expected to lead to higher contributions in the long term (depending on the actual performance of GMPF relative to valuation assumptions).

### 3.9.5 Pooled contributions

The Administering Authority has historically allowed employers to agree to pool their contributions as a way of sharing experience and smoothing out the impact of experience on contribution rates.

Each of the ten Greater Manchester local authorities are the major employers in pools containing certain related employers. In addition, separate pools are operated for some academy schools, colleges, town and parish councils and for smaller admission bodies. Upon a new employer joining GMPF, consideration is given by the Administering Authority and the relevant local authority on the appropriateness of joining a local authority pool.

For clarity, unless otherwise agreed, pooling operates on the following basis:

- Schedule 2 Part 3 [1d (i)] employers (formerly referred to as Transferee Admission Bodies) are pooled with their awarding authority.
- For all other Schedule 2 Part 3 [1] employers (formerly referred to as Community Admission Bodies) pooling is determined via discussion between the Administering Authority, the new employer and the ceding employer.
- For new academy schools pooling is determined via discussion between the Administering Authority, the academy trust and the relevant local authority.

Following GMPF becoming the sole LGPS fund for the Probation Service with effect from 1 June 2014, GMPF has also created a pool for the Community Rehabilitation Companies (CRCs) and their sub-contractors.

Those employers that have been pooled are identified in the Rates and Adjustment Certificate which is detailed in the 31 March 2019 Actuarial Valuation report (finalised in 2020).

Employers are not generally permitted to discontinue participation in a pooling arrangement. A possible exception is academy schools which move to a new or existing multi academy trust. Any other employers who do not wish to continue with current/historic pooling arrangements should contact the Administering Authority to discuss the circumstances of their request. Where an employer discontinues participation in a pooling arrangement,

all liabilities attributed to their active, deferred and pensioner members are assumed to transfer to their new arrangement.

### 3.10 Proposed approach to valuation to reflect cost management process and McCloud Judgement

Information on the Cost Management process and the McCloud case can be found on the Scheme Advisory Board website (on the links below):

<https://www.lgpsboard.org/index.php/projects/cost-management>

<https://www.lgpsboard.org/index.php/structure-reform/mccloud-page>

Given the unknown nature of the scale and timing of any impact on liabilities as a result of the Cost Management process and McCloud the Scheme Advisory Board has advised administering authorities that the scheme benefit design used in the 2019 valuation should be as set out in current regulations.

However, MHCLG and the Scheme Advisory Board have also indicated that LGPS funds should make allowance for the risks posed by McCloud in their funding strategies at this valuation. As part of the 2019 valuation the Actuary has:

- Included additional prudence in the valuation assumptions (in particular the future expected investment return) to reflect the risk and potential extra cost resulting from the outcomes of the Cost Management process and the McCloud case; and
- Included an explicit allowance for the potential past service effects of the McCloud case in employer secondary rates.

However, once the outcome of the Cost Management process/McCloud are known and appropriate benefit changes are made, GMPF may elect to reassess whether any of the above measures were sufficient and may review rates as necessary under such statutory guidance or provision in regulation as may be available at that time (please see section 4.7 - Interim Valuations).

## 4. Other Aspects of Funding Strategy

### 4.1 Background

In addition to the collection of regular contributions from employers, GMPF will seek additional contributions from employers in certain circumstances in order to maintain the solvency of GMPF and protect the interests of other employers.

Moreover, following recent amendments to the LGPS Regulations, GMPF may pay an exit credit to employers in certain circumstances. The circumstances in which an exit credit may be paid are set out in section 4.2.4.

The Local Government Pension Scheme: Changes to the Local Valuation Cycle and the Management of Employer Risk consultation released on 8 May 2019 makes proposals to allow interim valuations to be undertaken under certain circumstances in order to make adjustments to employer contribution rates (see section 4.7 below) and for LGPS funds to be granted the flexibility to spread exit payments over a period of time or to allow an employer with no active members to defer exit payments in return for an ongoing commitment to meet their existing liabilities.

The consultation document issued by MHCLG proposes that Administering Authorities should set out in their Funding Strategy Statements their policy in applying the additional flexibilities, however, it should be noted that (as at March 2020) no changes to the LGPS Regulations have been made (other than in relation to exit credits) and should the proposed changes be introduced, further guidance for Administering Authorities is expected to be provided by a combination of MHCLG, the LGPS Scheme Advisory Board and CIPFA.

The FSS will be updated to reflect the outcome of the consultation when known.

## 4.2 Exiting employers

### 4.2.1 Admission bodies

Under the LGPS Regulations currently in force, an admission body is assumed to become an 'exiting employer' under Regulation 64 of the 2013 LGPS Regulations on the termination of its admission agreement.

Admission agreements are assumed to terminate for any of the following reasons unless otherwise agreed by the Administering Authority:

- The end of the contract (outsourced contractors only);
- Last active member ceasing active membership in GMPF;
- The insolvency, winding up or liquidation of the admission body;
- Any breach by the admission body of any of its obligations under the agreement that they have failed to remedy to the satisfaction of the Administering Authority;
- A failure by the admission body to pay any sums due to GMPF within the period required by the Administering Authority; or
- The failure by the admission body to renew or adjust the level of the bond or indemnity or to confirm an appropriate alternative guarantor as required by GMPF.

In addition, either party can voluntarily terminate the admission agreement by giving the appropriate period of notice as set out in the admission agreement to the other party (and the guarantor to the admission agreement where relevant).

### 4.2.2 Other employers

An employer that is not an admission body may also become an exiting employer, for example as a result of the employer's last active member ceasing active membership in GMPF. However, the Administering Authority currently (as at March 2020) has the discretion to suspend the requirement for an exit payment (see 4.2.3. below) in specific circumstances where the relevant employer is likely to subsequently employ an active member within a period of no more than 3 years.

### 4.2.3 Exit payments

If an employer becomes an exiting employer under Regulation 64 of the 2013 LGPS Regulations, the Administering Authority must instruct the Actuary to carry out a special valuation to determine whether an exit payment is required from the employer or an exit credit may be due to the employer.

The Administering Authority must look to protect the interests of other ongoing employers and will adopt valuation assumptions which, to the extent reasonably practicable, protect the other employers from the likelihood of any material loss emerging in future.

In order to protect other employers in the Fund, the cessation liabilities will be calculated using a 'gilt's cessation basis' with no allowance for potential future investment outperformance and with an allowance for further future improvements in life expectancy. This approach results in a higher value being placed on the liabilities than would be the case under a valuation on the ongoing funding basis and could give rise to significant payments being required.

Where there is a guarantor to the exiting employer's admission agreement, it is possible that any deficit could be transferred to the guarantor. In some cases, particularly for Admission Bodies providing services under contract, the admission agreement may specify that all of the assets and liabilities in the admission body's sub-fund within GMPF will return to the sub-fund of the guarantor without needing to crystallise any deficit or surplus.

In other cases, the admission agreement may require the Administering Authority to seek repayment of the termination deficit from the exiting employer (or from any security that was in place) with any unpaid amounts then falling due on the guarantor. In such cases, a discussion may be held with the guarantor to determine the most appropriate basis and timing of any deficit payments.

In all cases, GMPF's default position is that any termination deficit would be levied on the exiting employer as a capital payment.

In the event that GMPF is not able to recover the required payment in full directly from the exiting employer or from any bond, indemnity or guarantor, then:

- (a) In the case of Admission Bodies providing services under a contract the awarding authority will be liable. At its absolute discretion, the Administering Authority may agree to recover any outstanding amounts via an increase in the awarding authority's contribution rate over an agreed period
- (b) In the case of employers that are not providing services under contract and have no guarantor, the unpaid amounts fall to be shared amongst all of the employers in the Fund. This will normally be reflected in contribution rates set at the formal valuation following the cessation date.

As an alternative to (b) above, where the exiting employer is continuing in business, GMPF, at its absolute discretion, reserves the right to enter into an agreement with the exiting employer to accept appropriate alternative security to be held against any deficit and to carry out the exit valuation on a less prudent valuation basis or recover the deficit over an agreed period.

This approach will be considered further following the outcome of the consultation referred to in Section 4.1.

Until the outcomes of the Cost Management process/McCloud (see section 3.10) are known the GMPF actuary will include an estimate of the potential impact when calculating exit payments or credits.

#### 4.2.4 Exit credits

If an employer becomes an exiting employer under Regulation 64 of the 2013 LGPS Regulations (as amended) whilst its sub-fund in GMPF is in surplus, as identified in the cessation valuation, it may be entitled to receive an exit credit. In accordance with Regulation 64(2ZAB) of the LGPS Regulations the Administering Authority will determine the amount of any exit credit (which may be zero) by taking into account the factors set out in Regulation 64(2ZC). In order to protect other GMPF employers, liabilities will be calculated on a 'gilt's cessation basis' as described in 4.2.3.

Where the contract was entered into before May 2018, GMPF will take into account the fact that the original contract could not have been drafted with regard to the May 2018 regulation changes that implemented exit credits retrospectively and, subject to any representations to the contrary, that the employer priced the contract accordingly.

Exit credits for other types of employers and for cases relating to employers whose contract commenced after May 2018 will also be considered on a case by case basis. As part of its process in determining whether an exit credit is due the Administering Authority will consider representations made by an admission body and any entity who provides a guarantee for it, or any other relevant factors as deemed by the Administering Authority.

If the Administering Authority determines that an exit credit is due then it must be paid within 6 months of the date that the employer became an exiting employer (unless otherwise agreed between the Administering Authority and the employer).

Until the outcomes of the Cost Management process and McCloud judgement (see section 3.10) are currently unknown the GMPF actuary will include an estimate of the potential impact when calculating exit credits.

### 4.3 Employers with no remaining active members

In general, an employer exiting GMPF due to the departure of the last active member, will make an exit payment (or receive an exit credit) on an appropriate basis and consequently have no further obligation to GMPF. Thereafter it is expected that one of two situations will eventually arise:

- a) The employer's asset share runs out before all its ex-employees' benefits have been paid. In this situation the other employers in GMPF will be required to contribute to pay all remaining benefits: this will be done by the Actuary apportioning the remaining liabilities on a pro-rata basis at successive formal valuations;
- b) The last ex-employee or dependant dies before the employer's asset share has been fully utilised. In this situation the remaining assets would be apportioned pro-rata by the Actuary to the other GMPF employers.



## 4.4 Early retirement costs

In the valuation process, it is assumed that active and deferred members' benefits on retirement will be payable from the earliest age that the member could retire without incurring a reduction to their benefits and without requiring their employer's consent to retire. Members receiving their pension unreduced before this age (or enhanced on ill-health grounds) are deemed to have retired "early" and the expected cost of providing that member's benefits will increase.

Any additional lump-sum contributions which are required to be made by the employer under Section 3.8 arising from early retirements become due immediately upon the award of an early retirement.

GMPF monitors early retirement experience compared to the allowances described in section 3.8 on an ongoing basis. This information is used to determine any necessary lump-sum employer contributions.

## 4.5 Policies on bulk transfers

From time to time GMPF makes or receives a bulk transfer of members' accrued benefits from other LGPS funds or other occupational pension schemes ("external" transfer). GMPF also undertakes 'internal' bulk transfers, where the liabilities in respect of a group of members transfer from one employer to another. The amount of assets transferred is determined in accordance with the LGPS Regulations.

For internal transfers, the amount of assets is determined by actuarial factors provided by the Government Actuary's Department ('GAD').

For external transfers, each case will be treated on its own merits, but in general:

- GMPF will seek the most cost effective method of transfer to keep professional and administration costs as low as possible;
- where only active members transfer and the employer will remain an active participant in the fund, GMPF will usually pay a bulk transfer amount equal to a cash equivalent transfer value based on factors issued by the Government Actuary's Department, adjusted by actual or estimated investment returns from the transfer date to the payment date
- when only active members transfer and an exit event is triggered (i.e. the transferring employer will no longer have any active membership) then the transfer amount may be limited by the need for GMPF to meet the liabilities of any ex-employees of the employer
- where the entirety of an employer's membership transfers (as to extinguish their liability in the fund), GMPF will usually pay a bulk transfer amount equal in value to the employer's asset share as at the transfer date, adjusted by actual or estimated investment returns from the transfer date to the payment date
- GMPF may permit shortfalls to arise on bulk transfers if the employer has suitable strength of covenant and commits to meeting that shortfall in an appropriate period. This may require the employer's contributions to increase between valuations.

## 4.6. Pay awards in excess of assumptions made by the Actuary

Some admission agreements state that GMPF reserves the right to seek additional contributions from admission bodies if pay awards have been in excess of the rate assumed by the Actuary at previous actuarial valuations. Prior to seeking any such payment GMPF will consult the relevant guarantor to the admission agreement.

## 4.7 Interim valuations

In accordance with the proposals made in the consultation issued in May 2019 (see section 4.1 above), if recommended to do so by its actuary, the Administering Authority may elect to conduct an interim valuation in advance of the next valuation required under the Regulations in order to assess:

- a) the funding position of GMPF at that point.
- b) whether any changes to employer contribution rates are required in order to increase the likelihood of employer funding targets being met.

In making the decision whether to conduct an interim actuarial valuation the Administering Authority and its actuary would consider the requirements of the LGPS Regulations and any relevant guidance.



The Administering Authority may also elect, if recommended to do so by its actuary and subject to any relevant guidance, to reassess the funding target, funding position and contribution rate of individual employers. This would typically be due to one or more of the following circumstances occurring:

- The employer ceasing to employ any active members
- A material transfer of members to or from the employer
- Change in legal status of the employer
- A material structural change (such as the employer becoming part of, or leaving, a wider group)
- A material change in covenant strength (for example GMPF becoming sub-ordinated behind secured creditors)

If the request for reassessment is made by the employer (or any other employer which acts as its guarantor) then the employer would be expected to meet the professional costs incurred.

## 5. Links to Investment Strategy

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

### 5.1 Investment Strategy

The investment strategies currently being pursued are described in GMPF's Investment Strategy Statement.

The investment strategy (for the GMPF 'Main Fund') is reviewed annually, to ensure that it remains appropriate to the relevant liability profile and takes account of major movements in market valuations. The Administering Authority has adopted a Main Fund benchmark, which sets the proportion of assets to be invested in key asset classes such as equities, bonds and property. As at 31 March 2019, the proportion to be held in equities and property was broadly 75% of the total Main Fund assets.

The investment strategy of lowest risk would be that which provides cashflows which replicate the expected benefit cashflows (i.e. the liabilities). Equity investment would not be consistent with this. This strategy informs policy for part of GMPF where liabilities are mature and employers have agreed such an approach.

The Main Fund's benchmark includes a significant holding in growth-seeking assets such as equities in the pursuit of long-term higher returns than from a liability matching strategy. The Administering Authority's strategy recognises the relatively immature liabilities relevant to the Main Fund and the secure nature of most employers' covenants.

The same investment strategy is currently followed for most employers covered by the Main Fund. The Administering Authority can discuss with employers the feasibility of pursuing a more cautious investment strategy than the Main Fund norm. It should be noted there are a number of employers, with specific characteristics, where lower risk strategies have been put in place.

### 5.2 Consistency with funding basis

For employers covered by the Main Fund, the funding basis adopts an investment return assumption such that there is at least a 75% likelihood the Main Fund investment strategy will deliver the assumed return over 20 years. As at 31 March 2019, this was 3.6% p.a. The Main Fund's current bespoke investment strategy is broadly 75% held in real assets and 25% in monetary assets. For employers pursuing a more cautious investment strategy than the Main Fund norm, a lower investment return assumption may be adopted as appropriate. Both the Actuary and the investment adviser to GMPF consider that the funding basis fulfils the requirement to take a 'prudent longer term' approach to funding.

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

GMPF does not hold a contingency reserve to protect it against the volatility of investments. GMPF conducts continual monitoring of investment performance across funds, managers and asset classes to ensure a modicum of protection to GMPF's funding position from investment volatility. Unfortunately, it is not possible to eliminate volatility entirely as there is an inherent risk in investment.

### 5.3 Balance between risk and reward

Prior to implementing its current investment strategies, the Administering Authority considered the balance between risk and reward by altering the level of investment in potentially higher returning, but more volatile asset classes, like equities. This process was informed by the use of asset-liability techniques to model the range of potential future solvency levels and contribution rates.

