

ACTUARIAL VALUATION 2022

Report of the Director of Finance and Public Value

Please note that the following recommendations are subject to consideration and determination by the Committee before taking effect.

Recommendation: that the Committee be asked:

1. To approve the process carried out by the Fund Actuary as a basis for revision of the Funding Strategy Statement.
2. To approve the proposed policy for allowing discounts to employers who pay their deficit contributions in advance.

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### **1. Introduction**

- 1.1 Every three years Devon County Council (as the administering authority) is required to have an actuarial valuation of the Devon Pension Fund conducted by a qualified independent actuary. Barnett Waddingham are the Council's appointed Fund Actuaries.
- 1.2 The purpose of the valuation is to establish the Fund's liabilities in relation to its assets and determine the current funding level, and to set contribution rates for the Fund's employers for the next three years. The approach to the Valuation has to take into account Section 13 of the Public Sector Pensions Act 2013.
- 1.3 The timetable and process for the current valuation was outlined in a report to a previous meeting of the Committee. The Actuary met with officers in September to confirm the assumptions to be used for the valuation. The Actuary has now provided the Fund level results from the valuation, and this is summarised in this report.

### **2. Factors taken into consideration**

- 2.1 The triennial actuarial valuation examines how the assumptions built into the previous valuation have fared and then considers future prospects for the Fund. The Actuary has to certify levels of contribution to secure the solvency of the Devon Fund, but also have regard to the desirability of maintaining as stable a contribution rate as possible.

- 2.2 The Actuary also has to take into account Section 13 of the Public Sector Pensions Act 2013. This provides for an independent review (by the Government Actuary's Department (GAD)) of the valuation and employer contribution rates to check that they are appropriate. Remedial action may be required where that review identifies a problem. The Actuary will therefore aim to ensure that the assumptions applied will lead to contribution rates that ensure the long-term cost efficiency of the fund and achieve solvency over an appropriate period, and thereby seek to avoid any red flags when GAD carry out their review. Long term cost efficiency is now seen as a requirement while stability of contribution rates is only "desirable".
- 2.3 The following factors, outlined in paragraphs 2.4 to 2.6, have been considered by the Actuary and have been taken into account in the current valuation, and calculation of the level of deficit and future contribution levels.
- 2.4 **Inter-valuation experience** – The valuation will be impacted by what has happened over the three years since the last valuation, compared to the assumptions made by the actuary at the time. The experience of pay and pension increases and mortality rates against the assumptions made in 2019 have been marginally positive. The biggest impact has been from investment performance. Investment returns have been above the expected level, 7.6% per year against the actuarial assumption of 5.1%, and this has had a positive effect in reducing the deficit position.
- 2.5 **Revised assumptions** – These include:
- (a) Price Inflation – Based on the Bank of England's 20 year inflation curve, average CPI has been estimated at 2.9% in projecting future liabilities. This compares with an estimate for CPI of 2.6% at the 2019 Valuation. While inflation is currently high, the assumption is based on forecast inflation over the longer term.
  - (b) Salary Increases – Assumed to be equivalent to CPI plus 1%, which comes to 3.9%. The level of pay increases takes into account the effect of increments and promotions for individual members of the Fund, not just the national pay awards.
  - (c) Statistical Assumptions – The key factor influencing pension liabilities is pensioner mortality, i.e. how long pensioners will be receiving their pension. The Actuary uses national statistical tables and then adjusts them based on an analysis of the Devon Pension Fund's membership. Improvements in longevity had already slowed down at a national level, prior to the Covid pandemic. Much work has been done on the impact of Covid on life expectancy, but the longer-term impact is still uncertain. The actuary has reduced the longevity assumptions for the 2022 Valuation, which will have the effect of reducing the impact on the Fund's liabilities.
  - (d) Discount Rates – In determining the value of accrued liabilities and future contribution requirements it is necessary to discount future payments to and from the Fund. Barnett Waddingham's approach is to reflect the investment return expected to be achieved from the underlying investment strategy. The investment return going forward has been assumed to be 4.7%, which compares with an assumption of 5.1% at the last valuation. This is summarised in the following table:

## **Actuarial Valuation 2022 - Breakdown of Discount Rate**

| Asset Class                                                                     | Percentage of Fund | Assumed Return | Real (relative to CPI) |
|---------------------------------------------------------------------------------|--------------------|----------------|------------------------|
| Equities                                                                        | 55%                | 6.9%           | 4.0%                   |
| Corporate Bonds                                                                 | 12%                | 2.8%           | -0.1%                  |
| Multi-Asset Credit                                                              | 12%                | 5.6%           | 2.7%                   |
| Property                                                                        | 10%                | 6.4%           | 3.5%                   |
| Infrastructure                                                                  | 10%                | 6.9%           | 4.0%                   |
| Cash                                                                            | 1%                 | 0.7%           | -2.2%                  |
| Expenses (deduction)                                                            |                    | -0.2%          |                        |
| <b>Neutral estimate of discount rate based on long-term investment strategy</b> |                    | <b>6.0%</b>    | <b>3.1%</b>            |
| Prudence allowance                                                              |                    | -1.3%          |                        |
| <b>Discount rate assumption</b>                                                 |                    | <b>4.7%</b>    | <b>1.8%</b>            |

