

LGPS fund accounting – 2013-14

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What we're going to cover today

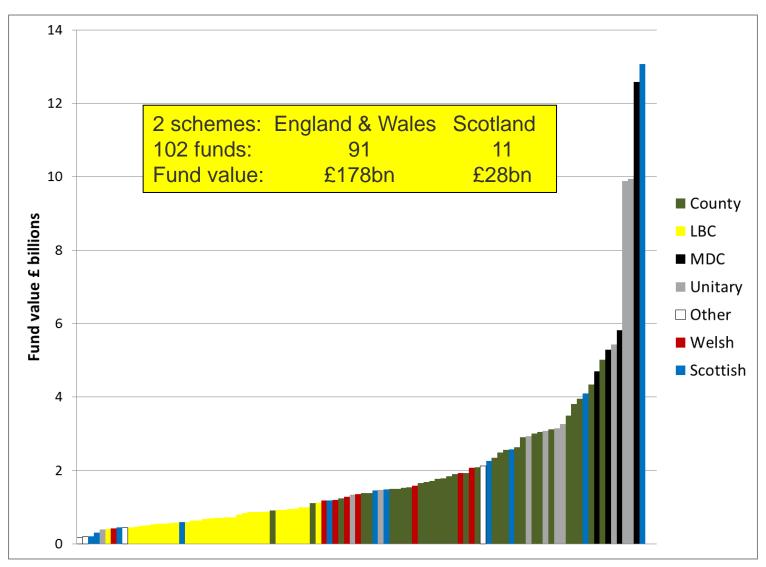
- Setting the scene
- Financial Reporting framework
- The Pension Fund Accounts
- Fund Account
- Net Assets Statement
- Disclosures
- Annual Report

Overview Key players Regulation



2 schemes, 102 Funds

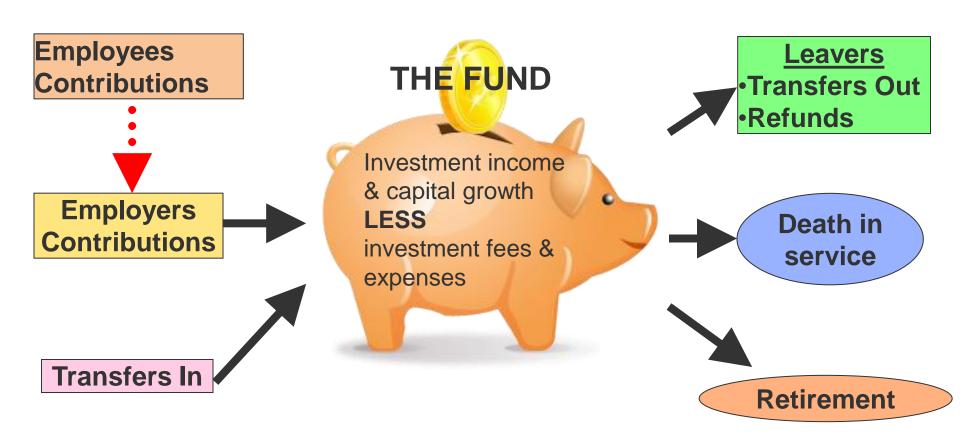
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Source: LGPS audited a/cs 2012/13



Pension fund overview





Fund Account

Dealings with members, employers and others	directly involved in the fund	
Contributions		(191,262)
Transfers in from other pension funds	Minimum disclosure	(25,358)
	Supporting disclosure	(216,500)
Benefits	notes	232,580
Payments to and on account of leavers		48,896
Administration expenses		5,970
Net (additions) / withdrawals from dealings with members		70,946
Returns on investments		
Investment income		(52,660)
Taxes on income		773
Profit and losses on disposals & changes in MV of investments		(300,444)
Investment management expenses		7,300
Net return on investments		345,031
Net (increase) / decrease in net assets available for benefits during the year		(274,085)



Net Assets Statement (NAS)

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	4 C L /	133Cl3	Statement

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Cash deposits

Investment liabilities

Borrowings

Current assets

Current liabilities

Net assets of the fund available to fund benefits at the period end

Minimum disclosure

Supporting disclosure

notes

4,403,074

12,850

4,415,924

(11,051)

(436)

104,178

(11,506)

4,497,109



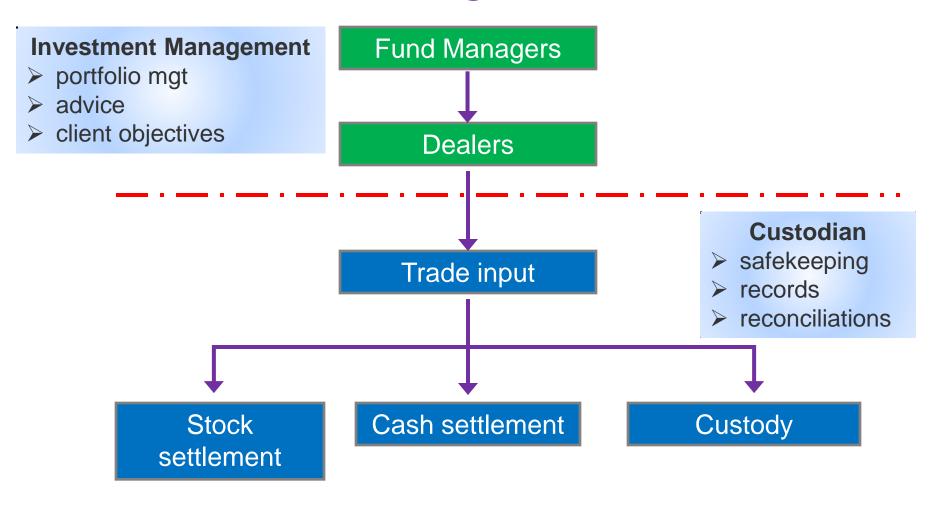
Meet the key players

- Investment Manager
- Custodian
- Pensions administrator
- Pensions Panel Members ("Trustees")
- Actuary
- Independent Investment Advisor





Investment Manager & Custodian





Actuary

- Triennial/annual funding
- Rates & Adjustment certificate
- > IAS19/FRS17
- Asset liability modelling
 Valuation

- Common rate to secure solvency
- As nearly a constant rate as possible
- Funding Strategy
 Statement