Being mindful of the sensitivity of individual employers' contributions to changes in investment returns, the Administering Authority continues to review the feasibility of implementing more bespoke investment strategies for individual employers or groups of employers. Enabling other investment strategies will require an increase in the number of investment mandates and potentially higher ongoing costs which would have to be borne by the employers. The potential benefits of multiple investment strategies need to be assessed against the costs.

### 5.4 Inter-valuation monitoring of funding position

The Administering Authority monitors investment performance on a quarterly and annual basis. There is also detailed monitoring of additional liabilities arising from early and ill-health retirements, the costs of which are met by employers. In addition, the Actuary routinely assesses the funding position, taking account of elements of actual experience compared to the financial assumptions underlying the valuation.

## 6. Key risks and controls

### 6.1 Types of risk

The Administering Authority has an active risk management policy in place that is continually classifying, monitoring and managing risk. The measures that the Administering Authority has in place to control key risks are summarised below under the following headings:

- financial
- demographic
- regulatory
- governance.

### 6.2 Financial risks

Risk	Summary of control mechanisms
Fund assets fail to deliver returns in line with the anticipated returns underpinning valuation of liabilities over the long-term	<p>Only anticipate long term return on a relatively prudent basis to reduce risk of under-performing.</p> <p>Analyse progress at each formal actuarial valuation (for all employers).</p> <p>Use of interim valuations to monitor funding levels.</p>
Inappropriate long term investment strategy	<p>Set GMPF-specific benchmark, informed by asset-liability modelling of liabilities.</p> <p>Examine scope for extending employer-specific investment strategies.</p> <p>Annual review of investment strategy incorporates consideration of alternative approaches.</p>

Risk	Summary of control mechanisms
Active investment manager under performance relative to benchmark	<p>Short term (quarterly) investment monitoring analyses market performance and active managers relative to their index benchmark.</p> <p>GMPF has a manager monitoring framework.</p> <p>Regular reporting to employers describes Main Fund performance. If appropriate, the Actuary will be asked to evaluate the implications.</p>
Pay and price inflation significantly higher than anticipated	<p>The focus of the actuarial valuation process is on real returns on assets, net of price and pay increases.</p> <p>Inter-valuation monitoring, as above, gives early warning.</p> <p>Some investment in bonds, particularly index-linked bonds, also helps to mitigate this risk.</p> <p>Employers pay for the impact of their own salary awards and are reminded of the geared effect on pension liabilities of any bias in pensionable pay rises towards longer-serving employees.</p>
Effect of possible increase in employer's contribution rate on service delivery and admission/ scheduled bodies	<p>Seek feedback from employers on scope to absorb short-term contribution rises.</p> <p>Mitigate impact through time horizons, probabilities of achieving funding targets and phasing in of contribution rises.</p> <p>Consult employers on possibility of paying more (extra administration and higher regular contributions) to enable employer-specific investment strategies to give greater certainty of cost.</p>
Orphaned employers give rise to added costs for the Fund	<p>The Fund seeks an exit payment (or security/guarantor) to minimise the risk of this happening in the future.</p> <p>If it occurs, the Actuary calculates the added cost spread pro-rata among all employers.</p>
Effect of possible asset underperformance as a result of climate change	<p>Explicitly consider ESG issues when setting the overall funding and investment strategies.</p> <p>Carry out scenario testing on potential Government policy changes when evaluating funding and investment strategies.</p>

## 6.3 Demographic risk

Risk	Summary of control mechanisms
Longer life expectancy	<p>Set mortality assumptions with some allowance for future increases in life expectancy.</p> <p>Actuary monitors experience of a large sample of pension funds when setting assumptions and makes allowance for the location and lifestyle of GMPF's membership.</p>
Deteriorating patterns of ill health and other early retirements	<p>Employer contribution rates include an allowance to meet the strains that arise from ill-health early retirement costs.</p> <p>Early retirement experience and its financial impact are measured on an ongoing basis.</p>

## 6.4 Regulatory Risk

Risk	Summary of control mechanisms
Changes to regulations, eg more favourable benefits package, potential new entrants to scheme, e.g. part-time employees	<p>The Administering Authority is alert to the potential creation of additional liabilities and administrative difficulties for employers and itself.</p>
Changes to national pension requirements and/or HM Revenue and Customs rules eg changes arising from Public Sector Reform	<p>Changes to national pension requirements and/or HM Revenue and Customs rules e.g. changes arising from Public Sector Reform</p> <p>The Administering Authority considers all consultation papers issued by MHCLG/HM Treasury and comments where appropriate.</p> <p>It will consult employers where it considers that it is appropriate.</p> <p>Any changes to member contribution rates or benefit levels will be carefully communicated with members to minimise possible opt-outs or adverse actions.</p> <p>Copies of submissions are available for employers to see at <a href="http://www.gmpf.org.uk">www.gmpf.org.uk</a></p> <p>The Administering Authority is monitoring the progress on any settlement as a result of the McCloud ruling and will consider an interim valuation or other appropriate action once more information is known.</p> <p>Explicit allowance has been made in Employer funding plans to help manage the potential effects of McCloud.</p> <p>The Government's long term preferred solution to GMP indexation and equalisation – conversion of GMPs to scheme benefits – was built into the 2019 valuation.</p>

## 6.5 Governance risk

Risk	Summary of control mechanisms
Administering Authority unaware of structural changes in an employer's membership (eg large fall in employee members, large number of retirements).	<p>The Administering Authority monitors membership movements on an annual basis, via a report from the administrator to the Pension Fund Management Panel.</p> <p>The Administering Authority and Actuary will be involved in actioning any bulk transfer of members from an employer's sub-fund and will consider any subsequent risks.</p>
Administering Authority not advised of an employer closing to new entrants.	<p>The Actuary may be instructed to consider revising the rates and Adjustments certificate to increase an employer's contributions (under Regulation 64) between triennial valuations.</p> <p>Secondary contributions may be expressed as monetary amounts (see Actuarial Valuation report).</p>
Administering Authority failing to commission the Actuary to carry out a termination valuation for a departing Admission Body and losing the opportunity to call in a debt.	<p>In addition to the Administering Authority monitoring membership movements on an annual basis, it requires employers with Admission Agreements to inform it of forthcoming changes.</p> <p>It also operates a diary system to alert it to the forthcoming termination of Admission Agreements due to the ending of contracts.</p>
An employer ceasing to exist with insufficient funding or adequacy of a bond.	<p>The Administering Authority believes that it would normally be too late to address the position if it was left to the time of departure.</p> <p>The risk is mitigated by :</p> <ul style="list-style-type: none"> <li>• Seeking a funding guarantee from another scheme employer, or external body, where ever possible.</li> <li>• Alerting the prospective employer to its obligations and encouraging it to take independent actuarial advice.</li> <li>• Vetting prospective employers before admission.</li> <li>• Offering lower risk investment strategies – with higher employer contributions - to reduce the risk of investment under performance and a significant debt crystallising on termination.</li> </ul>

## 7. Definitions

### Solvency

The notes to the Public Service Pensions Act 2013 state that solvency means that the rate of employer contributions should be set at 'such level as to ensure that the Scheme's liabilities can be met as they arise'. It is not regarded that this means that the pension fund should be 100% funded at all times. Rather, and for purposes of Section 13 of the Public Service Pensions Act 2013, the rate of employer contributions shall be deemed to have been set at an appropriate level to ensure solvency if:

- the rate of employer contributions is set to target a funding level for the whole fund (assets divided by liabilities) of 100% over an appropriate time period and using appropriate actuarial assumptions; and either
- employers collectively have the financial capacity to increase employer contributions, and/or the fund is able to realise contingent assets should future circumstances require, in order to continue to target a funding level of 100%; or
- there is an appropriate plan in place should there be, or if there is expected in future to be, a limited number of fund employers, or a material reduction in the capacity of fund employers to increase contributions as might be needed.

If the conditions above are met, then it is expected that the fund will be able to pay scheme benefits as they fall due.

### Long term cost efficiency

The notes to the Public Service Pensions Act 2013 state that 'Long term cost-efficiency implies that the rate must not be set at a level that gives rise to additional costs. For example, deferring costs to the future would be likely to result in those costs being greater overall than if they were provided for at the time.'

The rate of employer contributions shall be deemed to have been set at an appropriate level to ensure long term cost efficiency if the rate of employer contributions is sufficient to make provision for the cost of current benefit accrual, with an appropriate adjustment to that rate for any surplus or deficit in the fund.

In assessing whether the above condition is met, GAD may have regard to the following considerations.

- The implied average deficit recovery period.
- The investment return required to achieve full funding over different periods e.g. the recovery period.
- If there is no deficit, the extent to which the amount of contributions payable is likely to lead to a deficit arising in the future.
- The extent to which the required investment return is less than the administering authority's view of the expected future return being targeted by a fund's investment strategy taking into account changes in maturity/strategy as appropriate.

END OF MAIN BODY OF FSS



## Annex – responsibilities of key parties

The Administering Authority should:-

- operate GMPF as per the LGPS Regulations;
- effectively manage any potential conflicts of interest arising from its dual role as Administering Authority and a GMPF employer;
- collect employer and employee contributions, and investment income and other amounts due;
- ensure that cash is available to meet benefit payments as and when they fall due;
- pay from GMPF the relevant benefits and entitlements that are due;
- invest surplus monies (i.e. contributions and other income which are not immediately needed to pay benefits) in accordance with GMPF's Investment Strategy Statement) and LGPS Regulations;
- communicate appropriately with employers so that they fully understand their obligations to the GMPF;
- take appropriate measures to safeguard GMPF against the consequences of employer default;
- manage the valuation process in consultation with GMPF's actuary;
- prepare and maintain a FSS and an ISS, after consultation;
- notify the Actuary of material changes which could affect funding; and
- monitor all aspects of GMPF's performance and funding and amend the FSS/ISS as necessary and appropriate.

The individual employer should:-

- deduct contributions from employees' pay correctly;
- pay all contributions, including their own as determined by the Actuary, promptly by the due date;
- exercise discretions within the regulatory framework;
- make additional contributions in accordance with agreements in respect of, for example, augmentation of scheme benefits, early retirement strain; and
- notify the Administering Authority promptly of all proposed material changes to membership or legal status which affect future funding;
- submit data necessary for calculating liabilities

The Actuary should:-

- prepare valuations, including the setting of employers' contribution rates. This will involve agreeing assumptions with the Administering Authority, having regard to the FSS and LGPS Regulations, and targeting each employer's solvency appropriately;
- provide advice relating to new employers in GMPF, including the level and type of bonds or other forms of security (and the monitoring of these);
- prepare advice and calculations in connection with bulk transfers and individual benefit-related matters;
- assist the Administering Authority in considering possible changes to employer contributions between formal valuations, where circumstances suggest this may be necessary;
- advise on the termination of Admission Bodies' participation in GMPF; and
- fully reflect actuarial professional guidance and requirements in the advice given to the Administering Authority.

Other parties:-

- investment advisers (either internal or external) may be asked to assist in ensuring that GMPF's ISS remains appropriate, and consistent with this FSS;
- investment managers, custodians and bankers will typically all play their part in the effective investment (and dis-investment) of GMPF assets, in line with the ISS;
- auditors will comply with their auditing standards and sign off annual reports and financial statements as appropriate;
- the Local Pensions Board will review the valuation process and funding strategy and ensure they comply with the regulations and relevant guidance;
- the LGPS Scheme Advisory Board and the Government Actuary will also review GMPF's funding strategy as part of their monitoring of the LGPS as a whole.

END OF ANNEX

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## **Funding Strategy Statement**

April 2020



# Governance Policy

2022 to date



# Governance Policy

## 1. Constitution

The Administering Authority operates within the Council's Governance arrangements. The statutory officer roles required are an integral part of GMPF's governance arrangements, these are:

- Head of Paid Service - *Chief Executive*
- Monitoring Officer - *Director of Governance and Pensions [Borough Solicitor]*, and
- Chief Finance Officer - *Director of Finance [S151 Officer]*

Further details of the Council's Governance arrangements can be found on the Council's website at [tameside.moderngov.co.uk/ieListMeetings](https://tameside.moderngov.co.uk/ieListMeetings).

## 2. Delegation

Tameside MBC delegates its function in relation to maintaining the GMPF to the following:

- Pension Fund Management Panel
- Pension Fund Advisory Panel
- Pension Fund Working Groups
- The Director of Governance and Pensions.

## 3. Frequency of meetings

The Pension Fund Management Panel, the Pension Fund Advisory Panel and the Pension Fund Working Groups meet at least quarterly.

## 4. Pension Fund Management Panel

### Terms of Reference

Carries out a similar role to that of the trustees of a pension scheme. It is the key decision maker for:

- Investment Management
- Monitoring investment activity and performance
- Overseeing administrative activities
- Guidance to officers in exercising delegated powers.

The detailed terms of reference are reviewed annually by Tameside MBC and the current detailed delegations are contained in the Tameside MBC Constitution referred to below under the heading Access to Information.

### Structure

Consists of local Councillors, plus a representative of the Ministry of Justice (following selection of the Fund as the sole administering authority for the probation service's LGPS interests).

The majority of the Councillors are drawn from Tameside MBC and the other Councillors nominated by the remaining nine local authorities within Greater Manchester acting through the Association of Greater Manchester Authorities. Currently all local authorities are represented on the Management Panel.

All members have voting rights.

## 5. Pension Fund Advisory Panel

### Terms of Reference

To work closely with the Pension Fund Management Panel and to advise on all matters.

The detailed terms of reference are reviewed annually by Tameside MBC and the current detailed delegations are contained in the Tameside MBC Constitution referred to below under the heading *Access to information*.

### Structure

Consists of ten local Councillors one drawn from each of the ten Greater Manchester local authorities, a representative of the Ministry of Justice and a minimum of two employee representatives nominated by the North West T.U.C. Current and long standing practice is to have six employee representatives.

All the elected members and employee representatives have voting rights.

## 6. Pension Fund Working Groups

### Terms of reference

GMPF utilises Working Groups to consider in detail specific aspects of its activities and the monitoring of performance.

There are currently three Working Groups which consider particular areas of GMPF activities and make recommendations to the Pension Fund Management and Advisory Panels. The GMPF activities covered by the working groups are:

- Policy and Development
- Investment Monitoring and ESG
- Administration, Employer Funding and Viability

### Structure

Membership of the Working Groups is drawn from the members of the Management and Advisory Panels. Each Working Group is chaired by a Tameside MBC Councillor.

## 7. Director of Governance and Pensions

### Terms of reference

- Responsible for implementing the decisions of the Pension Fund Management Panel and for the day-to-day management of the affairs of the GMPF;
- The Director of Governance and Pensions is the administrator to GMPF and acts as the link for members, advisers and investment managers between meetings; and
- The delegated powers of the Director of Governance and Pensions are reviewed annually and the current powers are contained in the Tameside MBC Constitution referred to below under the heading *Access to information*.

In addition GMPF also has the following governance arrangements in place.



## 8. External advisers

Four external advisers assist the Pension Fund Advisory Panel in particular regarding investment related issues.

## 9. Internal control

Tameside MBC provide internal audit arrangements to GMPF both as a tool of management and with direct reporting to the relevant Working Group, Panel and the Local Board.

## 10. External review

Tameside MBC including the GMPF is subject to external audit. The external auditors are appointed by Public Sector Audit Appointments Ltd. This helps ensure that public funds are properly safeguarded and accounted for and are used economically, efficiently and effectively in accordance with the statutory and regulatory requirements. An audit opinion is given separately on the Fund's Annual Report and Accounts.

## 11. Annual Report and Accounts

Annually a Report and Accounts is produced for approval by the Pension Fund Management Panel. The report currently includes the following sections:

- Chair's Introduction
- Management Structure
- Investment Report
- Statement of Accounts
- Scheme Administration
- Actuarial Statement and Employer Contributions
- Scheme at a glance.

The Policy Statement comprising:

- Funding Strategy
- Investment Strategy Statement
- Governance Policy
- Governance Compliance Statement
- Core Belief Statement
- Communications Policy
- Pensions Administration Strategy.
- Responsible Investment Policy

The Annual Report and Accounts is published on GMPF's website.

## 12. GMPF Local Board

The GMPF Local Pension Board has been established to assist the Management Panel. In particular to assist:

- secure compliance with the Regulations, any other legislation relating to the governance and administration of the Scheme, and requirements imposed by the Pensions Regulator in relation to the Scheme; and
- ensure the effective and efficient governance and administration of the Scheme.

