

Public Document Pack



PENSION FUND COMMITTEE AND PENSION BOARD WEDNESDAY, 19 OCTOBER 2022

A MEETING of the PENSION FUND COMMITTEE AND PENSION BOARD will be held VIA MICROSOFT TEAMS on WEDNESDAY, 19 OCTOBER 2022 at 10.00 AM.

All attendees, including members of the public, should note that the public business in this meeting will be livestreamed and video recorded and that recording will be available thereafter for public view for 180 days.

J. J. WILKINSON,
Clerk to the Council,

12 October 2022

BUSINESS		
1.	Apologies for Absence	
2.	Order of Business	
3.	Declarations of Interest	
4.	Minute (Pages 3 - 8) Minute of Meeting held on 15 September 2022 to be noted and signed by the Chairman. (Copy attached).	2 mins
5.	External Audit Report (Pages 9 - 54) Consider report by Audit Scotland. (Copy attached.)	30 mins
6.	Final Annual Report and Accounts 2021/22 (Pages 55 - 152) Consider report by Acting Chief Financial Officer. (Copy attached.)	20 mins
7.	Any Other Items Previously Circulated	
8.	Any Other Items which the Chairman Decides are Urgent	
9.	Private Business Before proceeding with the private business, the following motion should be approved:-	

	“That under Section 50A(4) of the Local Government (Scotland) Act 1973 the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraph 8 of Part 1 of Schedule 7A to the aforementioned Act.”	
10.	Minute (Pages 153 - 154) Private Section of Minute of Meeting held on 15 September 2022 to be noted and signed by the Chairman. (Copy attached).	2 mins

NOTES

1. **Timings given above are only indicative and not intended to inhibit Members’ discussions.**
2. **Members are reminded that, if they have a pecuniary or non-pecuniary interest in any item of business coming before the meeting, that interest should be declared prior to commencement of discussion on that item. Such declaration will be recorded in the Minute of the meeting.**

Membership of Committee:- Councillors D. Parker (Chairman), P. Brown, C. Hamilton, W. McAteer, D. Moffat, S. Mountford, S. Scott, J. Pirone, Mr D Bell, Mr A Daye, Mr M Drysdale, Mr M Everett, Ms K M Hughes, Ms K Robb and Ms L Steven

Please direct any enquiries to Declan Hall Tel: 01835 826556
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**SCOTTISH BORDERS COUNCIL
PENSION FUND COMMITTEE AND PENSION BOARD**

MINUTES of Meeting of the PENSION FUND
COMMITTEE AND PENSION BOARD held
via Microsoft Teams on Thursday, 15
September 2022 at 10.00 am

Present:- Councillors D. Parker (Chairman), P. Brown, C. Hamilton, W. McAteer, D. Moffat, S. Mountford, J. Pirone, S. Scott, D. Parker (Chairman), P. Brown, C. Hamilton, W. McAteer, D. Moffat, S. Mountford, S. Scott, J. Pirone, Mr D Bell, Mr A Daye, Mr M Everett and Ms K M Hughes.

Apologies:- Mr M. Drysdale

In Attendance: Acting Chief Executive, Acting Chief Financial Officer, Chief Officer Audit and Risk, Pensions and Investment Manager, HR Shared Services Manager, Democratic Services Officer (D. Hall).

Also in Attendance: Ms A Fitzpatrick (Audit Scotland), Mr A Ross, Mr A Singh (Isio).

CHAIRMAN

The Chairman welcomed Ms Claire Scott, who had been appointed as an external consultant to the Pension Fund. Ms Scott was undertaking work related to the Fund and its corporate governance.

1. **MINUTE**

There had been circulated copies of the Minute of the Meeting held on 29 June 2022. A typographical error was present in the Minute of the previous meeting related to the spelling of the Chief Officer, Audit and Risk's name, where "Ms Stacy" was present instead of "Ms Stacey" in paragraph 3.2.

DECISION

NOTED for signature as amended by the Chairman.

2. **RISK REGISTER UPDATE**

With reference to paragraph 8 of the Minute of the meeting held on 29 June 2022 there had been circulated copies of a report by the Acting Chief Finance Officer which formed part of the risk review requirements and provided an updated full register and proposed management actions to mitigate the risks. The report explained that identifying and managing risk was a corner stone of effective management and was required under the Council's Risk Management Policy and process guide and CIPFA's guidance "Delivering Governance in Local Government Framework 2007". It was further reflected and enhanced in the "Local Government Pension Scheme" published by CIPFA. A virtual risk workshop was held on 4 May 2022 with Officers from relevant Departments to review and update the full risk register. The revised Risk Register was approved by the Joint Pension Fund Committee and Pension Fund Board on 29 June 2022. Appendix 1 to the report detailed the risks within the approved risk register which had been identified management actions and the progress of these actions to date. There were no new risks identified during the review. The Pensions and Investment Manager, Ms Kirsty Robb, presented the report and explained that the main elements that had been updated concerned training – which had been circulated to Members of the Pension Fund Committee and the Pension Board, and taken up appropriately. Ms Robb highlighted that the review of the single code had been highlighted as a risk and that Ms Scott hoped to report in December 2022.