AON Hewitt



Barnett Waddingham

Process

Assumptions

Regulatory

requirements

HYMANS # ROBERTSON

- Data download
- Consistency/validation checks
- Report back

- Discount rate
- Inflation
- Pay
- Longevity
- > Investment return



Regulatory environment

Superannuation Act 1972		Public Service Pensions Act 2013
To 31 March 2008	From 1 April 2008	From 1 April 2014
 Local Government Pension Scheme Regulations 1997 30+ amendment Regulations 	 LGPS (Administration) Regulations 2008 LGPS (Benefits, Membership and Contributions) Regulations 2007 	 Local Government Pension Scheme Regulations 2013
Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009		



Other regulation (1)

Pensions Act 1993, 1995 & 2004

- Created new regulator The Pensions Regulator (replaced OPRA)
- Occupational schemes generally
- Currently has restricted application to the LGPS Internal Dispute Resolution Procedure required for each fund
- Public Service Pensions Act 2013 extends role from April 2015
- Consulted (December 2013) on
 - Draft Code of Practice Governance and Administration for Public Service Pension Schemes
 - Draft Regulatory Strategy



Other Regulation (2)

Financial Services & Markets Act 2000, Financial Services Act 2012

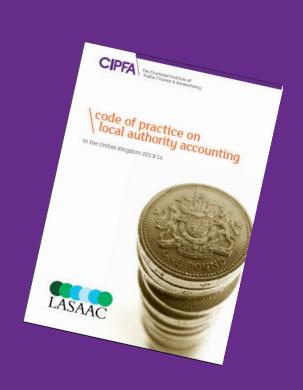
Financial Services Authority replaced 2013 by:

	Prudential Regulatory Authority	Financial Conduct Authority
Regulates & supervises	Banks, building societies, credit unions, insurers, major investment firms	26,000 financial advisory firms
	Part of Bank of England	Independent
Authorisation	Authorises firms & approved persons	Authorises firms Register firms
Supervision & regulation	Risk-based approach	FCA Handbook



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Code application of IAS 26 Accounting and Reporting by Retirement Benefit Plans

IAS 26	Code adaptation			
Valuation of financial instruments				
Market value	Bid price (IAS 39)			
Analysis of investment assets and income				
assets to be "suitably classified"	Follow Pension SoRP			
AVCs				
Not covered	Disclosure note only			
Actuarial present value of promised retirement benefits				
Measure at current salary levels or projected salary levels	Projected salary levels			



The accounts in summary

	Where in the Code?
Fund Account	
Layout & content (incl. IAS 19 requirements)	6.5
Net Assets Statement	
Layout & content	6.5
Disclosures	
IAS 26 specific disclosures Accounting Policies Debtors Creditors Financial instruments Related party transactions	6.5 3.3 & 3.4 5.4 8.2 7.4 + IFRS 7 3.9 + IAS 24



Fund Account

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Net Assets Statement (NAS)

Net Assets Statement

Cash deposits

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(436)

104,178

(11,506)

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CIPFA performance in public services Investme	ent rec	concilia	tion ta	ble	cipfa.org.uk
Analysis as per NAS?	Market value 1 April 2011 £'000	Purchases Soluting the year and derivative payments £'000	ales during the year and derivative receipts £'000	Change in market value during the year £'000	Market value 31 March 2012 £'000
Fixed Interest Securities	330,390	1,734,605	(1,656,820)	8,497	416,672
Equities	1,080,286	615,147	(585,803)	73,426	1,183,056
Pooled investments	1,794,391	942,834	(1,026,759)	157,860	1,868,326
Pooled Property investments	152,613	153,661	(152,853)	769	154,190
Private Equity/infrastructure	343,132	226,335	(185,628)	36,641	420,480
Property	364,001	10,548	(42,397)	8,087	340,239
Derivative contracts:					0
 Futures 	1,495	5,160	(3,939)	(1,567)	1,149
 Purchased/Written Options 	(117)	3,517	(4,565)	1,735	570
 Forward Currency Contracts 	(18,072)	97,518	(90,426)	10,628	(352)
	4,048,119	3,789,325	(3,749,190)	296,076	4,384,330
Other Investment Balances: Cash deposits Amount receivable for sales of investments Investment income due	108,959 21,681 -		igrees to	12,368	12,850 2,741 7,608
Amounts payable for purchases of investments	(2,125)	Fun	d A/c?		(2,656)
Net investment assets	4,176,634			308,444	4,404,873

Comparator table?

Balances should agree to NAS



What we're going to cover today

Inclumental Andrews Parameters Pa

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Basis of preparation Valuation
Transaction costs
Future benefits
Accounting policies



Basis of preparation

- Accruals
- Current version of the Code of Local Authority Accounting Practice in the United Kingdom
 - NOT the Pension SoRP!
- Underpinned by Local Government Pension Scheme (Management & Investment of Funds) Regulations 2009





Valuation principles

Investment	Class	Measurement	Examples
Property		Fair value	Direct property
Financial	Loans & receivables	Amortised cost	Debtors
assets	Fair value through P&L	Fair value	All other inv'ts +ve derivatives
	Available for sale	N/A	
	Held to maturity	Code does not permit	
Financial Liabilities	Amortised cost	Amortised cost	Creditors, loans
	Fair value through P&L	Fair value	-ve derivatives

Pricing hierarchy

cipfa.org.uk

less

req'ts

diligence

Due

Easy to price, there is a liquid market for these securities

- UK and overseas equities
- **Bonds**
- Forwards and futures
- Deposits and short term investments
- Pooled investment vehicles invested in the above

Moderately difficult to price, limited visible market parameters

- Credit default, inflation, interest rate and other swaps
- Options
- Unquoted pooled investment vehicles
- Property
- Liquid asset backed securities (ABSs) and bonds
- Hedge funds
- Hedge fund of funds
- Pooled investment vehicles invested in the above

Difficult to price, lack of a liquid market, difficult to verify parameters used in valuation

- Structured investment vehicles (SIVs)
- Unquoted private equity investments
- Pooled investment vehicles invested in the above

opaque

more

Transparency



Reporting future retirement benefits

Objectives of IAS19 and FRS17:

- 1. Statements show fair value of assets & liabilities relating to members from that employer
- 2. Operating costs of providing retirement benefits recognised as earned & related finance costs etc recognised as they arise
- 3. Disclosure of costs or providing benefits & related gains, losses, assets & liabilities