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## 13. Risk management

Risk awareness is embedded into the performance management process. Risk Management will continue to feature in the training planned for all GMPF managers. Working Groups, Panel and the Local Board consider risk management issues.

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## 14. Communication with employers

Meetings are held with GMPF employers at which administrative matters are discussed and updates provided on funding, investment matters and other key issues. Training events are also provided for employers and support is also provided by the Pensions Office.

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## 15. Access to information

The GMPF Annual Report and Accounts can be accessed via the GMPF website at: [www.gmpf.org.uk](http://www.gmpf.org.uk)

The Tameside MBC Constitution can be accessed via the website at [www.tameside.gov.uk](http://www.tameside.gov.uk)

The Constitution contains GMPF's Terms of Reference and Scheme of Delegation.

All of the above mentioned documents are also available in hard copy form upon request.



## **Governance Policy**

2022 to date



# Governance Compliance Statement

2017 to date



# GMPF Governance Compliance Statement

## Principle A - Structure

	Fully compliant
(a) The management of the administration of benefits and strategic management of fund assets clearly rests within the main committee established by the appointing council.	✓
(b) That representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.	Partial
(c) That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.	✓
(d) That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel.	✓

## Principal A(b) – Structure

### Reason for non-compliance:

In addition to the 10 local authorities within the Greater Manchester area the GMPF also has in excess of 550 non-local authority employers whose activities are diverse. It is considered impractical for each, or groups of the non-local authority organisations to be separately represented on the GMPF committee.

To compensate for the lack of direct participation, GMPF holds an Employer update meeting to which all employers are invited and they have the opportunity to ask questions, and to raise any issues regarding administrative, investment and funding matters.

Meetings can also be held with individual or groups of employers as required.

At the Advisory Panel, there are six representatives of Scheme Members appointed by the North West TUC. These representatives also participate in GMPF's Working Groups.

Additionally, non local authority employers and scheme members are represented on the Pension Board. All members of the Pension Board are invited to attend as observers at all decision making committees to ensure adequate oversight, scrutiny and challenge through the Pension Board.

## Principle B - Representation

	Fully compliant
<p>(a) That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include:</p> <ul style="list-style-type: none"> <li>(i) employing authorities (including non-scheme employers, eg, admitted bodies);</li> <li>(ii) scheme members (including deferred and pensioner scheme members;</li> <li>(iii) where appropriate, independent professional observers; and</li> <li>(iv) expert advisors (on an ad-hoc basis).</li> </ul>	<p><b>Partial</b></p> <p>✓</p> <p><b>Partial</b></p> <p>✓</p>
<p>(b) That where lay members sit on a main or secondary committee, they are treated equally in terms of access to papers and meetings, training and are given full opportunity to contribute to the decision making process, with or without voting rights.</p>	<p>✓</p>

### Principal B – Representation

#### Reason for non-compliance:

Principle B(a)(i) – see explanation provided previously at Principle A(b).

Principle B(a)(ii)&(iii) – GMPF considers that the roles envisaged by MHCLG for an independent professional observer are already adequately catered for within GMPF's current governance arrangements through the participation in the Advisory Panel of four expert external advisors from diverse professional backgrounds and the invitation and right of all Pension Board members who include non-scheme employers and pensioner representatives to attend all meetings to ensure adequate oversight, scrutiny and challenge through the Pension Board.

## Principle C - Selection and role of lay members

	Fully compliant
<p>(a) That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee.</p>	<p>✓</p>
<p>(b) That at the start of any meeting, committee members are invited to declare any financial or pecuniary interest related to specific matters on the agenda.</p>	<p>✓</p>
<p>(c) Induction training is provided to new members. All members participate in mandatory training sessions and support is also provided for voluntary additional training. The induction of new members includes a copy of the Annual Report, that sets out the Management Arrangements and a summary of the responsibilities of the Management and Advisory Panels.</p>	<p>✓</p>



## Principle D - Voting

	Fully compliant
<p>(a) The policy of individual administering authorities on voting rights is clear and transparent, including the justification for not extending voting rights to each body or group represented on main LGPS committees.</p> <p>All members of the Management and Advisory Panels have voting rights.</p>	✓

## Principle E - Training/facility/time/expenses

	Fully compliant
<p>(a) That in relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process.</p>	✓
<p>(b) That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum.</p>	✓
<p>(c) That the administering authority considers the adoption of annual training plans for committee members and maintains a log of all such training undertaken.</p>	✓

## Principle F - Meetings (frequency/quorum)

	Fully compliant
<p>(a) That an administering authority's main committee or committees meet at least quarterly.</p>	✓
<p>(b) That an administering authority's secondary committee or panel meet at least twice a year and is synchronised with the dates when the main committee sits.</p>	✓
<p>(c) That an administering authority who does not include lay members in their formal governance arrangements, must provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.</p>	✓

## Principle G - Access

	Fully compliant
(a) That subject to any rules in the council's constitution, all members of main and secondary committees or panels have equal access to committee papers, documents and advice that falls to be considered at meetings of the main committee.	✓

## Principle H - Scope

	Fully compliant
(a) That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.	✓

## Principle I - Publicity

	Fully compliant
(a) That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the scheme is governed, can express an interest in wanting to be part of those arrangements.	✓



## **Governance Compliance Statement**

2017 to date



# Core Belief Statement

2018 to date



# Core Belief Statement

This is the Core Belief Statement (*the Statement*) of the Greater Manchester Pension Fund (GMPF), which is administered by Tameside MBC (*the Administering Authority*).

It has been prepared by the Administering Authority in collaboration with GMPF's Actuary, Hymans Robertson LLP, and after consultation with GMPF's investment Advisors and Managers.

The objective of the Statement is to set out GMPF's key investment beliefs. Strategic decisions are taken in the context of the relevant GMPF objectives. These beliefs will form the foundation of discussions, and assist decisions, regarding the structure of GMPF, strategic asset allocation and the selection of investment managers.

## 1. Investment governance

- 1.1 GMPF has the necessary skills, expertise, diversity and resources to internally manage some assets, such as infrastructure, private equity, local investments and cash.
- 1.2 Investment consultants, independent advisors and officers are a source of expertise and research to inform Management Panel decisions.
- 1.3 GMPF has a governance structure that enables it to implement tactical views readily, but acknowledges that market timing is very difficult.
- 1.4 There can be benefits from collaboration with other like minded pension funds.

## 2. Long term approach

- 2.1 The strength of the employers' covenant allows a longer term deficit recovery period and for GMPF to take a long term view of investment strategy.
- 2.2 The most important aspect of risk is not the volatility of returns but the risk of absolute loss and of not meeting the objective of facilitating low, stable contribution rates for employers and taxpayers alike.
- 2.3 Illiquidity and volatility are shorter term risks which offer potential sources of additional compensation to the long term investor. Moreover, it is important to avoid being a forced seller in short term markets.
- 2.4 Participation in economic growth is a major source of long term equity return.
- 2.5 Over the long term, equities are expected to outperform other liquid assets, particularly government bonds.
- 2.6 Well governed companies that manage their business in a responsible and sustainable manner will produce higher returns over the long term.

### 3. Appropriate investments

- 3.1 Allocations to asset classes other than equities and government bonds (eg corporate bonds, private equity and property) offer GMPF other forms of risk premia (eg additional solvency risk/illiquidity risk).
  - 3.2 Diversification across asset classes and asset types will tend to reduce the volatility of the overall GMPF return.
  - 3.3 In general, allocations to bonds are made to achieve additional diversification. However, for a number of those scheme employers with mature liabilities, a bond allocation may have other benefits such as liability hedging.
- 

### 4. Management strategies

- 4.1 Passive management provides low cost exposure to equities and bonds and is especially attractive in highly researched markets.
- 4.2 Active managers can add value over the long-term, particularly in relatively under researched markets and by following a rigorous approach it is possible to identify managers who are likely to add value.
- 4.3 The case for value investing is compelling, but it may result in prolonged periods of over and underperformance in comparison to a style neutral approach.
- 4.4 The fees paid to active managers should be aligned to the interests of GMPF rather than performance of the market, thereby ensuring the delivery of value for money to GMPF.
- 4.5 Active management performance should be monitored over multi-year rolling cycles and assessed to confirm that the original investment process on appointment is being delivered and that continued appointment is appropriate.
- 4.6 Employing a range of management styles can reduce the volatility of GMPF's overall returns but can also reduce overall outperformance.





## **Core Belief Statement**

2018 to date



# Investment Strategy Statement

Version 1.3



# Investment Strategy Statement

## 1. Background

- 1.1 This Statement has been prepared in accordance with the Local Government Pension Scheme (LGPS) (Management and Investment of Funds) Regulations 2016 (the Regulations). The Regulations require administering authorities to prepare, publish, and when appropriate revise, a written statement recording the investment policy of the pension fund; they also stipulate certain key issues which must be covered in the Statement.
- 1.2 The terms of appointments of any external investment managers include a provision that the investment manager must take account of, and shall not contravene, this Statement in undertaking its management role. Greater Manchester Pension Fund (GMPF) may terminate the appointment of any external investment manager by not more than one month's notice.
- 1.3 The Local Government Pension Scheme (the Scheme) was established by statute to provide death and retirement benefits for all eligible employees. The Scheme is a contributory, defined benefit occupational pension scheme.
- 1.4 Tameside Metropolitan Borough Council (TMBC) became the administering authority of GMPF in 1987 after the abolition of the Greater Manchester County Council in 1986. GMPF covers all ten councils of Greater Manchester, the National Probation Service and numerous other smaller employers.
- 1.5 The Statement outlines the broad investment principles governing the investment policy of GMPF. In preparing the Statement, TMBC has consulted those persons it considered appropriate.

## 2. Organisation and management arrangements of GMPF

- 2.1 The investment powers of TMBC under the Scheme are given in the Regulations. Amongst other matters, the Regulations require TMBC to have regard to both the suitability and diversification of its investments and to take proper advice in making decisions regarding the investment matters of GMPF.
- 2.2 TMBC has delegated all its functions as administering authority of GMPF to the Pension Fund Management Panel (the Management Panel or the Panel) which routinely meets on a quarterly basis and whose Terms of Reference are detailed in TMBC's Constitution. Amongst other matters, the Panel decides on the investment policy most suitable to meet the liabilities under the Scheme and has ultimate responsibility for the investment strategy.
- 2.3 The Management Panel has in turn appointed a Pension Fund Advisory Panel and external professional advisors and has dedicated internal officers of GMPF to advise it on the exercise of its delegated powers. There are also a number of Working Groups which report quarterly to the Panel on specialist matters.
- 2.4 The Director of Pensions exercises certain delegated powers as specified in the Constitution and provides the link between the Panel, the external professional advisors and GMPF's investment managers. Each year a GMPF business plan is submitted by the Director of Pensions to the Management Panel for consideration.
- 2.5 A primary objective of TMBC is to maintain a low and stable employer contribution rate. This is to be achieved by attempting to maximise the long term investment return whilst not exceeding an acceptable degree of risk.
- 2.6 The assets of GMPF are separated into two distinct parts – a Main Fund and a Designated Fund. This separation has been made in order to reflect a major difference in liability profiles between most of the employers of GMPF and that of a small number of other employers of GMPF.

- 2.7 Having taken appropriate advice, the Management Panel has decided that a bespoke benchmark, which is biased towards equity is a suitable investment benchmark for the management of the Main Fund. Detail on the Main Fund's bespoke benchmark is included in GMPF's Annual Report and Accounts. This benchmark will be reviewed annually and when appropriate in response to significant changes in the investment environment. The Designated Fund has a bespoke benchmark which is heavily orientated towards UK index linked stock.
- 2.8 The Management Panel has delegated the management of the majority of the Main Fund's securities portfolio, and the management of the Main Fund's direct property portfolio, to regulated, external, professional investment managers whose activities are defined and constrained by detailed Investment Management Agreements. The remainder of the Main Fund (including private equity, private debt, infrastructure, local investments, elements of the Special Opportunities Portfolio and UK cash), together with a proportion of the Designated Fund, is managed internally by officers of GMPF. The Treasury Management of UK cash is undertaken by officers of TMBC.
- 2.9 The Main Fund is largely actively managed but has a significant element, which is passively managed on a pooled basis. One of the appointed external securities managers has been given: an active multi-asset (ex-property) discretionary benchmark reflecting its perceived skills and the relative efficiency of markets. Separately, this Manager, as replicator for GMPF's Factor Based Investment portfolio has been given a single broad equity market benchmark. This is a specialist mandate to replicate a Factor Based Investment portfolio (determined via a specific customised non-market capitalisation index) that provides diversified multi-factor exposure, coupled with reduced carbon intensity and other important risk control design features. The second appointed external securities manager has a single broad equity market benchmark reflecting its specialist mandate. The third appointed external securities manager has an absolute return benchmark reflecting its specialist multi-asset credit mandate. These individual benchmarks are detailed in the Investment Management Agreements and have been chosen to be consistent with the overall bespoke benchmark determined for the Main Fund.
- 2.10 For the discretionary active mandates, each of the Main Fund's external active securities managers has been set the target of achieving a rolling three year average performance which exceeds the average performance of their individual benchmark by at least 1% per annum. The specialist Factor Based Investment portfolio is expected to outperform its broad (market capitalisation) equity benchmark over the medium to long term. GMPF anticipates that in two years out of three the external active multi-asset securities manager's annual performance will be within 4.5% of the annual performance of its individual benchmark. The equivalent range for the specialist global equity securities manager is +/- 7%, +/- 6% for the specialist multi-asset credit securities manager and +/- 2.5% for the Factor Based Investment portfolio.
- 2.11 The fees of one of the external active securities managers consist of two elements: an ad-valorem base fee together with a performance element which is capped at a prudent level of outperformance. The fees for the two remaining external active securities managers consist of a fixed base fee with no performance element. The fees of the Main Fund's external passive securities manager and the Factor Based Investment portfolio consists of an ad-valorem base fee with no performance element. The fees of the external property manager comprise of a combination of a fixed and ad-valorem base fee with no performance element.
- 2.12 The Designated Fund is predominantly passively managed.
- 2.13 The investment returns of the Main Fund, its underlying component portfolios and the Designated Fund are calculated quarterly by an external, third party professional performance measurement company appointed directly by TMBC.
- 2.14 The Management Panel monitors the performance of the appointed external investments managers at each of its quarterly meetings. The performance of the specialist portfolios managed internally by officers of GMPF is monitored annually by the Policy and Development Working Group.

### 3. The types of investments to be held

- 3.1 The Regulations require TMBC to set out the maximum percentage of the total value of all investments of GMPF money that it will invest in particular investments or classes of investment. These maximum percentage limits are set out in an Appendix to this Statement and are applicable only at the time the investment is made. Depending on market conditions, the allocations to specific investments or classes of investment may stray outside the maximum percentage limits before adjustments are made to rectify the situation. The Regulations also require that not more than 5% of the total value of all investments of GMPF money be invested in entities which are connected with the authority, within the meaning of section 212 of the Local Government and Public Involvement in Health Act 2007.
- 3.2 In addition to the Regulations, TMBC has decided to further restrict the types of investment which the appointed external securities managers may hold and to restrict the type and extent of investment activity which they are permitted to undertake. These further detailed restrictions are extensive and are documented in a Schedule to each of the Investment Management Agreements.
- 3.3 GMPF assets currently include a UK and overseas spread of equity, fixed interest bonds (including those issued by Governments, companies and other entities), other debt securities (eg bank loans and securitised debt), index linked bonds, private equity, private debt, infrastructure and property. The Main Fund's external active multi-asset securities manager is permitted limited use of certain derivatives. The Main Fund's active specialist multi-asset credit manager is permitted use of certain derivatives for hedging, duration and currency management, asset allocation and security selection. The limited use of certain derivatives is permitted in the Factor Based Investment portfolio in order to maintain the desired level of (equity market) risk exposure. GMPF supplements its investment income by participating in a Commission Recapture program.

