



Northamptonshire Pension Fund

Annual Report Year Ended 31 March 2025

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Chairperson's Foreword

As the newly appointed Chair of the Northamptonshire Pension Fund Committee, I am delighted to present the Annual Report and Statement of Accounts for the year ended 31 March 2025.

I have reviewed the Fund's activities, governance and performance throughout the reporting period and would like to extend my gratitude to my predecessor, Cllr Malcolm Longley, for his leadership, and to the dedicated committee/board members, officers and advisors who have tirelessly worked in the best interests of the Fund's members and employers.

The Fund continue to grow steadily, now managing over 83,000 active, deferred and pensioner member records. Despite uncertainty and market volatility during the year, the Fund remains in a strong financial position with its value increasing by £129.3 million to £3.75 billion.

Our core objective is to ensure that we can pay benefits to our scheme members and other beneficiaries as they fall due. Our Funding Strategy and Investment Strategy are designed to ensure a stable cash position and maintain a sufficient funding level. I am pleased to report that our investment income rose to £61.1 million during the year, which was a key strategic objective as the fund matures.

The funding level, which compares Fund assets to liabilities, stood at 113% at the last formal valuation on 31 March 2022. This means that for every £1 of liabilities owed to members, the Fund has £1.13 of assets to cover the liability. This funding level has improved further, having reached an estimated 140% as at 31 March 2025. The next formal valuation will be taking place during 2025-26 based on the position as at 31 March 2025.

The Scheme Administration section of this annual report sets the Key Performance Indicators (KPIs) for our main interactions with members (page 19 to 22). This year we have introduced a Value for Money statement (page 38 to 41) to demonstrate our continuous commitment to improving value for money for all members and employers.

Beyond the Fund's day to day "business as usual" operations, the pensions team has delivered a range of projects and planned activities throughout the year, including procurements, asset pool developments, policies and procedure reviews, continued implementation of the Climate Action Plan, Pensions Dashboards, and launching a new Fund website (more details of such activities can be found in page 15 to 18).

Pension Dashboards is the government-led initiative designed to empower individual pension savers by allowing them to view details of all their pensions in one secure place. This is a significant project that involves industry-wide collaboration and preparation. As of March 25, the Fund had undertaken all required activities to ensure it could connect to the dashboard ecosystem by the deadline of 31 October 2025. Pension Dashboards will be made available to the general public at a future date yet to be determined by government.

The new Fund website successfully launched in January 25. It features improved navigation, more effective search functionality and clear, more relatable content with better accessibility to all users. If you have not yet visited the [new site](#), I encourage you to do so and would love to hear your feedback.

If you are a scheme member and not yet using member self-service, I also encourage you to register via the [Fund's website](#).

The Fund is currently a member of ACCESS asset pool. Following the LGPS Fit for the Future consultation published in November 2024, all pools must be established as FCA-regulated investment management companies, possessing the expertise and capacity to implement investment strategies. ACCESS submitted a proposal to become an FCA-regulated investment management company, but this was not supported by Government. Following an evaluation process to determine alternative pooling options, the Fund concluded that Border to Coast Pension Partnership (BCPP) is its preferred pooling partner. An expression of interest to join BCPP has been submitted, alongside six other LGPS funds from ACCESS. Further due diligence is being undertaken alongside the necessary governance steps to progress the transition from ACCESS to BCPP, including obtaining approval from the BCPP partner funds. On 27th November 2025, the Council approved BCPP as the Fund's preferred pooling partner and authorised the necessary steps to be undertaken for the Administering Authority to become a shareholder in BCPP.

I hope this annual report provides you with a deeper understanding of the Fund's operations, progress, and strategic direction. We remain steadfast in our mission to provide financial security for our members, uphold strong governance practices, and act as responsible stewards of its assets.

Yours Faithfully,

Cllr John Slope
Chair of the Northamptonshire Pension Fund Committee

Summary Report

West Northamptonshire Council is the administering authority for the Northamptonshire Pension Fund (the Fund) which is part of the Local Government Pension Scheme (LGPS). The LGPS is a defined benefit pension scheme and the Fund has over 82,000 members and 160 active employers. The main purpose of the Fund is to pay benefits to members and beneficiaries as they fall due.

Funding Level

At the last formal valuation the Funding level was 113%. This means for every £1 of liabilities owed to members, the Fund has £1.13 of assets to cover the liability. The actuarial statement on [page 71](#) provides more information on the latest actuarial valuation as of 31 March 2022.

Financial Performance

The budget is approved by Pension Fund Committee (see Governance section on [page 47](#)) at the start of the year and forecasts are reported against the budget on a regular basis throughout the year. As at the end of the year, the Fund is still cash-flow positive, and the fund received enough income to pay its expenses.

Key highlights:

- The Fund returned 3.2% on investments during the year resulting in a £72.7m return on investments. In total, the Fund value increased by £129.3m from £3.619 bn to £3.748 bn. The Fund's total investment return was 3% p.a over the three years and 8.7% p.a over the five years to 31 March 2025.
- The Fund has received £150.1m of contributions during the year, of the total amount of contributions received, only 1% (£628k) was paid late by employers.
- Transfers in and out represent amounts received and paid for members who have joined or left the Fund, the Fund received £9.3m of transfers in and paid £13.9m transfers out during the year.
- Benefits payable are Pensions and lump-sum benefits paid to members. The Fund paid £132.6m in Pension benefits during the year.

- Management expenses during the year were £17.2m, of that £12.9m were paid to investment managers.
- Investment income received from investment managers during the year was £61.1m.

Financial Performance	2024-25 Budget £000	2024-25 Actual £000
Contributions	-135,000	-150,075
Transfers in from other funds	-17,500	-9,327
Total Income	-152,500	-159,402
Benefits payable	128,000	132,626
Payments to and for leavers	12,500	13,944
Total Benefits	140,500	146,570
Surplus of contributions over benefits	-12,000	-12,832
Management Expenses		
Administrative Costs	2,847	3,045
Investment Management Expenses (Invoiced)	817	856
Investment Management Expenses (Non-Invoiced)	13,500	12,038
Oversight and Governance Costs	988	1,298
Total Management Expenses	18,152	17,237
Total Income less Expenses	6,152	4,405
Investment Income	-32,000	-61,148
Taxes on Income	0	63
	-151,000	-72,657
(Profit)/loss on disposal and changes in market value of investr		
Net return on investments	-183,000	-133,742
Net (increase)/decrease in assets during the year	-176,848	-129,337

Summary Report (continued)

Administration

Membership of the LGPS is voluntary and employees are free to choose whether to join the scheme, remain in the scheme or make their own personal arrangements outside the scheme. Organisations participating in the Northamptonshire Pension Fund include: Scheduled bodies, Admitted bodies and Resolution/Designated bodies. For more information on these types of employers see [page 78](#).

The Fund has been working on business plan activities during the year across areas including administration, governance, investments and communications, all while keeping up to date with its business as usual activities. To name a few, we have successfully carried out three tenders and reviews for expiring contracts; continued with the development of the ACCESS Pool and climate action plan; launched a new website for the Fund; implementing best practice and adhering to new legislation and regulations. For more information of these projects, see [page 15](#).

The Fund has developed a number of Key Performance Indicators (KPIs) to monitor service delivery. This report includes casework carried out during the year and the time taken for the case work to be completed against the Fund's targets. The Fund's targets for casework are currently tighter than the CIPFA Guidance recommends. For more information on the Fund's KPIs, see [page 19](#).

This year we have introduced a Value for Money statement to demonstrate our commitment to improving value for money for all members and employers. For the statement, see [page 38](#).

Governance

West Northamptonshire Council has established a Pension Fund Committee (PFC) and Investment Sub-Committee (ISC).

All members of the ISC sit on the PFC. Councillor John Slope is the Chairman for the Northamptonshire Pension Fund Committee and Councillor Scott Packer is the Vice-Chair since May 2025.

Member Type	Number of representatives
West Northamptonshire Council elected members	7
North Northamptonshire Council elected members	2
All other employer's representative	1
Active scheme member representative	1
Deferred and Pensioner member representative	1
Non-elected employer and scheme member representative	1

The Local Pension Board (LPB) was established on 1 April 2015, providing an additional layer of governance for the Fund. The Local Pension Board is made up of 3 scheme employer representatives and 3 scheme member representatives. Alicia Bruce is the Chair and Julie Petrie is the Vice Chair for the LPB.

The full membership list of the above governance bodies during the reporting period is available on [page 49](#).

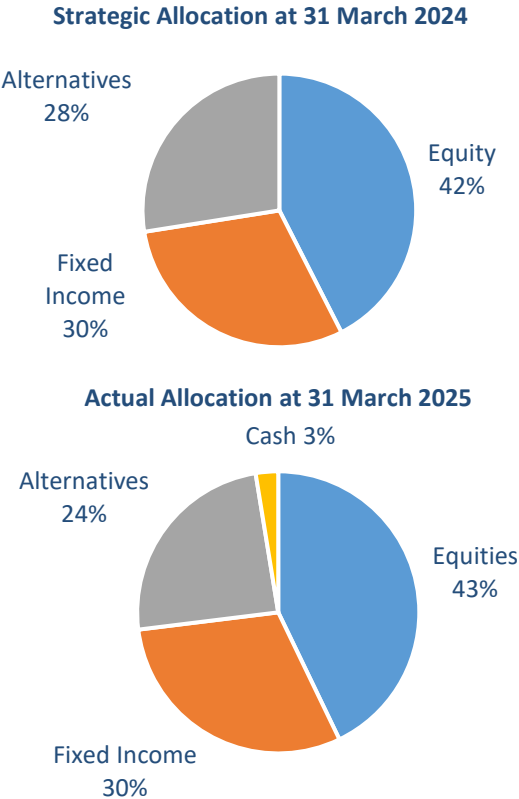
Investments

The primary objective of the Fund is to pay benefits as they fall due to members and beneficiaries. In normal market conditions, all accrued benefits should be fully covered by the value of the Fund's assets and an appropriate level of contributions is agreed by the employer to meet the cost of future benefits accruing. The Fund's approach to its investment arrangements is set out in its Investment Strategy Statement (ISS).

Summary Report (continued)

The Fund adopts a long-term perspective, focussing its investment strategy to generate sustainable returns on a risk adjusted basis to grow the Fund’s assets to reflect its equally long-term future liabilities. The Fund has produced a responsible investment policy which sets out our approach to sustainable responsible investment and will help us manage the carbon and climate risks impacting our investments better. The Fund has also created a climate action plan, decarbonisation pathway and a climate dashboard which measures the funds progress at decarbonisation over time. All four documents can be found on the Funds website [key documents page](#).

The below pie charts show the Fund’s actual allocation compared to its strategic allocation:



The detailed market summary from our independent advisor’s annual review is available from the [page 67](#) ‘Independent Adviser’s annual review – Twelve months to 31st March 2025’

The Fund is currently a member of the ACCESS assets pool, working with ten like-minded LGPS funds in response to the Government’s LGPS reform agenda, which encourages LGPS funds to collaborate in pooling investments to generate efficiency savings and share the collective expertise, while maintaining investment performance. Collectively as at 31st March 2025, the ACCESS Pool has significant scale with assets of £66.7bn (of which 74% has been pooled) serving 3,517 employers with 1.2 million members including 354K pensioners.

More details of the recent development in the ACCESS Pool since the launch of the Government’s LGPS pension review in July 2024 is available on the [page 54](#)

UK and Levelling Up Investments

“Levelling up” refers to assets that make a measurable contributions to one of the missions set up in the Statement of Levelling Up Missions, which was presented to the UK Parliament by the former government and support any local areas within the United Kingdom.

The ambition set in this statement and following-up policy initiative is for the funds to invest up to 5% of their assets in projects which support levelling up. As at 31 March 2025, the Fund has 3% invested in levelling up assets. The below table shows the Funds levelling up assets.

Asset	£m
M&G UK Residential Property	47.2
Catapult Ventures	0.6
M&G Shared Ownership Fund	47.6
LGIM Affordable Housing	6.6
Total	102.0

Summary Report (continued)

Task Force on Climate Related Financial Disclosures (TCFD)

The Fund recognises the systemic risk associated with climate change and has been working towards producing a climate change report. To manage this systemic risk and to align with its support of the Paris Agreement and a “just transition”, the Fund currently expects that its investment portfolio will be net carbon neutral by 2050, in line with UK Government’s targets.

Since the targets were set in June 2021, the Fund has:

- Reviewed the Fund’s passive equity allocation (23 % of total fund assets at 30 June 2024) and implemented changes to the underlying benchmarks to increase exposure to stocks with positive climate-related characteristics, in favour of stocks with negative climate-related characteristics while maintaining expected return.
- Switched one of the Fund’s multi-asset credit mandates (7.0% of total Fund assets at 30 June 2024) to a portfolio with the same expected risk and return and stronger integration of positive Environmental, Social and Governance factors.
- Implemented a strategic allocation of 1% of total Fund assets to timberland.

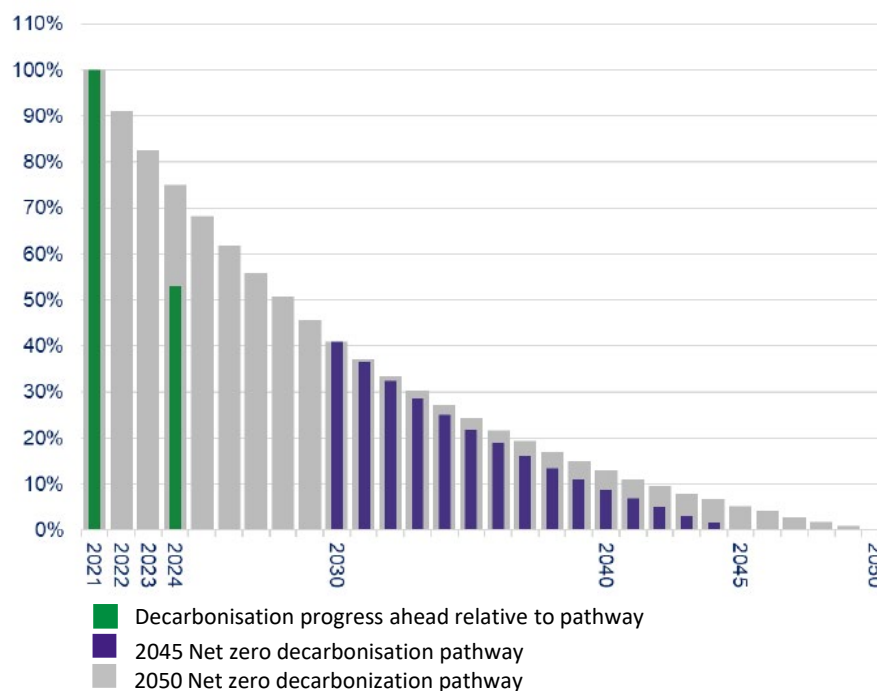
As at 30 June 2024, the Fund’s reporting has expanded to include an additional forward-looking metric, SBTi alignment. This is a measure of how many companies in a portfolio have submitted climate transition plan that have been approved by the Science Based Targets Initiative (SBTi). The Fund will continue to track absolute emissions, weighted average carbon intensity (WACI) and SBTi alignment, as each metric provides a different insight as to the nature of the companies held within portfolios.

The Fund’s reporting also includes corporate bonds in its carbon reporting since 30 June 2024 as the quality and availability of the climate-related data has improved over time.

Progress against targets

The chart below demonstrates the Fund’s progress (Green and Red bars) against the pre-defined pathway (Grey bars) required in order to achieve the Net Zero objective by 2050. The purple bars demonstrate the pathway to achieve Net Zero by 2045 for information.

The full report is available on [page 61](#)



Statement of Responsibilities

Introduction

This Annual Report and Statement of Accounts sets out the arrangements by which the Local Government Pension Scheme operates, reports changes which have taken place and reviews the investment activity and performance of the Northamptonshire Pension Fund ("Fund") during the year.

The Statement of Accounts has been prepared in accordance with the CIPFA/LASAAC Code of Practice for Local Authority Accounting in the United Kingdom 2024-25.

The accounts summarise the transactions and deal with the net assets of the Pensions Fund. The accounts do not take account of the obligation to pay future benefits which fall due after year end. The actuarial position of the Fund which takes into account these obligations is available on the Fund's website, [2022 Valuation Report](#)

The Council's Responsibilities in respect of the Pension Fund

West Northamptonshire Council is required to:

- Make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this Council that officer is the Chief Finance Officer; and
- Manage its affairs to secure economic, efficient and effective use of resources and safeguard its assets; and
- Approve the Statement of Accounts which form part of the Council's Statement of Accounts.

Responsibilities of the Executive Director Resources and Deputy Chief Executive

The Executive Director Resources and Deputy Chief Executive is responsible for the preparation of the Council's statement of accounts in accordance with proper practices as set out in the *CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom (the Code)*.

In preparing this statement of accounts, the Executive Director Resources and Deputy Chief Executive has:

- Selected suitable accounting policies and then applied them consistently; and
- Made judgments and estimates that were reasonable and prudent; and
- Complied with the Code.

The Executive Director of Resources and Deputy Chief Executive has also:

- Kept proper accounting records which are up to date; and
- Taken reasonable steps for the prevention and detection of fraud and other irregularities.

Certificate of Accounts

I certify that this Statement of Accounts presents a true and fair view of the financial position of the Pension Fund at 31 March 2025 and of its income and expenditure for the year 2024-25. I authorise the accounts for issue.

Executive Director Resources and Deputy Chief Executive
(Section 151 Officer)

Dated: xxxxxxxx

Scheme Management & Key Officers

The Key Officers of the Fund during the year were:

Martin Henry – Executive Director Resources and Deputy Chief Executive

James Smith – Assistant Director of Finance & Strategy

Mark Whitby – Head of Pensions

Ben Barlow – Investments and Fund Accounting Manager

Mohammed Mansha – Systems and Projects Manager

Akhtar Pepper – Operations Manager

Cory Blose – Employer Services and Communications Manager

Michelle Oakensen – Governance and Regulations Manager

The Team

The Pensions Service is based in Northampton and consists of the following teams:

- **Operations** – contact point for members of the scheme to deal with members' enquiries and requests. Maintain member records, calculate benefits and pensions payable.
Email: Pensions@westnorthants.gov.uk
- **Employers** – contact point for employers of the scheme and those wanting to join. Deliver training sessions to employers and payroll providers to assist them to participate efficiently in the Fund.
Email: PenEmployers@westnorthants.gov.uk
- **Funding** – record and reconcile contributions paid into the Fund and accounts for fund expenses. Provide financial monitoring and reporting of functions such as debt management and cash requirements.
Email: PenContributions@westnorthants.gov.uk
- **Governance** – support all Committees in governing the Fund effectively, develop and monitor policies and practices to improve data quality and ensure regulatory compliance.
Email: Pensions@westnorthants.gov.uk
- **Investments** – oversee the governance of Fund assets and support the Investment Sub-Committee, financial monitoring and reporting of investments.
Email: PenInvestments@westnorthants.gov.uk
- **Projects** – is responsible for delivering a wide range of projects that are required to be delivered across the service.
Email: PenProjects@westnorthants.gov.uk
- **Systems** – ensure internal systems are operating efficiently and provide support to maintaining accurate member records.
Email: PenSystems@westnorthants.gov.uk

Martin Henry

Executive Director Resources and

Deputy Chief Executive

West Northamptonshire Council

Email: Martin.Henry@westnorthants.gov.uk



James Smith

Assistant Director, Finance - Strategy

West Northamptonshire Council

Email: James.Smith@westnorthants.gov.uk



Enquiries relating to management and administration should be directed to:

Mark Whitby

Head of Pensions

Pensions Service

Email: Mark.Whitby@westnorthants.gov.uk



Further information regarding the accounts and investments can be obtained from:

Ben Barlow

Investments and Fund Accounting Manager

Pensions Service






























Email: Ben.Barlow@westnorthants.gov.uk



Registered Pension Scheme Number: 10079143

Scheme Management, Advisors and Partners

To visit each provider's website, you can access their link by clicking on the logos.

<u>Partners</u>		<u>Asset Managers (Continued)</u>	
ACCESS (Pension Pool)		Catapult	
Barclays (Bank)		CBRE Global	
David Crum (Independent Advisor)		Harbour Vest Partners (UK)	
Grant Thornton (Auditors)		IFM Investors	
Hymans Robertson (Actuary)		JP Morgan	
Hymans Robertson (Governance Benefits Consultants)		Legal & General Investment Management	
Mercer (Investment Consultants)		Longview Partners*	
Northern Trust (Custodian)		M&G Investments*	
Squire Patton Boggs (Legal Advisors)		Newton*	
<u>Asset Managers</u>		Osmosis	
Adams Street Partners		Stafford Capital Partners	
Allianz Global Investors		Waystone Management Limited	
Ares Asset Management		UBS Asset Management	
AVIVA Investors		<u>AVC Providers</u>	
Baillie Gifford & Co*		Prudential	
BlueBay Asset Management*		Standard Life	

*Sub-funds managed by Waystone Management in the ACCESS pool ([page 54](#))

Financial Performance

Financial Performance

The financial performance of the Fund is monitored against budgeted performance on a regular basis throughout the year by the Pension Fund Committee.

Variance Analysis

Contributions from members are set in accordance with LGPS regulations and contributions from employers are set at the percentage rate recommended by the actuary in the payroll period to which they relate. If there were to be a large increase in active membership numbers or salary increases were higher than expected, contribution income would increase and vice versa for decrease. The 2024-25 forecasted variance is due to actual salary increases being much higher than the actuarial salary increase assumption used from the 2022 valuation.

Benefits payable are Pensions, retirement and death lump-sum benefits paid to beneficiaries during the year. The figures are driven by pensioner membership numbers and Pension Increase. Benefits are in line with current membership numbers.

Transfers in and payment out values represent the amounts received and paid for members who have either joined or left the Fund during the financial year and are calculated in accordance with the Local Government Pension Scheme Regulations and guidance. These figures are demand led.

Management expenses include all direct fees charged to the Pension Fund during the year. For more information, the accounting policies on management fees can be found on [page 81](#).

- Administration fees are higher than expected due to the bank interest payments received during the year was much lower than what was initially budgeted.
- Investment management expenses (non - invoiced) are higher than expected due to higher transaction costs from the changes in our asset holdings to align with the Investment Strategy.
- Oversight and governance costs are higher than expected due to underestimated consultancy costs for the implementation of the investment strategy and the pre-valuation actuarial works.

The 2024-25 budget for profit/loss on disposal and changes in market value of investments assumed the actuarial target would be achieved. The actual market experience is explained in the independent investments advisor's review ([page 67](#)).

Details of non-investment assets and liabilities of the Fund are not included in the below table, they can be found in the Statement of Accounts in [Notes 21 to 22](#). There have been no significant changes to non-investment assets and liabilities during the year.

Financial Performance	2024-25 Budget £000	2024-25 Actual £000
Contributions	-135,000	-150,075
Transfers in from other funds	-17,500	-9,327
Total Income	-152,500	-159,402
Benefits payable	128,000	132,626
Payments to and for leavers	12,500	13,944
Total Benefits	140,500	146,570
Surplus of contributions over benefits	-12,000	-12,832
Management Expenses		
Administrative Costs	2,847	3,045
Investment Management Expenses (Invoiced)	817	856
Investment Management Expenses (Non-Invoiced)	13,500	12,038
Oversight and Governance Costs	988	1,298
Total Management Expenses	18,152	17,237
Total Income less Expenses	6,152	4,405
Investment Income	-32,000	-61,148
Taxes on Income	0	63
	-151,000	-72,657
(Profit)/loss on disposal and changes in market value of investments		
Net return on investments	-183,000	-133,742
Net (increase)/decrease in assets during the year	-176,848	-129,337

Financial Performance (continued)

Financial Performance (continued)

A breakdown of Administration Cost is shown below:

Administration Costs	2024-25 Budget £000	2024-25 Actual £000
Staff related	2,145	2,122
Altair administration and payroll system	338	354
Data Assurance	21	17
Communications	86	39
Other non pay and income	-233	25
County Council overhead recovery	490	487
Total Administration Costs	2,847	3,044

Contributions

Contributions are made by active members of the Fund in accordance with the LGPS Regulations 2013 and range from 5.5% to 12.5% of pensionable pay for the financial year ended 31 March 2025. Employers' contributions are set as part of the triennial actuarial funding valuation. The last such valuation was at 31 March 2022. Employers' contributions comprise a percentage rate on active payroll between 0% and 43.2% and deficit payments of fixed cash amounts set for each employer as part of the triennial funding valuation. The Fund works closely with employers to collect contributions on time. The following table shows the amount of regular employee and employer contributions paid during the year and the value and percentage of which were paid both on time and after the deadline of the 19th day of the month following deduction.