Different reporting requirements

Pension Fund a/cs

3 options:

- A. In Net Assets Statement
- B. In the notes to the a/cs
- C. Cross referred to actuarial report
- If using A:
 - need to compare assets with liabilities at the same date
 - Analysis of movement in IAS 19 assets & liabilities
 NOT disclosed
- Will need actuarial valuation of all pension liabilities including smaller bodies

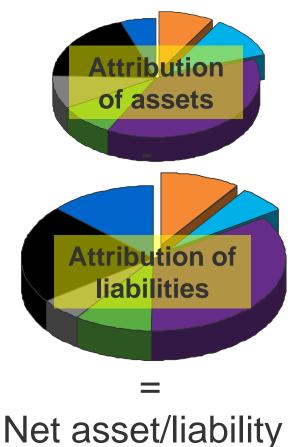
LG employer a/cs

- IAS 19 charge recognised in CIES
- Statutory override applied for council tax charging:
 - IAS 19 charge transferred to Pension Reserve via MiRS
 - Replaced by actual contributions payable to pension fund
- Disclose analysis of movement in IAS19 assets & liabilities



FRS 17/IAS19 – an employer issue

- Each body accounts for its own share of assets/liabilities & pension costs
- Actuary estimates assets & liabilities for employers
- Methodology:
 - Roll forward membership data from last triennial funding valuation
 - Different assumptions to funding valuation
 - Key difference is discount rate
- Pension fund involvement:
 - Providing data on cashflows
 - Not all employers have same yearend





Accounting policies

- Code requires a summary of significant accounting policies
- May be different from single entity a/cs

Specific issues:

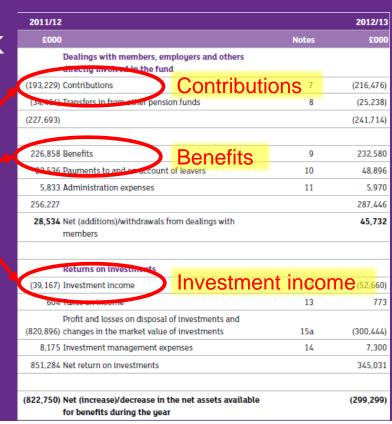
- Estimation uncertainty
 - Disclose material estimations
 - Separate note or information in specific notes
 - Not required for balances at fair value based on recent market prices
- Significant judgments
 - In applying accounting policies
 - "significant" effect on the accounts
- Future changes in accounting policies





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Contributions receivable

Includes:

- Employers includes:
 - Normal individual to employer
 - Augmentation
 - Deficit funding
- Employees
 - banded rates
 - Employers determine banding before the financial year

Dealings with members, employers and others directly involved in the fund

Contributions

Transfers in from other pension funds

Include: Added years AVCs

Exclude: Money purchase AVCs



Pension fund strain - what is it?

Pay retirement benefits early

Enhanced retirement benefits?

Loss of ees & ers contributions

Loss of investment return

"Pension Strain"

Recovery of strain from employer depends on benefit provided:

- Include in next triennial funding
- Additional employer's contribution in year
- Additional employer's contribution spread more than 1 year



Pension Strain: cipfa.org.uk When are contributions payable?

PF may charge additional Er Regulation 41 Early contribution does not preclude PF must charge additional Er spreading of III-health contribution payment Adjust triennially set Er Regulation 40 contribution rate allows spreading of payment Spread additional contribution Augmentation over more than 1 year PF accounting: Pay additional Er contribution

in year

- Recognise dr income
- **Discounting** required?



Additional Voluntary Contributions

- a member may elect to pay AVCs
 - Reg 15 LGPS (Benefits, Membership & Contributions)
 Regs 2007
- Employer to notify administering authority
- Administering authority ensure paid over

Reg 25 LGPS (Admin) Regs 2008

N.B. Money purchase AVCs still have to be included as disclosure note to pension fund accounts



Employer/ee contributions What systems of control might I expect?

- At pension fund administering authority
 - Exception testing
 - Holding a/cs by employer
 - Monitoring against forecast levels of income per employer
 - Testing by internal audit at employers & admin authority
- At employer body
 - DoF certification
 - Payroll exception reporting
 - Testing by internal audit



Transfers in & out

	Individual	Bulk
Example	Employee tsfrs to another LA/admitted body	Group of employees trsfr to another body eg LSVT
Accounting	Cash	Accrual
Valuation	Standard actuarial formula	Actuarial valuation

Accounting policy disclosed?



Benefits payable

- Pensions
- Lump sums on retirement
- Lump sum death benefits

2011/12			2012/1
£000			£00
185,417	Pensions		189,193
38,864	Commutation and lump sur	retirement benefits	38,62
2,577	Lump sum death benefits		4,762
226,858			232,580



Lump sums

- On retirement
 - Lump sum plus ongoing pension
 - Lump sum maybe called 'retirement grant'
 - Commutation of pension into lump sum
- On death in service
 - Lump sum/death grant
 - Survivor's pension

Based on actual date of retirement or death



Payments to and on behalf of leavers

- Refund of contributions
- Purchase of annuities to match preserved benefits
- Group transfers out
- Individual transfers out





Refunds of contributions

What is covered:

- Leave with less than 2 years membership
 - Refund ee's contributions, net of tax
 - May have option to retain benefits in scheme
 - May have option to transfer to another arrangement

Accounting:

Apply IAS 37

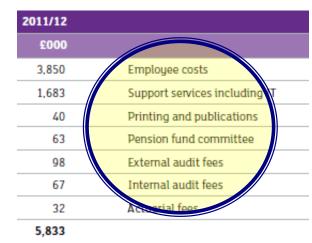


Administrative and other expenses

- Premiums on term insurance policies
- Administration fees
 - In-house costs:
 - CECs
 - Overhead recovery
 - Out-sourcing
- Actuarial fees
- Legal and other professional fees
 - NOTE excludes investment advisors fees!

Reliability of systems?

SERCOP compliant?