### 4. The balance between different types of investments

- 4.1 The Regulations require TMBC to have regard to the diversification of its investments.
- 4.2 The overall bespoke benchmark of the Main Fund comprises a mix of different assets which is sufficient to provide adequate diversification for the Main Fund. GMPF's Annual Report and Accounts contains more detail on the overall Main Fund benchmark.
- 4.3 The strategic balance of investments takes account of the risk/return characteristics of each asset class and in particular the potential for enhanced long term returns from equity and the higher level of short term volatility associated with that asset class. In this context, risk in relation to any asset class is considered 'in the round' rather than being analysed into the specific components of risk (eg liquidity, foreign exchange, interest rate sensitivity etc). Allowance is also made for the benefits of diversification across the asset class mix within the Main Fund. The overall bespoke benchmark provides a reasonable long term balance appropriate to the liabilities relevant to the Main Fund and its funding position.
- 4.4 For the Main Fund, tactical asset allocation is delegated to the appointed external multi-asset securities manager who must operate within asset class and country restrictions which are documented in a Schedule to the Investment Management Agreement.
- 4.5 The bespoke benchmark of the Designated Fund has also been specifically chosen in the context of the relevant liabilities and funding position.

### 5. Risk: measurement and management

- 5.1 The Management Panel recognises that risk is inherent in any investment activity. The overall approach is to seek to reduce risk to a minimum where it is possible to do so without compromising returns (eg in operational matters), and to limit risk to prudently acceptable levels otherwise (eg in investment matters).
- 5.2 Operational risk is minimised by:
- having custody of GMPF's financial assets provided by a regulated, external, third party, professional custodian appointed directly by TMBC with control and liability issues thoroughly addressed in a Global Custody Agreement;

- having the deeds of direct property investments held securely by GMPF's Legal Section;
- documenting control and liability issues relating to the relationships with the appointed external investment managers in the Investment Management Agreements;
- having an external, third party, accounting provider independently maintain complete accounting records relating to the investment activity of the appointed external securities managers and to the entitlements (eg income) arising from GMPF's securities portfolios;
- officers of TMBC Internal Audit and of GMPF's Investments Group receiving reports on and reviewing the internal operating procedures of the appointed external custodian/accounting provider and securities managers; and
- subjecting internal investment management activity to close Internal Audit scrutiny.

#### 5.3 Investment risk is constrained by:

- diversifying across investment managers;
- diversifying across types of investment;
- restricting external appointed investment manager activity as documented in a Schedule to or in relevant Clauses of the Investment Management Agreements;
- selecting appropriate investment benchmarks in order to control the risk that the assets will not be sufficient to meet the liabilities whilst also having a strong likelihood of achieving a good return;
- taking appropriate internal and external professional advice on the investment activity of both the externally managed securities portfolios and of the internally managed portfolios;
- quarterly, formal, Management Panel monitoring of asset allocation against the investment benchmarks and asset class restrictions; and
- quarterly, formal, Management Panel monitoring of investment manager and overall Fund activity and performance.

5.4 Some risks lend themselves to being measured (eg using such concepts as 'Active Risk' and such techniques as 'Asset Liability Modelling') and where this is the case, GMPF employs the relevant approach to measurement. GMPF reviews new approaches to measurement as these continue to be developed.

## 6. The expected return on investments

6.1 There is a broad expectation that in the longer term the return on equity will be greater than on other assets.

6.2 The overall Main Fund return is expected to be broadly in line with the overall bespoke benchmark. Over the last 20 years this benchmark has averaged a return which is comfortably ahead of both price and earnings inflation over the same period. However, over any shorter period, such as one or five years, actual Main Fund returns may vary significantly from the benchmark and indeed benchmark returns may vary significantly from their long term averages.

6.3 Over the long term appropriate to the liabilities of the Scheme it is expected that the investment returns of both the Main Fund and the Designated Fund will be at least in line with the assumptions underlying the actuarial valuations.

## 7. The realisation of investments

7.1 General investment principles require that issues of liquidity and marketability be considered in making any investment decision. Over the coming years, pension payments are expected to significantly exceed employer and employee contributions each year. During this period, investment income is anticipated to comfortably generate receipts per year in excess of the expected shortfall to GMPF. Thus, it is not expected that there will be any material need to realise investments in the near future other than to seek higher returns.



- 7.2 The vast majority of GMPF's assets are readily marketable. However, some investments, such as property, and more so private market assets, are less easy to realise in a timely manner. Such relative illiquidity is not considered to have any significant adverse consequences for GMPF. Officers of GMPF will continue to investigate and assess options for dealing with the deteriorating cash flow position of GMPF.
- 7.3 TMBC informs the appointed external investment managers of any projected need to withdraw funds in order to enable the investment managers to plan an orderly realisation of assets when this proves necessary.

## 8. GMPF's approach to pooling investments

- 8.1 TMBC signed a memorandum of understanding with the administering authorities of the Merseyside Pension Fund and the West Yorkshire Pension Fund to create the Northern LGPS in order to meet the criteria for pooling investments released by Government on 25 November 2015. [Formally, this is achieved through the mechanism of a joint committee established under sections 101 and 102 of the Local Government Act 1972.]
- 8.2 The three funds submitted a pooling proposal to Government in July 2016 and DCLG (now MHCLG) provided its confirmation in January 2017 that it was content for the funds to proceed with the formation of the Pool as set out in the July 2016 proposal.
- 8.3 Following the issue of the LGPS (Management and Investment of Funds) Regulations 2016, the plans for the Northern LGPS evolved from the July 2016 proposal.
- 8.4 The vast majority of the benefits of pooling for the funds in the Northern LGPS are in respect of alternative assets where there is greatest scope to generate further economies of scale and to combine resources to make increasingly direct investments. Following detailed discussions and consideration of professional advice, it was agreed in March 2017 by each of the participating funds that in order to meet the Reduced Costs and Excellent Value for Money criteria set by Government most effectively, the Northern LGPS should focus resource on making collective investments in alternative assets such as private equity and direct infrastructure. The private equity and direct infrastructure investments would initially be made via joint ventures and partnerships to enable pooled investments to be made and start generating material cost savings from an early stage. Such structures would in all cases be compliant with relevant financial services law.
- 8.5 The Scale and Strong Governance and Decision Making criteria are met by:
- i. the joint committee providing monitoring and oversight of the operations of the Northern LGPS with the Joint Committee constituted so as to separate elected members from any manager selection decisions and;
  - ii. appointing a FCA regulated common custodian for the Pool, which has custody of all the pool's actively managed listed assets (ie internally and externally managed equities and bonds) and act as master record keeper for all pool assets.
- 8.6 As at 31 March 2015, the total value of assets across the three participating funds was £35.4 billion which is in excess of the £25 billion criterion set by Government. The combined asset value of the Northern LGPS is expected to remain (significantly) above £25 billion over the foreseeable future. Strategic asset allocation will continue to be set by each fund's pension committee with the selection of individual investments and investment managers for external mandates carried out on a pooled basis by appropriately qualified and experienced officers, operating under the legal framework of specialist investment vehicles where appropriate.
- 8.7 All public-market assets and new commitments to private equity and direct infrastructure will be monitored and overseen by the Northern LGPS Joint Committee with all assets other than day to day cash used for scheme administration purposes being held under the common custody agreement. Day to day cash is assumed to be 1% of total assets for each fund.
- 8.8 In accordance with the 2015 pooling criteria and guidance, legacy private market assets (ie those entered into prior to the formation of the Pool) will be run-off on a segregated basis.
- 8.9 At 31 March 2019, externally managed public-market assets, direct infrastructure and private equity commitments made via the Pool made up 80% of GMPF's total assets. Over time, as private equity commitments continue to be made via the Pool and legacy private-market assets run off it is expected that approximately 90% of GMPF assets will be invested via the Pool structure set out above.

8.10 It is intended that the Northern LGPS will procure the following services as required on behalf of the participating funds:

- External fund management for certain public-market mandates.
- Common custodian for Pool.
- Investment management systems.
- Performance analytics.
- Responsible Investment advisory services.
- Other professional advice.

8.11 The Northern LGPS Joint Committee is created via the approval of an inter-authority agreement between the administering authorities to the participating funds. The role of the Joint Committee is to:

- i. provide monitoring and oversight of the Northern LGPS to ensure that the pool is effectively implementing the participating authorities' strategic asset allocation decisions
- ii. to oversee reporting to the participating authorities' pension committees
- iii. act as a forum for the participating authorities to express the views of their pension committees
- iv. ensure segregation of duties in investment decision making between elected members and officers
- v. monitor performance of portfolios
- vi. monitor the appointment of investment managers.

8.12 Reporting processes of the Northern LGPS include regular written reports on the performance of Northern LGPS investments to the Joint Committee, which are discussed at formal meetings. The Joint Committee will not be undertaking any regulated activities.

8.13 The Northern LGPS governing documentation grants the Joint Committee and each administering authority certain powers regarding the operation of the Northern LGPS, which can be used to ensure the effective performance of Northern LGPS. GMPF's approach to pooling set out above will be reviewed periodically going forwards to ensure this continues to demonstrate value for money, particularly following any changes to funds' strategic asset allocations, pool management arrangements or taxation policy in the UK or internationally. The reviews will take place no less than every three years.

8.14 A report on the progress of asset transfers will be made to the Scheme Advisory Board on at least an annual basis.

## 9. Socially responsible investment

9.1 GMPF holds a general policy of not interfering in the day to day investment decisions of its investment managers. However, GMPF may choose to actively invest in or disinvest from companies for social, ethical or environmental reasons, so long as that does not risk material financial detriment to GMPF.

9.2 As a responsible investor, GMPF wishes to promote corporate social responsibility, good practice and improved company performance amongst all companies in which it invests.

9.3 GMPF endeavours to be a socially responsible investor wherever possible but does so within the duties placed upon it under statute and under general trust law principles to manage the Scheme in the best financial interests of the Scheme members and beneficiaries.

9.4 GMPF's approach to responsible investment activities is set out in its Responsible Investment Policy. Consequently, from time to time GMPF will pursue certain specific issues direct with investee companies, either individually or, more usually, collectively with other institutional investors via its membership of the 'Local Authority Pension Fund Forum' (LAPFF), its membership of the 'Institutional Investors Group on Climate Change' (IIGCC), as a signatory to the 'UN Principles for Responsible Investment' or by means of other ad hoc groupings.

- 9.5 The climate emergency is an urgent, financially material social, economic and environmental risk. The Panel recognise that climate-related risks and opportunities will be financially material to the performance of the investment portfolio and will become ever more so over the expected lifetime of GMPF. As such, the Panel will consider climate change issues across GMPF and specifically in areas such as Strategic Asset Allocation, Investment Strategy and Risk Management with the aim of minimising adverse financial impacts and maximising the opportunities for long term economic returns on GMPF's assets.
- 9.6 GMPF's long term goal is for 100% of assets to be compatible with the net zero emissions ambition by c2050 in line with the Paris Agreement. The decarbonisation goal will be regularly evaluated in line with the latest science and climate risk assessment and GMPF's objective of maintaining long term financial performance. GMPF will continue to measure and report its carbon footprint and will seek to utilise the latest methodologies to ensure accuracy and relevance. GMPF reports annually in line with the recommendations of the Taskforce for Climate Related Financial Disclosures.
- 9.7 GMPF, via its membership in the Northern LGPS is a signatory to the Paris Aligned Investment Initiative's Net Zero Asset Owner Commitment. GMPF will draw on the IIGCC's Net Zero Investment Framework to reach its decarbonisation goal. This includes the setting of interim targets which GMPF is currently developing and will publish in due course.
- 9.8 GMPF has undertaken a number of initiatives to enhance its approach to managing this risk. Company engagement is a key element of GMPF's approach to climate change. GMPF wishes to promote and encourage compliance with its own UK Environmental Investment Code. GMPF's appointed external securities managers are encouraged to operate a policy of constructive shareholder engagement with companies. GMPF is a signatory of the UK Stewardship Code.
- 9.9 By joining forces with over 80 other LGPS funds within LAPFF, GMPF collectively has a very powerful voice in challenging companies to disclose their business models, and the assumptions that underpin their investment decisions, leading to greater capital discipline. This could have the dual success of enhancing shareholder value, whilst also reducing greenhouse gas emissions.
- 9.10 GMPF is a signatory to the Carbon Disclosure Project (CDP) which seeks information from major corporations worldwide on their Greenhouse Gas Emissions. GMPF is also a signatory to Climate Action 100+ whose aim is to work with companies to ensure that they are minimising and disclosing the risks and maximising the opportunities presented by climate change.
- 9.11 GMPF is a member of the Institutional Investors Group on Climate Change (IIGCC) which is a forum for collaboration on climate change for European investors. The IIGCC seeks to promote a better understanding of the implications of climate change amongst its members and other institutional investors, and to encourage companies and markets in which its members invest to address any material risks and opportunities to their businesses associated with climate change and a shift to a lower carbon economy.
- 9.12 GMPF actively invests in low carbon and renewable energy technology and will seek to increase the scale of investment in this sector where suitable opportunities arise, in order to encourage a move toward a lower carbon economy. Within the strategic asset allocation to infrastructure, a key strategy is investments in low carbon and renewable energy opportunities.
- 9.13 GMPF supports the Investing in a Just Transition initiative which focuses on delivering a transition to a low carbon economy while supporting an inclusive economy with a particular focus on workers and communities across the UK. GMPF understands this needs to be done in a sustainable way that safeguards against communities being left behind during this transition.
- 9.14 The Panel has approved an allocation to Local Investments, which has the twin aims of generating a commercial return and delivering a positive social impact. GMPF's Annual Report and Accounts contains more detail on the specific investments within this allocation.
- 9.15 GMPF is able to exercise its responsibilities on wider ESG (Environmental, Social and Governance) issues through its membership of organisations such as the 30% Club, Workforce Disclosure Initiative and the Make My Money Matter initiative. GMPF reports annually on its responsible investment activity through the UN Principles for Responsible Investment's reporting framework and uses this framework as a basis to report on its responsible investment activity quarterly to GMPF's Management Panel which is publicly available.

## 10. The exercise of investment rights

- 10.1 The exercise of rights which are not voting rights (eg dividend entitlements, rights issues etc) are delegated by TMBC to the investment managers of GMPF as part of their normal investment responsibilities.
- 10.2 GMPF retains maximum possible authority to exercise the voting rights attached to its investments to promote and support good corporate governance principles. The importance of accountability to beneficiaries is fundamental to GMPF's approach. Therefore, GMPF makes publicly available its voting record. In the case of the GMPF's own voting decisions, it pre-discloses votes on all companies. GMPF will report on its voting activity as part of its Annual Report.
- 10.3 GMPF implements its voting policy in partnership with a specialist advisor (currently PIRC Ltd) who provides appropriate research and vote execution services that cover the major markets in which shares with voting rights are held.
- 10.4 GMPF votes in line with the recommendations of its advisor, having judged that the advisor's voting guidelines promote high standards of corporate governance and responsibility and enable GMPF to exert a positive influence as shareholders concerned with value and values.
- 10.5 The appointed external passive securities manager votes in respect of GMPF at every opportunity in the UK and in respect of companies in the vast majority of overseas markets except where practicalities are a significant obstacle.
- 10.6 In casting votes in respect of GMPF in the UK, the appointed external passive securities manager normally implements its own Voting Policy. However, the passive securities manager will vote in respect of GMPF according to GMPF's instructions on a case by case basis should GMPF so require.

## 11. Stocklending

- 11.1 GMPF itself has participated in a prudently structured Stocklending program via its Custodian since March 2003. However, GMPF suspended its Stocklending program between September 2008 and May 2011 in the wake of the 2008 financial crisis.
- 11.2 GMPF does not lend UK and US Equities and does not take Cash as collateral. The maximum volumes of stock 'on loan' are set at a prudent level. All loans must be pre-collateralised and be subject to recall upon demand.
- 11.3 Certain pooled vehicles within which GMPF invests may undertake an amount of Stocklending on behalf of the pooled vehicle investors. Where this occurs, the extent of the activity is disclosed by the pooled vehicle. GMPF considers this aspect of the pooled vehicle when making investment decisions.