Contributions	Total Paid in 2023-24 £000	Total Paid On Time £000	% Paid On Time	Total Paid Late £000	% Paid Late
Employer	117,270	116,772	99	499	1
Employee	32,805	32,676	99	129	1
Total	150,075	149,448	99	628	1

The Fund did not apply any additional charges or levies in respect of contributions received late, and no reports were made to The Pensions Regulator in respect of late contributions during the year.

Recovery of Overpayments of Pension

The Fund participates in the National Fraud Initiative which is a biennial process. The necessary recoveries arising from identified overpayments are being pursued.

Annual Pensioner Payroll (£)	107,707,129
Total write off amount (£)	151,320
Write offs amount as % of payroll	0.14%

The following tables show the analysis of pension overpayments that occurred during the last five years:

Year	Overpayment £	Recovered/in progress £	Written Off £
2020-21	45,998	5,297	40,701
2021-22	11,326	9,481	1,845
2022-23 ¹	262,560	50,507	212,053
2023-24	59,736	0	59,736
2024-25 ¹	157,807	6,487	151,320

¹ Overpayments in 2022-23 and 2024-25 are high, as in addition to usual activity, the Fund undertook a Guaranteed Minimum Pension (GMP) rectification project. Overpayments identified as a result of incorrect or non-application of the GMP are written off after authorisation is obtained from management, unless the member could have known that their pension was being paid incorrectly as a result of the non or misapplication of GMP.

Overpayments identified with a value of under £250 are automatically written off, in line with the Fund's Overpayments Policy.

Scheme Administration

Introduction

West Northamptonshire Council is responsible for administering the Northamptonshire Pension Fund. The Fund is available to employees of the Council, organisations with a statutory right to be in the scheme (scheduled bodies) and organisations, such as outsourced contractors and charities, which the Council has admitted under its discretionary powers (admitted bodies). It also includes organisations that can admit their employees to the LGPS by passing their resolution to nominate them for access.

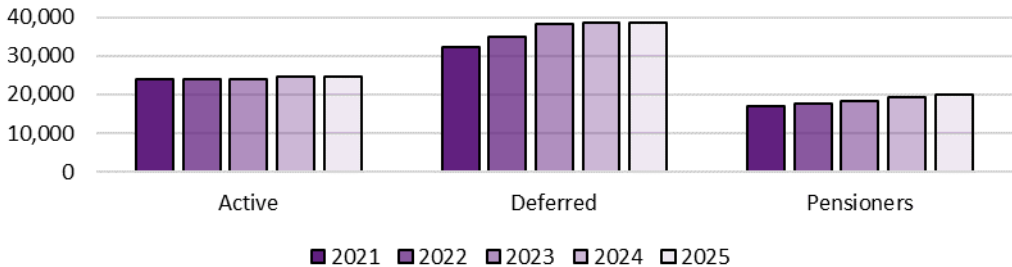
The Fund is a qualifying scheme under the automatic enrolment regulations and can be used by employers to automatically enroll eligible employees, and every three years re-enrol anyone who opts out of the scheme.

A shared service partnership between West Northamptonshire Council and Cambridgeshire County Council provides pension administration services to the Northamptonshire Pension Fund.

Membership

Membership of the Fund increased by 1% from the previous year.

On 31 March 2025, the total membership of the Fund was 83,172 with 24,682 active, 38,396 deferred and 20,094 pensioner members. The deferred figure is inclusive of 7,329 open cases that may change status (undecided leavers).



Pension Fund Administration

There are 95 staff members (approximately 91 full time equivalent) within the Pensions Team, providing all aspects of service to both the Northamptonshire and Cambridgeshire Funds, with an average staff to member ratio of 1:2,025 (total members for Northamptonshire and Cambridgeshire Pension Funds divided by full time equivalent staff members). Of the 91 full time equivalent staff, approximately 42 are attributed to the Northamptonshire Pension Fund.

Internal audit perform risk based audit procedures to assess the effectiveness and efficiency of administration services.

The requirements of the General Data Protection Regulations (GDPR) are recognised and feature in the design of the Fund's administration processes. The Fund has in place a GDPR compliant privacy notice, conducts privacy impact assessments for all new activities involving personal data and has in place a Register of Processing Activities and Information Asset Register.

Scheme Administration Tools

The [Pensions website](#) contains detailed information for all the Fund's stakeholders and has dedicated pages for both members and employers. There is a comprehensive suite of forms and factsheets for members, prospective members and employers.

Support for members and employers can be accessed via the website or by contacting the Helpline on 01604 526 528.

[Our online pension account](#) is an online platform which allows members to securely access their records, amend their personal information, perform benefit projections and view their annual benefits statement.

i-Connect is a system used which allows employers to securely upload monthly payroll data into the pension database, improving efficiency and accuracy of data and ensuring timely record maintenance.

Scheme Administration (continued)

Scheme Framework

The Local Government Pension Scheme is a statutory funded pension scheme. The operation of the Northamptonshire Pension Fund is principally governed by the Local Government Pension Scheme Regulations 2013 (as amended) and the Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended) which have been made within the context of the primary legislation of the Public Service Pensions Act 2013.

The Scheme covers eligible employees of the Unitary authorities, the Police Authority, Police and Crime Commissioner and Academies within the county area other than teaching staff, police officers and fire-fighters for whom separate statutory arrangements exist. A number of other bodies are also members of the scheme.

Employers' contribution rates are set by the Fund's Actuary every three years following the valuation of the Fund, in order to maintain the solvency of the Fund. The last valuation took place as at 31 March 2022. The results of the valuation were a funding level of 113% (31 March 2019: 93%) and an average primary employer contribution rate of 20.5% (31 March 2019: 19%). The primary rate includes an allowance of 0.8% (31 March 2019: 0.8%) of the pensionable pay for the Fund's expenses. The average employee contribution rate is 6.3% (31 March 2019: 6.3%) of pensionable pay.

On 1 April 2014, the new Local Government Pension Scheme 2014 came into effect, allowing more flexibility around paying into the scheme and drawing benefits in comparison to the 2008 scheme. Normal pension age is linked to the state pension age but benefits can be drawn earlier or later, between age 55 and 75. The normal retirement age is the age a member can access their pension in full; if it is accessed before that date benefits will usually be reduced and if accessed after normal retirement age benefits may increase. All service built up to 31 March 2014 in the LGPS is fully protected and will continue to be based on a member's final year annual pay when the individual leaves the LGPS (2008 scheme). The new scheme from 1 April 2014 is a Career Average Revalued Earning (CARE) scheme under which the pensionable pay for each year of membership is used to calculate a pension amount for that particular year, which is then revalued each year in line with inflation. The comparison between the 2008 scheme and 2014 scheme (CARE scheme) is illustrated on the [page 112](#)

Benefits built up before April 2014 also retain their protected Normal Pension Age, which for most members is 65, although certain members have a retirement age of 60 for all or part of their membership.

There is an additional protection known as the 'underpin' for members who were active on 31 March 2012 and were within ten years of their Protected Normal Pension Age on 1 April 2012. These members will get a pension at least equal to the pension they would have received in the LGPS had it not changed on 1 April 2014, subject to meeting certain criteria.

In December 2018 the Court of Appeal ruled against the Government in two linked cases relating to the Judicial Pension Scheme and the Firefighters' Pension Schemes. This ruling is generally referred to as the McCloud judgment.

In essence, the Court held that the transitional protections afforded to older members of public sector schemes when the reformed schemes were introduced in 2015 constituted unlawful age discrimination.

A written ministerial statement followed on 15 July 2019 to confirm that, as transitional protection was provided in all public service schemes upon their reform, the McCloud judgment had implications for all those schemes, including the LGPS in England and Wales.

Primary legislation required in relation to the McCloud remedy has now been put in place as The Public Service Pensions and Judicial Offices Bill received Royal Assent in March 2022, becoming the Public Service Pensions and Judicial Offices Act 2022.

Local Government Pension Scheme (Amendment) (No.3) Regulations 2023 came into force on 1 October 2023 to implement the McCloud remedy for the LGPS in England and Wales, which removed the age requirement and an immediate entitlement to benefits on leaving from the qualifying criteria.

Anyone who qualifies is entitled to have their pension built up between 1 April 2014 and 31 March 2022 calculated using final salary rules if it is higher than the CARE pensions.

The benefits of members in scope of the McCloud remedy that retire on or after 1 October 2023 are having their benefits fully assessed and paid accordingly. All other members in scope of the remedy are having their benefits reassessed in line with MHCLG statutory guidance that was issued in June 2024.

Scheme Administration (continued)

Summary of activities undertaken during the year

The following activities/projects were undertaken by the Fund during the year. The majority of these were listed in the Fund's Annual Business Plan and Medium-term Strategy and their performance and progress were monitored by Fund management team and reported periodically to governing bodies within the Fund's governance structure. The current Business Plan and Medium-term strategy can be obtained on the Fund's website [key documents page](#).

Activity	Description	Year end status
McCloud remedy rectification	Following the implementation of the age discrimination remedy on 1 October 2023, the records of scheme members within scope of the McCloud ruling are reviewed to determine if any rectification of benefits is required in line with the remedy and statutory guidance on implementation issued in June 24.	This project will continue into 2025-26.
Processing of undecided leaver records	To reduce the backlog by 1,000 in 24/25, and by 2,500 in 25/26 and by 2,500 in 26/27 with intention to reduce by 6,000 over the next 3 years from a baseline of approximately 7,268 case at January 2024.	The project will continue into 2025-26.
Investment Consultant Contract	The current investment consultancy contract with Mercer expires September 2024, with the ability to extend up to a maximum of three years. The contract has been extended for 2 years up to September 2026.	The project will continue into 25/26. This activity will be impacted by any regulations and guidance arising from the LGPS: Fit for the Future consultation proposals.
Review the National LGPS Framework for Additional Voluntary Contribution Services (AVC)	The first National LGPS Framework for AVC Services is being developed to support Funds in meeting their AVC responsibilities and is due to launch at the end of April 2024. A decision will be made as to whether to enter into a procurement process.	The project was rescheduled to commence in 2025/26 due to the Pension Dashboard requirements to connect to the ecosystem.
Implement equality, diversity and inclusion (EDI) best practices	The Pensions Regulator has published guidance to help improve pension schemes' equality, diversity and inclusion. Pension schemes have legal duties to scheme members, and good decision making is key to ensuring those duties are met. EDI supports robust discussion and effective decision making and is an important consideration for schemes. The Fund will be aiming to improve its equality, diversity and inclusion via these best practices.	The project will continue into 2025/26. There were some delays in enacting the EDI action plan due to conflicting statutory priorities.

Scheme Administration (continued)

Summary of activities undertaken during the year continued

Activity	Description	Year end status
Implement the best practice recommendations of the good governance review	Following consultation with LGPS stakeholders, in February 2021, a number of recommendations for improvement were identified. Some would require the input of MHCLG to amend scheme regulations and publish statutory guidance, others by SAB and others for Funds to implement as best practice. The standards are expected in due course.	The project was rescheduled to comment in 2025-26 due to the standards not being released during 2024/25.
Procure an Integrated Service Provider (ISP)	To complete procurement activities to have ISP solution and associated data quality reports in place, which enables; - connection to the Dashboard ecosystem. - improvements in data quality to facilitate smoother data matching.	Completed. Contract has been awarded to Heywood Pensions Technology Ltd and been incorporated in the Fund's existing pension administration and payroll software contract through a variation agreement.
Prepare for the implementation of Pension Dashboards	Government made a commitment that Pension Dashboards would be created by the pensions industry, enabling pension savers to view details of all their pensions together. The final staging date to connect to the dashboards ecosystem is 31 October 2026. Project plan activities based on national connection guidance will be undertaken on the following areas as preparation; Governance, Internal controls, Connection, Record keeping, Budget, Resource, Data.	Ongoing, on track as per the Project plan activities based on national connection guidance.
Continue to review cyber resilience	Cyber-crime will continue to evolve and become increasingly sophisticated and as such this area will be regularly reviewed and monitored.	Completed. Ongoing monitoring and development of the cyber strategy and action plan at each Committee/Board cycle.
Address and mortality screening services	To extend the contract with the current supplier of address and mortality screening services until 31 March 2025 and to have a new solution in place from 1 April 2025.	Completed.

Scheme Administration (continued)

Activity	Description	Year end status
Review and implement changes required from the Pension Regulator's new General Code of Practice	The new General Code of Practice was released on 28 March 2024. To review compliance of the Fund against the new standards and develop an action plan of changes to implement.	The compliance review is completed. The small number of actions highlighted from the review will be undertaken during 2025-26.
Explore the upgraded member self-service portal, Heywood Engage	The Fund's supplier (Heywood Pension Technologies Ltd) of the current member self-service portal (MSS) have released a new self-service portal, Heywood Engage, with many enhanced features to provide scheme members with a better understanding of their future pension entitlement. In order to determine the optimum time, migrate to the new portal a full review of the portal's offerings, migration process and communication requirements will need to be undertaken.	Completed. Review of the current and enhanced features was conducted including the actions required from the migration process and possible impacts during the migration. Decision was made and Engage will be implemented by 30 November 2025.
Support the build of the ACCESS FCA regulated entity	The fund is a member of the ACCESS asset pool, contracting with Waystone, an FCA-regulated operator, with a small support function. The LGPS Fit for the Future consultation published in November 2024 set requirements for all pools to be established as FCA-regulated investment management companies, possessing the expertise and capacity to implement investment strategies. ACCESS is required to carefully consider all options, including establishing a new pool company, merging with another pool, or becoming a client of another pool company. The pool is required to achieve the pooling requirement by March 2026.	Ongoing. ACCESS' proposal to become an FCA-regulated investment management company was not supported by Government. A Review of the Fund's options and related activity is underway.
Continue activities within the Fund's Climate Action Plan	During 2024-25 the Fund will continue to focus on the milestone dates within the plan which are key to ensure the Fund is on the correct path to achieve "net-zero" carbon emissions by 2050 at the latest.	Ongoing, for more information see the Funds Climate report on page 61 .
Continue with the development of the website	To launch a new website following the review of the current website and testing of the recommended changes. To review satisfaction with the new website, following the initial launch.	Completed.

Scheme Administration (continued)

Activity	Description	Year end status
Prepare for 2025 Fund Valuation	<p>The date of the next triennial valuation of the Pension Fund is 31 March 2025 with results to be published by 31 March 2026 and new employer contribution rates effective from 1 April 2026. Officers will work with the Fund's actuarial advisors to develop requirements and plan for the valuation. This will include a review of assumptions to be used for the valuation and preparation of early valuation results for large local authority employers. During 24/25, the Fund complete pre-valuation activities, such as planning and data cleansing.</p>	Ongoing, the main valuation activities will be conducted in 25/26.
Review suitability of having multiple investment strategies	<p>To re-visit and reconsider a suitability of having multiple investment strategies to provide greater flexibility to meet the different funding requirements of scheme employers, after the changes in the landscape have been observed since the last investigation and modelling assessment. A two-stage process is proposed for reconsideration;</p> <ul style="list-style-type: none"> - Investigating degree of changes in the landscape to warrant further impact modelling. - Taking a full impact review of options. 	Ongoing, the more detailed analysis will be conducted by the Fund's advisors to look at recommendation in 2025-26.

Scheme Administration (continued)

Freedom of Information Requests

The Freedom of information Act allows everyone the right to request access to information the Administering Authority holds. For further information or if you wish to make a request, you can find the information on West Northamptonshire Council's website at [Make a Freedom of Information \(FOI\) request](#)

The table to the right lays out how many Freedom of Information requests the Fund received during the year:

Nature of query	Number of Queries
Financial and performance information on the Fund's alternative holdings	10
The Fund's investment holdings	2
Annual Reports and Valuations	1
Pensioner Payments	3
The Funds Expenses	1
Employer Contributions	1
Total number of Freedom of Information request received	18

Key Performance Indicators

The Fund has developed a number of Key Performance Indicators (KPIs) to monitor service delivery. These KPIs are reviewed internally on a monthly basis to monitor and inform where delivery is met or remedial action is required. The Pension Fund Committee receives quarterly performance updates within a Business Plan update.

Total number of casework

KPI	Total number of cases open as at 31 March	Total number of cases created during the year	Total number of cases completed in year	Total % of cases completed in year	Total number of cases completed in previous year	Total % of cases completed in previous year
Deaths recorded of active, deferred, pensioner and dependent members	7	663	666	99%	701	99%
New dependent member benefits	37	324	335	93%	331	90%
Deferred member retirements	34	991	987	96%	818	96%
Active member retirements	40	577	556	90%	422	91%
Deferred benefits	3,777	4,078	4,543	58%	3,837	50%
Transfers in (including interfunds in, club transfers)	173	620	519	65%	759	82%
Transfers out (including interfunds out, club transfers)	0	315	315	100%	301	100%
Refunds	50	577	588	94%	580	92%
Divorce quotations issued	35	149	141	77%	91	72%
Actual divorce cases *	5	6	2	18%	1	17%
Member estimates requested either by scheme member and employer	143	745	678	76%	699	83%
New joiner notifications	0	4,742	4,742	100%	5,949	100%
Aggregation cases	2,530	1,576	1,384	34%	1,383	35%
Optants out received after 3 months membership	10	114	104	84%	62	100%

*There has been a delay completing divorce cases while the Fund waits for further guidance on McCloud.

Scheme Administration (continued)

Key Performance Indicators continued

Time taken to process casework

KPI	Fund target	% completed within fund target in year	% completed within fund target in previous year
Communication issued with acknowledgement of death of active, deferred, pensioner and dependent member	5 days	99%	99%
Communication issued confirming the amount of dependents pension	5 days	92%	98%
Communication issued to deferred member with confirmation of pension and lump sum options (actual)	10 days	93%	86%
Communication issued to active member with confirmation of pension and lump sum options (actual)	5 days to 31 December 2023 and 10 days from 1 January 2024	95%	84%
Communication issued with deferred benefit options	15 days	93%	97%
Communication issued to scheme member with completion of transfer in	10 days	94%	99%
Communication issued to scheme member with completion of transfer out	10 days	93%	98%
Divorce quotation	10 days	80%	68%
Communication issued to new starters	2 months	99%	99%
Member estimates requested by scheme member and employer	10 days	56%	82%

Scheme Administration (continued)

Key Performance Indicators continued

Communications and Engagement

Engagement with online portals	Percentage as at 31 March
% of active members registered	59%
% of deferred member registered	46%
% of pensioner and survivor members	64%
% total of all scheme members registered for self-service	55%
% of all registered users that have logged onto the service in the last 12 months	16%

Communication	As at 31 March
Total number of telephone calls received in year	9,484
Total number of email and online channel queries received	19,522
Number of scheme member events held in year (total of in-person and online)	7
Number of employer engagement events held in year (in-person and online)	10
Number of times a communication (i.e newsletter) issued to:	
a) Active members	Annually
b) Deferred members	Annually
c) Pensioners	Annually

Age band	% of registered users on MSS	Number of users registered on MSS
0-20	16.7%	64
21-25	29.4%	387
26-30	42.9%	872
31-35	41.3%	1,456
36-40	42.8%	2,005
41-45	48.2%	2,618
46-50	52.0%	2,888
51-55	56.4%	3,840
56-60	63.6%	4,739
61-65	70.2%	4,367
66-70	74.7%	3,442
71-75	61.9%	2,329
76-80	50.5%	1,516
81-85	41.0%	603
86-90	35.4%	225
Over 90	28.5%	72

Scheme Administration (continued)

Key Performance Indicators continued

Resources

Resources	
Total number of all administration staff (FTE)	41.84
Average service length of all administration staff	9 years
Staff vacancy rate as a %	6%
Ratio of all administration staff to total number of scheme members (all staff including management)	1:1,967
Ratio of administration staff (excluding management) to total number of scheme members	1:2,119

Data Quality

Annual Benefit Statements	
Percentage of annual benefit statements issued as at 31 August	100%
Data category	
Common data score	96.10%
Scheme specific data score	91.80%
Percentage of active, deferred and pensioner members recorded as 'gone away' with no home address held, or address is known to be out of date	4.07%
Percentage of active, deferred and pensioner members with an email address held on file	58.39%
Employer performance	
Percentage of employers set up to make monthly data submissions	99.54%
Percentage of employers who submitted monthly data on time during the reporting year	87.00%

Scheme Administration (continued)

Contributors to the Fund

Active Employers as at 31 March 2025

Type Of Body	Number of Active Employers
Administering (AA)	1
Scheduled (S)*	270
Admitted (Ad)	63
Total	334

LEA schools are included within Scheduled Bodies but not in the above figures as they belong to their responsible local authorities, and in the table below they are shown in the Body column as S

The table to the left, shows the number of employers in the Fund as at 31 March 2025. The breakdown of contributions by employers shown in the table below will show a different number of employers when compared to the left, as employers joined and left the fund throughout the year. The ceased column has been added to show this movement. Where contributions exist for ceased employers, these represent prior year adjustments that have been made within 2024-25, or contribution receipts recorded within the period.