Returns on investments

- Investment income
- Change in market value of investments
- Investment managers' expenses

Returns on investments		
(39/67) Investment income	12	(52,660)
604 Taxes on income	13	773
Profit and losses on disposal of investments and		
(82) 896) changes in the market value of investments	15a	(300,444)
8,175 Investment management expenses	14	7,300
851,284 Vet return on investments		345,031



Investment income

- Fixed interest securities
- Equities
- Index-linked securities
- Private equity
- Hedge funds
- Pooled investment vehicles
- Property rentals
- Interest on cash deposits
- Share of profits/losses of associates & JVs
- Income from derivatives

Source:Custodian CREST/Euroclear



Change in market value

- Not just 'the balancing figure'
- Reasonableness check
 - Use market indices
 - In line with Investment Strategy
- Agree movements to manager/custodian reports
- Investigate 'reconciling' items

Valuation tolerance?

Purchases

Opening value

Change in mkt value

Closing value

Sales



Investment management expenses - principles

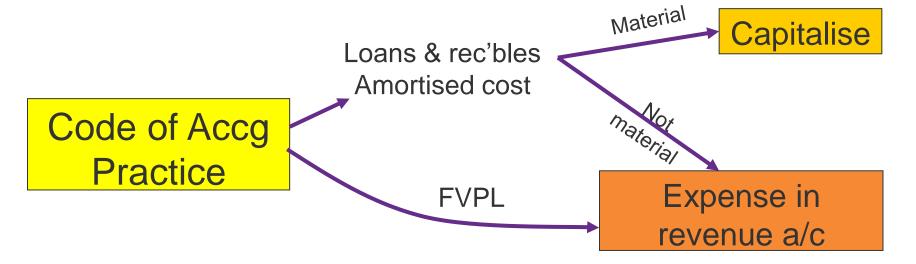
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Pension SoRP

IFRS

Capitalise and disclose

Expense in revenue a/c





Investment managers expenses Issues

- But where to disclose?
 - Code only has one line Administrative expenses
 - Example accounts has extra line Investment Management expenses
- Accruals basis
- Risk of understatement due to netting
- Challenges:
 - Market linked fees
 - Performance fees
 - Embedded fees
 - Private equity & opaque pricing
- Inconsistent reporting
 - lack of inter-fund comparability
 - impact for benchmarking

Area of close external scrutiny



Investment management expenses - a way forward

What to do now

- Gross up fees and investment income
- Request information from fund managers, brokers etc
- Disclose either:
 - 1 line per the Code plus disclosure note(s)
 - 2 lines per example accounts plus disclosure note(s)

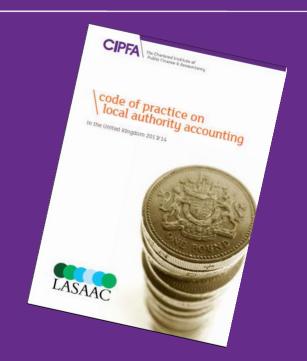
For the future – new CIPFA guidance

- 3 categories of expense
 - Pensions administration
 - Oversight and governance
 - Investment management expenses
- Expected summer 2014 for implementation 2014/15



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Investments
Property
Derivatives
Unquoted investments



Investments - generally

- Include at market value at date of net assets statement
- Adequate accounting policy disclosure
- Fair value measurement:
 - Level 1 quoted prices in active markets
 - Level 2 inputs observable directly or indirectly
 - Level 3 inputs not based on observable market data



Securities and pooled investment vehicles

 Quoted securities 	
At closing priceEx-dividend	Level 1
Clean' fixed interest valuations	
 Unquoted securities 	
 Estimated fair value 	Levels 2 or 3
Disclose basis	
 Pooled investment vehicles (unit trusts, 	
managed funds etc)	Level 1 or 2
closing bid price	

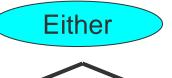


Property

Directly held

Open market value

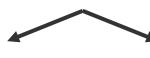
Even if occupied by administering authority or other admitted body





Pooled investment vehicles

Valued at



Closing bid price

If available

- External/independent valuation periodically
 - Depending on significance to investment portfolio
- Disclose basis used



Investment property

IAS 40 IFRS 5

- Only applies to property held directly
- Disclosure requirements (Code section 4.4.4):
 - rental income in Fund A/c
 - direct operating expenses in Fund A/c

Also where not separately disclosed:

- any restrictions in disposal
- contractual obligations
- include in investment reconciliation
- Meet "held for sale" criteria
 - Disclose in current assets as "Investment property held for sale"
 - Disclose effects of disposal





Miscellaneous

- Insurance policies
 - Rare in LGPS
- Other
 - Works of art
 - Cash
 - Loans

Valuation? Auction house

Separate bank a/c?

Risk of co-mingling

Balance per Investment Strategy

Limited to:

- Change of fund manager
- Cashflow shortfalls
- 90 days maximum



Derivatives

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IFRS 7

- What are they?
 - Financial contract between two parties that derive its value from the price of an underlying item
 - No/minimal initial investment required
 - Settled in the future
- Part of portfolio management
 - Matching long or short positions to underlying investment sectors
- Hedging against risk

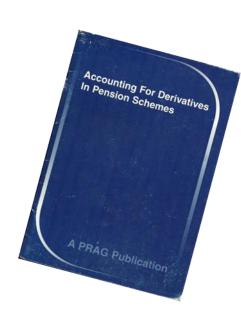
Underlying	Exchange traded derivative (ETD)	Over the counter (OTC)
Exchange rate		Forward foreign exchange
Interest rate		Swaps
Equity price	Futures	
Security price	Options	Options

Increasingly difficult to measure



Accounting framework

- Derivatives stated at fair value
 - Total exposure to the stock market of the contract
 - Quoted market price of the contract, averaged by reference to all other contracts, weighted by lot size
 - Increase/decrease whether long (buy) or short (sell)
- Cash backing open futures positions
- Should be reported gross
- Separate asset classes in net asset statement no offset of assets and liabilities
- Comprehensive description of derivative terms in notes to the accounts
- Include in investment risk disclosures and pricing hierarchy analysis (levels 1, 2 and 3)





Forward Foreign Exchange

Two parties agree to exchange currencies on a specific future date at an agreed rate of exchange

Characteristics:

- OTC contract each is potentially unique
- No commission payable normally
- No margin receipts/payments
- Settled on a gross basis on settlement date
- No collateral
- Value calculated using published market information on forward foreign exchange rates



CIPFA\ performance in public services Forward Foreign Exchange worked example

cipfa.org.uk

Trade	Sell		Buy		opening	settlement	revaluation	currency sold	Unrealised profit/(loss) (in buy	Unrealised
date	currency	Sell Nominal	currency	Buy nominal	rate	date	rate	currency)	currency)	profit/(loss)
16/03/0X	GBP	18,220,318	EUR	29,132,000	0.62544	09/04/0X	0.62184	29,300,653	(168,653)	(104,875)
05/03/0X	EUR	117,251,000	GBP	74,209,353	1.580003	09/04/0X	1.60813	72,911,394	1,297,959	1,297,959
15/03/0X	GBP	15,047,400	EUR	23,999,809	0.62698	10/04/0X	0.62184	24,198,186	(198,377)	(123,359)
29/03/0X	EUR	24,000,000	GBP	14,739,208	1.62831	10/04/0X	1.60813	14,924,167	(184,958)	(184,958)
										884,766

What is reported?