## APPENDIX TO INVESTMENT STRATEGY STATEMENT

### TABLE OF LIMITS ON INVESTMENTS

MAIN FUND	
Asset class	Limit (%)
<b>Total Equities</b>	<b>30 – 85</b>
UK Equities	5 – 20
Overseas Equities	10 – 50
Global Equities	2 – 25
<b>Total Bonds</b>	<b>10 – 50</b>
Government Fixed Interest Bonds	1 – 12
Corporate Bonds	2 – 17
Government Index Linked Bonds	1 – 12
Multi-Asset Credit	2 – 10
<b>Total Alternatives</b>	<b>5 – 45</b>
Private Equity	0 – 10
Private Debt	0 – 7
Infrastructure	0 – 15
Special Opportunities	0 – 7
Local Investments	0 – 7
Property	3 – 15
<b>Total Cash</b>	<b>0 – 10</b>

DESIGNATED FUND	
Asset class	Limit (%)
Equities	0 – 100
Government Fixed Interest Bonds	0 – 100
Corporate Bonds	0 – 100
Government Index Linked Bonds	0 – 100
Other Liability Matching Assets*	0 – 100
Cash	0 – 100

*\*Other Liability Matching Assets include exposure to derivative instruments (eg interest rate and inflation swaps) used for liability matching purposes and are currently accessed via pooled funds.*

There are a small number of employers whose liability profiles are significantly different from most of GMPF's employers. Investments in the Designated Fund reflect the specific liability profiles of these employers. The assets held in the Designated Fund have been specifically chosen in the context of the relevant liabilities and funding position. Given the nature and size of the Designated Fund, it is not considered appropriate to restrict the limits on Asset Classes. The proportion of assets within each asset class will change over time as GMPF develops its framework to meet the diverse needs of its employers.





## Investment Strategy Statement

Version 1.3



# Responsible Investment Policy

2022



# *GMPF Responsible Investment Policy*

## Introduction

The combined assets of GMPF now stand at over £27bn. These assets are invested to fund the retirements of hundreds of thousands of beneficiaries who live both within Greater Manchester and beyond. GMPF will always act in accordance the interests of those beneficiaries and we want our Responsible Investment activities to make a positive contribution to our region.

Environmental, social and governance (ESG) issues are important to GMPF for a number of reasons. ESG factors can be financially material and, as such, should be part of the assessment and monitoring of investments in all asset classes. Achieving sustainable, long-term financial returns underpins the ability to pay pensions. A focus on ESG issues helps reduce risks to GMPF and its beneficiaries. These risks might be financial, such as the underperformance or failure of an investee company, or reputational, resulting from poor corporate behaviour.

In addition, our beneficiaries live in a society that is affected by the behaviour of investee companies. Therefore, we expect high standards from those businesses. Consistent with GMPF's fiduciary duty to our beneficiaries we will ensure that the businesses in which we invest are both financially and environmentally sustainable, have high standards of governance and are responsible employers. As far as possible GMPF will seek to invest in a way that is financially and socially beneficial for Greater Manchester.



# 1. About the Greater Manchester Pension Fund Responsible Investment policy

This policy set outs GMPF's approach to Responsible Investment activities. It provides an overview of themes that will form part of those activities in addition to information on how this policy is implemented and our commitments to reporting and accountability.

Our approach to responsible investment has been informed by a number of important initiatives. GMPF fully supports the aims and objectives of the Stewardship Code and we are signatories of the Code. We are also signatories of the Principles for Responsible Investment (PRI) and as such we aspire to harmonise [the six responsible investment principles](#) with how we implement our investment beliefs.

We have also considered guidance from the Law Commission, Department of Work and Pensions and Ministry of Housing, Communities and Local Government in developing this policy.

We consider our approach to Responsible Investment to be rooted in financial materiality and risk management. It will also be informed by our understanding of our beneficiaries' views, and by reference to international standards such as the UN Sustainable Development Goals, the UN guiding principles on business and human rights and IIGCC's Net Zero Investment Framework. Therefore, we have expectations of investee businesses that encompass more than financial considerations alone.

GMPF will seek to apply the RI policy to all asset classes over time. The policy applies to both internally and externally managed assets.

By tilting RI activity toward portfolio companies generating value out of the North of England, GMPF will be in a position to maximise the positive impact good corporate practice can have on the communities and beneficiaries residing in the region. Our industrial heritage underpins our activity on many of the issues facing the North in the 21st Century. A transition to a net-zero economy that does not come at the expense of the region's workforce is a priority, and GMPF will continue to leverage its assets under management to this end.

GMPF has appointed PIRC as its Responsible Investment adviser, to assist in the development and implementation of the RI policy.





## 2. ESG themes

Over time the GMPF will publish policy positions on specific ESG issues in order to provide greater clarity about our expectations to both investee businesses and other stakeholders. Below we set out ESG themes that will be important areas of focus for our Responsible Investment activities, and our core positions in each area.

### Climate change

GMPF considers climate change risk as financially material to the long-term performance of investments. We integrate climate change considerations into our overall investment strategy, with the aim of minimising adverse financial impacts and maximising opportunities for long-term economic returns in all asset classes.

GMPF's long-term goal is for 100% of assets to be compatible with the net zero-emissions ambition by c.2050 in line with the Paris agreement. This decarbonisation goal will be regularly evaluated in line with our objective of maintaining long-term financial performance. As part of the Northern LGPS's Net Zero Asset Owner commitment, GMPF is working with its pooling partners in developing interim decarbonisation objectives and targets. In implementing our approach, GMPF:

- takes financially material climate change considerations into account as an integral part of its investment strategy and asset allocation;
- reviews a variety of research and analytical materials to encourage the use of scenario analysis to provide estimations of relative performances of asset classes and sectors under different scenarios which will be used where possible in asset allocation decisions;
- monitors and provides feedback to external investment managers in relation to incorporation of climate risk in the investment process;
- engages with companies in order to align their business practices and policies with a low carbon economy;
- liaises with company boards in improving the governance, management and disclosure on climate risk;
- takes company approaches to climate risk and responsiveness to engagement into account in proxy voting;
- supports the filing of relevant climate related shareholder resolutions;
- interacts with policy makers and regulators on investment implications of climate change;
- collaborates with other investors and participates in investor initiatives to leverage outcomes of company and policy engagement;
- and will report on policy objectives and activities regularly.

GMPF will also align reporting with the recommendations of the Task Force on Climate-Related Financial Disclosures within its annual reports.

GMPF actively supports the objectives of a Just Transition to a low-carbon economy, and will actively engage with the social aspects of responding to climate change. We consider this fits well with our objective of seeking to ensure a regional dimension to our RI activities.



## Environmental issues

GMPF considers multiple other environmental factors as financially material to long-term performance of investments. These include but not limited to; deforestation, water scarcity, loss of biodiversity, sustainable agriculture, pollution and plastics. Whilst recognising significant overlap between these issues, and the correlation with climate change, GMPF considers each independently as part of its stewardship activities.

### Deforestation, loss of biodiversity and sustainable agriculture

The conversion from arboreal and tree-clad areas to land used for agriculture and pasture are primary drivers of deforestation globally. Key commodities such as soy and beef in south America and palm oil in southeast Asia continue to drive deforestation and with it the loss of biodiversity. Land cleared in this way also significantly reduces the capacity to store carbon and can contribute, in a material way, to climate change. The IPCC Special Report on Climate Change and Land (2019) identifies that 23% of GHG emissions globally stem from the use of land, with commodity-driven tropical deforestation alone accounting for 5% of total emissions.

GMPF recognises the transition risks connected with companies failing to address supply chainwide deforestation, including changes in regulation, consumer trends and damage to brand equity as the shift to a low carbon economy takes pace. GMPF also recognises the potential physical risks to companies that fail to eliminate deforestation from the supply chain. These include crop and livestock productivity, and ultimately, profitability.

Sustainable Development Goal 15 focuses on protecting, restoring and promoting sustainable use of ecosystems, managing forests in a sustainable way, and reversing land degradation and biodiversity loss. Through its stewardship activity, GMPF is committed to supporting the SDGs, including goal 15, and will work towards the removal of unsustainable deforestation from the companies in which it invests.

GMPF actively encourages investee companies to adopt effective deforestation policies and practices. GMPF expects portfolio companies to be able to maintain robust procurement processes that enable good visibility and traceability of the relevant supply chains. Companies should also set science-based GHG reduction targets which include segregated disclosure of emissions arising from land use change across the value chain. These targets should comply with the requirements of industry standards and align with the recommendations of the Taskforce on Climate-Related Financial Disclosure. GMPF also expects companies to be able to demonstrate expertise on land use change issues at the board level.

### Water Stewardship

The supply and availability of fresh water underpins virtually every transaction on earth, financial or otherwise. As the global demand for fresh and dependable sources of water increases, driven largely by population growth, preserving the supply of reliable freshwater becomes ever more challenging.

There are significant physical and transitional risks facing companies in future scenarios of high water stress. The World Economic Forum has consistently identified water crises as one of the top risks to economic prosperity. For water-dependent sectors, including agribusiness and mining, water stress, pollution and flooding significantly undermine continuity and productivity. With water currently priced significantly below its innate value, and potential requirements to internalise the associated costs, the risks facing companies failing to be proactive on water stewardship are material.

GMPF actively encourages investee companies to adopt effective water stewardship practices. GMPF expects portfolio companies to be able to demonstrate expertise on water issues at the board level, mitigate water risks through the adoption of effective internal water-management processes and disclose water-related business risks and impacts via disclosure platforms such as CDP Water, GRI, and SASB. For investee companies that are highly dependent or derive significant value from natural water sources, regular mapping of the operational impact on ground and surface-water resources should be undertaken. GMPF also encourages companies to align the businesses' values with internationally recognised water standards and norms such as Sustainable Development Goal 6, 'clean water and sanitation for all'.



## People

GMPF puts significant emphasis on respect for human and labour rights within in its RI policy and stewardship activity. Ensuring that investee companies treat employees and other stakeholders with fairness and respect and adhere to and go beyond legal requirements is one of the most positive impacts we can have as investors.

We are also mindful of our history and our membership. The assets of GMPF represent the combined savings of generations of public sector workers, without whom the pension fund would not exist. Therefore, we have a responsibility to act in the best interests of those workers, and we actively promote decent work.

## Employment standards and human capital management

We consider effective management of people is a source of both value creation and competitive advantage. We actively support initiatives to improve corporate reporting and investor understanding in relation to employment practices and human capital management.

We expect all businesses in which GMPF invests to treat their workforce with respect and to employ and reward them fairly. Companies should offer secure, direct employment where possible, and should not interfere with the right of their workforce to seek representation through a trade union. We will consider whether the actions of investee businesses are in accordance with ILO Core Conventions both in relation to their directly employed workforce and in their supply chain.

We expect companies to work with employees and their representatives to adopt stringent occupational health and safety preventative measures and reporting processes. Disclosures should include frequency, severity and lost-time due to injuries, as well as fatalities and reporting should encompass both directly and indirectly employed members of the workforce.

GMPF looks favourably on opportunities to invest in ways that aid the creation of good jobs, and have other social benefits, particularly within Greater Manchester. We will also consider the potential impact of our investments on public service provision and public sector employment practices.

## Human Rights

Societal expectations of companies with regard to human rights are increasing, as are legal and regulatory obligations. As investors we consider that we have a responsibility to actively contribute to improving company practices, and that this is an area where we can have a positive impact.

Embedded within GMPF's approach to investment lies its responsibility to respect human rights as outlined in the UN Guiding Principles on Business and Human Rights (UNGPs). These principles underpin expectations GMPF applies to all investee companies. Our assessment of company practice in relation to human rights is also informed by sources such as the Corporate Human Rights Benchmark and OECD Watch.

Stewardship activity around human rights is pursued both through our membership of the Local Authority Pension Fund Forum (LAPFF) and our own direct engagement. We also seek to participate in collaborative investor initiatives relating to human rights.

Specifically, GMPF expects portfolio companies to have effective due diligence, grievance and access to remedy policies and processes in place. We encourage companies to increase the granularity of their reporting in these areas. Our objective in encouraging greater corporate transparency is for this to drive real-world improvements in practice.

## Public Health

We are mindful of the socio-economic divide in relation to health outcomes in the UK and around the world. Therefore we also seek to support initiatives for improving nutrition, ensuring healthy lives and promoting well-being in line with SDGs 2 and 3. As Greater Manchester looks to drive economic development building out of the pandemic, a focus on developing and maintaining a healthy population is essential.

There is a clear link between public health and nutrition. The food and drink companies in which we invest bear the risks associated with failing to adequately address these concerns within their business activities. GMPF recognises that in order to protect value, companies involved in the development, production and sale of food and drink should work to mitigate risks posed by government regulation and the modelled shifts in consumer demand for healthier food. We will engage with portfolio companies on the issues of health and nutrition as we consider that this has the potential to achieve both financially and socially beneficial outcomes.

## Corporate governance and financial reporting

GMPF considers good corporate governance practices continue to provide protection to shareholders and to our beneficiaries. A full list of positions that GMPF takes is provided in the shareholder voting guidelines that we have adopted.

Division of responsibilities and board independence are fundamental principles of good governance. We seek separation of chair and chief executive positions and independent representation on boards in all markets. We fully support board diversity in its widest sense. Diversity is desirable not only in its own right, but also because there is evidence that diverse boards make better decisions. In addition to supporting the 30% Club and recommendations of the Parker and Hampton-Alexander Reviews<sup>1</sup>, we actively encourage employee representation at board level. We also consider that diversity and equal pay is important throughout organisations, not simply at board level.

In relation to remuneration it is our view that executives must be appropriately rewarded for their contribution to the success of the businesses that they steward. Where performance-related reward is used this should be focused on long-term performance and take account of ESG factors. The reputational risk of overly generous pay including the comparison to average employee pay should be taken into consideration in remuneration packages. We also consider that excessive executive reward contributes to wealth and income inequality.

Beneficiaries' interests are well served by ensuring the highest standards in financial reporting and related issues. We take a robust position on audit quality and auditor independence as we view this as the first line of defence for shareholder interests. We encourage auditors not to undertake non-audit work for the same company and support mandatory rotation of the audit firm. We also advocate reform of accounting standards.

## Tax

We consider certain corporate tax arrangements, whilst potentially beneficial to shareholders in the short term, can be a source of regulatory, financial and reputational risk to companies and their investors. Aggressive corporate tax avoidance may have a negative effect on public finances and by extension on public service provision. Therefore, we seek to monitor the behaviour of investee companies in respect of tax planning and challenge where necessary.

<sup>1</sup> <https://www.gov.uk/government/publications/ethnic-diversity-of-uk-boards-the-parker-review>



## 3. Application of the policy

### Investment decisions

GMPF employs a mixture of in-house and external asset managers. Where management is undertaken in-house, ESG factors will be considered as part of the assessment process both before and after investment decisions are made. This integration applies to both equity and other asset classes, and applies to all regions, including, for example, smaller non-BRICs countries in Emerging Markets.

We seek to use our influence as investors actively to address issues of concern. We recognise that our ability to act as effective stewards, and our responsibility to do so, is greater where our holdings are greater or more concentrated. Therefore, we monitor sizeable investments closely and engage where necessary. In addition, we are involved in impact investing. Whilst this is not synonymous with 'Responsible Investment' this is an area where the policy may have significant practical application.

Where external managers are appointed, we envisage analysis of their competence in relation to Responsible Investment to form part of the appointment process. Expectations in relation to incorporation of ESG factors are part of the manager agreement, and managers are monitored in relation to performance on these factors. Appointed managers are also expected to report back to GMPF on their activities.

### Voting and engagement

Voting and engagement is a cornerstone of our RI activities. We take the legal right to vote seriously and exercise it in a way consistent with our publicly disclosed objectives and policy positions. How we vote is one way of providing investee companies with an indication of our views as shareholders, as well as to the wider market.

Therefore, in line with our commitment to transparency and democratic accountability, we ensure that our voting aligns with our engagement. For example, if we have informed a company we do not support a certain director, or consider the remuneration policy is inappropriate, we will not vote in favour.

GMPF retains the maximum possible authority to direct voting, rather than delegating authority to asset managers. We have dedicated voting guidelines that inform how our votes are cast. This combination of retained authority and a clear framework ensures both a consistent approach is taken across equity holdings and provides clarity to the businesses in which we invest about our expectations.

We are long-standing and active participants within LAPFF. Most engagement activity is undertaken through the Forum and representatives of GMPF frequently take part in company engagements.

GMPF, as a member of the Northern LGPS also undertakes its own engagement, either on specific companies or sectors, and we envisage that this will increase particularly in relation to major and unique investments, such as in infrastructure assets.