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body
Abbey CofE Acad (Daventry)	10,758	38,821	49,579	S
Abbeyfield School	80,644	242,763	323,407	S
Abington Vale Primary School	39,774	145,077	184,851	S
ABM (St Mary's CE Primary)	974	-	974	Ad
ABM Catering (Duston Eldean Primary School)	1,003	4,670	5,673	Ad
ABM Catering (Lyncrest Primary)	649	3,019	3,668	Ad
ABM Catering Limited - 2016 PDET	1,867	7,228	9,095	Ad
ABM Catering Limited (2018 PDET)	669	2,590	3,259	Ad

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body
ABM Catering Limited (Montsaye Academy)	2,509	7,781	10,291	Ad
Alfred Lord Tennyson School	16,958	72,978	89,936	S*
All Saints CofE Primary School and Nursery Unit (NNC)	16,766	72,548	89,313	S*
All Saints CofE VA Primary School (WNC)	27,633	125,147	152,779	S*
AMEY Limited	7,772	24,674	32,446	Ad
Amplius Living	66,294	16,370	82,664	Ad
Aquarius Action Projects (NCT)	206	532	738	Y Ad
Ashby Fields Primary School	31,390	123,174	154,563	S

Scheme Administration (continued)

Employer	Employee Contribution £	Employer Contribution £	Grand Total £	Ceased Type of Body
Ashton CofE Primary School (WNC)	3,950	18,385	22,334	S*
Aspens - DSLV Academy (Dantre & Southbrook)	4,121	7,706	11,827	Ad
Aspens (EMAT)	911	3,149	4,060	Ad
Aspens (Lion Academy Trust)	536	1,473	2,009	Ad
Atlas FM (Rowan Gate)	280	1,288	1,568	Ad
Badby School	13,703	47,358	61,062	S
Balfour Beatty-St Lighting	6,020	13,737	19,757	Ad
Barby Academy	4,260	16,496	20,756	S
Barry Road Primary (WNC)	36,765	166,176	202,941	S*
Barton Seagrave Primary School (NNC)	47,859	205,749	253,609	S*
Beanfield Primary School	73,079	205,815	278,894	S
Billing Brook Academy	117,138	370,144	487,282	S
Birkin Cleaning Services (Elizabeth Woodville)	-	18,000	18,000	Y Ad
Bishop Stopford Academy	77,757	254,822	332,580	S
Blackthorn Primary (Academy)	24,870	81,023	105,893	S
Blakesley CE Primary	7,228	28,303	35,531	S
Blisworth Community Primary School (WNC)	10,697	47,614	58,311	S*
Boddington C of E Primary Academy	5,271	16,982	22,253	S

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body
Boothville Primary School (WNC)	51,856	235,906	287,761	S*
Boughton Primary Academy	11,391	37,065	48,456	S
Bozeat Community Primary Academy	10,751	48,611	59,363	S
Bracken Leas Primary School	25,962	98,587	124,549	S
Brackley Church of England Junior School (WNC)	15,231	68,957	84,188	S*
Brackley Town Council	29,337	115,409	144,746	S
Brambleside Primary School	22,053	95,751	117,804	S
Braunston Academy	13,932	53,790	67,722	S
Briar Hill Primary Academy	21,071	68,500	89,570	S
Bridgewater Primary School (WNC)	53,733	244,319	298,052	S*
Brightr Ltd (Braunston Primary School)	391	1,512	1,903	Ad
Brigstock Latham's CE Primary School (NNC)	8,548	37,735	46,282	S*
Brington Primary school (WNC)	7,312	32,857	40,169	S*
Brixworth CEVC Primary Sch. (WNC)	34,419	156,691	191,111	S*
Brixworth Parish Council	2,937	10,107	13,044	S
Brooke Weston Academy	297,418	746,571	1,043,989	S
Broughton Primary School (NNC)	16,400	69,130	85,529	S*
Buckton Fields Primary School	15,576	60,954	76,530	S

Scheme Administration (continued)

Employer	Employee Contribution s £	Employer Contribution s £	Grand Total £	Ceased Type of Body
Bugbrooke Comm Primary Sch. (WNC)	21,267	96,012	117,279	S*
Bugbrooke Parish Council	1,451	6,106	7,557	S
Byfield Academy	13,073	47,834	60,907	S
Campion School	75,979	237,579	313,558	S
Camrose Early Years Centre Children and Families (WNC)	33,190	146,405	179,594	S*
Caroline Chisholm School	120,518	386,327	506,844	S
Castle Primary Academy	36,664	131,197	167,860	S
Cater Link (The Ferrers)	2,058	6,322	8,380	Ad
Cater Link (Weavers Acad)	3,067	12,614	15,681	Ad
Cater Link Ltd (Eastfield Aca)	272	829	1,101	Ad
Cedar Road Primary (Academy)	15,780	58,651	74,431	S
Chacombe CEVA Primary Academy	10,652	37,484	48,135	S
Chelveston Road School	28,441	98,206	126,647	S
Chenderit School (Academy)	49,962	163,999	213,961	S
Chiltern Primary School (WNC)	13,171	70,753	83,924	S*
Chipping Warden Primary Academy	9,193	36,951	46,144	S
Cleantec (Chenderit School)	469	1,671	2,140	Y Ad
Cleantec (The Parker E-ACT)	3,879	12,412	16,290	Ad

Employer	Employee Contribution s £	Employer Contribution s £	Grand Total £	Ceased Type of Body
CLIPSTON PRIMARY (WNC)	5,124	23,698	28,822	S*
Cogenhoe Primary School	13,108	46,824	59,932	S
Collingtree C of E Primary School	7,590	29,395	36,986	S
Coombs Catering (Thomas Beckett Catholic Academy)	2,837	12,969	15,806	Ad
Corby Business Academy	91,898	253,553	345,450	S
Corby Old Village Sch (NNC)	18,367	79,127	97,494	S*
Corby Primary Academy	45,110	155,336	200,445	S
Corby Technical School	64,821	171,641	236,462	S
Corby Town Council	8,235	30,899	39,134	S
Cosgrove Village Primary (WNC)	6,654	30,992	37,646	S*
Cottingham CofE Primary Academy	7,468	28,920	36,387	S
Cottingham Parish Council	541	2,400	2,941	S
Cranford CoE Academy	7,263	27,800	35,063	S
Crick Primary School (WNC)	15,310	69,060	84,370	S*
Croughton All Saints CE Primary (WNC)	10,985	49,347	60,332	S*
CROYLAND NURSERY (NNC)	30,737	135,428	166,165	S*
Croyland Pri (Well'boro) (NNC)	46,595	199,605	246,200	S*
Cucina Restaurants (Elizabeth Woodville School)	2,410	9,201	11,611	Ad

Scheme Administration (continued)

Employer	Employee Contribution s £	Employer Contribution s £	Grand Total £	Ceased Type of Body
Culworth C of E Primary Academy	8,861	39,141	48,002	S
Danesholme Infants Academy	20,425	74,073	94,497	S
Danesholme Junior Academy	21,486	94,827	116,313	S
Daventry Hill School	90,279	281,965	372,244	S
Daventry Norse Limited	23,011	106,946	129,957	Ad
Deanshanger Parish Council	1,558	6,579	8,137	S
Deanshanger Primary (WNC)	4,037	13,410	17,446	Y S*
Deanshanger Primary School	18,278	97,501	115,779	S
Delapre Primary School (WNC)	42,927	222,095	265,022	S*
Denfield Park Primary (NNC)	38,911	164,921	203,832	S*
Denton Primary School (WNC)	12,300	55,080	67,380	S*
Desborough Town Council	2,154	10,431	12,586	S
DSL V E-ACT Academy	54,105	175,319	229,424	S
Duston Eldean Primary (WNC)	33,200	151,212	184,412	S*
DUSTON PARISH COUNCIL	6,971	28,173	35,143	S
E-ACT The Grange School	17,014	58,543	75,557	S
Earl Spencer Primary School (WNC)	31,259	144,510	175,769	S*
Earls Barton Parish Council	1,676	7,049	8,725	S

Employer	Employee Contribution s £	Employer Contribution s £	Grand Total £	Ceased Type of Body
Earls Barton Primary School (NNC)	30,537	130,787	161,325	S*
East Haddon CE Primary School (WNC)	3,946	18,065	22,011	S*
East Hunsbury Parish Council	5,313	16,921	22,234	S
East Hunsbury Primary Academy	44,092	161,814	205,905	S
Eastfield Academy	12,218	35,481	47,699	S
Easy Clean (Campion Sch)	1,087	3,774	4,860	Y Ad
Easy Clean Contractors Limited (St Thomas More Catholic Primary)	281	1,352	1,633	Ad
Easy Clean Contractors Ltd (St Brendan Pri)	750	4,058	4,808	Ad
Ecton Brook Primary (Academy)	70,875	242,106	312,982	S
Ecton Village Academy	4,720	16,139	20,860	S
Elizabeth Woodville School	73,815	266,999	340,814	S
emPSN Services Ltd (pre. EMBC)	25,645	79,067	104,713	Ad
Exeter - a learning community	53,024	176,026	229,050	S
Fairfields School (WNC)	79,002	359,051	438,053	S*
Falconers Hill Academy	11,392	45,818	57,210	S
Falconers Hill Infant School	15,382	61,258	76,640	S
Farthinghoe Primary School	3,311	11,858	15,169	S
Finedon Infants School	17,799	70,330	88,130	S

Scheme Administration (continued)

Employer	Employee Contribution s £	Employer Contribution s £	Grand Total £	Ceased Type of Body
Finedon Mulso CEVA Junior School	10,166	40,558	50,724	S
Finedon Town Council	1,718	7,277	8,995	S
Flore Church of England Primary School (WNC)	8,361	37,324	45,685	S*
Freemans Endowed Church of England Junior School	17,407	67,184	84,591	S
Fresh Start (Deanshanger Sch)	316	1,636	1,953	Y Ad
Fresh Start(Innovate MAT)	1,444	7,874	9,318	Ad
Friars Academy	63,276	208,653	271,929	S
FUTURES HOUSING GROUP	31,417	337,245	368,662	Ad
Gayton Church Of England Primary School (WNC)	6,090	27,854	33,944	S*
Geddington CE Primary School (NNC)	15,008	64,008	79,017	S*
Glaphthorn CE Primary School	6,328	24,990	31,318	S
Gloucester Nursery School (WNC)	15,029	67,011	82,041	S*
GRANGE PARK PARISH COUNCIL	2,088	7,462	9,550	S
Grange Primary Academy	24,337	78,448	102,784	S
Grange Transport Limited	9,756	43,248	53,003	Ad
Great Addington CEVA Academy	4,454	17,025	21,478	S
Great Doddington Primary (NNC)	11,738	51,563	63,301	S*
Greatwell Homes	35,539	-	35,539	Ad

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body
Greatworth Primary School (WNC)	4,722	21,677	26,399	S*
Green Oaks Academy	17,548	71,891	89,440	S
Greenfields Primary School and Nursery	33,815	116,102	149,917	S
Greenfields Spec Sch for Comm	46,581	164,789	211,370	S
Greens Norton Primary School	11,432	44,027	55,459	S
Grendon CE Primary School (NNC)	15,277	38,680	53,956	S*
Gretton Primary School	11,725	34,191	45,915	S
GSO (Hatton Academies)	2,450	9,171	11,621	Ad
Guilsborough CEVA Primary School	6,832	26,762	33,594	S
Guilsborough School (Academy)	79,597	254,920	334,517	S
Hackleton CofE Aided Primary School (WNC)	11,070	49,571	60,641	S*
Hall Meadow Primary School	41,708	145,985	187,693	S
Hardingstone Academy	22,831	76,196	99,027	S
Harlestone Primary School (WNC)	5,586	26,002	31,588	S*
Harpole Primary School (WNC)	8,897	39,825	48,722	S*
Hartwell Primary (Academy)	10,676	35,390	46,066	S
Havelock Infants	15,306	57,969	73,275	S
Havelock Junior	22,433	85,743	108,176	S

Scheme Administration (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body	Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body
HawksmoorLearn'Trust HQ-Staff	14,971	46,396	61,367	S	Innovate Ltd (Magdalen School)	-	526	526	Y Ad
Hawthorn Community Primary	24,205	91,391	115,596	S	Innovate Services Ltd (Campion School)	1,866	6,262	8,127	Ad
Hayfield Cross CofE School (NNC)	28,633	124,107	152,740	S*	Irchester Primary	28,520	118,473	146,992	S
Hazel Leys Primary & Nursery School	20,997	87,938	108,935	S	Irthlingborough Junior School	33,292	126,793	160,085	S
Headlands Primary (Academy)	77,896	254,696	332,592	S	Irthlingborough Nursery & Infants School	26,304	104,478	130,782	S
Helmdon Primary School (WNC)	4,437	20,380	24,816	S*	IRTHLINGBOROUGH TOWN COUNCIL	11,062	43,379	54,441	S
Henry Chichele Primary School (NNC)	25,195	108,690	133,886	S*	Isebrook School	200,383	655,556	855,939	S
Higham Ferrers Junior School	12,606	49,156	61,762	S	Isham CE Primary Academy	3,796	14,700	18,496	S
Higham Ferrers Junior School (NNC)	14,922	64,193	79,115	Y S*	John Hellins Primary School (WNC)	22,184	101,082	123,266	S*
Higham Ferrers Nur & Inf Acad	9,907	39,434	49,341	S	Just Ask Estate Services Limited	4,817	-	4,817	Ad
Higham Ferrers Nur & Inf sch (NNC)	13,402	56,642	70,044	Y S*	Kettering Buccleuch Academy	119,476	307,814	427,290	S
Higham Ferrers Town Council	3,384	12,142	15,526	S	Kettering Park Infants Academy	16,239	64,415	80,654	S
Highfield Nursery (NNC)	14,645	61,263	75,908	S*	Kettering Park Junior Academy	24,185	93,104	117,289	S
Hopping Hill Primary (WNC)	32,404	142,899	175,302	S*	Kettering Science Academy (including Compass Primary)	128,594	359,117	487,712	S
Hospital and Outreach Education PRU	25,545	94,602	120,147	S	Kettering Town Council	3,070	12,539	15,609	S
Hunsbury Park Primary (WNC)	42,232	188,506	230,738	S*	KGB Cleaning (Chenderit)	874	3,116	3,991	Ad
Huxlow Academy	58,892	225,937	284,829	S	KGB Cleaning Ltd (Grange Academy)	351	1,280	1,631	Ad
IDVerde	34,272	6,470	40,742	Ad	KGB SW Ltd (Buccleuch Acad)	5,051	15,190	20,241	Ad

Scheme Administration (continued)

Employer	Employee Contribution s £	Employer Contribution s £	Grand Total £	Ceased Type of Body
Kier (May Gurney Nordis)	15,864	58,693	74,557	Ad
Kier (North Northants)	32,297	91,383	123,680	Ad
Kier (West Northants)	7,679	21,631	29,310	Ad
Kilsby Academy	10,190	35,234	45,424	S
Kindred (Campion School)	1,089	3,332	4,421	Ad
Kings Cliffe Endowed Primary School (NNC)	14,037	60,191	74,228	S*
Kings Heath Primary Academy	24,525	78,989	103,513	S
Kings Meadow School	17,558	50,333	67,891	S
Kings Sutton Primary Academy	12,359	45,135	57,494	S
Kingsley Primary School	22,306	60,831	83,136	S
Kingsley Special Academy	92,516	322,951	415,467	S
Kingsthorpe College	46,874	194,923	241,796	S
Kingsthorpe Grove P (WNC)	47,963	221,228	269,192	S*
Kingsthorpe Parish Council	4,156	17,670	21,826	S
Kingsthorpe Village Primary School (WNC)	15,751	71,605	87,357	S*
Kingswood Catering (Bridgstock)	762	3,349	4,110	Ad
Kingswood Catering (Hunsbury)	329	1,531	1,859	Y Ad
Kingswood Catering (Pytchley)	1,050	3,875	4,925	Ad

Employer	Employee Contribution s £	Employer Contribution s £	Grand Total £	Ceased Type of Body
Kingswood Primary Academy	24,688	96,531	121,219	S
Kingswood Secondary Academy	93,223	333,021	426,244	S
Kislingbury CE Primary Academy	6,301	24,442	30,743	S
Latimer Arts College (NNC)	70,421	286,549	356,970	S*
Legacy Leisure Ltd	1,484	7,676	9,160	Ad
Lings Primary (Academy)	30,454	102,659	133,114	S
Little Harrowden Community Primary School	11,712	46,085	57,797	S
Little Houghton CE Primary (WNC)	7,614	35,074	42,688	S*
Little Stanion Primary School (NNC)	22,394	94,979	117,374	S*
Loatlands Primary Academy	35,018	135,138	170,157	S
Loddington CE Primary School	7,863	30,000	37,864	S
Lodge Park Academy	69,640	246,841	316,481	S
Long Buckby Infant School (WNC)	10,173	47,067	57,240	S*
Long Buckby Junior School (WNC)	24,581	54,693	79,274	S*
Lumbertubs Primary Academy	19,587	56,604	76,191	S
Lyncrest Primary School (WNC)	14,080	64,996	79,076	S*
Magdalen College (Academy)	83,117	304,315	387,433	S
Maidwell Primary School (WNC)	6,160	28,320	34,480	S*

Scheme Administration (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body
Malcolm Arnold Academy	101,987	290,831	392,818	S
Malcolm Arnold Prep (DRET)	18,618	59,993	78,611	S
Manor School Sports College	106,935	325,591	432,526	S
Maplefields Academy	48,991	156,599	205,590	S
Marie Weller Primary School	9,676	35,589	45,265	S
MAWSLEY PRIMARY (NNC)	25,284	108,910	134,194	S*
Maxim Facilities Management Ltd	1,527	5,266	6,793	Ad
Meadowside Primary School (NNC)	33,271	143,630	176,901	S*
Mears Ashby C of E Endowed School	7,442	28,407	35,849	S
Middleton Cheney Academy	36,223	113,799	150,022	S
MILLBROOK INFANT (NNC)	16,142	76,558	92,699	S*
Millbrook Junior School (NNC)	31,648	134,073	165,720	S*
Millway Primary School (WNC)	27,599	124,806	152,405	S*
Milton Parochial Primary School	3,001	11,398	14,398	S
Miquill South LTD (Whitefriars School)	46	201	246	Y Ad
Mitie Care & Custody Ltd	4,365	13,320	17,684	Y Ad
Monksmoor Park CE Primary School (WNC)	22,518	101,552	124,069	S*
Montsaye Academy	90,077	253,700	343,777	S

Employer	Employee Contribution £	Employer Contribution £	Grand Total £	Ceased Type of Body
Moulton College	308,109	1,168,527	1,476,636	S
MOULTON PARISH COUNCIL	12,353	46,344	58,698	S
MOULTON PRIMARY SCHL (WNC)	42,490	194,544	237,035	S*
Moulton School and Science College	86,434	265,331	351,765	S
Naseby CE Primary	4,142	15,677	19,819	S
Nassington School (NNC)	7,980	34,471	42,451	S*
New Horizons Academy	32,085	107,429	139,514	S
Newbottle and Charlton CEVA Primary School (WNC)	5,456	25,394	30,850	S*
Newnham Primary Academy	6,941	24,745	31,687	S
Newton Road School	18,157	54,692	72,849	S
Nicholas Hawksmoor Primary School	23,266	89,371	112,637	S
North Northants Council	5,791,499	20,981,112	26,772,611	S
Northamp' Children's Trust	2,688,009	6,735,272	9,423,281	S
Northampton Academy	121,866	315,994	437,860	S
NORTHAMPTON COLLEGE	513,332	2,079,990	2,593,323	S
Northampton High School	21,002	105,767	126,768	Ad
Northampton International Academy	101,275	341,523	442,797	S
Northampton Partnership Homes Ltd	653,077	3,621,933	4,275,010	S

Scheme Administration (continued)

Employer	Employee Contribution £	Employer Contribution £	Grand Total £	Ceased Type of Body
Northampton School for Girls Academy	66,212	259,865	326,078	S
NORTHAMPTON THEATRES TRUST LTD	12,225	56,418	68,643	Ad
Northampton Town Council	27,393	101,680	129,073	S
Northamptonshire Carers	3,176	10,028	13,204	Ad
Northamptonshire Fire & Rescue Service	163,284	462,318	625,602	S
Northamptonshire Sport	33,708	97,851	131,559	Ad
Northants Chief Constable	2,693,632	7,910,094	10,603,726	S
Northants Music & P/A Trust	1,539	1,002	2,541	Ad
Northants Police & Fire Crime Commissioner	271,691	808,430	1,080,121	S
Northgate Sch Arts (Academy)	141,993	460,437	602,430	S
Oakley Vale Primary School	35,200	100,167	135,367	S
Oakway Academy	30,256	117,737	147,993	S
Old Stratford Primary School	11,582	48,844	60,426	S
Olympic Primary School Academy	25,377	89,355	114,732	S
Oundle CE Primary School	20,490	78,802	99,291	S
OUNDLE TOWN COUNCIL	4,591	16,656	21,247	S
Our Lady Immaculate Catholic Academies Trust HQ staff	19,818	48,574	68,392	S
Our Lady of Walsingham Catholic Primary School	26,118	93,843	119,961	S

Employer	Employee Contribution £	Employer Contribution £	Grand Total £	Ceased Type of Body
Our Ladys Catholic Primary School	28,403	98,872	127,275	S
Overstone Primary School (WNC)	13,998	63,420	77,418	S*
Park Junior Sch Academy	21,822	76,085	97,907	S
Parklands Nursery School (WNC)	9,778	44,242	54,020	S*
Parklands Primary School	17,421	71,021	88,442	S
Parkwood Leisure Ltd (formerly The Castle Theatre)	777	2,784	3,562	Ad
Pathfinder Legal (NCT)	13,768	29,627	43,395	Y Ad
Pathfinder Legal (WNC)	4,927	13,990	18,917	Y S
Pattishall Church of England Primary School (WNC)	11,116	51,909	63,025	S*
Paulerspury CoFE Prim Sch	6,345	22,433	28,778	S
Pboro Diocese Ed. Trust (HQ)	113,025	317,691	430,716	S
Pen Green Centre for Children	148,235	548,599	696,834	S*
Pendergate Ltd (Wrenn School)	6,731	26,908	33,639	Ad
Pineham Barns Primary School (Free School)	24,202	86,569	110,770	S
Pitsford Primary School (WNC)	5,989	27,501	33,490	S*
Places For People Leisure Management Ltd	8,445	-	8,445	Ad
Polebrook CoE Primary School	6,756	30,182	36,938	S
Preston Hedge's Primary (Acade	47,756	147,261	195,017	S

Scheme Administration (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body
Prince William Academy	48,112	250,533	298,645	S
Priors Hall - A Learning Community	37,766	129,587	167,353	S
Prospects Services	10,689	-	10,689	Ad
Purgo Supply (EMAT)	2,354	8,475	10,829	Ad
Purple Oaks Academy	41,158	142,057	183,214	S
Pytchley Endowed CEVA Primary School	5,646	21,993	27,639	S
Queen Eleanor Primary Academy	15,507	53,819	69,326	S
Raunds Park Infant School	12,620	54,861	67,481	S
Raunds Town Council	11,292	46,504	57,796	S
Rectory Farm Primary Academy	16,027	62,710	78,737	S
Red Kite Academy	72,355	243,528	315,883	S
Redwell Primary School	35,343	143,588	178,931	S
Renuvo Heating & Property(NPH)	15,488	24,066	39,554	Ad
Ringstead CoE Primary Academy	9,287	35,726	45,013	S
RM Education (BrookeWestonAT)	6,397	-	6,397	Ad
Roade Primary School (WNC)	20,911	94,751	115,662	S*
Rockingham Forest Trust	285	-	285	Y Ad
Rockingham Primary Academy	21,557	72,690	94,247	S

Employer	Employee Contribution £	Employer Contribution £	Grand Total £	Ceased Type of Body
Ronald Tree Nursery School	23,165	96,454	119,618	S*
Rothersthorpe CoE Primary	4,854	17,276	22,130	S
Rothwell Junior School	24,274	91,349	115,623	S
Rothwell Town Council	2,249	8,132	10,381	S
Rothwell Victoria Infants School	17,703	67,863	85,566	S
ROWAN GATE PRIMARY (NNC)	153,263	659,993	813,256	S*
Rushden Academy	57,519	203,109	260,628	S
Rushden Primary Academy	31,509	101,595	133,104	S
RUSHDEN TOWN COUNCIL	19,392	73,143	92,535	S
Rushton Primary Academy	7,509	28,767	36,276	S
Ruskin Infant and Nursery School	13,879	51,191	65,070	S
Ruskin Junior Academy	23,653	88,317	111,970	S
Semilong Services Limited	2,947	6,029	8,976	Ad
SHAW HEALTHCARE	9,032	-	9,032	Ad
Silverstone CE Primary Academy	12,865	49,844	62,709	S
Silverstone UTC	35,046	104,479	139,525	S
Simon de Senlis Primary Academy	35,720	152,582	188,302	S
Sir Christopher Hatton Academy	104,778	336,713	441,490	S

Scheme Administration (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body
South End Infant School (NNC)	22,702	97,987	120,690	S*
SOUTH END JUNIOR RUSHDEN (NNC)	22,773	96,454	119,227	S*
Southfield Primary Academy	4,172	13,198	17,370	Y S
Southfield School for Girls	85,277	261,756	347,033	S
Sponne School	97,236	313,410	410,646	S
Spratton CE Primary School	5,060	19,596	24,656	S
Spring Lane Primary School	30,911	89,794	120,705	S
St Andrews Primary Academy	29,342	112,860	142,202	S
St Barnabas	13,990	53,939	67,929	S
St Brendan's Catholic Primary School	20,282	102,872	123,153	S
St Edwards Catholic Primary	11,923	51,749	63,672	S
St Gregory's Catholic Primary School	22,515	97,462	119,976	S
St James CE Primary School	53,508	205,735	259,243	S
St James Infant School	19,879	77,800	97,679	S
St Loy C of E Primary Academy	3,754	17,815	21,569	S
St Lukes CEVA Primary School Academy	20,571	78,110	98,681	S
St Marys Catholic Primary School	12,235	52,334	64,570	S
St Mary's Catholic Primary School (Aston-le-Walls) (WNC)	4,960	22,299	27,259	S*

