

Practical Considerations in Preparing the Accounts

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Background

- New guidance introduced in 2014
- Desire for consistent, comparable data across funds
- New categorisation of management costs
- Full disclosure of investment management costs, including non-invoiced, transaction costs and underlying fees



West Midlands Pension Fund

- 473 employers
- 277,558 members
- £11.4 billion investment assets
- Mix of internal and external management
- 164 external fund managers, managing 295 funds

(All figures 2014/15)



Classification of Costs (1)

- Increase in number of reporting categories from two (Administration/Investment) to three (Administration/Investment/Oversight and Governance)
- Changes required:
 - Apportionment of 'corporate' costs
 - Stripping out certain professional fees
 - Allocating resulting adjusted cost centres to the three headings



Classification of Costs (2)

- Costs directly attributable to four teams:
 - Administration
 - Governance
 - Finance
 - Investments
- Plus apportionments for:
 - Premises costs (floor space)
 - IT costs (FTE staff)
 - Support services from council (FTE staff)



Classification of Costs (3)

- Other adjustments:
 - Investment strategy and oversight to Oversight and Governance
 - Settlements to Investments
 - Scheme communications to Administration
 - Professional fees to Oversight and Governance
 - Investment advice, tax advice, legal fees, actuarial fees, internal and external audit



Impact

| Heading | 2013/14 Original £000 | 2013/14 Re-stated * £000 |
|--------------------------|-----------------------------|--------------------------------|
| Administration | 4,518 | 3,153 |
| Investment | 11,477 | 10,816 |
| Oversight and Governance | - | 2,026 |
| TOTAL | 15,995 | 15,995 |

^{*} Before adjustment for non-invoiced investment fees

- Cost of 'Administration' significantly reduced
- Internally, moved to monitoring 'cost of Administration and Oversight and Governance'



Investment Management Costs: Our Approach (1)

- Welcomed the drive for enhanced transparency and completeness
- Supported work already underway internally
- Wanted to comply with the new guidance in full
- Implemented from 2014/15
- Prior to this, disclosed the cost of invoiced fees only (2013/14: £11.0 million, including internal)



Investment Management Costs: Our Approach (2)

- Already collected high-level data around fee structures
- Supplemented this by surveying fund managers directly, requesting:
 - Management costs
 - Performance costs
 - Transaction costs
 - Any other costs
- Provided selected quotes from CIPFA guidance to assist



Investment Management Costs: Our Approach (3)

- Seek to recognise costs for all external funds
- Realistic about prospects of capturing absolutely everything first time: materially correct
- Early discussions with auditors and Committee members
- Measurement based on:
 - invoiced costs
 - costs reported by manager
 - our own estimate



Investment Management Costs: Survey Results

- Partial data from fund manager returns
- Overlaid this on existing data
- Cross-checking, reasonableness



Issues

- Confusion around transaction costs and expenses
- Timing of performance fees charged/accrued
- Returned fees for whole fund
- Returned cumulative fees
- Currency
- Chasing and checking
- Fourth quarter estimate



Outcome

| Heading | 2014/15 Pre-Code £000 | 2014/15 Code £000 |
|--------------------------|-----------------------------|-------------------------|
| Administration | 4,287 | 3,059 |
| Investment | 11,512 | 81,235 |
| Oversight and Governance | - | 2,132 |
| TOTAL | 15,799 | 86,426 |

Total increase in reported costs of £70.6 million



Adjustments to the Accounts

- Adjust Fund Account:
 - Debit Management Costs
 - Credit Changes in Market Value of Investments
- Also need to adjust note "Reconciliation of Movement in Investments"
 - Increase Sales During the Year to match increase in Changes in Market Value
- Separate disclosure of transaction costs and performance fees
- Re-state prior year



Developments in 2015/16

- Spreadsheet template developed and circulated to all external managers
- Quarterly reporting required
- Monitoring of position in-year
- More on transaction costs
- Building up picture in stages



West Midlands Pension Fund

Questions