Where boards of investee businesses are resistant to dialogue or change, GMPF will escalate issues by, for example, voting against the re-election of the Chair of the board. Ultimately, in such cases, GMPF will consider adjusting its investments as appropriate to the risks, in accordance with its Responsible Investment policy and its fiduciary responsibilities.

### Shareholder resolutions

GMPF also considers shareholder resolutions a useful tool to proactively raise issues of concern either where boards of investee businesses are resistant to dialogue or change, or to amplify the shareholder voice where engagement with boards has been positive. We have co-filed resolutions at different companies in recent years on issues ranging from climate change to employment practices.

GMPF will consider filing or co-filing resolutions in cases where engagement has not resulted in the achievement of change or as part of systemic engagement on issues such as climate change, employment standards and corporate political spending.

## Collaboration and partnerships

GMPF often has a significant ownership of particular businesses or other assets and therefore can be an influential voice. There are also many instances where it is advantageous to work in collaboration with other investors and investor initiatives. In addition to participating in existing investor groups, GMPF seeks to initiate collaboration where it believes it can play a useful role.

As well as being a LAPFF member, we participate in, or are a member or signatory of, the following initiatives:

- The Stewardship Code
- The Principles for Responsible Investment
- The Institutional Investor Group on Climate Change
- Paris Aligned Investment Initiative: Net Zero Asset Owner Commitment
- The Carbon Disclosure Project
- The Transition Pathway Initiative
- the 2021 Global Investor Statement to Governments on Climate Change
- Climate Action 100+
- Say on Climate
- Pensions For Purpose
- The Workforce Disclosure Initiative
- The Human Capital Management Coalition
- Make My Money Matter
- The 30% Club

Other collaborations will be reviewed in due course, following consideration of our interests in participation.

## Securities litigation

Given the focus on cost reduction, GMPF will be an active participant in securities litigation. Where there has been corporate wrongdoing that has resulted in a financial loss to GMPF as shareholders, we seek to recoup these losses where practical.

## Securities Lending

Instances in which GMPF has securities on loan, rights are retained to recall shares to exercise voting rights. We monitor lending activity and maintain guidance on the recall of shares.

## Public policy advocacy

We recognise that regulatory intervention is sometimes necessary to address issues such as corporate disclosure requirements and shareholder rights. Where appropriate GMPF will participate in public policy consultations and engagement. This may be through LAPFF and other collaborative investor initiatives or by GMPF or the Northern LGPS on its own.

## Costs and charges

We recognise the growing interest in costs and charges incurred as part of local authorities' investment activities. GMPF supports the Transparency Code and expects all external managers to become signatories. We consider reducing unnecessary costs is part of our fiduciary duty and is one of the core objectives of GMPF. We will closely monitor all investment costs to ensure that greatest possible benefits from our investment activities are returned to members.

## 4. Reporting and accountability

The importance of accountability to beneficiaries is a central element of our approach. Therefore, GMPF will make its voting record, and those of asset managers that have delegated voting authority, publicly available. In the case of GMPF's own voting decisions, we will pre-disclose votes on all companies. GMPF, as a member of the Northern LGPS, will also produce a regular stewardship report on its broader activity.

In addition, we intend to hold a regular stewardship event to provide an update on activities and for there to be open discussion of current or emerging ESG themes. This will form part of GMPF's process for taking beneficiaries' views into account.

We meet quarterly to discuss the implementation of the RI policy, and as a member of Northern LGPS will undertake an annual review of activities. The RI policy will be reviewed and updated as required.

For further information on the GMPF Responsible Investment policy please contact:

[tom.harrington@gmpf.org.uk](mailto:tom.harrington@gmpf.org.uk)

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Administered by

 **Tameside**  
Metropolitan Borough



**Responsible Investment Policy**

2022





# Communication Policy

2022



# Communications Policy

## Introduction

The Greater Manchester Pension Fund (GMPF) is a regional pension fund administering the Local Government Pension Scheme (LGPS). It is the largest LGPS fund in England and Wales.

GMPF has a Communication and Engagement Strategy that has been developed based on the feedback we receive. The Strategy is used to drive changes to the communication work that we do. It outlines GMPF's aims and objectives when communicating and engaging with all its stakeholders.

This Communications Policy is a statement of how those aims and objectives are currently being delivered.

The LGPS Regulations require us to prepare, maintain and publish a statement setting out our policies on communications and this document has been prepared in line with these requirements. It covers our communications with:

- pension fund members
- representatives of members
- prospective pension fund members
- our employers and prospective employers.

This document will be revised and re-published whenever there is a material change to the way we communicate or engage with any of these groups.

This Communications Policy and the Communications and Engagement Strategy are available on the GMPF website.

## Pension fund members

We communicate with our members in a variety of different ways.

### GMPF Website and My Pension

General information about GMPF and about being a member of the LGPS is held on the GMPF website at

[www.gmpf.org.uk](http://www.gmpf.org.uk)

Members can also access information about their own pension through the My Pension area of the website. This is a secure area that allows members to see the personal details we hold about them, update information such as their death grant nomination and do their own pension estimates. It is also the area where contributing and deferred members will be able to see their annual pension statements going forward and where pensioner members can view their pension payment information.

All members who have registered for My Pension will receive e-mails to alert them to any key updates made to the GMPF website or My Pension area. News updates are also added here.

Members can send questions and queries to us using the online forms and we will respond to them by e-mail or other method as requested. The GMPF website also has a 'feedback zone' where members can leave feedback or register complaints or compliments about the service we provide. There is also a survey presented to members when they logout of My Pension, giving them the opportunity to provide feedback specifically about this online service.

All literature (such as GMPF's annual report and Guide for Members) and all statements and policies are also held on the website. Information about how to raise a formal dispute can also be found on the website. This includes contact details for the Pensions Advisory Service and the Pensions Ombudsman.

## **Twitter**

GMPF has a Twitter account and we regularly tweet information and updates that we believe our members may be interested about. You can follow us at: @GMPF\_LGPS

## **Google**

GMPF makes use of a feature in Google where members can ask us questions and receive answers back, see our opening times, access directions to our offices, see photos and write reviews on our performance.

## **Helpline**

We provide a helpline service for all our members to use if they need to contact us by telephone or e-mail. There are two helpline numbers for members; one for pensioner members to call being 0161 301 7100, and one for all other members to call being 0161 301 7000.

## **Roadshows, seminars, webinars and surgeries**

Each year, GMPF arranges a programme of face-to-face events in order to meet with individuals or small groups of members. These can vary depending on the requests and many are organised in conjunction with GMPF's employers. Information about these events will therefore be provided to members by their employer or advertised on the GMPF website where appropriate.

## **Individual letters, telephone calls and e-mails**

Whenever we are dealing with a specific request or processing a pension benefit, it is likely that we will communicate either by letter, telephone call or e-mail, depending on which is most appropriate.

## **What we do not do**

We never cold call our members about any aspect of their pension. If a member receives an unexpected call from someone claiming to be from GMPF then we suggest that they ring our Helpline to check whether the call was genuine.

## **Visits to our offices**

Members are welcome to visit our offices should they prefer to speak to us face-to-face. Ideally, an appointment should be made in advance to ensure someone is available. Private interview rooms are used in order to discuss matters confidentially. In addition, members can return documents or make general enquiries at our reception at any time during office hours. Confirmation of our opening hours and details of how to find us can be found on our website at [www.gmpf.org.uk/contact](http://www.gmpf.org.uk/contact)

## **Special requests and paper communications**

If any member requires us to provide information or communicate with them in a specific way (for example, requires letters to be in large print or on a different coloured background) then they should contact us and we can make arrangements for this.

If a member wishes to opt-out of receiving electronic communications and wishes to receive paper copies instead then we ask that they put this request in writing to us quoting their unique GMPF pension reference. This is so that we can identify the correct pension record and make the necessary arrangements.

If we are unable to communicate electronically with a member for whatever reason and we are required by law to provide information to them, then we will send that information in writing either to their home address or to their employer to forward on.

## **Consultations, surveys and focus groups**

GMPF also conducts various consultation events, surveys and focus groups from time to time in order to obtain feedback that might help to improve the service provided to members. All relevant results or feedback is published on the GMPF website.

## Representatives of members

### General information about GMPF and the LGPS

All general information and literature is available to the representatives of members on the GMPF website, as detailed in the section above.

### Employee representatives who are members of the GMPF Management Panel, Local Board or Working Groups

These representatives will receive information presented face-to-face at the relevant meetings, be provided with written reports for agenda items and will receive relevant training where identified or requested. News updates or alerts will also be circulated as and when required.

## Prospective pension fund members

### General information about GMPF and the LGPS

All general information and literature is available to prospective pension fund members on the GMPF website. Prospective members can contact us by using the 'Contact Us' option on the website.

### Promoting the benefits of joining

GMPF requires all its employers to provide prospective members with a link to or copy of its 'Guide for Members'. This guide highlights the benefits and costs of joining the LGPS. It should be provided as part of an employee's letter of appointment ideally.

GMPF also requires its employers to engage with any events that promote the benefits of the LGPS to prospective members.

### Consultations and surveys

GMPF also conducts various consultation events and surveys from time to time for prospective members, in order to obtain feedback that might help it to promote the LGPS to non-members.

## GMPF employers

We also communicate with our employers in a variety of different ways.

### GMPF Website and Employers Website

General information about GMPF and about becoming an employer in GMPF is held on the GMPF website.

In addition, employers can access a secure area of the website known as the 'Employers website'. This area holds procedure notes, training information, forms and guidance to assist employers to carry out successfully their employing authority responsibilities.

### E-mail bulletins and newsletters

We issue regular bulletins to our employers to provide news, updates and reminders. We also issue newsletters and ad-hoc alerts whenever there is specific or topical information that we believe employers need to be aware of.

### Helpline

We provide a helpline service for all our employers to use if they need to contact us by telephone. The number is 0161 301 7200.

### Meetings, webinars, training events and surgeries

GMPF arranges a number of different face-to-face events depending on the requirements of each employer.

GMPF will arrange face-to-face meetings with all its large employers, the frequency of which may depend on the agenda to be discussed. Conference calls may also take place in order to discuss specific matters.

We also arrange training events for employers to attend. These may be large-scale events providing general training on the LGPS or smaller events or webinars to provide training on a specific area or task (such as how to provide pay and contribution returns).

GMPF will also work with employers who have individual training needs, hosting in-house training sessions or visiting employers.

Each year GMPF hosts an Employer update meeting, in order to present its accounts and provide employers with an update about the work of the fund over the previous twelve months.

### **Consultations, surveys and focus groups**

GMPF also conducts various consultation events, surveys and focus groups with its employers from time to time in order to obtain feedback that might help to improve the service provided to employers and their members. All relevant results or feedback is made available to all employers.

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## Communications Policy

2022





# Pension Administration Strategy Statement

Effective from 1 April 2020



# Pension Administration Strategy

1. Introduction
2. Purpose of the Pension Administration Strategy
3. Role of Scheme employers and their expected performance
4. Role of GMPF and its expected performance
5. How performance will be monitored
6. Actions where there is non-compliance
7. Communication, resources and available support
8. Feedback and review process

Appendix 1 – Relevant regulations and guidance

Appendix 2 – Escalation procedure for none or late provision of information

Appendix 3 – Escalation procedure for none or late payment

Appendix 4 – Memorandum of understanding regarding data exchange

Appendix 5 – Further sources of information

## 1. Introduction

This is the Pension Administration Strategy of Greater Manchester Pension Fund (GMPF). This document:

- confirms the purpose of the strategy and says what it is intended to achieve
- outlines the role of GMPF's scheme employers and sets out their expected levels of performance
- outlines the role of GMPF and sets out its expected levels of performance
- explains how the performance of GMPF and its employers will be monitored
- explains what actions might be taken when employers do not meet the requirements
- confirms how GMPF will communicate with its employers
- details the resources and support that is available for employers to access
- explains how employers and other stakeholders can contribute to the development of the strategy, both now and in the future.

GMPF has prepared this strategy following the Local Government Pension Scheme (LGPS) regulations and other relevant regulations, legislation and guidance, details of which are provided in appendix 1. The strategy does not override any provision or requirement set out within any of those regulations.

This Pension Administration Strategy applies to all employers in GMPF. Employers must have regard to this strategy when carrying out their role.

Tameside Metropolitan Borough Council (TMBC) is the administering authority for GMPF, as defined in the LGPS regulations.

## 2. Purpose

This Pension Administration Strategy:

- provides clarity on the key roles and responsibilities of GMPF and its employers
- sets expectations and confirms the targets that GMPF and its employers need to work to
- helps all parties to achieve regulatory compliance by providing a framework that is clear and user-friendly
- assists GMPF and its scheme employers in adhering to the Pensions Regulator's Codes of Practice
- complements procedures that help all parties to meet their data protection and data quality responsibilities
- helps to ensure all parties provide the best possible service to scheme members and other relevant stakeholders
- emphasises the importance of the shared role that GMPF and its scheme employers have in ensuring excellent service delivery to scheme members
- promotes efficient working practices, transparency and a culture of continual improvement.

An effective Pensions Administration Strategy supports GMPF and its employers to deliver on their responsibilities so that all pension fund members and stakeholders receive an excellent service.

### 3. Role of Scheme employers and their expected performance

Scheme employers and administering authorities have distinct decision-making and administrative duties under the LGPS regulations and other relevant legislation.

Employer performance has a significant impact on the overall level and quality of service provided to scheme members. This section covers:

- 3.1 The agreed service delivery tasks and responsibilities that an employer should carry out in their role.
- 3.2 The key legislative and regulatory responsibilities of an employer.
- 3.3 Accepted methods of data exchange.
- 3.4 The additional responsibilities of those employers who use an external payroll provider.
- 3.5 The additional roles and responsibilities of those employers with access to Altair.

#### 3.1 Scheme employers - agreed service delivery tasks and responsibilities

The following expectations have been agreed to ensure GMPF and its employers work together and co-operate effectively to provide the best level of service possible to scheme members.

Employers are expected to:

- nominate a principal authorised officer for day to day pension matters and keep their GMPF contacts list up to date
- inform GMPF immediately whenever a new employer authorised officer needs to be appointed or removed from our records
- ensure GMPF are informed in any changes to contact information, such as a change of address or email details
- use the Employers section of the GMPF website to obtain and request information
- promote and highlight pension responsibilities and statutory requirements within their organisation
- consider GMPF's Communication and Engagement Strategy when communicating about GMPF and the LGPS
- support GMPF with promotional activities and in distributing communications
- encourage scheme members to use GMPF's My Pension online service
- assist GMPF in obtaining feedback and analysis that will help to improve the service provided
- have regard to GMPF employer bulletins and relevant Local Government Association and Scheme Advisory Board guidance
- comply with any request from GMPF's internal auditors, including requests for documentation or to attend an employer's offices to carry out an audit on compliance with pension duties, including follow up action
- return any legal documentation promptly and within the requested timescales
- pay any invoices for fees, fines or additional costs promptly and within the requested timescales
- keep GMPF informed of any changes that may affect its ability to meet its statutory obligations or provide the expected service to scheme members
- respond promptly to any enquiries that relate to breaches in the law
- protect member data from improper disclosure and use any information supplied by GMPF only to administer the LGPS
- keep GMPF informed of structural, governance or corporate changes that might affect its eligibility to remain an LGPS employer or that relate to the terms of its admission
- comply with the statutory duties and targets set out in Section 3.2.

### 3.2 Scheme employers - statutory duties and targets

This section outlines the key legislative and regulatory responsibilities of an employer. GMPF recommends that employers also refer to the LGPS regulations directly when undertaking their role and assessing their LGPS responsibilities. Providing accurate data in a timely way is vital to ensure compliance with the law and statutory guidance.