Employer	Employee Contribution £	Employer Contribution £	Grand Total £	Ceased Type of Body
St Mary's CEVA Pri Acad Kettering	23,571	87,419	110,990	S
St Mary's Pri Acad, Burton Latimer	20,464	78,390	98,854	S
ST PATRICKS PRIMARY (NNC)	20,091	86,720	106,811	S*
St Peters's C of E Academy	11,588	41,885	53,474	S
St Thomas More Catholic Primary School	12,226	57,993	70,218	S
St. Andrews CEVA Primary	27,008	122,251	149,259	S*
Standens Barn Primary School	20,247	79,404	99,651	S
Stanion CofE (Aided) Primary School (NNC)	5,655	24,921	30,576	S*
Stanton Cross Primary Sch	10,909	36,368	47,277	S
Stanwick Academy	15,932	67,524	83,456	S
Stanwick Parish Council	1,514	6,107	7,621	S
Staverton CofE Pri Academy	7,886	30,308	38,195	S
Stimpson Avenue Primary Academy	24,261	102,818	127,079	S
Stoke Bruerne Church Of England School (WNC)	6,266	28,966	35,232	S*
Studfall Infant School & Nursery Academy	35,502	137,880	173,382	S
Studfall Junior School Academy	36,980	162,001	198,981	S
Sunnyside Primary (Academy)	14,187	50,457	64,644	S
Syresham St James C.E. Primary School and Nursery (WNC)	12,900	59,548	72,447	S*

Scheme Administration (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body
Sywell CEVA Primary School	7,181	27,581	34,762	S
Taylor Shaw (Ferrers School)	1,512	5,702	7,215	Y Ad
Taylor Shaw (Grange Prim)	90	318	408	Ad
Tennyson Road Infant School (NNC)	-	32,125	32,125	Y S*
The Abbey Primary School	22,316	67,019	89,335	S
The Arbours Primary (Academy)	16,708	53,997	70,705	S
The Avenue Infants School (NNC)	19,171	81,626	100,797	S*
The Bliss Charity School (WNC)	11,856	53,179	65,035	S*
The Bramptons Primary School (WNC)	3,641	16,949	20,591	S*
The CE Academy	69,721	224,424	294,145	S
The Duston School	101,039	311,351	412,390	S
The Ferrers School Academy	51,980	182,327	234,307	S
The Gateway School	35,788	91,087	126,875	S
The Good Shepherd Catholic Primary School	15,651	73,824	89,475	S
The Grange School (WNC)	5,934	26,622	32,556	Y S*
The NSB Trust	123,662	386,833	510,495	S
The Parker E-ACT Academy	299,134	728,873	1,028,007	S
The Radstone Primary School	20,340	78,306	98,646	S

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body
The University of Northampton	1,384,122	5,569,917	6,954,039	S
Thomas Becket Catholic School	40,093	186,451	226,544	S
Thorplands Primary (Academy)	24,135	83,450	107,585	S
THRAPSTON PRIMARY (NNC)	3,631	10,244	13,875	Y S*
Thrapston Primary School	52,068	150,665	202,734	S
Thrapston Town Council	3,581	12,340	15,920	S
Tiffield Church of England Voluntary Aided Primary School (WNC)	4,873	22,569	27,442	S*
Titchmarsh Church of England Primary (NNC)	6,791	29,601	36,392	S*
Tove Learning Trust - HQ	33,812	79,440	113,252	S
Towcester CE Primary School (Acad)	30,094	114,369	144,463	S
Towcester Town Council	8,584	34,225	42,809	S
Trilogy Active Ltd	45,829	-	45,829	Ad
Trinity CE Primary School	7,887	30,822	38,709	S
Uni of Northampton Enterprises	20,081	-	20,081	Ad
Upton Meadows	37,417	143,533	180,951	S
Upton Parish Council	1,992	7,899	9,891	S

Scheme Administration (continued)

Employer	Employee Contribution s £	Employer Contribution s £	Grand Total £	Ceased Type of Body
Veolia UK Ltd	36,955	85,073	122,028	Ad
VERNON TERRACE PRIMARY (WNC)	30,929	137,916	168,845	S*
Victoria Primary Academy	30,207	100,194	130,401	S
Walgrave Primary School (WNC)	9,898	45,690	55,589	S*
Wallace Road Nursery School (WNC)	7,832	34,861	42,693	S*
Warmington School (NNC)	8,548	37,267	45,815	S*
Warwick Primary Academy	16,856	45,504	62,361	S
Waynflete Infants' (Academy)	14,720	69,085	83,804	S
Weavers Academy	92,861	356,249	449,111	S
Weedon Bec Parish Council	1,876	7,041	8,917	S
Weedon Bec Primary School	36,011	119,243	155,254	S
Weldon Primary Academy	10,431	40,796	51,227	S
Weldon Village Academy	12,538	36,835	49,373	S
Welford, Sibbertoft and Sulby Endowed School	5,323	20,614	25,936	S
Wellingborough Town Council	9,035	27,093	36,128	S
Welton C of E Primary (Academy)	4,757	14,282	19,039	S
West Haddon Endowed CE Primary (WNC)	20,083	91,496	111,580	S*
West Haddon Parish Council	3,386	12,712	16,099	S

Employer	Employee Contribution s £	Employer Contribution s £	Grand Total £	Ceased Type of Body
West Northants Council	6,558,453	26,688,809	33,247,262	AA
Weston Favell Academy	78,845	258,401	337,246	S
Weston Favell CE Primary School	32,819	110,878	143,697	S
Whitefriars Primary Sch	4,758	21,800	26,558	S
Whitefriars Primary School (NNC)	23,903	101,275	125,178	Y S*
Whitehills Nursery School (WNC)	8,822	42,490	51,312	S*
Whitehills Primary (WNC)	33,671	152,946	186,618	S*
Whittlebury Church of England Primary School (WNC)	4,349	20,030	24,379	S*
Wilbarston Primary Academy	6,641	20,322	26,963	S
Wilby CE Primary School (NNC)	7,680	33,153	40,833	S*
Windmill Primary School	26,126	98,206	124,332	S
Wollaston Primary School	15,750	62,196	77,946	S
Wollaston School (Secondary)	82,459	308,236	390,695	S
Woodford CofE Primary School	9,345	34,688	44,033	S
Woodford Halse CE Primary Academy	18,815	66,194	85,009	S
Woodland View Primary Academy	26,581	99,137	125,719	S
Woodnewton - a learning community	75,345	209,905	285,249	S
Woodvale Primary (Academy)	35,659	127,113	162,772	S

Scheme Administration (continued)

Employer	Employee Contributions £	Employer Contributions £	Grand Total £	Ceased Type of Body
Wootton Parish Council	15,005	48,995	64,000	S
Wootton Park School	108,362	332,429	440,791	S
Wootton Primary School	28,866	97,125	125,991	S
Wren Spinney Community School	61,732	249,161	310,893	S
Wrenn School	91,298	305,361	396,659	S
Yardley Gobion CE Primary School (WNC)	8,467	39,138	47,605	S*
Yardley Hastings Primary (WNC)	9,125	42,550	51,676	S*
Yelvertoft Primary School (WNC)	6,574	31,569	38,142	S*
Grand Total	23,129,908	81,258,778	150,075,395	

Scheme Administration (continued)

Communications Policy

Our strategy outlines how we plan to use technology to enhance our service and reduce costs where appropriate. It shows how we try to meet the needs of all our stakeholders. We also encourage feedback so we can continue to make improvements. You can find our communications strategy and plan on the [key documents page](#) of our website.

Our communications plan outlines our activities monthly for each stakeholder group. As well as:

- sending out statutory communications
- planned newsletters
- surveys
- employer training
- web updates

it also highlights other key communications initiatives.

Digital communications

Electronic communication is our preferred method of sharing information for most stakeholders. This could be through:

- our website
- emails
- texts
- self-service
- webinars
- videos.

For example, when a member first joins, we'll send them an email text, or letter depending on their preference. We ask them to visit our website to see guides and videos for more information about the scheme. We also suggest they sign up to our self-service portal. We use webinars, videos, and face to face events to educate our employers and members about the scheme.

Accessibility

We're committed to making sure our communications are accessible to everyone. We give all members the option to opt out of electronic communications, or to receive them in the best format for them. For example, braille, audio CD, alternative languages, or other reasonable adjustments. If members choose to opt out, we'll send them a paper copy of their pension statement or annual newsletter.

We make sure our communications are easy to understand, through:

- Plain English accreditation
- checking readability scores
- never using colour as the only way to convey information.

Promotion

We promote the scheme to members and employers through our website. We encourage our employers to promote the LGPS by giving them:

- posters,
- news stories, and
- email copy.

We also engage prospective members with promotions linked to:

- Life events
- Pensions Awareness Week, and
- the Pensions Attention campaign.

Scheme Administration (continued)

Value for Money Statements

Northamptonshire Pension Fund is dedicated to delivering Value for Money (VfM) to its members, employers and other stakeholders to achieve the long-term financial sustainability of the fund. This statement aims to:

- Define the principles that underpin our approach to VfM.
- Ensure these principles are reflected in our strategies.
- Illustrate how VfM is measured.
- Set out targets for the year ahead.
- Define roles of different stakeholders and assign responsible owners to any targets.

Our Value for Money Principles

When assessing service delivery and interventions, the Fund applies the following VfM principles:

- **Economy:** Are inputs of appropriate quality acquired at a minimised price?
- **Efficiency:** How well are inputs converted into outputs?
- **Effectiveness:** How well do those outputs achieve outcomes?
- **Equity:** Are services available to and do they reach all people that they are intended to?

Value for Money Framework – Logic Map Example

The following framework illustrates how the Fund applies the VfM principles to its activities, using the website redevelopment project (completed in 24/25) as an example.



Stage of Logic Map	Example
Context: Refers to the problems the proposal aims to address.	The Fund's website had not been reviewed for several years. A comprehensive review was required to assess fitness for purpose and explore alternative solutions to better meet the needs of stakeholders.
Inputs: Refers to the resources required to deliver the proposal.	<ul style="list-style-type: none"> - Project leadership by the Fund's officers. - Engagement with users, members, employers, and officers for journey mapping and insight gathering. The pain points were also identified. - West Northamptonshire Council IT team developed prototype based on user feedback. - Ongoing stakeholder consultations.
Outputs: Refers to the tangible deliverables of the proposal.	<ul style="list-style-type: none"> - Improved website navigation. - Easier access to relevant pension information. - Enhanced search functionality. - Engaging content linking pension information to life events. - Unified platform for member and employer websites for better user experience.
Outcomes: Refers to the short- and medium-term results of the proposal.	<ul style="list-style-type: none"> - Improved understanding of pension information for members and employers. - Increased member engagement with retirement planning. - Reduction in routine enquiries as more information is self-served online. - Greater control over user outcomes by migrating the member website from an externally hosted site to an internally managed platform.
Impacts: Refers to the longer term effects of the proposal.	<ul style="list-style-type: none"> - Members engage proactively with pension issues throughout their working life. - Better-informed retirement decisions. - Enhanced financial wellbeing for members for their retirement.

Scheme Administration (continued)

Our Strategies with VfM Principles

The VfM principles are embedded in the Fund's business planning process through the following approaches;

- **Needs Assessment:** Ensuring that strategic goals and priorities are based on a clear understanding of stakeholder needs and service demands in line with regulations and guidance.
- **Governance Structure and Reporting Mechanism:** Ensuring transparency in planning and prosecution.
- **Benchmarking:** Comparing the Fund's historical performance against industry standards and best practices to identify areas for improvement and innovation.
- **Cost-Benefits Analysis:** Evaluating strategic options by assessing their potential costs relative to expected benefits, to support informed decision-making and optimal resource allocation.

Joined Service Delivery Model

The Northamptonshire Pension Fund operates under a lead authority shared service model, with West Northamptonshire Council acting as the lead authority. This collaborative model maximises VfM through:

- **Shared Resources:** Combining operational functions for Fund management and administration, IT support, and project delivery.
- **Joint Procurement:** Leveraging economies of scale to achieve cost savings, particularly for specialist services, software licensing, and support contracts.
- **Strategic Planning Alignment:** Coordinating projects, strategy and policy development, and service improvements while ensuring the sovereignty and distinct needs of each Fund are protected.
- **Efficiency Gains:** Streamlining processes and reducing duplication of effort.
- **Governance:** Each Fund retains independent governance and oversight structures, ensuring local accountability and decision making.

Technology, Digital Services & System Utilisation

The Fund recognises the essential role of technology in delivering an efficient, accessible, and cost-effective pension service. Investments in digital platforms have enhanced service delivery through:

- **Website Development & Digital Accessibility:** A modern, user-friendly website that provides 24/7 access to essential information, forms, and guidance, compliance with digital accessibility standards.
- **Member Self-Service (Members' Account) Portal:** On-line member accounts for secure access to personal pension details, self-service tools, and digital distribution of documents, such as letter, statement and pensioner payslips.
- **Employer Membership Data Submission Portal:** an on-line platform for employers to securely and promptly manage and transmit member-related data.
- **System Utilisation:** bulk calculations on routine administration exercises and automated distribution of the member communications.

How We Measure Value for Money

The Northamptonshire Pension Fund is committed to ensuring that VfM is achieved and delivered across all aspects of service delivery. This is monitored and ongoing performance is reviewed against the Fund's objectives using a combination of:

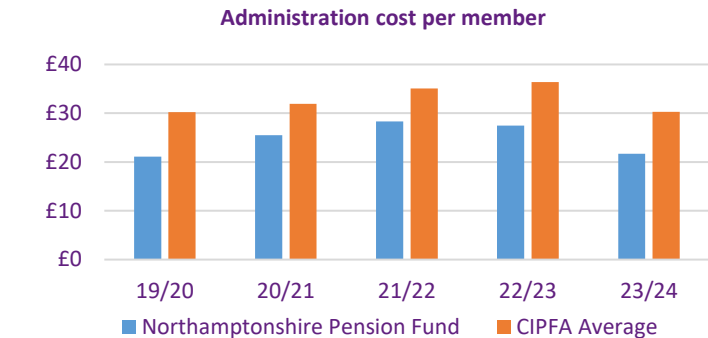
- **Key Performance Indicator (KPI):**

Developed to monitor service delivery, with annual results disclosed in this annual report (see [pages 19 - 22](#)). KPIs are reviewed monthly to monitor and inform where delivery is met, or remedial action is required. The Pension Fund Committee and Pension Fund Board receive quarterly performance updates.

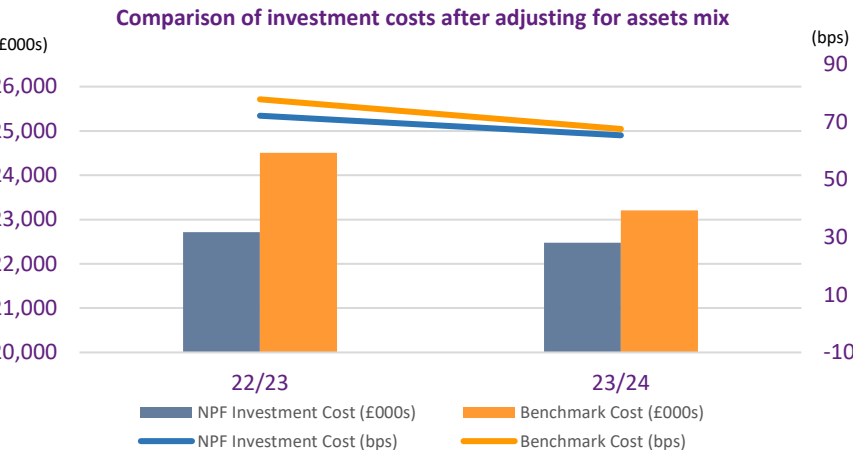
Scheme Administration (continued)

- Benchmarking:**

The Fund participates in the CIPFA Benchmarking club for pensions administration, which enables the comparison of costs and service delivery performance with other LGPS Funds. The graph below presents a five-year comparison between the Northamptonshire Pension Fund against the CIPFA average cost per member.



The Fund also takes part in the CEM investment benchmarking which seeks to provide a more holistic approach to investment management expenses benchmarking. The peer group is selected based on size of assets and includes LPGS funds as well as large global pension funds. The following graph shows the Fund's investment costs in the last two years compared with its benchmark.



*one basis point (bps) is equivalent to 0.01%, meaning that a 100 bps represent a 1% management fee. 40

- Member Satisfaction Survey:**

Surveys are sent to members once their enquiries or requests have been completed by the Fund to monitor non-financial performance. The following table shows the survey results across the two Funds in the last two years.

Member survey	2023-24	2024-25
Number of members surveyed	3443	3099
Number of responses	439	474
Number of responses expressed as a %	12.8%	15.3%
Average score (of 5)	3.92	4.15

Targets

The Northamptonshire Pension Fund is committed to embedding VfM principles within all aspects of strategic and operational planning. These principles are reflected in the following strategies and plans along with their strategic targets, which can be found on the [Fund's website](#).

- Business Plan
- Investment Strategy Statement
- Funding Strategy Statement
- Communications Strategy and Communications Plan
- Administration Strategy

Examples:

Administration performance and customer journey performance is presented to the Pension Committee and Pension Board on a quarterly basis. The customer journey indicators are linked to statutory requirements and encompass all interactions from the start to the end of a process. Since April 2025, the Fund's administration performance targets have been aligned with the national standards issued by CIPFA enabling fair and consistent comparison across funds. The Fund's actual performance against these targets is published in the quarterly Administration Performance Report available [Council's democratic service page](#). Any customer journey targets not met are recorded as a non-material breach on the internal breaches log to review and identify process improvement.

Scheme Administration (continued)

Project work is included in the Fund's Business Plan with progress updates provided quarterly to the Committee and Board. As of March 2025, of 17 projects listed for the reporting period, 12 were completed as scheduled, and 5 were carried forwards due to the external factors. On-going progress can also be tracked in the quarterly Business Plan Updates Report on the [Council's democratic service page](#).

Accountability

Strong governance and oversight are central to delivering VfM within the Fund's strategies and policies and achieving their strategic targets. Independent governance and oversight are preserved by the separate Pension Committee and Local Pension Boards for each Fund, responsible for:

- Setting fund-specific strategies and policies
- Monitoring service performance and financial sustainability
- Ensuring compliance with laws and regulations
- Providing transparency and accountability to stakeholders.

KPI, Business plan update and budget monitoring update are reported quarterly to Pension committee and Local Pension Board. All reports are reviewed by Head of Pension, S151 officer and Monitoring Officer prior to being presented to the Committee and Board.

Continuous Improvement

The Northamptonshire Pension Fund is committed to continuous monitoring and improvement of VFM to achieve the Fund's primary purpose, long term stability of the pension fund to provide pension benefits to scheme members now and in the future.

A Quality Assurance Board is in place and meets regularly to identify opportunities for improvement, alternating between strategic and operational agendas. The discussions are informed by past experiences, regulatory changes, developments in the wider pensions landscape and determinations from the Pension Ombudsman. The board comprises key representatives from each team within the service, ensuring a well-rounded perspectives and coordinated follow-up actions.

The Fund will continue to;

- Review internal processes,
- Monitor performance through KPIs, benchmarking, and the Quality Assurance Board,
- Stay abreast of changes in the external environment and emerging opportunities.

This approach supports innovation and the effective use of technology to enhance service quality in line with VfM principle for all stakeholders.

Scheme Administration (continued)

Internal Dispute Resolution Procedures

The IDRP is a formal dispute procedure through which complaints or disagreements about decisions made by a scheme employer or the Fund are investigated and resolved. The LGPS regulations provide a two-stage process.

Stage 1 disputes are decided by the Head of Pensions if the complaint concerns an administering authority decision, or by an adjudicator appointed by the employer if an employer decision.

At Stage 2, the complaint is considered by West Northamptonshire Council's Monitoring Officer, and if the complainant is still unhappy with the decision they may formally refer the case to The Pensions Ombudsman.

The details of the Fund's IDRP process can be accessed via [the website](#).

At any stage, a scheme member may contact The Pensions Ombudsman for assistance with their complaint, but for a formal complaint to be raised with them both stages of the IDRP would normally need to be completed first. More information can be found on [The Pensions Ombudsman website](#).

The following formal disputes have arisen and/or been resolved during 2023-24 and 2024-25:

2024-25 Nature of dispute	Stage 1 Decision: Member complaint upheld/not upheld/partially upheld	Stage 2 Decision: Stage 1 decision upheld/not upheld/partially upheld
Challenge on maladministration regarding delays to paying pension entitlement and specifically payments of AVCs causing a financial loss.)	Partially upheld.	Not progressed to Stage 2
Challenge on handling of AVCS not transferred from another LGPS Fund and this not being identified at retirement, which limited options.	Partially upheld	Not progressed to Stage 2
Challenge on maladministration causing delays in paying pension entitlement and benefits from AVCs.	Upheld	Not progressed to Stage 2
2023-24 Nature of dispute	Stage 1 Decision: Member complaint upheld/not upheld/partially upheld	Stage 2 Decision: Stage 1 decision upheld/not upheld/partially upheld
Challenge for not allowing a transfer of AVCs and complaint of maladministration. (prior year)	Partially upheld.	Not progressed to State 2
Challenge on the payment of death grant (prior year)	Not upheld	Upheld
Challenge on the delays encountered in paying pension & AVCs.	Not upheld	Upheld
Challenge for not allowing a deferred pension to be paid on ill health grounds (exited employer). (prior year)	Not upheld	Upheld
Challenge on the refusal to allow change of structure of benefits in payment.	Not Upheld	Not progressed to State 2
Challenge on maladministration regarding delays in paying entitlement specifically AVCs.	Upheld	Not progressed to State 2

Scheme Administration (continued)

The Pensions Ombudsman

The Fund is not aware when a member has raised a dispute with The Pensions Ombudsman (TPO) unless:

- we have had initial contact from TPO in that year,
- the case has been resolved by acceptance of an opinion from a TPO adjudicator in that year (even if that is deemed as withdrawal of the complaint/dispute), and
- the case has been resolved by a TPO determination in that year.

The Pensions Ombudsman notified the Fund in 2023-2024 that a complaint had been received relating to an administering authority decision. The complaint related to the inability to transfer out pension benefits following redundancy after having attained normal pension age. The senior Adjudicator at the Pensions Ombudsman confirmed that the member accepted the original complaint to them cannot be upheld and the complaint was closed.

The Pensions Ombudsman notified the Fund in 2024-25 that a complaint had been received relating to an administering authority decision. The complaint relates to a pension administration system issue where commutation of pension for additional lump sum option was presented to this Pension Credit member via their online pension account when this option was not available to them under the regulations. The outcome has yet to be determined.

Complaints

Should you have a complaint about the service, we will do our best to put things right. To access support, please contact Pensions@westnorthants.gov.uk, telephone 01604 526 471, or write to:

Pensions Service, West Northamptonshire Council, One Angel Squire, Angel Street, Northampton, NN1 1ED

The Fund received 14 complaints during 2024-25, which were managed outside IDRPs (2023-24:17). An outline of the reasons for the complaints is as below;

Reason for complaint	Number of complaint
Administrative delays	9
Administrative error	3
Death grant award	1
Transfer of benefits	1
Total complaints	14

Member Satisfaction levels

A member satisfaction survey is sent to a member once their enquiries or requests have been completed by the Fund.