Forward Foreign Exchange

cipfa.org.uk

Unrealised

Investment manager report

worked example

							currency	profit/(loss)	
Trade	Sell	Buy		opening	settlement	revaluation	sold (in buy	(in buy	Unrealised
date	currency	Sell Nominal currency	Buy nominal	rate	date	rate	currency)	currency)	profit/(loss)
16/03/0X	GBP	18,220,318 EUR	29,132,000	0.62544	09/04/0X	0.62184	29,300,653	(168,653)	(104,875)
05/03/0X	EUR	117,251,000 GBP	74,209,353	1.580003	09/04/0X	1.60813	72,911,394	1,297,959	1,297,959
15/03/0X	GBP	15,047,400 EUR	23,999,809	0.62698	10/04/0X	0.62184	24,198,186	(198,377)	(123, 359)
29/03/0X	EUR	24,000,000 GBP	14,739,208	1.62831	10/04/0X	1.60813	14,924,167	(184,958)	(184,958)
									884,766

Fund A/c £

Change in market value 884,766

Net assets statement

Financial assets

Forward foreign exchange 1,297,959

Financial liabilities

Forward foreign exchange (308,317)
Cash (104,875)
989,641

Investment reconciliation table

Change in market
b/f Payments Receipts value c/f
Forward
foreign
exchange 0 18,220,318 (18,115,443) 884,766 989,641

First contract closed



Forward foreign exchange

	Opening market value £000	Purchases / derivative payments £000	Sales / derivative receipts £000	Change in market value £000	Closing market value £000
Fixed interest	620,234	451,466	(495,134)	30,536	607,102
Equities	267,345	45,234	(34,245)	104,256	382,590
Derivatives:			_		
Foreign exchange forwards	3,049	1,751,345	(1,752,312)	2,100	4,182
Interest rate swaps		350,000	(350,000)	15,234	15,234
Futures	51,234	341,000	(332,095)	-	60,139
	941,862	2,939,045	(2,963,786)	152,126	1,069,247
Cash	(52,347)			2,434	(58,299)
Total	889,515			154,560	1,010,948

Is it likely that a pension scheme with £1 billion of assets has had cash outflows of £1.7 billion of foreign exchange?



Forward foreign exchange

What is the custodian/fund manager doing?

- There is no cost to enter into a foreign exchange contract
- But to record the contract on the valuation system, both legs of the contract are entered
- This allows the fund manager/custodian to value the contract
- Most custodians/fund managers account for forward foreign exchange contracts in this way and most 'Pension SoRP' reports provided have this grossing up issue
- The custodians will usually provide a report to 'correct' the accounting entries that have been made



Derivative accounting - futures

Two parties agree to buy/sell a standard specified nominal amount of an asset at a specified price in the future at a price specified today

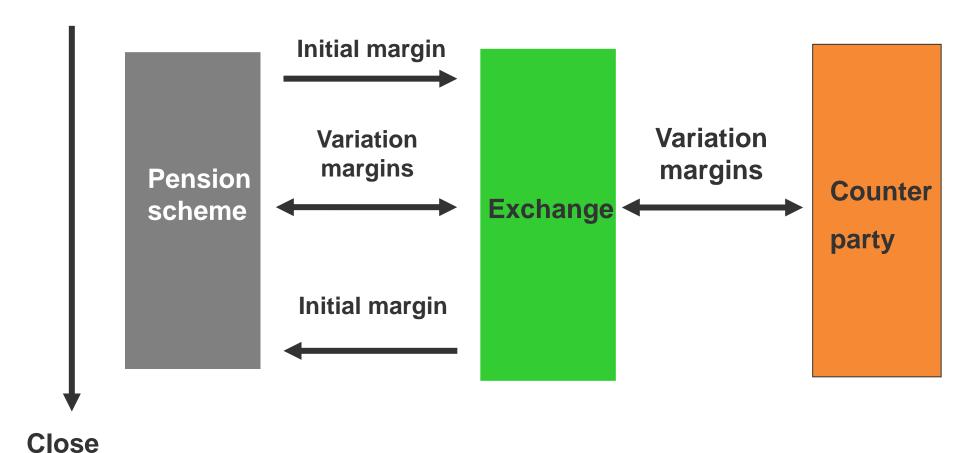
Characteristics

- ETD contracts
- no initial consideration so no purchase cost
- initial and variation margin cash movements are transfers between cash/amounts due to/from brokers
- unrealised gains/losses = typically variation margin cash movements over life of contract
- gains and losses are unrealised until the contract is closed out
- no sale proceeds
- economic exposure in notes to accounts



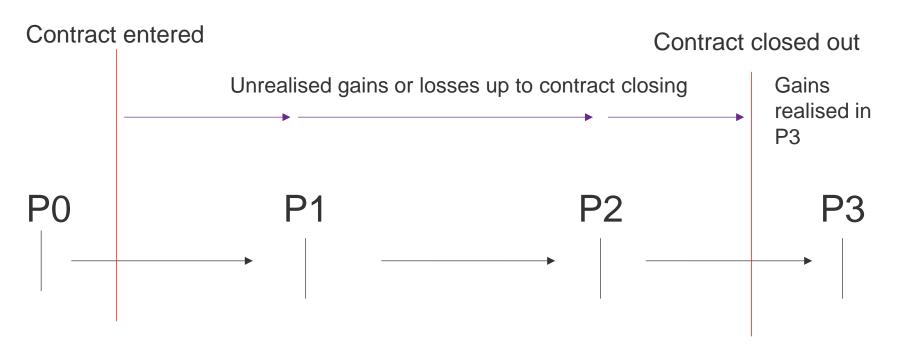
Futures – focus on cash flows

Inception



CIPFA\ Futures accounting Variation margins, gains and losses

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Cash flows

Initial margin on inception of contract paid to exchange

Variation margin at end of P1 (to)/from exchange

Variation margin at end of P2 (to)/from exchange Final variation margin to/from exchange and return of initial margin