#### Scheme member events

Responsibility	Regulation / Legal requirement	Statutory deadline / target	Overall case target	Format of submission	Locally agreed deadline / target
Determine eligibility to join the LGPS and GMPF	The Local Government Pension Scheme Regulations 2013 (LGPSR13)  LGPSR13 - <a href="#">Regulation 3</a>	n/a	n/a	n/a	n/a
Notify new joiners to GMPF	The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013, as amended (Disclosure regulations)  Disclosure Regulations – <a href="#">Regulation 6</a>	New joiners must receive a notification of joining within two months of the date of joining, or within one month of GMPF receiving jobholder information or where the individual is being auto-enrolled / re-enrolled	Notifications to the member must be sent within two months (or max. 46 working days) from date of joining	Monthly data submission, through i-Connect	Joiner notifications must be on the data return for the month that the member joined, or the month after if this is not possible
Nominate members to join GMPF	Applies where the employer is an admission body where nominations to admit new members are required as part of the terms of admission to GMPF	The terms as set out in the admission agreement	n/a	Form P121 must be completed and submitted to GMPF's Employer Support Team	Nominations should be made at least two months prior to the proposed date of joining to allow sufficient time for the application to be considered

Submit opt out notifications received to GMPF	Automatic enrolment legislation Or LGPSR13 – <a href="#">Regulation 5</a>	The employer must notify the pension scheme administrator that the person has opted out	Under auto enrolment, if the member opts out within three months of joining the employer must refund the contributions to the employee within six weeks of receiving the opt-out form or, if the payroll has already been run, by the end of the next pay period.	Monthly data submission, through i- Connect	Opt out notifications must be on the data return for the pay period that the member opted-out or the month after if this is not possible
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Responsibility	Regulation / Legal requirement	Statutory deadline / target	Overall case target	Format of submission	Locally agreed deadline / target
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#### Changes in circumstances

Notify all changes to member details, including personal home address, hours, date of birth and breaks in membership	Under requirements of GMPF PAS LGPSR13 - <a href="#">Regulation 59</a>	n/a	n/a	Monthly data submission, through i- Connect  Urgent address changes can be notified using spreadsheet P5.  Those submitting an online return to I-Connect must submit breaks in service using the P5 spreadsheet.	All changes should be on the monthly data return in respect of the pay period when the change in circumstances was made or the month after if this is not possible. Where circumstances do not allow this, the notification should be sent as soon as is reasonably practicable.
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Responsibility	Regulation / Legal requirement	Statutory deadline / target	Overall case target	Format of submission	Locally agreed deadline / target
<b>Leavers, retirements and deaths in service</b>					
Notify early leavers	LGPSR13 - <a href="#">Regulation 73</a>  The Occupational Pension Schemes (Preservation of Benefit) Regulations 1991	A statement of benefits should be provided no more than two months from the date of request / notification	Notifications to the member must be sent within two months (or max. 46 working days) from date of leaving	Monthly data submission, through i-Connect, plus leaver notification spreadsheet	Leaver notifications must be on the data return for the month that the member left, or the month after if this is not possible
Notify immediate retirements	Disclosure Regulations - <a href="#">Regulation 20</a>	A statement of benefits should be provided no more than two months from the date of request / notification	Notifications to the member must be sent within two months (or max. 46 working days) from date of leaving	Monthly data submission, through i-Connect, plus form P71	Retirement notifications should be on the data return for the month that the member retired, or on an earlier month's return. Where this is not possible, they should be on or the month after ideally at the latest.
Determine eligibility for ill health cases	LGPSR13 - <a href="#">Regulation 35</a> & <a href="#">38</a>	n/a	n/a	Form P72 should be submitted	The form should be received within ten working days of the decision being made
Review the payment of Tier 3 ill health retirements	LGPSR13 - <a href="#">Regulation 37</a>	n/a	n/a	n/a	n/a
Notify deaths in service and determine eligibility for survivor benefits	Disclosure Regulations - <a href="#">Regulation 21</a>	Information must be provided as soon as possible, but no later than two months from notification	Notifications to the dependant must be sent within two months (or max. 46 working days) from date of notification	Monthly data submission, through i-Connect, plus form P74a-d	A call should be made or email sent immediately to notify GMPF. Forms should be sent as soon as possible. Death in service notifications must be on the data return for the month that the member died, or the following month at the latest wherever possible

Responsibility	Regulation / Legal requirement	Statutory deadline / target	Overall case target	Format of submission	Locally agreed deadline / target
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### Estimate and pay information

Provide pay or other information that GMPF need in order to respond to annual or lifetime allowance matters / divorce / similar enquiries	Under requirements of GMPF PAS LGPSR13 - <a href="#">Regulation 59</a>	A statutory target may apply depending on the task	See regulations that apply for the specific case type that applies	The format of the response needed will be specified in the request	Responses are expected to be received within ten working days. However, where a member is awaiting payment (so in the case of a new retirement in particular) responses are expected within five working days. (Please note that timescales will be adjusted where appropriate, so over Christmas for example or where an employer has a significant number of requests to respond to)
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Responsibility	Regulation	Statutory deadline / target	Format of submission	Locally agreed deadline / target
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### Contributions and Payments

Band and re-band employee contributions	LGPSR13 - <a href="#">Regulation 9</a>	n/a	Monthly data submission, through i- Connect	Details must be supplied on the monthly data return submission in respect of the pay period when the change of band was made (note that alternative timeframes will be agreed for the implementation of retrospective pay awards)
Deduct employee contributions from pay (including any additional contributions)	LGPSR13 - <a href="#">Regulation 85</a>	n/a	n/a	n/a
Pay contributions during employee absences (such as assumed pensionable pay)	LGPSR13 - <a href="#">Regulation 15</a>	n/a	n/a	n/a

Pay a refund of contributions to opt outs where applicable	LGPSR13 - <a href="#">Regulation 5</a>	n/a	n/a	n/a
Pay all employee and employer contributions to GMPF	LGPSR13 - <a href="#">Regulations 67, 68</a> and <a href="#">69</a>	Every Scheme employer must pay to the appropriate administering authority on or before such dates falling at intervals of not more than 12 months as the appropriate administering authority may determine Under the Pensions Act 2004 and the Occupational Pension Schemes (Scheme Administration) Regulations 1996.	Payments must be made by BACS transfer every month	Payments must be made by BACS or CHAPS transfer by the first working day of the month following the month of deduction (note that a later timescale can be agreed for the month of January)
Send a remittance advice to accompany all payments sent to GMPF	LGPSR13 - <a href="#">Regulation 69</a>	Every payment must be accompanied by a statement. An administering authority may direct that the information shall be given to the authority in such form as it specifies in the direction.	A form P8 must be sent to the Pension Accountancy team	Form P8 must be received by the first working day of the month following the month of deduction
Provide scheme member pay and contribution data to GMPF	LGPSR13 - <a href="#">Regulation 80</a>	n/a	Monthly data submission, through i- Connect	The data return must be submitted on the date that has been agreed and no later than by the first working day of the month following the month of deductions
Pay strain cost invoices on request	LGPSR13 - <a href="#">Regulation 68</a>	n/a	Payments must be made by BACS transfer	Payment must be received by GMPF within 30 days of the date of the invoice
Pay AVCs deductions from pay to the AVC provider	LGPSR13 - <a href="#">Regulation 67</a>	n/a	Payment must be made by BACS to the AVC provider and accompanied by the providers requested forms	Payment must reach the AVC provider by 1st of the month or earlier if possible

Pay all other agreed payments to be made to GMPF (such as recharge payments or costs towards administration)	LGPSR13 - <a href="#">Regulation 69 &amp; 70</a>	n/a	Payments must be made by BACS transfer	Payment must be received by GMPF within 30 days of the date of the invoice
Ensure any changes to the employer contribution rate are implemented by the effective date	LGPSR13 - <a href="#">Regulation 67</a>	n/a	n/a	n/a
Respond to all queries sent by GMPF about any data or payments submitted	Under requirements of GMPF PAS LGPSR13 - <a href="#">Regulation 59</a>	n/a	The format of the response needed will be specified in the request	Responses are expected to be received within ten working days

Responsibility	Regulation	Statutory deadline / target	Format of submission	Locally agreed deadline / target
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## Governance

Appoint a nominated adjudicator for stage 1 appeals made under the internal dispute resolution procedure (IDRP)	LGPSR13 - Regulation 74	n/a	The employer does not need to notify GMPF of appointments unless specifically requested to do so	The appointment should be made within one month of the employer joining GMPF or within one month of the existing adjudicator's resignation
Appoint an Independent Registered Medical Practitioner (IRMP) in order to opine on ill health retirement cases	LGPSR13 - Regulation 36	n/a	Requests for approval must be made and agreed by GMPF in advance of the IRMP being used. Form P72i must be completed and submitted to GMPF's Employer Support team	The form should be submitted two months in advance of the IRMP being used for the first time.

Prepare and publish a Pensions Discretions policy	LGPSR13 - Regulation 60	Before the expiry of a month beginning with the date any such revisions are made, each Scheme employer must send a copy of its revised statement to each relevant administering authority, and must publish its statement as revised	A copy of the policy, and all subsequent revisions to it must be provided to GMPF's Employer Support team	A copy of the policy must be provided within one month of the employer joining GMPF and within one month of any revisions published thereafter
Notify GMPF of any bulk / TUPE transfers that are planned	n/a	n/a	Employers should contact the Employer Support team as soon as they are aware that a bulk / TUPE transfer might take place and confirm the scheme employer(s) involved	As soon as possible
Notify GMPF that there is an intention to outsource services and to expect an admission agreement application from the contractor appointed, or, where there is an intention to re-let an existing contract	n/a	n/a	Employers should contact the Employer Support team as soon as they are aware that this is being considered and should confirm the scheme employer(s) involved	As soon as possible
Changes to the policy about the admission of new members	n/a	n/a	Employers should contact the Employer Support team to discuss this as soon as it is being considered	As soon as possible
Termination of admission agreements	n/a	As set out within the admission agreement or as soon as termination becomes likely	Employers should contact the Employer Support team to discuss this as soon as it appears likely	As soon as possible

### 3.3 Scheme employers - accepted methods of data exchange

Employers should submit data and information to GMPF in the format referred to in the column headed 'format of submission' in the table in 3.2. Employers should speak to the relevant GMPF section to obtain approval to submit information in an alternative format. All employers must use GMPF's data transfer system, i-Connect, to submit data every month. All forms should be submitted using a secure method of data transfer or by post. Other information can also be supplied by email. However, employers must consider data protection when sending information by email and take appropriate steps to ensure data breaches do not occur.

Employers with access to Altair workflow (see 3.5) must use the workflow task and comments functions to respond to queries or exchange information securely where appropriate, unless GMPF have requested a response in a different format.

### 3.4 Scheme employers - additional responsibilities of those using an external payroll provider

A Scheme employer remains responsible for carrying out the requirements in 3.2, even if that employer decides to outsource some of its functions to a third-party provider or another part of its wider organisation.

Therefore, an employer must ensure that the third-party provider or equivalent can meet all of the employer's duties and obligations that they have been appointed to carry out.

- Employers must monitor their payroll providers to check they are meeting their responsibilities in full and we recommend employers carry out regular audits.
- Employers must explain the potential consequences to the provider if they do not comply with data requests. We recommend employers make clear the penalties they will impose for not complying.
- Employers must tell us when they change providers so that we can ensure no breaches of the law occur.
- We recommend employers ensure their payroll provider is familiar with LGPS regulations before the contract is let to ensure no breaches of the law occur.
- The employer is responsible for providing correct pay information to GMPF under LGPS regulations. An employer must ensure it always has access to historical pay information for its members, which can include pay data going back as far as the last 13 years.

### 3.5 Scheme employers - additional roles and responsibilities of those employers with access to Altair

GMPF normally gives employers that have more than 250 contributing members' access to its pension database, called Altair. Employers need to name individual licence holders to do this. A licence holder has access to carry out certain administrative tasks and to use the Altair workflow system.

Licence holders have access to the pension records of their employer's contributing members and can:

- amend address data
- calculate retirement estimates
- monitor and process GMPF workloads using Altair workflow.

Licence holders have additional responsibilities for data protection. A separate data processing agreement outlines all duties and responsibilities that an employer with licence holders must adhere to.

Specific points of note are:

- All licence holders must complete the training provided by GMPF before they get access to Altair.
- If a licence holder cannot attend the training, another licence holder at the employer must give written assurance that in-house training will be or has been carried out.
- Licence holders must not share their access details and passwords with anyone else under any circumstances.



- GMPF will check if licences are being used and will revoke any that are not being used (or regularly used) as the number of licences available is limited.
- Licence holders must monitor their task list and keep it up to date, answering queries using Altair workflow and sending responses within the timescales.

## 4. Role of GMPF and its expected performance

GMPF's main role is to calculate and pay pension benefits. However, GMPF has many other duties and obligations. This section covers:

- 4.1 The service delivery tasks and responsibilities that GMPF carries out in its role.
- 4.2 Who manages GMPF performance and how.
- 4.3 The key performance indicators used to help measure service delivery.

### 4.1 The service delivery tasks and responsibilities that GMPF carries out in its role

GMPF's prime responsibility is to calculate and pay benefits in line with LGPS regulations. Other key responsibilities include:

- keeping accurate pension records and data
- providing annual benefit statements to all contributing and deferred members
- providing P60s to pensioner members
- providing pension savings statements to those members who exceed the annual allowance limit
- preparing and publishing a discretions policy and keeping it up to date
- appointing a nominated adjudicator for stage 1 and stage 2 appeals made under the IDRP.

To do these successfully, GMPF expects to:

- provide employers with a point of contact through its Employer Support team and Employer Helpline service
- keep employers informed of any matters that might affect them through its communication methods and strategy
- provide or facilitate training to all new employers or those authorised officers that are new to the LGPS or GMPF
- maintain a section of the GMPF website that contains information to support employers
- hold an annual update meeting where employers can find out about GMPF's performance and learn about work being undertaken
- issue regular surveys and hold feedback sessions to get employer views and make improvements
- let employers know if there are any proposed scheme changes, administration challenges or anything similar that they may need to be aware of
- carry out certain tasks on an employers' behalf where it is reasonable and acceptable to do so
- audit employers from time to time, carrying out spot checks and asking for evidence to support effective pension administration.

### 4.2 Who manages GMPF performance and how

GMPF's Pension Fund Management Panel is responsible for ensuring GMPF complies with its statutory responsibilities. It also sets expectations regarding administration performance. The Local Pensions Board carries out a scrutiny role and reviews compliance with the rules.

When assessing administration performance, the Management Panel will consider:

- performance against statutory targets and key service delivery indicators (see 4.3)
- the cost of administration
- benchmarking reports to assess GMPF's performance compared to that of other pension funds
- ability to recruit to key posts
- the numbers of complaints and formal disputes received and their outcomes
- audit outcomes
- ability to deliver projects on time and to budget
- feedback received from stakeholders through surveys, the website and other channels
- feedback received from staff.

#### 4.3 The key performance indicators used to help measure service delivery

The LGPS regulations and other overriding pension legislation contain statutory targets that GMPF must meet.

Additionally, GMPF's Management Panel has set some performance standards based on the level of service that it expects to be delivered to members.

Details of these standards and our performance against them are published in the GMPF annual report.

### 5. How performance will be monitored

GMPF's Management Panel will monitor GMPF's performance and that of its employers in the following ways:

- Through regular reports to the Pension Fund Management Panel, relevant Working Groups and the Local Pensions Board.
- Through reporting and general day to day monitoring by GMPF managers and officers.
- Through reports provided to employers highlighting performance levels.
- By using the Internal Audit team to review processes and controls.
- By comparing performance against other LGPS pension funds, benchmarking key data and workloads.
- By following escalation procedures where there is non-compliance.
- By reviewing GMPF's breaches of the law log each quarter.
- By holding focus groups and forums when appropriate.

GMPF will monitor employer performance across the following key areas:

- The submission of monthly data returns.
- The payment of contributions and other payments due.
- The number of queries, along with the rate and quality of responses.
- The number of complaints received and IDRPs upheld against the employer.
- Whether or not GMPF have received a copy of the employer's current discretions policy.
- Whether or not an employer has failed to notify GMPF of key changes or events within a reasonable timeframe.

## 6. Actions where there is non-compliance

GMPF will apply one of two escalation procedures when an employer has not met their responsibilities. These are set out in Appendices 2 and 3. GMPF will endeavour to follow these whenever employers send information or payments late or not at all.