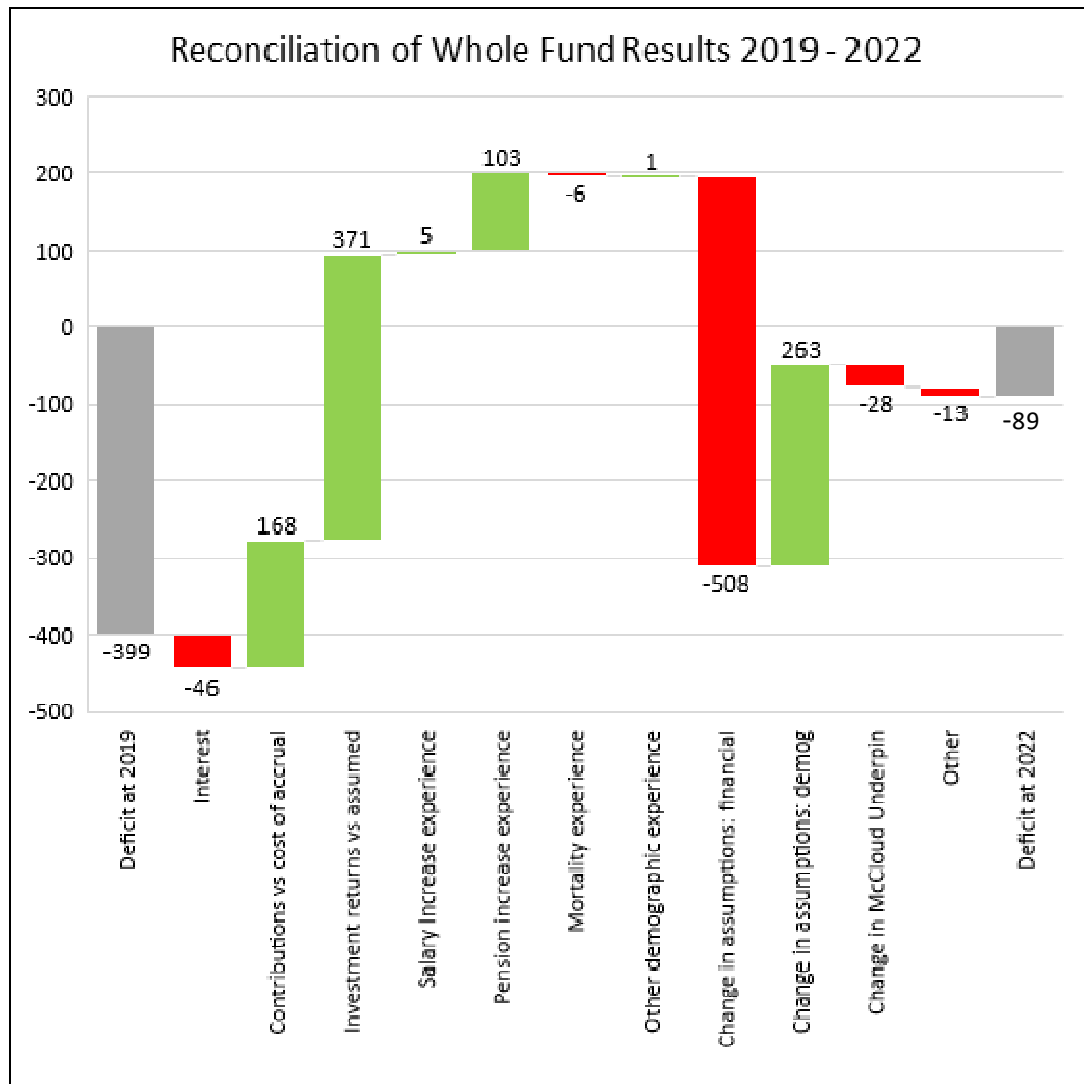
- 2.6 Deficit recovery period – Where individual employers have a deficit position the Actuary sets a recovery period over which secondary contributions need to be made to pay off the deficit. At the last two valuations the recovery period has been reduced by three years, based on the logic that the ultimate aim is to reach 100% funding, and as we are three years further on since the last valuation, a reduction of three years in the recovery period demonstrates that the Fund is progressing towards that goal. At this Valuation individual recovery periods will again be reduced by three years, but in addition the maximum recovery period will be set at 15 years, which will mean a reduction greater than 3 years for some employers. Reducing the recovery period will decrease the level of risk to the Fund and reduce the cost of meeting the deficit. It will also reduce the risk of not meeting the long-term cost efficiency objective set by Section 13.