	Opening market value £000	Purchases / derivative payments £000	Sales / derivative receipts £000	Change in market value £000	Closing market value £000
Fixed interest	620,234	451,466	(495,134)	30,536	607,102
Equities	267,345	45,234	(34,245)	104,256	382,590
Derivatives:					
Foreign exchange forwards	3,049	1,751,345	(1,752,312)	2,100	4,182
Interest rate swaps	-	350,000	(350,000)	-	60,139
Futures	51,234	341,000	(332,095)	-	60.139
	941,862	2,939,045	(2,963,786)	152,126	1,069,247
Cash	(52,347)			2,434	(58.299)
Total	889,515			154,560	1,010,948

- There are two problems here which are very much linked a large market value for the futures and a large negative cash balance or investment creditor.
- Another issue you may also see is futures with a £Zero market value.
- What is going on?



Derivatives - Risks

- Grossing up of legs of derivative contracts
- 'Simplified' futures accounting
- Economic exposure reporting of derivatives by investment managers/global custodians
- Lack of information on collateral positions/valuations
- Collateral re-hypothecation accounting implications
- Opaque/hard to understand reporting by investment managers/global custodians
- New types of derivative products eg longevity swaps
- Lack of understanding of derivative products by investment accounting service providers



Unquoted investments – what are they?

"dealt in the market but are not subject to any listing requirements and are given no official status"

- Derivatives
- Venture capital
- Private equity
- Hedge funds
- Funds of funds
- Emerging market investments



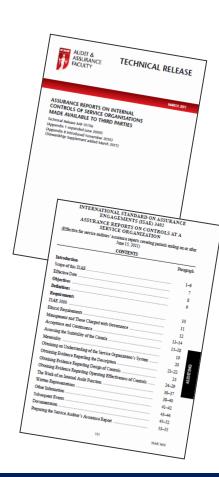


The internal controls report What to do with it?

- Internal controls reports for different jurisdictions
 - AAF 01/06SAS 70

Being replaced by ISAE 3402

- Work required:
 - Nature and content of report
 - Scope of work done
 - Usefulness and appropriateness incl period covered
 - Review exceptions raised
 - Do exceptions warrant reporting:
 - Pensions Panel
 - Governance Compliance Statement?
 - Additional work required?





What we're going to cover today

- Setting the scene
- Financial Reporting framework
- The Pension Fund Accounts
- Fund Account
- Net Assets Statement
- Disclosures

Annual Report

Debtors
Related parties
Financial instruments





Debtors and creditors

Don't forget investment transaction balances

Code requires specified analysis:

Analysis	Who?
Central government bodies	Probation boards/trusts, tax authorities
Other local authorities	Local authorities, police, fire, schools
NHS bodies	PCTs, NHS and foundation trusts
Public corporations and trading funds	PTEs
Bodies external to general government	Fund managers, colleges, ALMOs, LA companies etc

Deferred debtors/creditors (eg phased augmentation conts, magistrates courts)

- Maturity analysis
- Discount over life of deferral

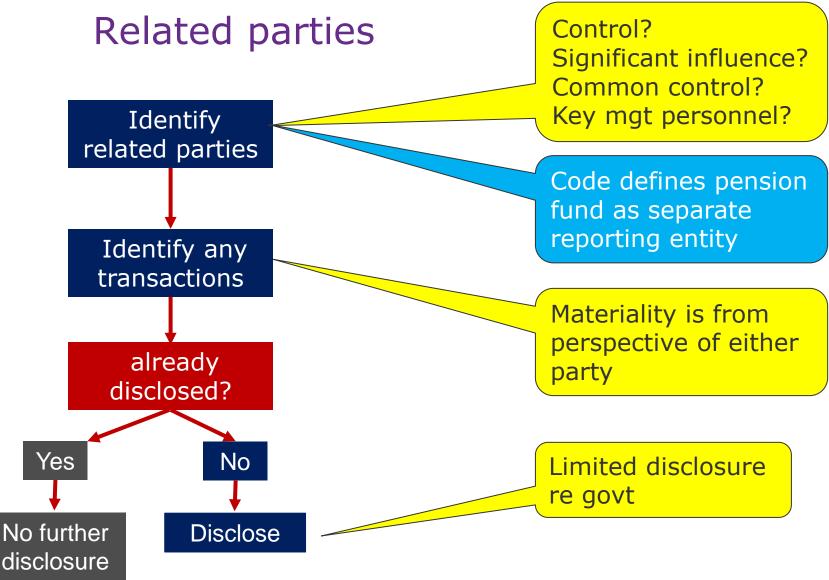
Related party transactions

IAS 24

- Disclosures as per Code
- But also key management personnel compensation
 - Short-term employee benefits
 - Post employment benefits
 - Other long-term benefits
 - Termination benefits
 - Share-based payments
- Pension fund examples 2.162-2.185 Pension SoRP

"Those with authority or responsibility for planning, directing or controlling..."







Should key management personnel compensation be disclosed?

- Requirements of IAS 24 met by senior officer remuneration and members allowances disclosures
- Code requirements stem from:
 - senior officers- Accounts & Audit Regulations 2011 Reg7(2)-(4)
 - Members Local Authorities (Members' Allowances)
 (England) Regulations 2003



Key management personnel compensation

Does the Code exemption apply to pension funds?

- Unclear
- Reg 7(2) applies to single entity authority accounts
- Pension fund accounts are separate standalone a/cs
 -Reg 7(1)(d)
- Pension fund a/cs in Annual Report should be "freestanding"



Key management personnel compensation – who and what

Who?

 "chief officers, elected members....having authority and responsibility for planning, directing and controlling the activities...." [Code 3.9.2.2]

What?