For the financial year 2024-25, the member satisfaction survey has been sent to 1,458 members. The Fund has received 182 responses in total (12.5% reply rate) with average score of 4.12 out of 5.

Employer satisfaction levels

During 2024-25, the Fund hosted two employer communication events. These events saw participation from 83 attendees representing 165 scheme employers. The purpose of these gatherings was to discuss specific topics and provide a platform for scheme employers to question and voice their opinions. Although no employer satisfaction survey was conducted in 2024-25, the next survey is scheduled for 2025-26

Governance and Training

Risk Management

The Northamptonshire Pension Fund has both a risk strategy and a risk register in place to identify, evaluate, mitigate and monitor risks associated with the activities that the Fund carries out. Risk is managed through regular reporting to the Pensions Committee, Local Pension Boards, West Northamptonshire Council's Monitoring Officer and Section 151 Officer. This ensures that risks are integrated within the governance structure of West Northamptonshire Council and all follow a consistent approach. Identified risks are recorded in the Risk Register, a copy of which can be found at: [Risk Register](#)

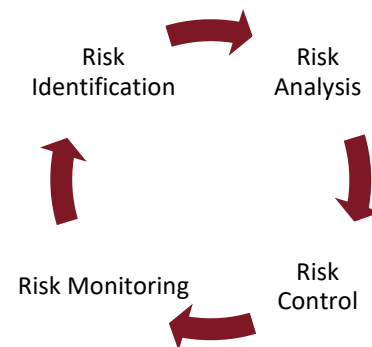
The aim of the Risk Register is to ensure that an informed decision can be made on whether a risk can, or should be accepted. Risk appetite is informed by an understanding of any existing controls and will also be influenced by the expected reward or outcome. Once risks have been identified the Fund assesses the impact and likelihood of a risk to enable effective decision making.

Risks recorded in the Risk Register are linked and managed in line with the Pension Fund objectives to ensure relevance and are reviewed by the Pension Fund Committee twice a year and the Local Pension Board quarterly. New risks are therefore identified promptly and current risks are monitored on a regular basis, with risk ratings revised where necessary. The accompanying Risk Strategy is reviewed on an annual basis to ensure it remains relevant to support the Risk Register.

The Risk Strategy and Risk Register covers key administration, governance and investment (including pooling) risks.

Third party risks are managed through the Risk Register and associated policies, such as the Payment of Pension Contributions Policy. Mitigations are put in place to minimise third party risks and, in particular, the risks associated with Scheme Employers and effective covenant monitoring.

The Administering Authority's risk management process is in line with that recommended by CIPFA and is a continuous approach which systematically looks at risks surrounding the Fund's past, present and future activities. The main processes involved in risk management are identified in the figure to the right:



Cyber Risk

Cyber risks are managed through the Risk Register. In addition, as cyber-crime continues to evolve and becomes increasingly sophisticated, a Cyber Action Plan has been developed and is regularly reviewed by Officers. All updates of the Cyber Action Plan are reported as an exempt appendix to the Business Plan Update report at each meeting of the Pension Fund Committee and Local Pension Board.

The Fund's Cyber Strategy sets out the Fund's approach to cyber governance and incorporates evaluation of key cyber risks. The first version of the Cyber Strategy was reviewed and agreed by the Pension Fund Committee, following collaboration with the Local Pension Board in September 2021. The strategy was formally reviewed during 2024/25 and the revised strategy was approved by the Committee in December 2024.

Investment Risk

The Fund's Investment Strategy Statement, which is reviewed annually, sets out the Fund's investment strategy which incorporates evaluation of key investment risks.

In addition, the Statement of Accounts section of this document, provides further information about Investment risks and how they apply to the Investment Assets held by the Fund.

Governance and Training (continued)

Investment Risk (continued)

There are many risks inherent in investments. The Fund addresses these in the following ways:

Market Risk – investments will reduce in value due to fluctuations in prices, interest rates, exchange rates and credit spreads.	The Fund invests in different markets across the world and in different types of investment to reduce the risk of the portfolio reducing in value due to adverse market conditions and to smooth returns.
Price Risk – investments may be incorrectly valued due to price fluctuations or estimates used in pricing.	Investments are valued at published prices, where available. Investments that are not sold on a market are valued by specialist Investment Managers. Notes 16, 17 and 18 in the Statement of Accounts gives information about how investments are valued and gives an indication of the value of investments subject to an element of estimation.

Risk Assurance

The objective of an internal audit is to educate management and employees about how they can improve business operations and efficiencies while giving reliability and credibility to the financial reports that go to Pension Fund Committee and the Local Pension Board. Following the internal audit conducted in 2023/24, which provided the Fund with a good level of assurance regarding its administration, the Fund’s Internal Auditor has completed a risk assessment to inform a new three-year internal audit strategy and plan commencing in 2025/26. This new plan is expected to provide continued assurance over the Fund’s operation in the years ahead.

At year end all Investment Managers, including Waystone Management who are the Operator of the ACCESS pool ([page 54](#)), are required to provide ISAE 3402 Services Organisation Control Reports, which are made available to external audit.

There were no issues identified in following a review of the reports received by the Investment Managers.

A risk management dashboard has been introduced in 2024/25, providing a high-level overview of the Northamptonshire Pension Fund’s risk profile. The profile includes the total number of risks and collective risk index between reviews as well as how those risks are distributed across high, medium and low residual risk ratings.

Risk assurances against any red and amber risks were also introduced to provide additional reassurance surrounding the management of the higher risks facing the Fund. The table contains tangible indicators to monitor performance of these risks against targets/tolerances.

Governance and Training (continued)

Policies and Strategy Statements

Information about the Fund's policies and procedures can be found on the Fund's website:

[Northamptonshire Pension Fund Key Documents](#)

The following strategies and policies were in place during the financial year

- Administering Authority Discretions
- Administration Strategy
- Admitted Bodies Scheme Employers and Bulk Transfers Policy
- Annual Business Plan & Medium-Term Strategy
- Anti-Fraud and Corruption Policy
- Cash Management Strategy
- Cessations Policy
- Communications Strategy
- Conflicts of Interest Policy
- Data Improvement Policy
- Data Retention Policy
- Employer Data Retention Policy
- Funding Strategy Statement
- Governance and Compliance Statement
- Investment Strategy Statement
- Overpayment of Pension Policy
- Payment of Employee and Employer Pension Contributions Policy
- Reporting Breaches of the Law to the Pensions Regulator Policy
- Review of Contribution Rate Policy
- Risk Register
- Risk Strategy
- Training Strategy
- The Fund also has a Cyber Strategy, however this is not published due to its sensitive nature

The following other documentation is in place during the financial year

- Climate Action Plan
- Communications Plan
- Cyber Action Plan
- Data Improvement Plan
- Decarbonisation Dashboard
- Full Privacy notice
- Personal Data Retention Policy Expectations
- EDI Action Plan
- Effectiveness Review Action Plan
- General code of Practice Action Plan

Policies and strategies are reviewed by the Pension Fund Committee on a three-year cycle to ensure they remain relevant and fit for purpose. Officers review all policies and strategies on an annual basis to ensure they remain fit for purpose and apply non-material amendments. If there are any material changes required, Committee approval is required before the three-year formal review point

Statement/Policy Changes in 2024-25

The following strategies and policies have been reviewed and updated accordingly in 2024-25:

- Administration Strategy
- Admissions Bodies, Scheme Employers and Bulk Transfers Policy
- Annual Business Plan and Medium-Term Strategy
- Anti-Fraud and Corruption Policy
- Climate Action Plan
- Communications Plan
- Communications Strategy
- Cyber Strategy
- Overpayment of Pension Entitlement and Debt Recovery Policy
- Risk Strategy
- Training Strategy

Governance and Training (continued)

Managing Decision Making

West Northamptonshire Council has established a Pension Fund Committee (PFC) and Investment Sub-Committee (ISC) having strategic and operational investment decision making powers, respectively.

Membership of both bodies consist of elected members, and non-elected employer and scheme member representatives. All members of the ISC sit on the PFC.

The PFC's business covers all Fund matters with the exception of non-strategic investment issues, which are delegated to the ISC. Officers across the operations, investment, transactions, corporate and governance functions support the PFC and ISC as required. All meetings of the PFC and ISC are in person and duly minuted.

PFC members and ISC members are required to attain a desired level of skills and knowledge, to ensure decisions being made on behalf of the Fund are made with full understanding of the impact and therefore mitigating the risk of unfounded decisions.

The Committee members must at all times be conscious of their accountability to stakeholders. The PFC is responsible for determining the nature and extent of any significant risks taken on by the Administering Authority in the pursuit of its strategic objectives. Risk management should be dynamic and comprehensive, considering operational, reputational and environmental, social and governance (ESG) risks in addition to financial risks.

West Northamptonshire Council acknowledged the establishment of the ACCESS Joint Committee (AJC) delegating powers to this body in response to the Government's pooling agenda. The Chairman of the PFC represents the Fund on the AJC, supported by Fund officers working in the ACCESS Officers Working Group (OWG).

The Local Pension Board (LPB) was established on 1 April 2015, providing an additional layer of governance for the Fund. The LPB is non-decision making but has the responsibility of assisting the Administering Authority to:

- Secure compliance with the Local Government Pension Scheme (LGPS) regulations and other legislation relating to the governance and administration of the LGPS and also the requirements imposed by the Pensions Regulator in relation to the LGPS; and
- Ensure the effective and efficient governance and administration of the LGPS.

LPB members are also required to attain a desired level of skills and knowledge, in order to exercise their authority to assist Administering authority to secure compliance with the various legislation and to ensure the effective and efficient governance and administration of the scheme.

The LPB has provided a separate annual report of its activities to Council for this financial year.

All PFC, ISC and LPB members have the right to vote at each meeting.

Pension Fund Committee and Local Pension Board Training

In July 2021, CIPFA published its revised Knowledge and Skills Framework aimed at Pension Fund Committee and Board members as well as senior officers. The principles of the guide include the need for formal objectives, policies, practices and strategies concerning knowledge and skills of those responsible for the fund. Administering authorities must maintain effective, ongoing maintenance and development of knowledge, addressing gaps where required and increasing skills as appropriate.

Northamptonshire Pension Fund has adopted the LGPS Online Learning Academy (LOLA) to deliver training that mirrors the Knowledge and Skills Framework.

Governance and Training (continued)

The areas covered are as follows:

- Committee Role and Pensions Legislation.
- Pensions Governance.
- Pensions Administration.
- Pensions Accounting and Audit Standards.
- Procurement and Relationship Management.
- Investment Performance and Risk Management.
- Financial Markets and Product Knowledge.
- Actuarial methods, Standards and Practice.

The platform also covers current LGPS issues, some examples include understanding McCloud, Pensions Dashboards, Cyber Risk and the Investment Consultation.

The Pension Regulator has an online toolkit designed to help those running public service schemes to understand the governance and administration requirements in the public service schemes Code of Practice. The toolkit is an user friendly resource and covers 7 compulsory short modules.

These are:

- Conflicts of Interests.
- Managing Risk and Internal Controls.
- Maintaining Accurate Member Data.
- Maintaining Member Contributions.
- Providing Information to Members and Others.
- Resolving Internal Disputes.
- Reporting Breaches of the Law.

Completion of the toolkit in conjunction with the CIPFA core competencies will provide Pension Fund Committee and Local Pension Board members with a good grounding for their respective roles. Officers will issue details of the

toolkit upon appointment and will request this to be completed within 6 months. The completion of the LOLA modules and the Pensions Regulator e-learning programme are a compulsory requirements of the Training Strategy for members of the Committee, Board and senior officers.

The online platform will be regularly updated, and members will be notified of the updates via email.

In addition to the compulsory training, the following types of training are also encouraged-

- In-house training events focused on enhancing economy, efficiency and effectiveness.
- Self-improvement and familiarisation with regulations and documents.
- Attending relevant courses, seminars and external events.
- Internally developed training days and pre/post meeting sessions.
- Shared training with other Funds or Asset Pools.
- Regular updates from officers and/or advisers.
- Circulated reading material.
- Topical training events in advance of decisions at meetings.

Progress reports will be monitored by Officers and information provided to both the Chair of the Committee and Board on an annual basis.

For more information the Fund's Training Strategy can be found on our [key documents page](#).

Governance and Training (continued)

Pension Fund Committee and Local Pension Board Membership

The following table shows the attendance of Committee and Board members at applicable Pension Fund Committee, Investment Sub-Committee and Local Pension Board meetings during 2024-25, training undertaken in year, including; Training days, Conferences and Strategic Workshops.

Councillor/Member Name	Representation as at March 25	Committee/Board	Meetings Attended	Training Undertaken (In person and virtual)
Cllr Malcolm Longley	West Northamptonshire Council Chair	Northamptonshire Pension Committee Investment Sub Committee	3 meetings out of 5 4 meetings out of 4	0 external training sessions attended 0 LOLA modules completed
Cllr Charles Morton	West Northamptonshire Council Vice-Chair	Northamptonshire Pension Committee Investment Sub Committee	4 meetings out of 5 4 meetings out of 4	2 external training sessions attended 9 LOLA modules completed
Cllr Phil Bignell	West Northamptonshire Council	Northamptonshire Pension Committee Investment Sub Committee	5 meetings out of 5 4 meetings out of 4	1 external training session attended 9 LOLA modules completed
Cllr Jamie Lane	West Northamptonshire Council	Northamptonshire Pension Committee	0 meetings out of 5	0 external training sessions attended 9 LOLA modules completed
Cllr Peter Matten	West Northamptonshire Council	Northamptonshire Pension Committee	4 meetings out of 5	2 external training sessions attended 9 LOLA modules completed
Cllr Cathrine Russell	West Northamptonshire Council	Northamptonshire Pension Committee Investment Sub Committee	0 meetings out of 5 2 meetings out of 4	1 external training session attended 9 LOLA modules completed
Cllr Graham Lawman	North Northamptonshire Council	Northamptonshire Pension Committee Investment Sub Committee	5 meetings out of 5 4 meetings out of 4	0 external training sessions attended 2 LOLA modules completed
Cllr Lloyd Bunday	North Northamptonshire Council	Northamptonshire Pension Committee	2 meetings out of 5	0 external training sessions attended 9 LOLA modules completed
Keith Holland-Delamere (Appointed May 2024)	West Northamptonshire Council	Northamptonshire Pension Committee	5 meetings out of 5	2 external training sessions attended 3 LOLA modules completed
Robert Austin	All Other Employers	Northamptonshire Pension Committee Investment Sub Committee	1 meeting out of 5 4 meetings out of 4	1 external training session attended 9 LOLA modules completed
Andy Longford	Active Scheme Members	Northamptonshire Pension Committee	1 meetings out of 2	3 external training sessions attended 9 LOLA modules completed
Paul Wheeler	All Other Employers	Northamptonshire Pension Committee	4 meetings out of 5	2 external training sessions attended 9 LOLA modules completed
Peter Borley-Cox	Active Scheme Members	Northamptonshire Pension Committee Investment Sub Committee	2 meetings out of 5 1 meetings out of 2	0 external training sessions attended 9 LOLA modules completed
Elnora Latchman	Deferred and Pensioner Members	Northamptonshire Pension Committee	4 meetings out of 5	2 external training sessions attended 6 LOLA module completed

Governance and Training (continued)

Councillor/Member Name	Representation as at March 25	Committee/Board	Meetings Attended	Training Undertaken (In person and virtual)
Cllr Greg Lunn	Board Scheme Employers	Northamptonshire Pension Board	2 meetings out of 4	0 external training sessions attended 9 LOLA modules completed
Julie Petrie	Board Scheme Members Vice-Chair	Northamptonshire Pension Board	3 meetings out of 4	0 external training sessions attended 9 LOLA modules completed
Cllr Andrew Weatherill	Board Scheme Employers	Northamptonshire Pension Board	4 meetings out of 4	0 external training sessions attended 9 LOLA modules completed
Kev Standish-Day	Board Scheme Members	Northamptonshire Pension Board	3 meetings out of 4	1 external training session attended 9 LOLA modules completed
Katy Downes	Board Scheme Members	Northamptonshire Pension Board	0 meetings out of 1	0 external training sessions attended 9 LOLA modules completed
Alicia Bruce	Board Scheme Employers - Chair	Northamptonshire Pension Board	3 meetings out of 4	1 external training session attended 0 LOLA modules completed
Carol Fowler (Appointed Oct 2024)	Board Scheme Members	Northamptonshire Pension Board	2 meetings out of 2	2 external training sessions attended 9 LOLA modules completed

Summary of Committee Activity

It is the responsibility of the Pension Fund Committee to develop and maintain strategies, policies, and procedures, thus ensuring effective governance, oversight and accountability is upheld on behalf of the Fund's stakeholders.

The below information demonstrates the key decisions and approvals that have been made by the Pension Fund Committee during 2024-25, supported by the Investment Sub-Committee and Pension Fund Board.

Key Governance Activities

- Approval of the Administration Strategy
- Approval of the Overpayment of Pension Entitlement and Debt Recovery Policy
- Approval of the Training Strategy
- Approval of the Communication Strategy and Plan
- Approval of the Payment of Employee and Employer Contributions Policy
- Approval of the Annual Report and Statement of Accounts
- Approval of the Business Plan
- Approval of the Anti-Fraud and Corruption Policy
- Approval of the Cyber Strategy
- Approval of the Admissions and Bulk Transfer Policy
- Review of the General Code of Practice Compliance and Action Plan
- Review of the Equality, Diversity and Inclusion Report (including the Equality, Diversity and Inclusion Action Plan)
- Review of the Northamptonshire Pension Fund Committee and Board Effectiveness Review
- Review of the Multiple Investment Strategies

Governance and Training (continued)

Key Investment Activities

- Annual Investment Review
- Annual Investment Consultancy Provider review

Reports noted

- Administration Report
- Business Plan update
- Governance and Compliance Report
- Employers Admissions and Cessations
- Risk Monitoring
- ACCESS update
- Pensions Dashboard update
- Internal Audit Report

Summary of Board Activity

The below information shows the reports the Local Pension Board have considered during 2024-25.

- Administration report
- Governance and Compliance Report
- Business Plan update
- Valuation update
- ACCESS update
- Review of the Training Strategy
- Review of the Overpayment of Pension Entitlement and Debt Recovery Policy
- Review of the Communication Strategy and Plan
- Review of the Payment of Employee and Employer Contributions Policy
- Review of the Anti-Fraud and Corruption Policy
- Review of the Cyber Strategy
- Review of the Admissions and Bulk Transfer Policy
- Review of the General Code of Practice Compliance and Action Plan
- Review of the Equality, Diversity and Inclusion Report (including the Equality, Diversity and Inclusion Action Plan)
- Review of the Northamptonshire Pension Fund Committee and Board Effectiveness Review
- Risk Monitoring
- Internal Audit Report
- Review of the Administration Strategy
- Annual Report and Statement of Accounts
- Annual Report of the Local Pension Board

A copy of the most recent Local Pension Board Annual Report can be found on the Councils website [here](#).

Governance and Training (continued)

Conflicts of interest

A conflict of interest is defined in section 5(5) of The Public Service Pension Act 2013 as a financial or other interest likely to prejudice the way in which someone carries out their role. It further specifies that a conflict does not include a financial or other interest arising merely by virtue of that person being a member of a relevant pension scheme.

Therefore, a conflict of interest may arise when an individual has a responsibility or duty in relation to the management of, or provision of advice to, the LGPS fund administered by West Northamptonshire Council, and at the same time, they:

- have a separate personal interest (financial or otherwise), or
- have another responsibility in relation to that matter.

This gives rise to a possible conflict with their first responsibility. An interest could also arise due to a family member or close colleague having a separate responsibility or interest in a matter.

West Northamptonshire Council, as Administering Authority will:

- encourage a culture of openness and transparency
- encourage individuals to be vigilant, have a clear understanding of their role and the circumstances in which they may have a conflict of interest, and of how potential conflicts should be managed
- evaluate the nature of any dual interests or responsibilities that are highlighted and assess the impact on the Fund's operations and good governance were an actual conflict of interest to materialise.

One of the key areas of potential conflict relate to the dual roles held by an individual who sits in the governing bodies of the Fund and at the same time is employed or representing West Northamptonshire Council as the Administering Authority to the Fund or/and a participating employer in the Fund.

All declarations should be collated and recorded on the Fund's Register of Conflicts of Interests.

In order for the Administering Authority to fulfil its obligations to manage and

monitor potential conflicts of interests the Pension Fund Committee and the Pension Fund Board must include an item on conflicts of interest at each meeting. The Pension Fund Board must also include an item on conflict of interest in its Annual Report.

The Fund's Register of Conflicts of Interest may be viewed by any interested party at any point in time. It will be made available on request by the Governance and Regulations Manager. To identify whether the objectives of this Policy are being met the Administering Authority will review the Register of Conflicts of Interest on an annual basis and consider whether there have been any potential or actual conflicts of interest that were not declared at the earliest opportunity.

It is inevitable that conflicts of interest will arise, and it is important to recognise that there are various ways that conflict can be managed depending on the individual circumstances.

The three main ways to assist in resolving conflict include:

- the conflicted individual concerned abstaining from the discussion, decision-making or providing advice relating to the relevant issue,
- the conflicted individual being excluded from the relevant meeting(s) and any related correspondence or material in connection with the relevant issue (for example, a report for a Pension Fund Committee meeting), or
- a working group or sub-committee being established which excludes the conflicted individual concerned, to consider the matter outside of the formal meeting (where the terms of reference permit this to happen).

Provided that the Administering Authority (having taken any professional advice deemed to be required) is satisfied that the method of management is satisfactory, the Administering Authority shall endeavour to avoid the need to advise an individual to resign due to a conflict of interest or to request the appointing body to reconsider their appointment to the Board or Committee). Where a Pension Fund Board Member has an actual conflict of interest as defined in the Public Service Pensions Act 2013, the individual will be required to resign from the Board.

For more information the Fund's Conflict of Interest Policy can be found on our [key documents page](#).

Investments

Investment Policy

The Fund's approach to its investment arrangements is set out in its Investment Strategy Statement, (ISS) as required by Regulations that require the Fund to create and maintain an approach to investments that includes, amongst other things:

- a requirement to invest fund money in a wide variety of investments;
- the Fund's assessment of the suitability of different types of investments;
- the Fund's approach to risk, including the ways in which risks are assessed and managed;
- the Fund's approach to pooling investments;
- the Fund's policy on how social, environmental and corporate governance considerations are taken into account; and
- the Fund's policy on the exercise of the rights (including voting rights) attaching to investments.

The Pensions Fund Committee (PFC) approves investment policies and strategy and an Investment Sub-Committee (ISC), which is supported by the Fund's Advisors, implements these investment policies and strategy, which includes the appointment and dismissal of Investment Managers and monitoring of performance.

The Fund adopts a long-term perspective, focussing its investment strategy to generate sustainable returns on a risk adjusted basis to grow the Fund's assets to reflect its equally long-term future liabilities. The PFC, Local Pensions Board, Fund officers and professional advisors have worked hard to develop an enhanced responsible investment (RI) policy, which forms part of our overall investment strategy. The RI policy sets out our approach to sustainable responsible investment and will help us manage the carbon and climate risks impacting our investments better.

The RI policy was agreed following a consultation that was open to scheme members and scheme employers. You can find a copy of the summary consultation responses and an updated investment strategy statement on our [key documents page](#).

The revised RI policy will inevitably mean some changes to our underlying investments over time. In February 2022, the Investment Sub Committee approved decarbonisation targets to reduce the carbon emissions of listed equities by 25% by 2024 and by 59% by 2030 together with a climate action plan for 2022, 2023 and beyond.

The Fund has been decarbonising the portfolio at the same rate as the European Policy Curve meaning the Funds decarbonisation pathway would align with Paris Accord and achieve the ambitions target to reach net zero by 2050 or earlier.

Progress against these targets are being reviewed regularly via a climate dashboard setting out key carbon metrics which are being measured and tracked over time. Regular communication will be provided on how the Fund is progressing on its journey to achieve net zero.