**DECISION
AGREED to:-**

- (a) note the management actions progress as contained in Appendix 1 to the report;**
- (b) note new quantifiable risks had been identified since the last review; and**
- (c) to an update on progress of management actions to be presented in December 2022.**

3. PENSION FUND BUDGET MONITORING TO 30 JUNE 2022

With reference to paragraph 10 of the meeting held on 29 June 2022 there had been circulated copies of a report by the Acting Chief Finance officer which provided the an updated position of the Pension Fund budget to 30 June 2022 including projections to 31 March 2023. The Local Government Pension Scheme (Scotland) Regulation 2014 required Administering Authorities to ensure strong governance arrangements and set out the standards they were to be measured against. To ensure the Fund met the standards a budget was approved on 17 March 2022 following the recommendations within the CIPFA accounting guidelines headings. The report was the first quarterly monitoring report of the approved budgets. The total expenditure to 30 June 2022 was £0.113m with a projected total expenditure of £7.400m against a budget of £7.296m. This projected a budget variance of £104k which represented the additional modules for the Pension Administration system and an allowance to allow the review work required for the single code as identified in the business plan. Ms Robb presented the report and highlighted that two additional elements required budget allocation, the additional systems administration as detailed in paragraph 5, and the work related to governance that Ms Scott was conducting. Those elements were included in the business plan. Regarding cash flow monitoring, Ms Robb explained that adequate data was present to allow the fund to monitor the flow on a quarterly basis. In response to a question regarding draw down notices from infrastructure managers, Ms Robb clarified that the notices were part of the Fund's commitment to invest in infrastructure, and that investment in this area differed from equity markets in that the investment was not paid in as one lump sum. When the project was in a suitable state of readiness a notice would be issued, after which the Fund would have 10 days to provide the balance. Ms Robb highlighted that the Fund was able to use its cash surplus to deal with draw down notices, and highlighted that it had not been required to disinvest from any equities at inopportune moments as a result.

**DECISION
AGREED:-**

- (a) to note the actual expenditure to 30 June 2022; and**
- (b) the projected out-turn as the revised budget.**

4. COMMUNICATION POLICY REVIEW

With reference to paragraph 6 of the Minute of the meeting held on 16 September 2021, there had been circulated copies of a report which provided a review on the Communication Policy and an update on the review of forms and communication, including annual benefit statements. The report outlined that in line with the Pension Fund business plan the Policy should be reviewed on an annual basis. The report discharged that requirement. Appendix 1 to the report contained the revised Communication Policy which had a number of amendments made to the previously approved version, those were within sections 5 and 6 to update on the improved communication methods that would be deployed by the Fund in response to feedback received in the Stewardship Code application, and recognised the implementation of the Member Self Service portal for the delivery of Annual Benefit Statements. The Pension Fund website continued to be a useful resource and had been visited on a regular basis.

The website continued to be updated to reflect the current Regulations and any relevant documents or news stories were published accordingly. Additionally, the link to the Member Self Service portal had been added. The Pensions Administration team had carried out a review of the supporting information published along with the Annual Benefit Statements and officers continued to encourage scheme members to sign up to the Members Self Service portal. Work continued to review processes and associated Forms, making use of emerging digital technologies where possible.

DECISION

AGREED to:-

- (a) approve the Communications Strategy as set out in Appendix 1 to the report;**
- (b) note the website performance; and**
- (c) note that work had continued on the review of Forms and the Annual Benefit statement documentation had been reviewed.**