- Compensation includes:
 - a) Short-term employee benefits eg pay, NI, annual leave
 - b) Post-employment benefits eg pension
 - c) Other long-term post-employment benefits
 - d) Termination benefits
 - e) Share-based payments
- Disclose in total and for each category
 - No names required



Key management compensation – in practice

Element	Officers	Members	Measurement
S/t benefits	Pay etc	N/A	IAS 19
Post-employment	Pensions	Pensions?	IAS 19
Other I/t benefits	Unlikely	N/A	IAS 19
Termination benefits	Potentially	N/A	IAS 19
Share-based pay'ts	Unlikely	N/A	IFRS 2

IAS 19 Employee benefits
IFRS 2 Share-based payments



Financial instruments

- Background
- What are financial instruments?
- Disclosures about significance
- Nature and extent of risks





Background

IFRS 7

Code requires extensive disclosures:

- Significance of financial instruments to
 - Financial position
 - Financial performance
- Nature and extent of risks arising from financial instruments to which the fund is exposed
- How the fund is managing those risks



IAS 32

Financial instruments – what are they?

Any contract giving rise to a financial asset in one entity and a financial liability or equity instrument of another entity





Financial instruments

– what are they?

Financial assets are:

- Cash
- Equity instrument of another entity e.g. shares
- Contractual right to:
 - receive cash or another financial asset from another entity e.g. trade debtor
 - exchange financial assets or financial liabilities under potentially favourable conditions e.g. derivatives

IAS 32



Financial instruments

– what are they?

Financial liabilities are contractual obligations to:

- Deliver cash or another financial asset
- Exchange financial assets or financial liabilities under potentially unfavourable conditions - e.g. derivatives

Equity is:

A residual interest in the net assets and also where there is no contractual obligation to make payments -e.g. non-puttable ordinary shares, preference shares (some)



Financial instruments - examples

IAS 32

Which of these are financial instruments?

Cash

Equity/debt instruments

Forward transactions

Guarantees

Leases

Overdrafts

Promised future retirement benefits

Property fund

Property

Subsidiaries, associates & JVs

Tax owed

Trade creditors

Classify into financial asset or liability.

If neither, which accounting standard applies?



CIPFA Significance of financial instruments Net assets statement

cipfa.org.uk

IFRS 7

Carrying value by asset category:

	FVPL	Loans and receivables	Financial liabilities at amortised cost
	£000s	£000s	£000s
Financial Assets			
Fixed interest	416,672		
securities	1,183,056		Note: No available
Equities	etc		for sale category
Etc		100,877	
Cash		16,151	
Debtors			
Total	4,403,074	117,028	0
Financial liabilities			
Other investment balances etc	(2,656)		Do figures agree to NAS?
Creditors			(11,506)
Total	(11,487)	0	(11,506)

IFRS 7

Significance of financial instruments Net assets statement

- Reclassification between categories
 - Code defines and restricts classification
 - Disclose when change valuation: cost ← fair value
- Derecognition
 - Transfer of assets
- Collateral
- Defaults and breaches



IFRS 7

Significance of financial instruments Fund account

Income, expense, gains or losses

- Net gains & losses by instrument category
- For instruments NOT at FVPL:
 - Total interest income/expense
 - Fee income/expense
- Interest on impaired financial assets
- Impairment losses by class of financial asset





Significance of financial instruments Hedge accounting

IFRS 7

- Hedges are derivatives used to offset changes in fair value of designated hedged item
- Option to **designate** instruments as hedging instruments
- Disclosures:
 - Description of each hedge
 - Description of each hedged instrument
 - Risks being hedged
 - Cashflows
 - Ineffectiveness



Significance of financial instruments Fund account



Fair value

- Balances analysed by class versus carrying value
- Grouping ONLY where offset permitted
- Valuation techniques & underlying assumptions
- Fair values analysed by hierarchy of valuation approach
 - Level 1 quoted prices
 - Level 2 other than quoted prices eg observable/derived data
 - Level 3 unobservable inputs eg valuation models
- Disclosure not required where
 - Carrying value approximates to fair value
 - Fair value cannot be measured reliably





Nature and extent of risks Disclosures - overall

For each type of risk (credit, liquidity, market):

Qualitative	Quantitative
Extent of risk exposure and how they arise	Summary quantitative data about exposure to risk
How the risk is managed Objectives	Based on information provide to key management
Policies Processes	Any concentrations of risk
Any changes from previous period	Links to: Risk register? Investment policy? SIP?



Nature and extent of risks Disclosures - specific

IFRS 7

Credit risk	Maximum exposure Collateral held Credit quality of past due/impaired assets
Past due/impaired assets	Age analysis of past due assets Analysis of impaired assets
Collateral	Nature and carrying amount of assets If not convertible, policy for disposal
Liquidity risk	Maturity analysis Arrangements for managing liqidity risk
Market risk	Sensitivity analysis for each market risk Methods and assumptions used Any changes and reasons



Example sensitivity analysis

Asset Type	Value at 31/3/12	%age change	Value on increase	Value on decrease
	£000	%	£000	£000
Cash & equivalents	12,850	0.0	12,850	12,850
Investment portfolio assets:				
UK bonds	72,514	3.6	75,125	69,903
Overseas bonds	344,158	2.9	354,139	334,177
consistency? Source?		Arithme	tic?	



Do the accounts hang together?

Your chance to spot the errors!



Annual Report

- What is required?
- Compliance
- Summary reports
- Management & financial performance
- Administrative management performance
- Risk management



Compliance What is required?

```
"An administering authority <u>must</u>.....prepare...the pension fund annual report which <u>contains</u>:....
.....must <u>publish</u> on or before 1 December....
.....must <u>have regard</u> to guidance...." [Reg 34]
```

- must not discretionary
- contains have or hold within
- publish
 - not defined in LGPS Regs
 - A&A Regs: "....must include publication on the body's website...."
- have regard
 - need good reason for not following



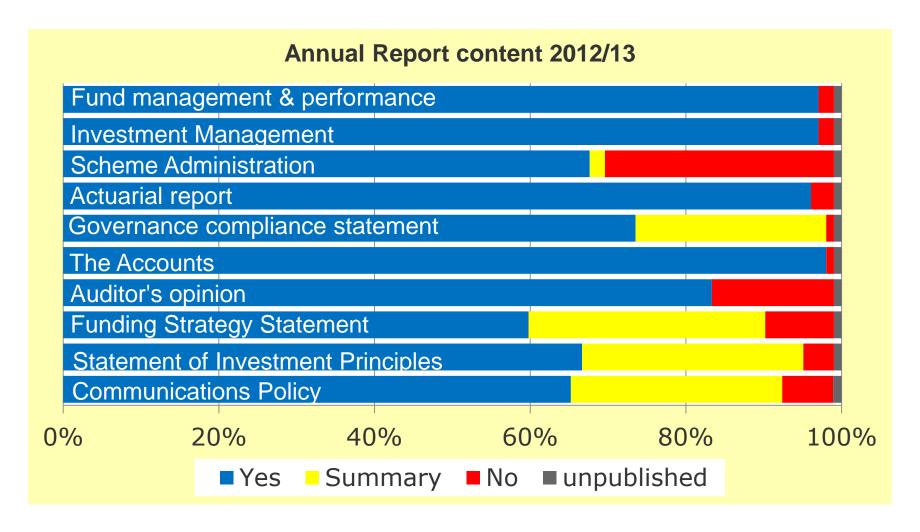


Must contain....