You can find copies of the Funds climate action plan, decarbonisation pathway, and climate dashboard on the [key documents page](#).

The Fund is a member of the Local Authority Pension Fund Forum (LAPFF), which is a voluntary association of LGPS funds that seeks to protect and enhance the value of its members' shareholdings by way of shareholder engagement, by action on corporate governance issues and by seeking to promote the highest standards of corporate social responsibility at the companies in which LAPFF members invest. Through LAPFF, the Fund exercises its belief that engagement with company management to promote improvements in SRI practices is more powerful than divesting from the company's shares. The Fund is also a subscriber to CIPFA and Pensions and Lifetime Savings Association (PLSA).

The Fund will continue to support the principles of the UK Stewardship Code (the "Stewardship Code").

Investments (continued)

Voting Rights

The Fund has delegated the exercise of voting rights to all investment managers on the basis that voting power will be exercised by them with the objective of preserving and enhancing long-term shareholder value. These findings are reported to the ISC for review periodically.

Waystone, the operator of the ACCESS Pool, requires investment managers appointed by the Pool to exercise their voting rights in line with the agreed ACCESS voting guidelines. Where investment managers on the platform do not adopt the positions set out in the Waystone policy, they are required to provide a robust explanation of the position adopted on a comply or explain basis in each sub-fund prospectus. This information is also included in the Fund's own stewardship reporting.

Information about Investment Manager voting is available at [Northamptonshire Pension Fund Key Documents](#)

Role of Investment Managers

Each Investment Manager relationship is governed by an Investment Management Agreement, which sets out how much they can invest, the asset class in which the Fund has employed them to invest, the expected target return and how much the Fund will pay for this service.

Active focus

With the exception of the passive global equity and passive index-linked bond mandates, the Fund favours an active management style to outperform agreed specific benchmarks.

Custodian

The Fund's Custodian is Northern Trust. The Custodian is responsible for ensuring that the Fund has good title to all investments, that all trades instructed by Investment Managers are settled on time and that all income due to the Fund is received and recorded accurately. Northern Trust also maintain the investment accounting records for the Fund.

Investment Management Fees

Fees of external Investment Managers and the Custodian are agreed in the respective mandates governing their appointments. Broadly, these are based on the market value of the investments under their management and therefore

increase or reduce as the value of these investments change. For investments like actively managed equities, private equity etc the investment management fee is higher as the expected return is also meant to be higher. All returns are reported net of fees to give a true view of performance achieved by the Fund.

Asset Pooling

The Fund is currently a member of the ACCESS asset pool, which includes an FCA-regulated operator, Waystone, and a small centralised support function. ACCESS was established in response to the Government's LGPS reform agenda, which encouraged LGPS Funds to collaborate in pooling investments to generate efficiency savings, while maintaining investment performance. As of 31st March 2025, the ACCESS Pool holds assets worth £66.7bn (with 74% pooled) serving 3,517 employers and 1.2million members.

As of 31 March 2025, the Northamptonshire Fund has invested £1,517.1m in the ACCESS pool and £1,496m under pool management resulting in pooled assets of £3,013m, representing 80.8% of the Fund's total assets.

In July 2024, the Government launched a pensions review and subsequently published the LGPS Fit for the Future consultation in November 2024. Based on this consultation, all pools must be established as FCA-regulated investment management companies, possessing the expertise and capacity to implement investment strategies. ACCESS submitted a proposal to become an FCA-regulated investment management company, but this was not supported by Government.

The Fund has evaluated alternative pooling options with the support of its investment consultant. Following this evaluation, the Fund has concluded that Border to Coast Pension Partnership (BCPP) is its preferred pooling partner. An Expression of interest to join the BCPP pool was submitted, alongside 6 other LGPS funds from ACCESS.

Further investment and operational due diligence is being undertaken, along with the necessary governance steps to progress the transition from ACCESS to BCPP. This includes approval of the BCPP partner authorities and the Fund's administering authority, West Northamptonshire Council, becoming a shareholder in BCPP.

Further updates will be provided on the Fund's website and through other communication channels.

Investments (continued)

Asset Pooling continued

The ACCESS Support Unit (ASU) has been created to manage the Operator contract against specified KPIs and provide technical and secretariat support services to the AJC and Officer Working Group (OWG).

In addition to the savings in Investment Management fees through joint investments, there are other tangible benefits from pooling including a governance premium (potential for reduced risk due to manager diversification achieved at pool level), improved performance and tax savings.

More information about the ACCESS asset pool, including the ACCESS Annual Report, can be found on their website: [ACCESS Pool](#).

The below table reports the progress the Fund has made in pooling their assets across the different asset classes.

Asset class	£m Asset values as at 31 March 2024				£m Asset values as at 31 March 2025			
	Pooled	Under pooled management	Not pooled	Total	Pooled	Under pooled management	Not pooled	Total
Equities	869.3	775.4	0.0	1,644.7	828.9	768.0	0.0	1,596.9
Bonds	514.0	493.5	0.0	1,007.5	575.1	550.2	0.0	1,125.3
Property	74.8	0.0	205.4	280.2	317.4	0.0	47.6	365.0
Diversified Growth Funds	107.2	0.0	0.0	107.2	0.0	0.0	0.0	0.0
Private Equity	0.0	0.0	272.3	272.3	0.0	20.6	288.1	308.7
Infrastructure	0.0	130.0	83.8	213.8	0.0	161.3	84.1	245.4
Dervatives	0.0	0.1	0.0	0.1	0.0	0.0	0.0	0.0
Cash and net current assets	0.0	0.0	81.3	81.3	0.0	0.0	96.4	96.4
Total	1,565.3	1,399.0	642.8	3,607.1	1,721.4	1,500.1	516.2	3,737.7

Pooled means assets invested through the Fund's chosen pool.

Under pool management means that the pool is responsible for the oversight or discretionary management of the investment, whether or not procured through the pool, (including passive market index tracker funds procured before pooling).

Not pooled means that the asset is neither pooled nor under pool management.

The Fund will maintain the current commitments during 2025-26 until the changes required from the Government's pension reforms, Fit for Future consultation.

Investments (continued)

Asset Pooling continued

A significant proportion (30.0%) of the Fund's assets are currently invested in UK assets. The below table sets out the Fund's investments in the United Kingdom in 2023-24 and 2024-25 by asset class.

Asset class	£m Asset values as at 31 March 2024				£m Asset values as at 31 March 2025			
	Pooled	Under pooled management	Not pooled	Total	Pooled	Under pooled management	Not pooled	Total
UK Listed Equities	51.6	207.3	0.0	258.9	48.9	27.4	0.0	76.3
UK Government Bonds	0.0	493.5	0.0	493.5	51.9	550.2	0.0	602.1
UK Property	74.8	0.0	180.8	255.6	290.0	0.0	47.6	337.6
UK Infrastructure	0.0	0.0	58.7	58.7	0.0	12.8	62.9	75.7
UK Private Equity	0.0	0.0	0.7	0.7	0.0	6.6	25.1	31.7
Total	126.4	700.8	240.2	1,067.4	390.8	597.0	135.6	1,123.4

UK Levelling Up

"Levelling up" refers to assets that make a measurable contributions to one of the missions set up in the Statement of Levelling Up Missions (made under Section 1 of the Levelling Up and Regeneration Act 2023), which was presented to the UK Parliament by the former government, and support any local areas within the United Kingdom. The following-up policy initiative related to this statement confirmed that funds are expected to publish plans for increasing investment in line with an ambition of up to 5% of assets being invested in projects which support levelling up.

As at the 31 March 2025 the Fund has 3% invested in levelling up assets:

£m Asset values as at 31 March 2025	Under pooled management				% Percentage of Total Fund
	Pooled	Under pooled management	Not pooled	Total	
UK Levelling up	0	6.6	95.4	102.0	3%

Investments (continued)

The Costs of Pooling

The costs of setting up the ACCESS pool and the operating cost of the pool are collected by a nominated host authority and re-charged in equal shares to the eleven ACCESS funds. Northamptonshire's share of costs is reported within Oversight and Governance Costs in Note 11 to the Statement of Accounts and comprises the following:

Operational Costs	2024-25 £000	2015-16 to 2024-25 Cumulative £000
Strategic & Technical	97.3	339.0
Legal	49.7	215.3
Project Management	0	81.1
ACCESS Support Unit	63.3	331.5
Other	13.9	55.0
Total Operational Costs	224.2	1,021.9

Cost Transparency

The analysis below shows the investment expenses incurred during the financial year 2024-25 between expenses incurred in respect of Pooled Assets held in the ACCESS Pool and those assets held outside of the pool.

	Asset Pool			Non- Asset Pool			Fund Total	
	Direct	Indirect	Total	Direct	Indirect	Total		
	£000	£000	£000	£000	£000	£000	£000	£000
Investment Management Fee	7,076	1,194	8,270	3,183	-42	3,141		11,411
Performance Fee	1,308	2	1,310	-700	642	-58		1,252
Transaction taxes	269	0	269	0	0	0		269
Broker commissions	300	0	300	0	0	0		300
Other explicit costs	-333	0	-333	293	0	293		-40
Implicit/indirect transaction costs	0	3,460	3,460	0	-681	-681		2,779
Administration	380	0	380	1,071	0	1,071		1,451
Governance and Compliance	299	0	299	352	0	352		651
Other	-421	3,856	3,435	-183	1,995	1,812		5,247
Total	8,878	8,512	17,390	4,016	1,914	5,930		23,320

Pooling Savings

Gross savings are calculated using the Chartered Institute of Public Finance and Accountancy price variance methodology based on average assets over the year. Net savings are calculated by subtracting the costs of pooling from the gross savings.

The below table sets out the gross and net fee savings for the 2024-25 financial year.

Savings	2024-25 £000	2015-16 to 2024-25 Cumulative £000
Gross savings	2,697.9	11,945.8
Fees	-224.2	-1,021.8
Net savings	2,473.7	10,924.0

Investments (continued)

Investment Allocation and Performance

The Pension Fund Committee (PFC) performed a review of the Strategic Asset Allocation at the March 2023 meeting in conjunction with the Fund's Investment Consultants, Mercer Ltd and the independent Investment Advisor.

The following changes to the strategy were approved by PFC in March 2023:

- Reduce the equity allocation by 12.5%, removing the standalone UK equity allocation and retaining the passive equity allocation at 20%;
- Increase fixed income (+10%) and alternatives (+2.5%) allocations to provide greater exposure to inflation linked, cashflow generative assets while protecting the strong funding position;
- Remove the Diversified Growth Fund (DGF) (-5%) within the alternatives allocation to facilitate direct investment across private market alternative assets;
- Consider sustainable and impact opportunities across an expanded private markets portfolio –aligned with “levelling up” guidance.

The following changes have been carried out during the year to reach the new strategic asset allocations.

- Implement final DGF (£107m) sale to fund increased private market allocations,
- Implement equity (£71m) sales to fund increased private market allocations,
- Invested in a long lease property manager (£40m),
- Invested in Timberland manager (\$16m),
- Invested in Social & Affordable Housing manager (£20m),
- Implement equity sales (£60) to fund increase allocation in index-linked gilts,
- Increased exposure in infrastructure (£64m).

The next review of the strategic asset allocation will take place in March 2026.

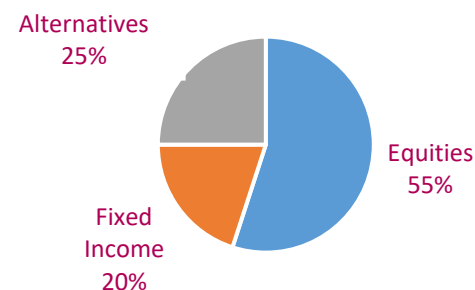
The following changes have been made as part of the work within the ACCESS pool

- Review of the Fund's equity portfolio, the Fund replaced their “value” equity manager during the year (£288m),
- Transition of property assets (£211m) into the pool.

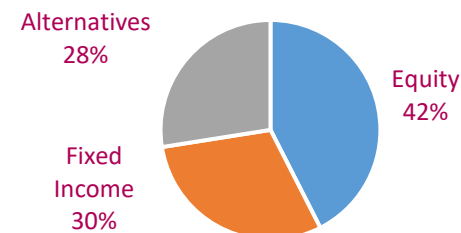
To reduce the risk on currency, the Fund transitioned two of their holdings with their global infrastructure managers to a GBP hedged share class (£154m).

The charts below show the strategic asset allocation before and following PFC approval and the actual allocation of assets at 31 March 2025.

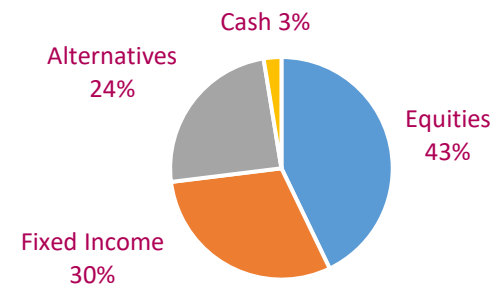
Strategic Allocation at 31 March 2023



Strategic Allocation at 31 March 2024



Actual Allocation at 31 March 2025



Investments (continued)

Total Fund Performance

The total investment return for the Fund over the financial year was 3.2% net of fees compared with a weighted benchmark return of 4.5%. In the previous year the total investment return was 10.7% compared with a weighted benchmark of 12.3%. The Fund's total investment return was 3.0% p.a over the three years to 31 March 2025 and 8.7% p.a over the five years to 31 March 2025.

Performance of Managers

The ISC continues to monitor the Investment Managers' performance against their benchmark at their quarterly meetings. All managers are measured against market-based performance benchmarks with bespoke outperformance targets set for active managers which are expected to be met over a three to five year period. Net of fees performance of each manager compared to benchmark over one year is shown in the table below.

Asset Class /Manager	Benchmark	Return %	Benchmark %	Variance %
Dodge & Cox – Equity	MSCI AC World (NDR) Index	n/a	n/a	n/a
Baillie Gifford – Equity	MSCI AC World (NDR) Index	5.8	4.9	0.9
Longview – Equity	MSCI World (NDR) Index	-1.4	4.9	-6.3
UBS –Equity	FTSE Developed (GBP Hedged) Index	7.8	7.9	-0.1
Osmosis – Equity	Solactive Osmosis Resource Efficient Core Equity Ex-Fossil Fuels Index NTR	3.9	4.0	-0.1
UBS - Index Linked Gilts	Composite	-10.5	-10.4	-0.1
BlueBay – Multi Asset Credit	Composite	6.8	7.6	-0.8
M&G Alpha Opportunities - Multi Asset Credit	Composite	9.1	7.6	1.5
CBRE – Property	MSCI All Balanced Property Funds Index	6.2	6.4	-0.2
Aviva – Property	Composite	2.8	7.3	-4.5
M&G – Residential Property	Composite	2.3	7.3	-5.0
M&G Shared Ownership – Property	Composite	2.7	7.3	-4.6
HarbourVest – Private Equity	MSCI World Index	9.6	9.7	-0.1
Adams Street – Private Equity	MSCI World Index	7.1	9.7	-2.6
Ares Capital – Infrastructure Debt	IRR of 10.0% p.a.	8.9	10.0	-1.1
Allianz – Infrastructure Debt	IRR of 4.0% p.a.	-1.7	4.0	-5.7
IFM Infrastructure	IRR of 10.0% p.a.	4.6	10.0	-5.4
JP Morgan Infrastructure	IRR of 10.0% p.a.	7.6	10.0	-2.4
Stafford - Timberland	IRR of 10.0% p.a.	n/a	n/a	n/a

n/a = Not invested for the full period therefore no meaningful performance measure is available

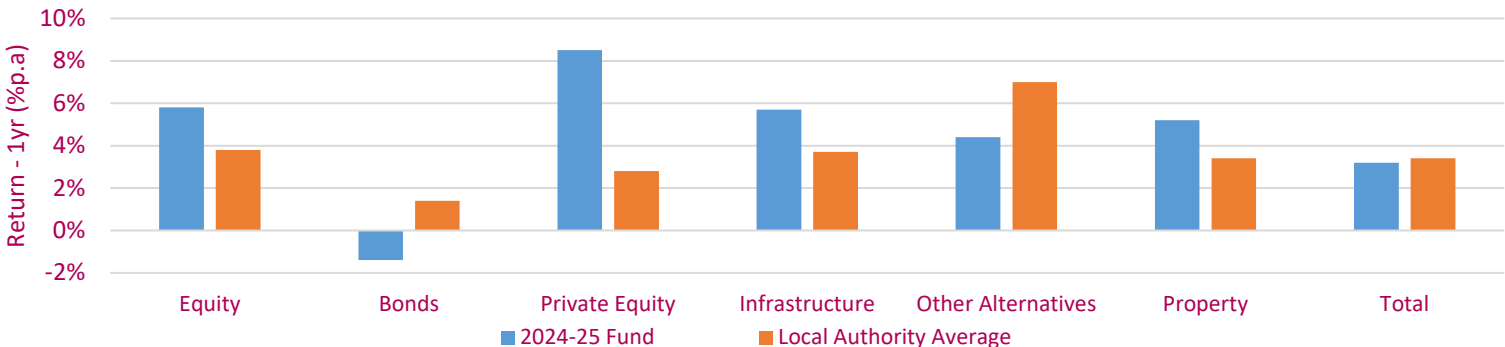
Investments (continued)

Performance in Comparison with Local Authority Universe

The Local Authority Universe is a national scheme consisting of 63 pension funds collated by PIRC Ltd that provides benchmarking of local authority pension funds investment performance.

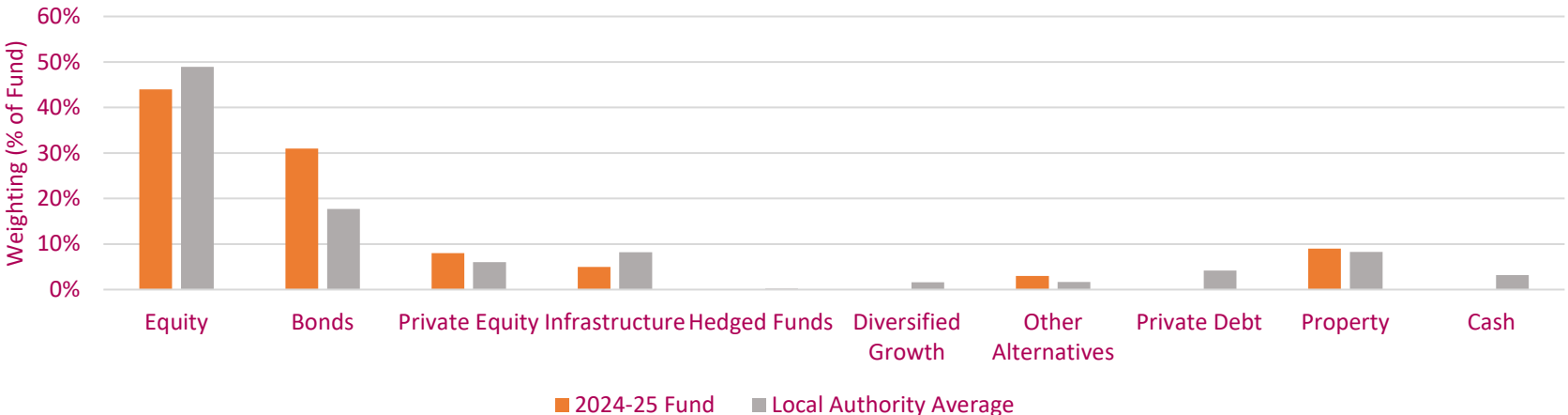
In 2024-25 the Fund’s performance of 3.2% net of fees over the financial year was ranked 61st percentile out of the 62 Funds participating in the Universe.

Investment Return compared to Local Authority Universe



The Fund’s current strategy has a higher allocation to Bonds and diversified growth and a lower allocation to Equities and Infrastructure when compared to the Local Authority Universe.

Investment Allocation compared to Local Authority Universe



Investments (continued)

Climate Change Report

Executive summary

The Fund recognises the systemic risk associated with climate change as well as local government targets in this regard and the views and aspirations of other scheme employers and scheme members.

In order to manage this systemic risk and to align with its support of the Paris Agreement and a “just transition”, the Fund’s Listed Equity portfolio has the following decarbonisation targets: a 25% reduction by 2024, a 59% reduction by 2030, and achieving net zero by 2050 or earlier. **The Fund has achieved its 2024 target during the year.**





The Fund is working towards producing climate change reports in future which comply with Task Force on Climate-Related Financial Disclosures (“TCFD”) reporting recommendations, which are expected to become mandatory for LGPS Funds in the coming years.

This report provides a summary of the Fund’s position as it relates to climate change, assessed across the four pillars under the TCFD Framework:

- **Governance:** How the Pension Fund Committee (PFC) maintains oversight and incorporates climate change into its decision making;
- **Strategy:** How potential future climate warming scenarios could impact the Fund;
- **Risk Management:** How climate-related risk is incorporated in the Fund’s broader risk management processes; and
- **Metrics and Targets:** How the PFC measures, and monitors progress against different climate related indicators known as metrics and targets.



The framework aims to:

-  Improve climate-related data quality
-  Increase focus on climate change
-  Enable more informed decisions
-  Provide a consistent framework for comparison

Governance

The Administering Authority has delegated to the PFC the power to determine and maintain the Fund’s strategies, policies and procedures. Implementation of the strategy and the monitoring of performance is delegated to the Investment Sub-Committee (ISC), for which the membership is drawn from the PFC.

Research into how climate-related risks and opportunities impact financial markets is constantly evolving and expanding. The PFC or its ISC receives training on a regular basis to keep up-to-date with developments and will allocate time on meeting agendas to cover items such as developing and meeting the Fund’s climate action plan, climate-change scenario analysis, reporting of metrics and monitoring of progress against agreed targets.

The PFC acknowledges that the reporting of climate-related risk is relatively new and the collective experience of the PFC and ISC will grow over time.

Climate change will form an explicit agenda item at least annually for the PFC or ISC when the Fund’s climate action plan and / or when the Fund’s annual climate change report is updated. It will also be covered as part of other agenda items as part of a wider discussion of funding or investment strategy, or as part of the investment manager appointment and review discussions.

Strategy

The Fund undertook climate scenario analysis on its investment strategy in 2021. Given the uncertainty around the timing and impact of climate-related transition and physical risks, the ISC considered three climate scenarios or ‘warming pathways’ i.e. the expected degrees of warming of the atmosphere by the end of the century relative to pre-industrial levels, to help test the resiliency of the Fund’s investment strategies at the strategic level.

Investments (continued)

Whilst a lower warming pathway (2°C scenario) is one in which governments, businesses and society should aim for as a minimum, there is a possibility that a failure to reduce GHG emissions quickly enough could set off irreversible feedback loops that significantly warms the planet (as modelled by 3°C and 4°C scenarios).

The Fund will be impacted by climate change, regardless of the scenario that unfolds.

Resilience of the Fund's investment strategy

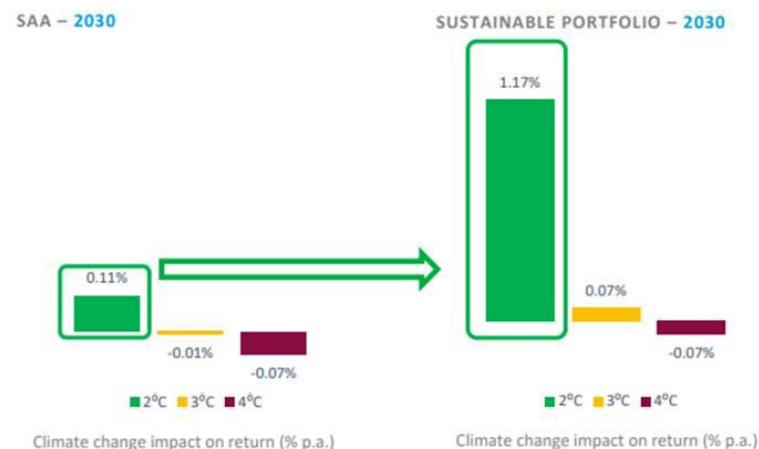
The graphic below shows how a 2°C scenario leads to enhanced projected returns for the Fund's investment strategy versus 3°C or 4°C scenarios, with the greatest impact over the period to 2030.