Where GMPF has incurred additional costs due to an employer's poor performance, it will recover those costs by charging employers at the following rates:

Activity	Charges
Monthly data return submitted late*	A fixed penalty of £500 if received after the first working day of the following month, plus a further fixed penalty of £50 for every further day late after that deadline. Note that both the file and the remittance advice (form P8) must be received for no penalty to apply.
Late payment of contributions and other payments due	A fixed penalty of £500 if received after the nineteenth of the following month or after seven days of the payment due date in the case of an invoice, plus interest on the total payment due charged at one per cent above base rate calculated from the due date.
Resubmission of incorrect data	A fixed penalty of £500 plus charges to account for the officer resource used to rectify any issues charged at a minimum hourly rate of £100.
Failure to respond within the timeframe	A charge of £25 per case for each case chased after the original deadline has passed.
Failure to provide a copy of discretions policy or latest version	A fixed penalty of £500 for failing to supply a copy plus a further £100 charged on each occasion that a policy is requested or is chased by an officer and is not supplied.
Failure to notify GMPF of key changes or events, including a change of payroll provider	A fixed penalty of £1000 where the change has a significant impact on administration or £500 plus a further £100 charged on each occasion that further information is requested or chased and not supplied.

\*Separate target dates may be agreed for those employers that submit weekly, fortnightly or four-weekly returns

If an employer's poor performance leads to a third-party agency issuing GMPF with financial penalties, then GMPF will recover these costs from the employer concerned.

This includes:

- Those imposed by agencies such as the Pensions Regulator for a breach of statutory duties, where the breach occurred due to the poor performance of an employer. An example would be where GMPF has not issued annual benefit statements because the employer has failed to provide member data.
- Those imposed by HMRC, such as scheme sanction charges that arise as a result of the decision of an employer. An example would be if the employer allowed a member to claim benefits that would cause GMPF to make an unauthorised payment.
- Those imposed by the Office of the Information Commissioner following a data breach where the breach was caused by the actions of an employer.

GMPF will pay the penalty but will recover it from the employer concerned. The list is not exhaustive and GMPF reserves the right to use the same principles and policy for other penalties imposed on it by outside agencies not detailed here.

In general, GMPF will apply a financial penalty where an employer fails to:

- meet the requirements of this Pensions Administration Strategy
- meet the requirements of the LGPS Regulations
- meet the requirements of other legislation.

Where this results in:

- additional work or costs for GMPF or its agents
- failure of GMPF to meet its obligations under the LGPS regulations, other legislation or guidance
- complaints by organisations or members
- appeals by members or their representatives.

In all cases, GMPF would look to consider any mitigating circumstances, such as system failure, business continuity events and so on, and take a pragmatic approach when making decisions.

GMPF would hope that any disputes could be resolved locally upon discussion. However, if these cannot be resolved, the matter would be referred to GMPF's Management Panel.

## 7. Communication, resources and available support

Employers can do many things to communicate well with GMPF to ensure an excellent service is provided to fund members. As a minimum, GMPF expects its employers to:

- inform GMPF about all changes that might affect its or GMPF's ability to meet pension obligations and deliver the required standards of service
- nominate a principal pensions authorised officer and keep their full list of contacts and authorised officers up to date
- promote and highlight the expected performance levels within their organisations to ensure managers, HR officers and so on are aware of the timescales that they need to work to and the requirements that they need to meet
- support GMPF with any promotional activities that they are carrying out, including assisting with distributing e-communications and promoting online access through My Pension

- assist GMPF with obtaining feedback or carrying out data analysis that will help improve the employer experience or service delivery to members
- fully support GMPF's internal auditors with any audits they wish to carry out and respond to all questions, queries and draft audit recommendations promptly by the timescales agreed
- cooperate with GMPF officers to resolve any issues, complaints or similar to a swift and agreeable conclusion.

GMPF resources and support available to employers to assist them includes:

- an employer helpline service
- an employer's section of the website
- regular information e-bulletins
- training webinars and seminars
- policy and strategy documents, including GMPF's discretions policy, communications policy, communication and engagement strategy, data strategy and annual report
- a GDPR memorandum of understanding for employers (see appendix 4)
- Altair usage and data sharing agreements
- procedures for providing feedback or escalating issues
- employer support meetings and conference calls.

GMPF will signpost employers to other resources and communications that may assist them in their role.

This includes guidance from the Local Government Association (LGA), the LGPS Scheme Advisory Board (SAB) and GMPF's fund actuary.

## 8. Feedback and review process

Regulation 59 of the Local Government Pension Scheme (LGPS) Regulations 2013 is the regulation that allows GMPF to create this strategy. Regulation 59 states that on creating or revising its strategy, the administering authority must consult with its employers.

GMPF will consult with employers whenever it changes the Pension Administration Strategy (except where there are minor or corrective amendments only). The consultation period will normally be eight weeks.

The GMPF Management Panel must approve the Pension Administration Strategy before it is published.

GMPF will review and update it each year in line with the annual review of all GMPF pension administration policies and strategies. It will also be reviewed:

- whenever there are regulatory changes
- if it is impacted by changes to other legislation or guidance
- if there are changes to policies, statements or strategies that affect its contents
- when there are operational changes.

Once approved, GMPF will publish the final version to the employers' section of the website and a link will be circulated to all GMPF employers and the Secretary of State.

If you have a question or comment about any aspect of this Pension Administration Strategy, please contact GMPF's Employer Liaison team.

## Appendix 1 – Relevant regulations and guidance

Regulations and other legislation governing the strategy include:

- The Local Government Pension Scheme 1995, 1997 and 2008 Regulations as they still have effect in part
- The Local Government Pension Scheme (Transitional Protection) Regulations 2014
- The Local Government Pension Scheme Regulations 2013 in force now or as amended and in force at any future date
- The Public Sector Pensions Act 2013
- The Pensions Act 1993
- The Pensions Act 1995
- The Pensions Act 2004
- The Pensions Act 2014
- The 2004, 2006 and 2014 Finance Acts
- The Occupational & Personal Pension Schemes (Disclosure of Information) Regulations in force and as amended
- The Occupational Pension Schemes (Transfer Values) Regulations in force and as amended

This list is not exhaustive and other Legislation and Regulations may and will apply in certain specific circumstances.

In accordance with the Public Sector Pensions Act 2015, the LGPS is regulated by the Pensions Regulator. GMPF and its employers are also required to comply with regulatory guidance or Code of Practice issued by the Pensions Regulator.

### Pension Administration Strategy

The Local Government Pension Scheme Regulations 2013 (Regulation 59 (1)) enables a LGPS administering authority to prepare a written statement of the Administering Authority's policies in relation to such matters mentioned in Regulation 59 (2) that it considers appropriate.

The regulation says that this written statement shall be known as the "Pension Administration Strategy" and shall include the following:

- Procedures for liaison and communications between the administering authority and Scheme employers ('its Scheme employers');
- The establishment of levels of performance which the administering authority and its Scheme employers are expected to achieve in carrying out their Scheme functions ("Service Level Agreements (SLA)"). These functions are:
  - (i) the setting of performance targets,
  - (ii) the making of agreements about levels of performance and associated matters, or
  - (iii) such other means as the administering authority considers appropriate.
- Procedures which aim to secure that the administering authority and its Scheme employers comply with statutory requirements in respect of those functions and with any agreement about levels of performance;
- Procedures for improving the communications by the administering authority and its Scheme employers to each other of information relating to those functions;
- The circumstances in which the administering authority may consider giving written notice to any of its Scheme employers under these regulations (additional costs arising from the Scheme employer's level of performance) on account of that employer's unsatisfactory performance in carrying out its Scheme functions when measured against levels of performance established under the SLA;



- The publication by the administering authority of annual reports dealing with:
  - (i) the extent to which the administering authority and its Scheme employers have achieved the level of performance established under the SLA;
  - (ii) such other matters arising from The Pension Administration Strategy as the administering authority considers appropriate.
- Such other matters as appear to the administering authority after consulting its Scheme employers and such other persons as it considers appropriate, to be suitable for inclusion in the Pension Administration Strategy.

In addition Regulations 59 (3 -7) requires that:

- Where the administering authority produces a Pension Administration Strategy, it is kept under review and revised where appropriate;
- When reviewing or revising the Pension Administration Strategy the administering authority must consult with its Scheme employers and such other persons it considers appropriate;
- Where the administering authority produces a Pension Administration Strategy or revises that strategy it must send a copy of it to each Scheme employer and to the Secretary of State;
- The administering authority and Scheme employers must have regard to the Pension Administration Strategy when carrying out functions under the LGPS regulations.

Regulation 60 requires each employer to publish its discretion on:

- funding additional pension [16(2)(e) and 16(4)9d]
- flexible retirement [30(6)]
- waiving actuarial reductions [30(8)]
- the award of additional pension [31] and, in addition,

Regulation 14 of the Local Government (Discretionary Payments)(Injury Allowances) Regulations 2011 requires employers to publish and keep under review its policy on these regulations. There are also a number of discretionary discretions under the current regulations and some mandatory discretions under previous sets of regulations. GMPF's Employer Support team can support with discretion policies upon request.

### Recovering costs due to poor performance

Regulation 70 of the Local Government Pension Scheme Regulations 2013 enables the administering authority to recover additional costs from a Scheme employer when, in the opinion of the administering authority, it has incurred additional costs because of the poor performance of the Scheme employer in relation to the Pension Administration Strategy.

The administering authority may give written notice to the Scheme employer stating:

- the administering authority's reasons for forming the opinion;
- the amount the administering authority has determined the Scheme employer should pay under Regulation 69 (1) (d) in respect of those costs and the basis on which the specified amount is calculated;
- the provisions of the Pension Administration Strategy which are relevant to the decision to give the notice.

GMPF has determined that it will apply a number of financial penalties for noncompliance with the requirements of this Administration Strategy under Regulation 70.

If financial penalties are levied, GMPF will issue an invoice to the employer confirming the costs due. The invoice will include a breakdown of the costs and details of the bank account into which the employer must pay. Payment will be due within 30 days of the date of issue. GMPF will provide details of how to query or appeal the amounts that GMPF are levying.

## Appendix 2 – Escalation procedure for non-provision or late provision of information

Where employers have not met the target dates and deadlines for information as set out in the table in section 3.2, the following procedures will be followed:

### 1. Failure to send the monthly data submission by the due date

Timeline (all days are working days, due date = 0)	Status	Action	GMPF Responsible Officer	Employer contact level	Register monitoring log / update
0 - 7 days		Email to be sent to employers reminding them of the due date for data submission	Emails sent automatically by i-Connect	Data submission contact	N/A
0 - 3 days	On watch	Email to be sent to employer reminding them that the submission due date is overdue and now classed as 'late'	Emails sent automatically by i-Connect	Data submission contact	Yes, unless exceptional circumstances apply
0 - 14 days	Enhanced watch	Email to confirm that the employer is in breach and is likely to be included on GMPF's breaches of the law log	Employer Support Team Manager / Section Manager	Most senior contact / finance contact at employer as appropriate	Yes
0 - 17 days	Enhanced watch	Telephone call and email to confirm that the employer is in breach and will be included on GMPF's breaches of the law log	Employer Support Section Manager / Head of Pensions	Most senior contact / finance contact at employer as appropriate	Yes
0 - 17 days to 0 - 23 days or more	Enhanced watch	Referred to the GMPF breaches of the law group to discuss and agree the next steps	Breaches of the law group		Yes

## 2. Failure to submit all other documentation or respond to queries by the expected date

<b>Timeline (all days are working days, due date = 0)</b>	<b>Status</b>	<b>Action</b>	<b>GMPF Responsible Officer</b>	<b>Employer contact level</b>	<b>Register monitoring log / update</b>
0 + 7 days		Reminder to be sent to employer	Pension Officer	Employer Pensions Contact	N/A
0 + 17 days		Employer contacted again to agree a final response date	Senior Pension Officer / Team Manager	Employer Pensions Contact	N/A
0 + 24 days	On watch	Employer to be contacted again escalated to a senior contact	Team Manager / Section Manager	Senior contact / manager at employer as appropriate	Yes, unless exceptional circumstances apply
0 + 31 days	On watch	Employer to be contacted again and escalated	Team Manager / Section Manager	Payroll / Pensions / Finance Manager at	Yes, unless exceptional circumstances apply
0 + 34 days or more	Enhanced watch	Referred to the GMPF breaches of the law group to discuss and agree the next steps	Breaches of the law group		Yes

## Potential courses of action

We should confirm the information we need and give you a proposed time scale at each stage of the escalation process. We should also tell you the next steps in the process if you do not send the information within the proposed timescale. For example, if the next step is for us to refer the item to a more senior manager within GMPF or at the employer, then this should be explained to you.

It may be that you need additional support from us to be able to provide the information. Wherever we can, we will provide you with this support. We will record details on a performance monitoring log or breaches of the law log when we have designated an employer as being 'On watch' or 'Enhanced watch'. Other potential courses of action are:

Status Level	Potential Courses of Action
On watch	<p>Range of outcomes include:</p> <ul style="list-style-type: none"> <li>• Financial penalties imposed</li> <li>• Meeting with senior officers from GMPF</li> <li>• Deadlines imposed for resolution of issues</li> <li>• Tameside MBC Internal Audit to support the employer to assess and improve pensions processes</li> <li>• Officers required to attend mandatory training</li> <li>• Request for written information to be submitted to the Pensions Administration Working Group</li> </ul>
Enhanced watch	<p>Range of outcomes include:</p> <ul style="list-style-type: none"> <li>• Financial penalties imposed</li> <li>• The employer is asked to attend Pensions Administration Working Group and provide a verbal update regarding improvements</li> <li>• Individual members affected are written to informing them about the issue</li> <li>• Executive Director referral for meeting with Chief Executive</li> <li>• Report unsatisfactory performance to the Pensions Regulator</li> <li>• Review of Admission Agreement (for admitted bodies only)</li> </ul>

## Appendix 3 – Escalation procedure for non-payment or late payment

Where employers have not met the target dates and deadlines for payments as set out in the table in section 3.2, the following procedures will be followed:

Timeline (all days are working days, due date = 0)	Status	Action	GMPF Responsible Officer	Employer contact level	Register monitoring log / update
0 + 7 days		Employer to be contacted to remind that the payment is now overdue	Accountancy Officer	Employer Contact	N/A
0 + 17 days	On watch	Employer contacted again to agree a final payment date	Accountancy Officer	Senior Employer Contact	Possibly
0 + 21 days	Enhanced watch	Employer to be contacted again but escalated to a senior contact	Team Manager / Section Manager	Senior contact / Finance Manager at employer as appropriate	Yes
0 + 24 days or more	Enhanced watch	Referred to the GMPF breaches of the law group to discuss and agree the next steps	Breaches of the law group		Yes

The potential courses of action are the same as those listed in appendix 2.

## Appendix 4 – Memorandum of understanding regarding data exchange

GMPPF needs to send and receive personal data all the time due to the nature of its work. Information about how we meet data protection legislation is set out on our website.

We will have put controls in place to ensure we meet the data security standards we believe are required to fulfil our duties. We expect employers to respect and adhere to these controls and to work with us to ensure the measures in place are as strong as possible. This may include signing authorisation documents and checking authorisation agreements, amongst other things.

We also expect all employers to comply fully with the data protection regulations, to obtain consent from individuals when required and use data only for the purposes for which they obtained it.

If you believe that we are failing in our duties as a data controller or if you believe that we could further strengthen the data security controls we have in place, we expect you to let us know as a matter of urgency so that we can take the necessary action.

## Appendix 5 – Further sources of information

There is lots of information on the GMPPF website. Supporting documents include:

- The charging schedule for other costs
- Communications Policy and the Communications and Engagement Strategy
- A document outlining administering authority discretions
- The Governance Compliance Statement
- The Funding Strategy Statement
- General information for members of the LGPS

The website address for the central LGPS website for employers and pension funds in England and Wales is <http://www.lgpsregs.org/>

This website contains particularly useful guides for employers regarding human resources, payroll and auto enrolment.

You may also find information held on The Pension Regulator's website useful, especially around auto enrolment responsibilities. This website can be found at <https://www.thepensionsregulator.gov.uk/en>





## **Pension Administration Strategy Statement**

Effective from 1 April 2020

# Annual Report 2022

## Useful contacts

### General members' enquiries



Greater Manchester Pension Fund  
 Guardsman *Tony Downes* House  
 5 Manchester Road  
 Droylsden, M43 6SF

*If calling in person please use M43 7UH for satnav.*



Visit [www.gmpf.org.uk](http://www.gmpf.org.uk) for general information or to send us a message.



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### Property, Local Investments, Accountancy and Legal



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### Employer Funding and Business Development



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A special thanks to all the organisations who agreed to be featured in this report, including Sanofi and Kersia.

Administered by

**Tameside**  
 Metropolitan Borough



**GMPF Annual Report**

2022