Management & financial performance	
Investment policy & performance	
Scheme Administration	
Outstanding borrowings	Scotland only
Actuarial report	
Governance compliance statement	
The Accounts including notes	
Pensions Administration Strategy performance	Discretionary
Funding Strategy Statement	
Statement of Investment Principles	
Communications Policy	England & Wales only



Not everything was included....



Publication

- Audit opinions given by 30 September
- 24 day delay between opinion and publication

Good practice:

- ✓ Project plan production
- ✓ Identify what you want, from whom and when
- ✓ Use CIPFA Guidance
- ✓ Populate with sections which are "givens"
 - ✓ Governance compliance statement
 - ✓ Funding Strategy Statement
 - ✓ Statement of Investment Principles
 - ✓ Communications Policy
- ✓ Arrange for Member approval





Accessibility – how easy to find

Quicker to find in 2012/13 – 2 pages to find annual report BUT fewer accessed from Fund homepage – 28 (34 in 2011/12)

Good practice:

- ✓ List reports under Reports and Documents not Investments
- ✓ Websites with internal search engines more accessible
- ✓ Check the report is searchable!
- ✓ Standardise naming of documents
- ✓ List most recent documents at the top of webpages
- ✓ Remove superceded versions
- ✓ Include newsletters under the "News" page

Annual Report - content

- CIPFA guidance
 - Revisit
 - Compare how your report follows
- Some content is a given
 - Actuary's report
 - The Accounts
- Focus on sections where there is wide variety of practice
 - Management and Financial Performance Report
 - Investment Policy and Performance Report
 - Scheme Administration Report





Management and financial performance

Area of annual reports with greatest variation in practice

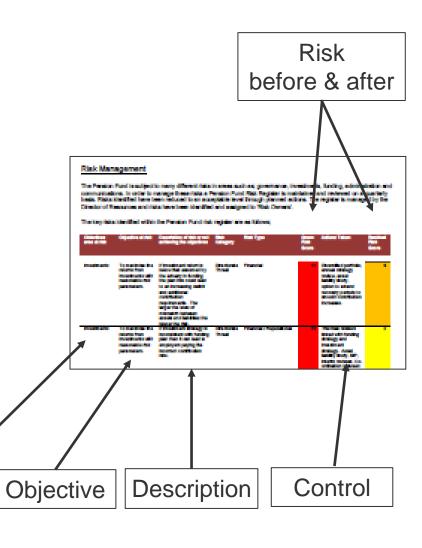
Compliance	
Scheme management & advisors	97%
Risk management	44%
Financial performance	22%
Administrative management performance	65%

Risk Management

- Fit within fund governance
- How risks identified and managed
- SUMMARY of key risks and actions to mitigate
- Approach to third party risk
 - Late contributions
 - Outsourced operations
- How investment risk managed
 - Advice
 - Regular review of performance v strategy

Area

Does section link to financial risk disclosures?



Financial performance

- Annual and 3 year forecast of major cashflows
- More detailed analysis of "controllable" expenditure
 - Administration expenses
 - Investment management expenses
- Variances explained
- Brief commentary on movements in assets and liabilities
- Amounts due from employers
 - Timeliness of receipt
 - Exercise of penalties





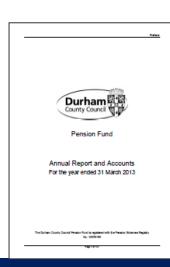
Administrative management performance

- Overlap with Scheme Administration Report
- Section focus is on performance of administration service
 - Key admin PIs dealings with members, customer satisfaction
 - Unit costs & benchmarking data
 - Staffing KPIs
 - Service development
 - Staff training
- 5 yearly analysis of membership <u>WITH</u> commentary

Scheme Administration Report

Review of administrative arrangements for the fund

- Focus on who does what <u>NOT</u> performance
- IT arrangements, self-service
- Scheme administration
 - Internal or outsourced
 - Assurance arrangements
- Internal Dispute Resolution Procedure
 - Explanation
 - Analysis of activity



Investment policy and performance

Purpose - demonstrate how investment strategy performed in year how thinks links to SIP

Asset allocation

- ✓ Actual v planned
- √ Variances explained
- Investment performance
 - By asset class
 - By fund manager

Compare against benchmarks

- UK Stewardship Code
- Compliance with Myners Principles

Tabular layout?

- Investment administration and custody
- Implementation of funding strategy

- Who does what
- How managed
- Managing contributions
- Managing admitted bodies
- Bonds

- ✓ Simple and clear messages
- ✓ Selective use of graphs

The Accounts

Ongoing issues:	
Accounting policies for estimation and critical judgments	> There should be some
Accounting for derivatives	Over-valuing risk
Disclosure of related party transactions	 Identification Only disclose if not already disclosed elsewhere Quantify

Summary reporting

 Increasing number of funds publishing summary reports 15 (11 in 2011/12)

Good practice:

- ✓ Simple naming of document (eg summary report, newsletter)
- ✓ No more than 4 pages
- ✓ Access from same page as full annual report.
- ✓ Short clear messages





In summary

- ✓ Statutory prescribed content
 - ✓ so must be included
 - ✓ draft skeleton Annual Report now
 - ✓ compare against CIPFA guidance
- ✓ Think about audience
 - ✓ Less is more
 - √ Simple and clear messages
- ✓ Timing
 - ✓ plan now for what you want, from whom and when
 - ✓ project plan throughout the year
- ✓ Publication
 - √ link on Fund homepage
 - ✓ include auditor's report OR state it is unaudited
 - ✓ consider summary report as well





LGPS fund accounting – 2012-13

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