CLIMATE CHANGE IMPACT ON RETURN (% P.A.)		
2°C	2030	0.11%
	2050	-0.05%
	2100	-0.07%
3°C	2030	-0.01%
	2050	-0.06%
	2100	-0.09%
4°C	2030	-0.07%
	2050	-0.13%
	2100	-0.16%

■ ≤ -10 bps
 ■ > -10 bps, < 10bps
 ■ ≥ 10 bps

Transition opportunities emerge from a 2°C scenario

The graphic below illustrates the benefits of investing sustainably (i.e. in a portfolio broadly aligned with the Fund's investment strategy but where asset class exposures are mapped to sustainable equivalents).



As at 30 June 2021. Source: Mercer/Investment Managers

Under the 2°C scenario, to 2030, the Sustainable Portfolio is expected to benefit by up to +15.0% on a cumulative basis, compared with the Fund's investment strategy.

Key findings of the analysis

Investing for a 2°C scenario is both an imperative and an opportunity the Fund should address.

- An imperative, since, for nearly all asset classes and timeframes, a 2°C scenario leads to enhanced projected returns versus 3°C or 4°C and a better investment outcome.
- An opportunity, since, although incumbents can suffer losses in a 2°C scenario, there are many notable investment opportunities enabled in a low-carbon transition, including sustainability themed investments in listed and private equities to infrastructure and fixed income.

Climate scenario analysis is an ever-evolving space and, as such, the scenarios modelled and reported may be subject to review in future periods. It is important to note that the modelling may understate the true level of risk due to the uncertainty around the future economic impacts of climate change.

Investments (continued)

Action taken since analysis date

Since the date of the climate scenario analysis (30 June 2021), the ISC has undertaken a number of workstreams with a view to improving the sustainability characteristics of the Fund's investment strategy. These include:

- Reviewing the Fund's passive equity allocation (23% of total Fund assets at 30 June 2024) and implementing changes to the underlying benchmarks to increase exposure to stocks with positive climate-related characteristics, in favour of stocks with negative climate-related characteristics while maintaining expected return.
- Switching one of the Fund's multi-asset credit mandates (7.0% of total Fund assets at 30 June 2024) to a portfolio with the same expected risk and return and stronger integration of positive Environmental, Social and Governance factors.
- Implementing a strategic allocation of 1% of total Fund assets to timberland.

Risk Management

This section summarises the primary climate-related risk management processes and activities carried out for the Fund. These assist with understanding the materiality of climate-related risks, both in absolute terms and relative to other risks that the Fund is exposed to.

Governance

The Fund recognises the systemic risk associated with climate change as well as local government targets in this regard and the views and aspirations of other scheme employers and scheme members.

The Fund has acknowledged the risk to the Fund of climate change in its Risk Register: "As long-term investors, the Fund believes climate risk has the potential to significantly alter the value of the Fund's investments."

The Officers maintain a Climate Action Plan which is reviewed and updated on a regular basis. This document forms part of the ISC's wider business plan

and summarises the progress, actions and outcomes of scheduled climate-related investment projects and tasks.

Strategy

The Fund's advisers will take climate-related risks and opportunities into account as part of the wider strategic investment advice provided to the PFC and ISC. This includes highlighting the expected change in climate-risk exposure through proposed asset allocation changes, both from the top-down level (via climate scenario analysis) and bottom-up (via climate-related metrics). Climate scenario analysis for the investments of the Fund will be reviewed periodically.

Reporting

The ISC will receive an annual climate dashboard providing an update on climate-related metrics and progress against targets in respect of the assets held in the Fund. The ISC may use the information to engage with the Fund's investment managers.

The ISC receives a quarterly stewardship monitoring report which summarises how the investment managers choose to vote and engage on climate-related issues (among other key engagement priorities).

Manager selection and retention

The ISC, with advice from its advisers, will consider an investment manager's firm-wide and strategy-specific approach to managing climate-related risks and opportunities when either appointing a new manager, in the ongoing review of a manager's appointment, or as a factor when considering the termination of a manager's appointment.

What are the climate-related risks and opportunities?

The Fund has considered two types of climate-related risks and opportunities in its climate scenario analysis:

1. Transition risks and opportunities

Investments (continued)

This covers the potential financial and economic risks and opportunities from the transition to a low-carbon economy (i.e. one that has a low or no reliance on fossil fuels), in areas such as:

- Policy and legislation
- Market
- Technology
- Reputation

Risks include the possibility of future restrictions, or increased costs, associated with high carbon activities and products.

There are also opportunities, which may come from the development of low-carbon technologies. In order to make a meaningful impact on reducing the extent of global warming, most transition activities need to take place over the next decade and certainly in the first half of this century.

2. Physical risks and opportunities

The higher the future level of global warming, the greater physical risks will be in frequency and magnitude. Physical risks cover:

- Physical damage (storms; wildfires; droughts; floods)
- Resource scarcity (water; food; materials; biodiversity loss)

Physical risks are expected to be felt more as the century progresses though the extent of the risks is highly dependent on whether global net zero greenhouse gas emissions are achieved by 2050.

There are investment opportunities, for example, in newly constructed infrastructure and real estate that are designed to be resilient to the physical impacts of climate change, as well as being constructed and operated in a way that have low or no net carbon emissions. There are also opportunities for investment in those companies or industries that focus on energy conservation and resource efficiency.

Metrics and targets

Metrics

The primary metrics that are used by the Fund to measure climate-related impact are:

- **Absolute emissions.** This is the total emissions of seven major GHGs associated with the investments held (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulphur hexafluoride and nitrogen trifluoride).
- **Carbon footprint.** This is the total emissions per million pounds invested.
- **Weighted average carbon intensity (WACI).** This is the total emissions per million pounds of sales

As at 30 June 2024, the Fund's reporting has expanded to include an additional forward-looking metric, SBTi alignment. This is a measure of how many companies in a portfolio have submitted climate transition plans that have been approved by the Science Based Targets Initiative (SBTi).

Limitations of emissions data

The Fund is aware of issues around climate-related data quality, in particular carbon data for many private companies, governments and asset classes is not currently sufficiently robust to set targets against. The Fund has therefore focused on the listed equity portfolio initially, given data quality is more robust within this asset class and it comprises a significant proportion of the Fund's strategic investment portfolio.

As at 30 June 2024, the Fund's reporting now includes corporate bonds in its carbon reporting as the quality and availability of climate-related data has improved over time. The Fund has also begun requesting data across a range of metrics annually from its private markets investment managers and seeks to engage with them on improving this data over time.

The Fund is also aware that Scope 3 emissions data, i.e. covering indirect emissions from the value chain such as those embedded in material inputs or freight, is an area that needs development and as such it is not currently included in the Fund's target-setting process. However, the Fund will continue to collect this data to inform its engagement with investment managers.

Investments (continued)

Targets

The Fund's overall climate-related objective is to align its portfolio with a 'pursue efforts towards 1.5°C' objective - i.e. net zero by 2050 or earlier.

Targets were set on an absolute emissions basis in 2021, but also monitored on an intensity basis (using two intensity metrics: carbon footprint and weighted average carbon intensity (WACI)). However, the Fund switched to a carbon footprint metric as the baseline measure for a de-carbonisation pathway from the 2022 analysis date as it:

- It is not impacted by changes in strategy, unlike absolute emissions. For example, a reduction in the Fund's strategic target equity allocation would, all else equal, lead to a reduction in the level of absolute emissions.
- Widening the scope of the Fund's climate reporting to include additional asset classes would naturally increase absolute emissions.

Carbon footprint is not impacted in the same way. Instead, it normalises absolute emissions by the amount of assets invested.

The Fund will continue to track absolute emissions, WACI and SBTi alignment as each metric provides a different insight as to the nature of the companies held within portfolios.

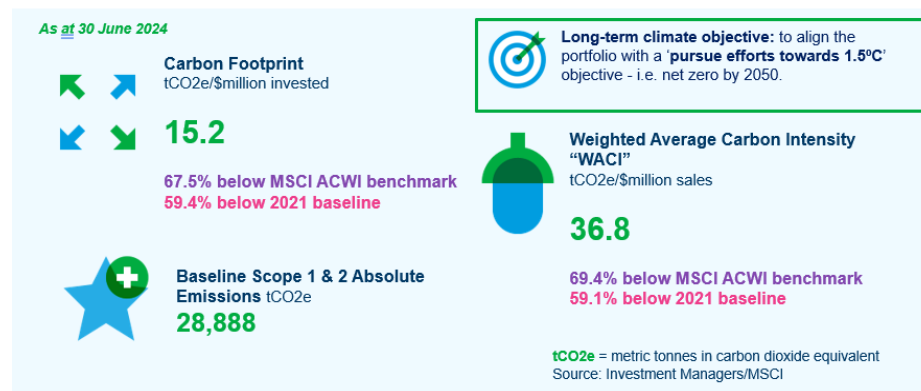
Carbon reporting dashboard

The Fund's metrics were initially measured as at 30 June 2021, providing a baseline for future targets, and were recalculated annually as at 30 June in order to monitor progress against these targets. The metrics are set out in the carbon reporting dashboard available on [the key document page](#).

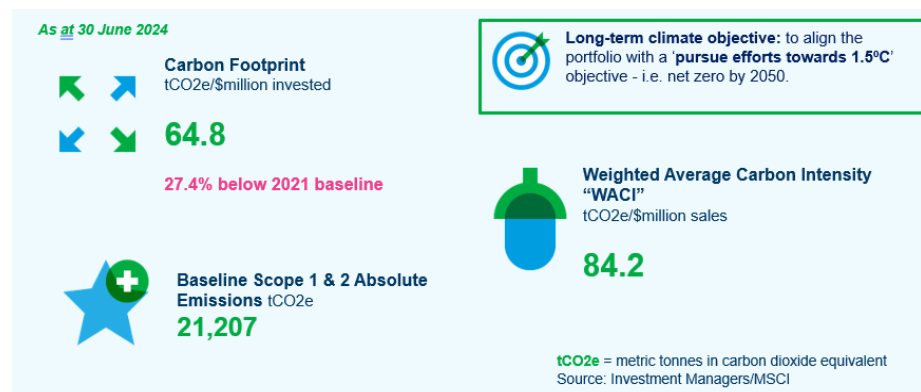
The reported metrics are based on Scope 1 and 2 emissions data for the listed equity portfolio and as of this year, this has expanded to now include corporate bonds.

The dashboard will be updated on an annual basis:

Climate action plan Climate monitoring dashboard – Listed Equity



Climate action plan Climate monitoring dashboard – Corporate Bonds



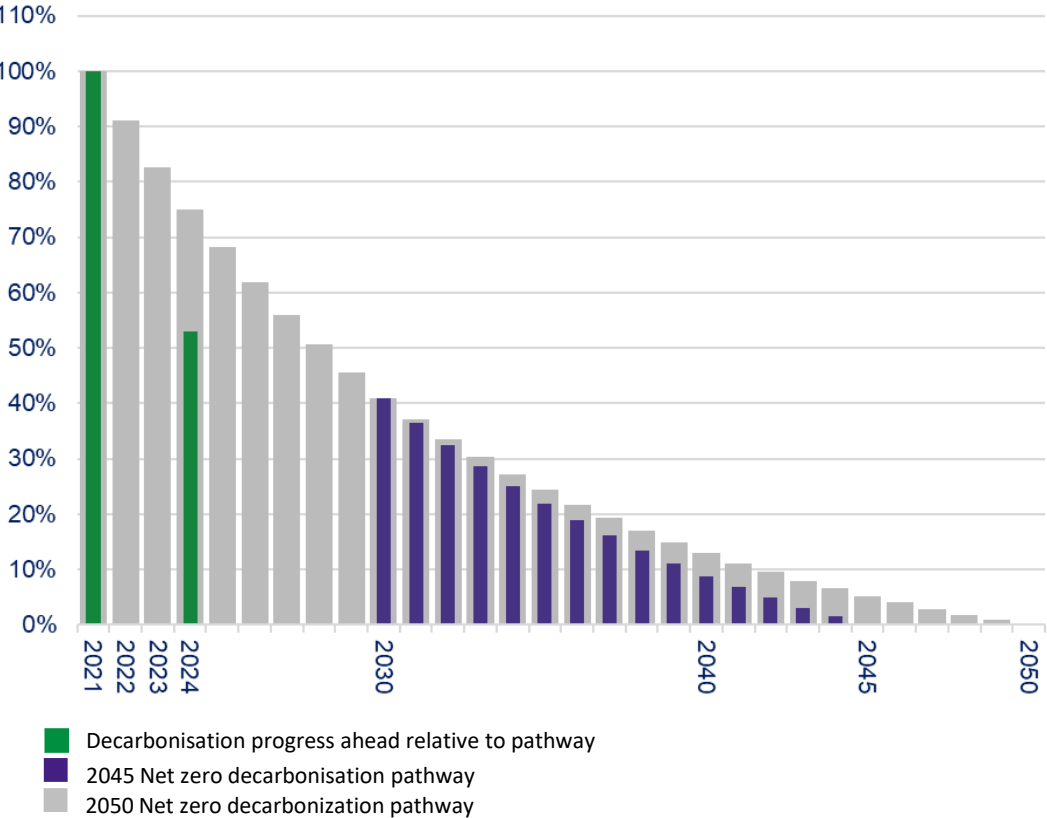
Investments (continued)

Progress against targets

The chart below shows a decarbonisation pathway for the Fund’s listed equity and corporate bonds portfolio (49.8% of total assets as at 30 June 2024) based on its Carbon Footprint, starting from a baseline as at 30 June 2021. It compares this portion of the Fund to the decarbonisation targets: a 25% reduction by 2024, a 59% reduction by 2030, and achieving net zero by 2050 or earlier.

Changes to the Fund’s passive equity portfolio were implemented in early 2023 with the objective of improving the portfolio’s climate characteristics. This is the key driver of the material reduction in the carbon footprint over the period shown.

The Fund will review and assess its interim targets following analysis of its carbon metrics as at 30 June 2025.



Investments (continued)

Investment Review – Financial Year to 31st March 2025

David Crum ASIP, May 2025

Economic Background & Market Review

Region / Asset Class	Index	12 months % return GBP
UK Equities	FTSE All Share	10.5
European Equities	FTSE Europe X UK	3.8
US Equities	S&P 500	6.0
Japanese Equities	TOPIX	-2.5
Asian Equities	MSCI AC Asia ex Japan	9.0
Emerging Markets Equities	MSCI Emerging Markets	5.8
Global Equities	MSCI World	4.8
UK Government Bonds	FTSE A Over 15 Year Gilts Index	-15.3
UK Index Linked Bonds	FTSE A Over 5 Year Index Linked Gilts Index	-9.2
Global Bonds	Merrill Lynch Global Broad Market Corporate Index	2.7
UK Property	MSCI All Balanced Property Funds Index	6.4

Source: Thomson Reuters Datastream

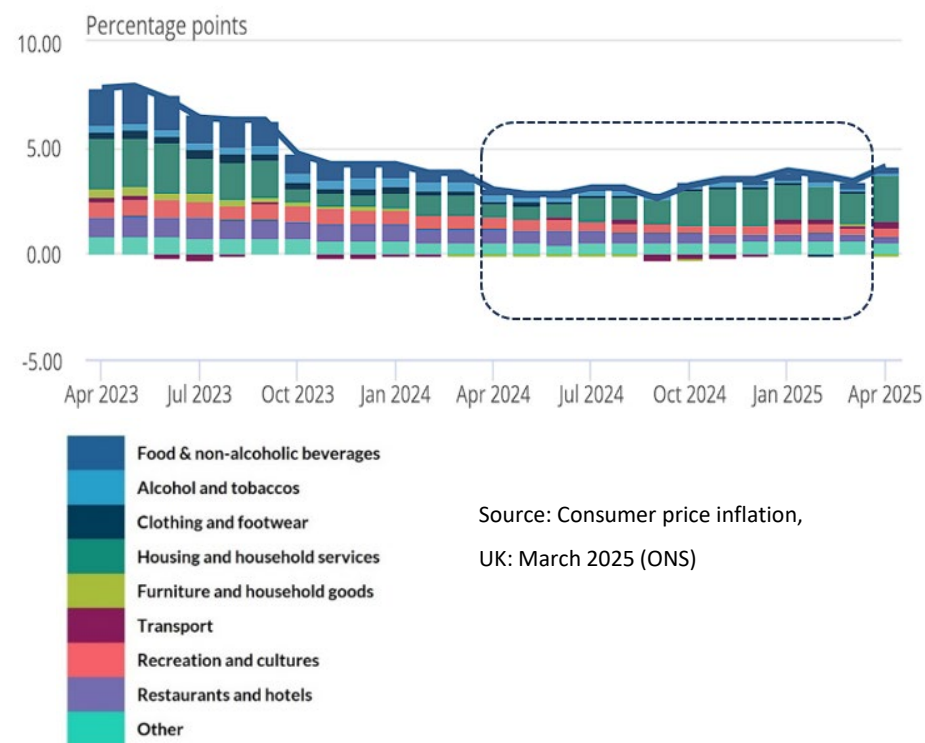
The 2024/25 financial year was marked by diverging central bank policies, uneven economic growth across regions, and significant geopolitical tensions. Equity markets ended the period higher, led by US technology stocks, while bond markets experienced volatility amid shifting interest rate expectations. To that combination, the return of President Trump to the White House turned out to be (so far) an additional destabilising factor. Set out below are summaries of my views on five key themes affecting the investment environment over the last year:

1) Inflation Dynamics and Monetary Policy Easing

Inflation: A Disinflationary Trend with Persistent Pockets

The last year saw a continued, albeit uneven, decline in inflation across the major global economies. In the UK, the Consumer Prices Index including owner occupiers' housing costs (CPIH) rose by 2.6% in the 12 months to March 2025. The largest upward contributions to the monthly change in the annual rate came from Housing and Household Services, Transport, and Recreation and Culture; the largest, partially offsetting, downward contribution came from Clothing and Footwear.

Chart 1: Breakdown of UK Annual Consumer Price Inflation



Source: Consumer price inflation,
UK: March 2025 (ONS)

Investments (continued)

Similarly, the Eurozone saw its annual inflation rate decline to 2.2% in March 2025, from 2.4% in the previous year, nearing the European Central Bank's (ECB) inflation target. The US also experienced a moderation of annual inflation, with its Consumer Price Index (CPI) increasing by 2.4% from March 2024 to March 2025. While headline figures showed progress, core inflation (excluding volatile food and energy) proved stickier in some regions. Some forecasts predicted temporary upticks in inflation for the latter half of 2025, highlighting that ongoing vigilance was required from Central Banks.

Interest Rates: A Global Shift Towards Easing, with Divergence

Responding to the disinflationary (i.e. prices are still going up, but less quickly) progress, central banks largely began a pivot towards easing monetary policy during this period, though with some differences in pace and level. The European Central Bank was at the forefront of this shift, initiating rate cuts and by the end of March 2025 had reduced its main interest rates by a cumulative 1.5 percentage points. The Bank of England followed suit, commencing its own rate-cutting cycle in August 2024, with subsequent reductions in November 2024 and February 2025. This brought the base rate down 0.75% to 4.5% at the end of March 2025, as inflationary pressures eased.

The Federal Reserve also took a more cautious stance, reducing rates by 0.75% during the period, citing ongoing uncertainty in the economic outlook, particularly stemming from shifts in US trade policy. This divergence reflected varying national economic conditions and differing assessments of inflation's persistence and the impact of external shocks

Global bond markets were characterized by significant volatility, largely driven by the evolving inflation narratives, central bank policy shifts, and heightened geopolitical uncertainties. While there was a general anticipation of rate cuts as disinflation progressed (especially from the European Central Bank and the Bank of England), the pace of the cuts and their impact on bond yields were not uniform. For instance, UK gilts, particularly longer-dated ones, experienced notable volatility and negative returns. In early 2025, yields on 30-year UK gilts briefly hit levels not seen since the late 1990s, influenced by concerns over the UK's fiscal position and ongoing government bond issuance.

2) Economic Growth: Subdued but Resilient

The global growth story was one of subdued but resilient expansion, marked by notable regional divergence and increasing headwinds from geopolitical and trade policy uncertainty. Global GDP growth for 2024 was stronger than initially anticipated (around 3.2-3.6%), largely driven by robust performances in the United States and China. However, as the period progressed into early 2025, momentum weakened, with global growth forecasts for the coming year being downgraded.

While the US economy continued to demonstrate strength, supported by solid domestic demand, other major economies faced greater challenges. The Eurozone, for instance, experienced more moderate growth (around 0.9-1.0%), with subdued consumer and business sentiment and lingering industrial weaknesses. Emerging markets, particularly in Asia like India, remained significant growth drivers, though China's growth was projected to slow due to mounting trade tensions, the long-lived property crisis, and domestic demand issues.

A crucial factor that increasingly impacted the global growth outlook was the significant shifts in US trade policy, including the threat and implementation of new tariffs, which heightened policy uncertainty, disrupted global trade, and weighed on investors worldwide.

3) Trump's Second Term

Upon entering office for his second term on January 20, 2025, President Trump and his administration swiftly embarked on a series of significant policy changes, primarily executed through Executive Orders, which do not require congressional approval:

Source: Federal Register

President	Term(s)	Total Executive Orders
Donald J. Trump	2017-2021	10.5
	20/01/2025-31/03/2025	3.8
Joseph R. Biden	2021-2025	6.0
Barack H. Obama	2009-2017	-2.5
George W. Bush	2001-2009	9.0
William J. Clinton	1993-2001	5.8

Investments (continued)

As at the end of March 2025, President Trump had issued nearly as many Executive Orders in his first 70 days of his second term than his predecessor did in 4 years in office.

A dominant theme of the incoming Administration was the aggressive re-shaping of trade policy, with the imposition of wide-ranging tariffs. This included a 25% tariff on all aluminum and steel imports effective March 12, 2025, and broad 25% tariffs on most goods from Canada and Mexico (effective March 4, 2025, after a short delay), alongside increased tariffs on China.

Beyond trade, the administration also pushed a broad deregulatory agenda and initiated measures aimed at reshaping the federal government's scope and priorities. This included executive orders to rescind various policies of the previous administration, such as those related to affordable healthcare and COVID-19, and a significant push to dismantle Diversity, Equity, and Inclusion (DEI) programs across federal agencies and educational institutions.

Other key actions included tightening immigration policies, with the President declaring a national emergency at the Southern Border on January 20, 2025, and a focus on law enforcement, including efforts to enhance resources and address criminal activity, particularly drug trafficking and illegal immigration. These initial actions signaled a rapid and assertive shift towards the "America First" agenda across economic, social, and national security domains.

4) Geopolitics: Deteriorating Global Security

The last year was profoundly shaped by an intensification of global geopolitical concerns, leading to increased market volatility and a deteriorating global security outlook. A paramount issue was the aforementioned escalation of trade tensions originating from the US and impacting Canada, Mexico and China, but beyond trade, the ongoing war in Ukraine remained a persistent source of instability, with continued fighting and the broader implications for European security and energy markets.