### **3. Overall results**

- 3.1 The Actuary has determined that the Devon Fund has a funding level of 98%, up from 91% at the 2019 Valuation. The Fund's assets were valued at £5,316 million against future pension liabilities assessed at £5,405 million, giving a deficit for this valuation of £89 million. This, along with the comparative figures for the previous valuation in 2019, is shown in the table below:

|                                   | <b>2019 Results</b> | <b>2022 Results</b> |
|-----------------------------------|---------------------|---------------------|
| <b>Assets</b>                     | £4,273m             | £5,316m             |
| <b>Liabilities</b>                | £4,672m             | £5,405m             |
| <b>Deficit</b>                    | (£399m)             | (£89m)              |
| <b>Funding Level (whole Fund)</b> | 91%                 | 98%                 |

- 3.2 The following chart shows a reconciliation of the deficit as at 31 March 2022 with the deficit as at 31 March 2019:



3.3 The change in financial assumptions, i.e. the reduction in the discount rate, will result in higher primary rate contributions for employers. The primary rate is the rate payable for the additional pension liabilities accrued during the year. The average primary rate for employers will increase from 16.9% to 19.2% of pensionable pay. However, the improved funding level will result in lower deficit contributions being required, which will offset the increased primary rate.

#### 4. Effects on Individual Employers

4.1 The valuation results presented in this report represent the average for the Fund. The position of each employer will be different, based on the profile of their fund members and cashflows in and out of the Fund. As a result, some fund employers will see their overall contribution rates, including deficit payments, reduce, while others will see increases. However, the Actuary will aim to maintain stable contribution rates where possible.

4.2 It is recognised that where there are contribution increases, this will place extra pressure on employers, but as outlined in paragraph 2.2 above the Fund needs to ensure that sufficient contributions are being paid to ensure long term cost efficiency and achieve full funding over an appropriate period. This is a requirement of Section 13 of the Public Sector Pensions Act 2013 and will be reviewed by the Government Actuary's Department once the Valuation is complete.

- 4.3 Except for academies and town and parish councils, deficit contributions will be quoted as cash amounts rather than as a percentage of pensionable pay. This will ensure that the Fund receives the contributions required to meet the deficit position, regardless of any volatility in employer payrolls.
- 4.4 In order to achieve as stable a rate as possible, groups of smaller employers have been put together in pools to even out their contribution rates. This reduces the level of volatility in their contributions. At the 2019 Valuation, it was agreed to put all academy employers into a single pool. This approach will be maintained for the 2022 Valuation. It is also proposed that due to the pooling arrangements the secondary or deficit contributions set for Academies should be set as a percentage of payroll, rather than a cash amount. This will be easier to administer where new schools join an existing multi-academy trust. Town and parish councils are also pooled together in one pool, with secondary contributions set as percentages.
- 4.5 At the 2019 Valuation it was agreed that the Fund should give a discount to employers who pay their contributions early. Where contributions are paid early, this provides the opportunity to invest them at an earlier stage and therefore provide a return to offset the impact on the Fund of the discount given. This can work well when the fund enjoys a positive return, but can be a risk if the contributions are paid just before a period of negative returns. That risk would fall upon the employer paying their contributions early, rather than on the Fund as a whole.
- 4.6 Assuming that the forecast investment return equates to the discount rate used by the Actuary in undertaking the Valuation, then the appropriate discount would be half the discount rate. However, some further allowance should also be made for prudence, recognising the risk to achieving the forecast investment return. It is therefore proposed to allow employers a 1.3% discount on early payment of their set deficit contributions, where they are set cash amounts, on the proviso that the payment is received on or before the date on which their April contributions are paid. No discount would be applied to primary rate contributions. If an employer wishes to pay three years of deficit contributions in advance, then a discount of 4% is proposed. These are slightly lower than the discounts provided following the 2019 Valuation due to the lower discount rate being used at this Valuation.
- 4.7 This may be a less attractive option for employers than at the previous Valuation, given that higher interest rates are now available for the investment of cash.

## **5. Conclusion**

- 5.1 The 2022 Valuation demonstrates that the Fund is making progress towards the long term objective of 100% solvency, with the funding level increasing from 91% to 98%, and reductions in the deficit recovery period for those employers with a deficit. The reduction in the average recovery period will help to reduce the cost of pensions in the longer term.
- 5.2 Employers will be provisionally notified of their individual rates in late November/early December. The formal certification of the rates will not be until the end of March, in order to take into account any issues that are

identified in the intervening period. However, it is unlikely that the results will change significantly from the provisional results.

- 5.3 The Committee is asked to approve the process undertaken by the Fund Actuary and the proposals on providing discounts for early payment of deficit contributions. Officers will then work with the fund Actuary to revise the Funding Strategy Statement, based on the approach taken to the Valuation. The revised Funding Strategy Statement will then be brought back to the Committee for approval, following consultation with employers and the Devon Pension Board.

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Electoral Divisions: All

Local Government Act 1972:  
List of Background Papers: Nil  
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