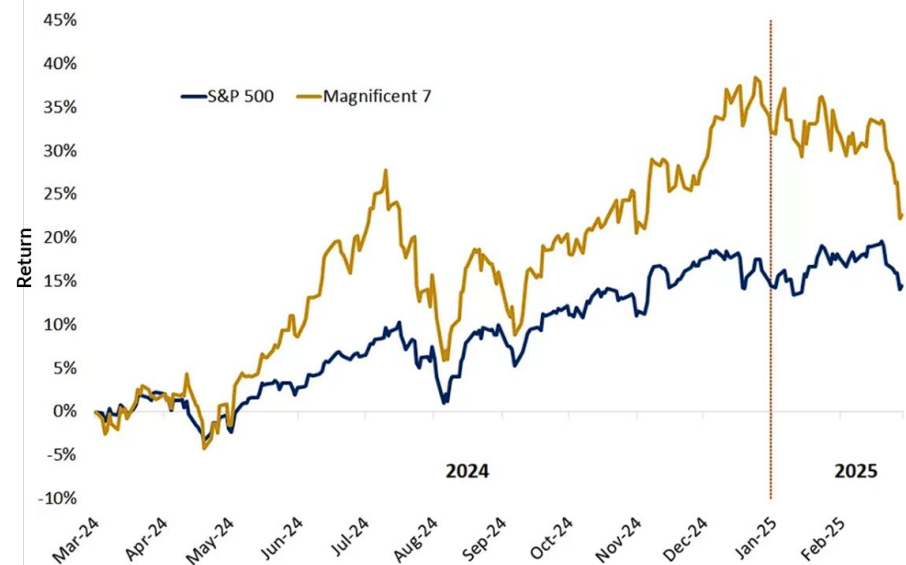
Incoming President Trump's cool approach towards Ukraine, and warm approach to Russia caused consternation amongst NATO members and European leaders, whose thoughts quickly turned to how they could best fill the equipment gap felt by Ukraine from the US' change of position, and how best to

discourage further Russian aggression – all taking place in universally difficult fiscal circumstances.

Simultaneously, the Middle East continued to be a flashpoint, experiencing renewed tensions and conflicts, including the intensification of Israeli military actions in Gaza, Lebanon, and Syria, and US airstrikes in Yemen against Houthi targets, all of which heightened regional instability and posed risks to global energy prices. These interconnected geopolitical challenges fostered an environment of elevated risk and reduced global cooperation, contributing significantly to market uncertainty.

5) The Magnificent Seven

The equity 'story' of the last year has arguably been that of the "Magnificent Seven" – which refers to seven dominant US-based technology and growth companies that have exerted an outsized influence on market returns. Apple, Microsoft, Amazon, Alphabet, Meta Platforms, Nvidia, and Tesla are characterized by their vast market capitalization, significant innovation, and leading positions in sectors like cloud computing, artificial intelligence, e-commerce, and electric vehicles.



Source: VolumeLeaders.com

Investments (continued)

Due to their exceptional performance and size, these stocks have become highly concentrated within broad market indices. As at end March 2025, the Magnificent Seven collectively accounted for almost a third of the S&P 500 Index, and a substantial portion of global equity benchmarks. Specifically, they represented nearly 25% of the MSCI World Index and over 20% of the MSCI All Country World Index (ACWI) by weight, underscoring their significant gravitational pull on global stock market performance.

This concentration presented both opportunities (due to their growth potential) and risks (related to market breadth and diversification). Portfolios that had exposure to these stocks (most notably indexed funds) benefitted significantly from their net positive performance in the period. However, many portfolios (usually actively managed funds) had underweight positions, and as a result their performance tended to lag both benchmark and invested peers.

As the previous chart shows, they performed exceptionally well up until January 2025, significantly outperforming the rest of the companies in the S&P 500 Index. However, they have fared significantly worse than the broader index since then, perhaps reflecting a return to lower (and more reasonable) company valuations and a challenging outlook for them and their specific sectors.

6) Sustainability: Onwards and Upwards Despite Headwinds

The last year saw some significant developments in the sustainability landscape within global financial markets, marked by both continued regulatory advancements and increased scrutiny.

Global green-bond issuance hit an all-time high of \$950 bn in 2024, up 12 % on the previous year, and there was an ongoing push for enhanced company disclosure and transparency, particularly in Europe. The EU's Corporate Sustainability Reporting Directive (CSRD) required 50,000 in-scope companies to produce their first sustainability reports in 2025, leading to a scramble for compliance and robust data.

There was also a heightened focus on combating 'greenwashing' – looking more environmentally friendly than in reality - with regulators in jurisdictions like the UK (such as the Competition and Markets Authority and the Financial Conduct Authority) gaining stronger powers and issuing more stringent guidance to crack down on misleading environmental claims, thereby fostering greater integrity in sustainable product offerings.

A growing emphasis on nature and biodiversity finance emerged, with initiatives like the Taskforce on Nature-related Financial Disclosures (TNFD) gaining traction. TNFD encourages organizations to assess and disclose nature-related risks and opportunities – for example, biodiversity loss can hit a company's cash-flows through supply-chain shocks, and so it represents a very real risk to long term investment performance, never mind the negative physical impact on the planet.

While the overall momentum for sustainable investing faced some headwinds in certain regions, particularly in the US due to political pushback on all things ESG (Diversity, Equity and Inclusion in particular was targeted), the underlying demand for sustainable solutions remained strong, with a notable shift towards 'impact investing' - investments made with the intention to generate positive, measurable social or environmental impact alongside a financial return - and a focus on tangible, measurable environmental and social outcomes beyond mere compliance.

Investment Outlook: Policy-driven Volatility

At the time of writing this Investment Review (May 2025), we have had a taste of the geopolitical and economic volatility that lies ahead in the coming year, viscerally demonstrated by the Trump Administration's ongoing tariff travails and their impact on international financial markets. Since US tariff policy looks ad-hoc, markets need to brace for sudden moves.

Global growth is likely to slow, should the US economy cool as a result of tariff impacts. Inflation expectations would then follow, inasmuch that headline inflation should edge lower towards Central Bank targets, but the possibility exists for core inflation (i.e. inflation excluding volatile Food and Energy items) remaining sticky.

What the White House's approach – on political, geopolitical and financial matters - has demonstrated is that we can expect a much bumpier ride for global financial markets in the coming year. From the Fund's perspective, we should take some comfort from the diversified nature of the investment strategy, in that we do not keep all of our eggs in one investment basket. We should also take comfort from the long term nature of the Fund's approach to investments, which can help temper any nervousness brought on by periods of short term market volatility,

Actuarial Information

Northamptonshire Pension Fund (“the Fund”) Actuarial Statement for 2024-25

This statement has been prepared in accordance with Regulation 57(1)(d) of the Local Government Pension Scheme Regulations 2013. It has been prepared at the request of the Administering Authority of the Fund for the purpose of complying with the aforementioned regulation.

Description of Funding Policy

The funding policy is set out in the Administering Authority’s Funding Strategy Statement (FSS), dated March 2023. In summary, the key funding principles are as follows:

- take a prudent long-term view to secure the regulatory requirement for long-term solvency, with sufficient funds to pay benefits to members and their dependants
- use a balanced investment strategy to meet the regulatory requirement for long-term cost efficiency (where efficiency in this context means to minimise cash contributions from employers in the long term)
- where appropriate, ensure stable employer contribution rates
- reflect different employers’ characteristics to set their contribution rates, using a transparent funding strategy
- use reasonable measures to reduce the risk of an employer defaulting on its pension obligations
- manage the fund in line with the stated ESG policies.

The FSS sets out how the Administering Authority seeks to balance the conflicting aims of securing the solvency of the Fund and keeping employer contributions stable. For employers whose covenant was considered by the Administering Authority to be sufficiently strong, contributions have been stabilised to have a sufficiently high likelihood of achieving the funding target over 20 years. Asset-liability modelling has been carried out which demonstrate that if these contribution rates are paid and future contribution changes are constrained as set out in the FSS, there is at least a 70% likelihood that the Fund will achieve the funding target over 20 years.

Funding Position as at the last formal funding valuation

The most recent actuarial valuation carried out under Regulation 62 of the Local Government Pension Scheme Regulations 2013 was as at 31 March 2022. This valuation revealed that the Fund’s assets, which at 31 March 2022 were valued at £3,364 million, were sufficient to meet 113% of the liabilities (i.e. the present value of promised retirement benefits) accrued up to that date. The resulting surplus at the 2022 valuation was £380 million.

Each employer had contribution requirements set at the valuation, with the aim of achieving their funding target within a time horizon and likelihood measure as per the FSS. Individual employers’ contributions for the period 1 April 2023 to 31 March 2026 were set in accordance with the Fund’s funding policy as set out in its FSS.

Principal Actuarial Assumptions and Method used to value the liabilities

Full details of the methods and assumptions used are described in the 2022 valuation report.

Method

The liabilities were assessed using an accrued benefits method which takes into account pensionable membership up to the valuation date; and makes an allowance for expected future salary growth to retirement or expected earlier date of leaving pensionable membership.

Actuarial Information (continued)

Assumptions

A market-related approach was taken to valuing the liabilities, for consistency with the valuation of the Fund assets at their market value.

The key financial assumptions adopted for the 2022 valuation were as follows:

Financial Assumptions	31 March 2022
Discount Rate	4.4%
Salary increase assumption	3.2%
Benefit increase assumption(CPI)	2.7%

The key demographic assumption was the allowance made for longevity. The life expectancy assumptions are based on the Fund's VitaCurves with improvements in line with the CMI 2021 model, with a 0% weighting of 2021 (and 2020) data, standard smoothing (Sk7), initial adjustment of 0.25% and a long term rate of 1.50% p.a. Based on these assumptions, the average future life expectancies at age 65 are as follows:

	Males	Females
Current Pensioners	21.6 years	24.3 years
Future Pensioners*	22.5 years	25.8 years

*Aged 45 at the 2022 Valuation.

Copies of the 2022 valuation report and Funding Strategy Statement are available on request from the Administering Authority to the Fund to the Fund and on the Fund's website.

Experience over the period since 31 March 2022

Markets were disrupted by the ongoing war in Ukraine and inflationary pressures in 2022 and 2023, impacting on investment returns achieved by the Fund's assets. Asset performance improved in 2024 and early 2025; however the recent increase in US tariffs on imports has caused significant market volatility. The peak of this market volatility was experienced immediately after 31 March 2025, however, generally lower than expected asset returns were experienced in the month immediately prior to this.

High levels of inflation in the UK (compared to recent experience) have resulted in higher than expected LGPS benefit increases of 10.1% in April 2023 and 6.7% in April 2024. However, inflation has reduced towards historical levels and the Bank of England's target (2% pa), with LGPS benefits increasing by 1.7% in April 2025.

There has been a significant shift in the wider economic environment since 2022, resulting in generally higher expected future investment returns and a reduction in the value placed on the Fund's liabilities. Overall, the funding position is likely to be stronger than at the previous formal valuation at 31 March 2022.

The next actuarial valuation will be carried out as at 31 March 2025, and will be finalised by 31 March 2026. The FSS will also be reviewed at that time, and a revised version will come into effect from 1 April 2026.

Adrian Loughlin FFA C.Act

9 May 2025

For and on behalf of Hymans Robertson LLP

Actuarial Information (continued)

Extract from the Actuarial Valuation Report

Executive Summary

We have carried out an actuarial valuation of the Northamptonshire Pension Fund ("the Fund") as at 31 March 2022. The results are presented in this report and are briefly summarized below.

Funding Position

The table below summarizes the financial position of the Fund at 31 March 2022 in respect of benefits earned by members up to this date (along with a comparison at the last formal valuation at 31 March 2019).

Valuation date	31 March 2019 (£m)	31 March 2022 (£m)
Past Service liabilities	2,679	2,984
Market Value of Assets	2,502	3,364
Surplus/(Deficit)	-176	380
Funding Level	93%	113%

The most significant external event to occur since the last valuation has been the Covid-19 pandemic. The impact on the funding position has been small, likely due to the age profile of the excess deaths and the level of pension.

Other significant factors occurring which affect the funding strategy of the Fund have been the better than expected investment returns. This has had a material positive impact on the funding position and employers' secondary contribution rates.

Contribution Rates

The table below summarizes the whole fund Primary and Secondary Contribution rates at this triennial valuation. The Primary rate is the payroll weighted average of the underlying individual employer primary rates and the Secondary rate is the total of the underlying individual employer secondary rates (before any pre-payment or capitalization of future contributions), calculated in accordance with the Regulations and CIPFA guidance.

Primary Rate (% of pay)	Secondary Rate (£)		
1 April 23 – 31 March 26	2023-24	2024-25	2025-26
20.5%	£8,586,000	£8,155,000	£7,660,000

The Primary rate also includes an allowance of 0.8% of pensionable pay for the Fund's expenses. The average employee contribution rate is 6.4% of pensionable pay.

The minimum contributions to be paid by each employer from 1 April 2023 to 31 March 2026 are shown in the Rates and Adjustment Certificate.

Douglas Green FFA

Robert McInroy FFA

31 March 2023

For and on behalf of Hymans Robertson LLP

The full valuation report is available on the Funds website [2022 Valuation Report](#)

Audit Opinion

This page is intentionally left blank. The final audit opinion will be included once it has been issued by the external auditors following the completion of the audit process.

Audit Opinion

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Glossary

ACCRUAL An amount to cover income or spending that belongs to the accounting year, which was outstanding at the accounting date.

ACTUARY An independent company which advises on the assets and liabilities of the Fund with the aim to ensure that the payment of pensions and future benefits are met.

ALTERNATIVES assets that fall outside of the traditional asset classes (equities, bonds and cash). Types of alternative investments include private equity, infrastructure and property.

ADMINISTERING AUTHORITY The LGPS is administered locally by 86 local pension funds. The administering authority is the body responsible for each fund. For the Northamptonshire Pension Fund, the administering authority is West Northamptonshire Council.

ADMISSION AGREEMENT A legal agreement allowing certain private companies and charities (Admission bodies) to participate in the LGPS.

ADMITTED BODIES Voluntary and charitable bodies whose staff can become members of the Local Government Pension Scheme subject to certain terms and conditions and other organisations to whom Local Government employees have been transferred under the outsourcing of Local Government services.

ANNUAL BENEFIT STATEMENT A document issued to active and deferred members on an annual basis informing them of the current and estimated future value of their pension benefits at the end of each scheme year.

AUTOMATIC ENROLMENT is the term used to describe an employer's duty to automatically enrol employees who meet certain criteria into a qualifying workplace pension scheme.

BOND Security issued by a corporate or government body borrowing in the capital markets. Bonds promise to pay interest (coupons) during the life of the bond plus the principal sum borrowed on the redemption date. Bonds may be secured over assets of the firm or be unsecured.

COMMUTATION Giving up part or all of the pension payable from retirement in exchange for an immediate lump sum. Commutation factors (usually calculated by the Scheme Actuary) are used to determine the amount of pension which needs to be given up in order to provide the lump sum.

CURRENT ASSETS Short-term assets such as inventories, receivables and bank balances.

CURRENT LIABILITIES Amounts owed which are due to be settled in less than one year, such as bank overdrafts and money owed to suppliers.

CUSTODIAN An external body responsible for ensuring Fund assets are registered in the name of the Fund, managing the settlement of trades entered into by the Fund, collecting income arising on Fund assets and reporting transactions and values to the Fund on a regular basis.

DEFINED BENEFIT a pension which guarantees you specific income throughout retirement

DEFERRED BENEFITS Deferred benefits are the pension benefits held within the pension fund for a member who has stopped building up new benefits in the LGPS but is not receiving payment of their pension benefits.

DEFICIT An outcome as a result of taking away all expenses from income. Additionally, the Fund is in deficit when the liabilities are larger than assets.

DERIVATIVE A financial instrument derived from a security, currency or commodity, or an index indicator representing any of these, the price of which will move in a direct relationship to the price of the underlying instrument. Derivatives can be used for a number of purposes - including insuring against price movements (hedging), increasing exposure to price movements for speculation or getting access to otherwise hard to trade assets or markets.

DISCRETIONS are powers given to employers and administering authorities, by the LGPS, to choose how to apply the Scheme rules in certain situations. A guide to these discretions is available on the [LGPS Regulations and Guidance website](#).

DIVIDEND The distribution of profits by a company to its shareholders. The dividend may be passed or cut if profits fall. [See also Equities]

Glossary (continued)

EBITDA Earnings Before Interest, Taxes, Depreciation, and Amortisation is a statistic used to assess a company's operating performance.

EQUITIES Shares representing the capital of a company issued to shareholders usually with voting rights on the way the company runs the business. Equity holders rank last in the event of the winding up of a company.

FIXED INCOME asset or security that pay a fixed level of income to investors, typically in the form of fixed interest or dividend. Government and corporate bonds are the most common types of fixed income products.

FORMAL VALUATION A valuation, carried out every three years, of the pension assets and liabilities held by each employer in the pension fund.

FINANCIAL INSTRUMENTS Contracts which give rise to a financial asset of one entity and a financial liability or equity instrument of another.

GUARANTEED MINIMUM PENSIONS (GMPs) A member of LGPS who were an active member of the scheme between 6 April 1978 and 5 April 1997, did not pay into the State earnings Related Pension Scheme (SERPS). The GMPs are a pensions which LGPS must pay to the member at least as good as the member would have received from SERPS.

LEAVER An active member who ceases membership of the LGPS as a result of ending an employment. This includes someone who leaves employment voluntarily or who's employment is terminated by the employer.

LOCAL GOVERNMENT The term local government within this document covers:

- County, District and Borough councils
- Combined local authorities
- Police and Fire service civilian staff
- Town and Parish Council's
- Local authority schools (non-teaching staff)
- Academy trusts (non-teaching staff)
- Sixth form colleges (non-teaching staff)
- Further or Higher education establishments (non-teaching staff)
- Other tax raising bodies

LOCAL GOVERNMENT PENSION SCHEME (LGPS) The LGPS is a national pension scheme for people working in local government or working for other employers that participate in the scheme.

LOCAL PENSION BOARD The Local pension board is made up of employer and member representatives and provides assistance to the scheme manager with the administration of the pension fund.

HEDGE To protect a fund from a fall in prices. This is usually accomplished by the selling of futures.

INDEX LINKED Stock whose value is related directly to an index, usually the Retail Price Index and therefore provides a hedge against inflation.

INTERNATIONAL FINANCIAL REPORTING STANDARDS (IFRS) Accounting Standards, Interpretations and the Framework adopted by the International Accounting Standards Board (IASB).

MHCLG Ministry of Housing, Communities and Local Government. A ministerial department responsible for housing, communities and local government in England.

PENSION STRAIN Charges to employers to cover discretionary early retirement costs, which are the responsibility of the employer, recovered in the first year of retirement in full.

PORTFOLIO A collection of investments. This can refer to the investments managed by a particular Investment Manager, or to describe the whole Fund's investments.

PENSION FUND (FUND) The LGPS is split into 86 local pension funds. The pension fund or simply "Fund" is the collective term for both the employers participating in the LGPS within Northamptonshire and the monies held to pay the benefits of those employers' members. The pension fund is administered by the administering authority and overseen by the pension fund committee and local pension board.

PENSION FUND COMMITTEE The pension fund committee is the ultimate decision maker for the pension fund. Its members act as 'quasi-trustees'. The pension fund committee decides the overall policy objectives, strategy and operation of the pension fund in line with the relevant legislation. It also decides the strategy for the investment of pension fund money

Glossary (continued)

PENSIONS OMBUDSMAN The Pensions ombudsman is the official body responsible for investigating complaints regarding pensions in the UK.

PENSIONS REGULATOR The pensions regulator is the official regulator of workplace pension schemes and is responsible for ensuring the pension schemes operating in the UK are managed in line with UK law.

PRAG Pensions Research Accountants Group is a leading independent industry body working for the development of occupational pension scheme, focusing on financial reporting and internal control.

RELATED PARTY A person or an organisation which has influence over another person or organisation.

RETIREMENT In this document retirement refers to the act, by an active or deferred member, of taking immediate payment of LGPS benefits following the end of a relevant employment regardless of whether that person stops all employment.

SAA Strategic Assets Allocation is a portfolio strategy by setting the target allocations for various asset classes and rebalancing the portfolio periodically.

SAB The Local Government Pension Scheme Advisory Board is a statutory body to help and support DLUHC and administering authorities fulfil their statutory duties and obligations in relation to the scheme.

SBTi alignment The Science Based Targets initiative (SBTi) is a corporate climate action organisation that enables companies and financial institutions worldwide to play their part in combating the climate crisis. They develop standards, tool and guidance which are line with climate science.

SCHEDULED BODIES Local Authorities and similar bodies whose staff are entitled automatically to become members of the local Authority Pension Fund.

SCHEME EMPLOYER An employer participating in the pension fund with current employees enrolled in the LGPS

SCHEME MEMBER An individual with pension benefits in the LGPS or who is in receipt of pension benefits from the LGPS. Members are categorized as:

- **Active member:** A current employee of a scheme employer building up pension benefits in the LGPS.

- **Deferred member:** A person who has pension benefits in the LGPS but who is neither building up new benefits in, or receiving payment of pension benefits from, the LGPS.

- **Pensioner member:** A person who receives payment of pension benefits from the LGPS. This may be someone who was an active member in the LGPS or a dependant of someone who was an active member of the LGPS and is being paid dependant benefits.

SCHEME YEAR The Scheme year runs from 1 April to 31 March.

STOCK Shares (e.g. Common stock). However, UK Gilts are more correctly described as stock.

SURPLUS An outcome as a result of taking away all expenses from income. Additionally, the Fund is in surplus when the assets are larger than liabilities.

TRANSFER VALUES Sums which are paid either to or received from other pension schemes and relate to new and former members' periods of pensionable employment with employers participating in the scheme.

TREASURY MANAGEMENT A process which plans, organises and controls cash, investments and borrowings so as to optimise interest and currency flows, and minimise the cost of funds.

UNFUNDED Pension benefits not funded by the Pension Fund. Benefits are fully reclaimed from the employer bodies.

UNIT TRUST An open-ended trust investing in a wide spread of stocks, shares and cash (subject to FSA limits). Investors buy units directly from the Investment manager to participate in a diversified portfolio. Unit trusts are subject to FSA investment and borrowing regulations.

VESTING PERIOD The length of time what an individual needs to be an active member of the LGPS to qualify for benefits in the scheme.

WEIGHTED AVERAGE CARBON INTENSITY (WACI) is a measure of carbon emissions calculated by a debtor/issuer divided by the debtor's/issuer's total revenue and weighted by the value of the creditor's/holder's investment as a share of its total investment portfolio.

Appendix A

Scheme Framework

The below table compares the 2008 and the 2014 schemes.

	LGPS 2008	LGPS 2014
Basis of Pension	Final Salary	Career Average Revaluated Earnings (CARE)
Accrual Rate	1/60 th	1/49 th
Revaluation Rate	Based on Final Salary	Consumer Prices Index (CPI)
Pensionable Pay	Pay excluding non contractual overtime and non pensionable additional hours	Pay including non-contractual overtime and additional hours
Employee Contribution Rates	Between 5.5% and 7.5%	Between 5.5% and 12.5%
Contribution Flexibility	No	Option to pay 50% contributions for 50% of pension benefit
Normal Pension Age	65	Equal to individuals state pension age
Lump Sum Trade Off	Trade £1 of pension for £12 lump sum	Trade £1 of pension for £12 lump sum
Death in Service Lump Sum	3 x Pensionable Pay	3 x Pensionable Pay
Death in Service Survivor Benefits	1/160 th accrual based on Tier 1 ill health pension enhancement Tier 1 – Immediate payment with service enhanced to Normal Pension Age (65)	1/160 th accrual based on Tier 1 ill health pension enhancement Tier 1 – Immediate payment with service enhanced to Normal Pension Age
Ill Health Provision	Tier 2 – Immediate payment with 25% service enhancement to Normal Pension Age (65) Tier 3 – Temporary payment of pension for up to 3 years	Tier 2 – Immediate payment with 25% service enhancement to Normal Pension Age Tier 3 – Temporary payment of pension for up to 3 years
Indexation of Pension in Payment	CPI (RPI for pre-2011 increases)	CPI
Vesting Period	3 months	2 years