5. PENSION ADMINISTRATION SYSTEM

With reference to paragraph 4 of the Minute of the meeting held on 12 September 2019, there had been circulated copies of a report by the Director – People, Performance and Change which sought approval to delegate responsibility for the procurement of the Altair Image and Altair Insights modules, as a supplement to the existing Pensions Administration, for the Scottish Borders Council Pension Fund to the Director – People, Performance and Change. The report explained that in 2019 the Fund had agreed to the procurement and continued use of the Aquila Heywood (now known as Heywood Technologies) Pensions Administration System for a period of five years with the option to extend for a further five year period on the approval of the Joint Committee and Board. Officers had been in discussion with Heywood Technologies over the pricing of those additional modules and had secured discounts for the Fund. The total additional cost for the licence fees, implementation and annual support and maintenance, less the savings for the Data Quality report were £228,100 over the seven years of the contract. With the move to homeworking as a result of the global pandemic, and the Council looking to rationalise the property estate, the Fund needed to consider how it could move away from traditional paper based files for scheme members to a modernised digital solution whilst addressing the deliverable as agreed in the Pension Fund Business Plan. The additional modules would also deliver a significantly improved experience for the Pensions Administration team who would be able to access all of the documents/images regarding a member in a single system. The implementation of the Altair Insights, whilst at an additional cost, did deliver savings on an annual basis in relation to the Pension Regulator Data Quality Report that Heywood Technologies had been providing the Fund. The module would also provide the Fund with access to key reports as it moved towards the outcome and implementation of McCloud regulation changes and the Pensions Dashboard through the provision of out of the box reporting, as well as reporting capabilities that would be used to produce the data required in the Pensions Administration Strategy annual report. Members welcomed the report and highlighted that the modernisation of the Fund's administration, coupled with financial savings, was a positive.

DECISION

AGREED to approve the delegation of responsibility for the additional modules provided by Heywood Technologies to the Director – People, Performance and Change, with additional costs restricted to a maximum of £228,110 over the seven year duration of the contract, subject to indexation on an annual basis for the support and maintenance, including implementation costs for the new modules.

6. RESPONSIBLE INVESTMENT METRICS AND TARGETS REPORT

- 6.1 There had been circulated copies of a report by Isio on Responsible Investment Metrics and Targets with the agenda. The Chairman welcomed Mr Andrew Singh and Mr Alex Ross of Isio to present the report. Mr Singh explained that since the publication of the agenda updated figures had been provided by some fund managers, and that he would highlight the impact of those changes where appropriate. The report followed training for Members on Responsible Investment which had taken place in August 2022. Mr Singh highlighted that the monitoring information in the report was also required for the 2020 UK Stewardship code and was expected to be required to comply with upcoming TCFD regulation. The training for Members had highlighted Responsible Investment considerations, climate science and TCFD Regulations; the importance of monitoring ESG metrics; and the various environmental and climate related metrics that could be monitored. The report detailed the results of the Fund's first annual Responsible Investment Metrics and Targets Assessment. It also documented each investment manager's ability to report on the required metrics and their current position. Those results should be used to guide decision making and action taken as a result could be documented. Mr Singh explained that the four responsible investment metrics that the managers had been asked to report on were carbon emissions, carbon footprint, implied temperature rise, and climate-related engagements. Carbon emissions and carbon footprint had the highest percentage of data, with 70% of managers able to report. 57% of managers could report on climate-related engagements, which was an acceptable rate. Mr Singh expected that the percentage of managers that could report on the implied temperature rise metric, which was the lowest at 31%, would rise at an appropriate rate.
- 6.2 A table outlining how each manager had performed against the metrics was provided in the report. The infrastructure investments made in conjunction with the Lothian Pension Fund was omitted from the table due to its overall small size, and its expected contribution was low. The reporting of data in this area was evolving, and had the potential to drive improvement in a major way. Mr Singh outlined the revised data, highlighting that Permira had gone from 22,726 to 504 with regard to their carbon emissions. M&G had also reduced significantly from 769,006 to 8,000 with regard to carbon emissions. Overall, using the adjusted numbers, the total greenhouse gas emissions for the portfolio was 162,269 metric tonnes. On a normalised basis, the adjusted emissions were 2,324 metric tonnes. The weighted average carbon footprint of the portfolio was 17 metric tonnes per \$1 million investment. The implied temperature rise ranged from 1.8 degrees Celsius to 3.2 degrees Celsius. Normalised implied temperature rise across the managers was 2.5 degrees Celsius. There were 290 individual climate engagements with companies that had been reported. Normalised across the managers there were 48 engagements, with an expectation that this would increase in the future. The biggest emitter in the portfolio was the M&G Alpha Opportunities Fund from an absolute perspective, whilst LGT reported a higher carbon footprint than Permira despite having a lower absolute emissions level. Mr Singh advised that Isio would engage with the largest emitters across the portfolio to assess the direction of travel and to seek a decrease in the emissions, and would push for better data consistency. In response to a question regarding how carbon emissions could be physically weighed, Mr Singh explained that a metric ton was a standard unit of measurement used scientifically across industry and the world. Regarding implied temperature rise projection and monitoring, Mr Singh explained that following the Paris agreement there was a globally agreed goal to restrict temperature rises below 2 degrees Celsius, and that a variety of scenario modelling would have been undertaken by companies which took into account business plans that would predict what pathway they were aligned to. A growing number of ESG data providers and climate modellers were active in the area, with many fund managers engaging specialists to assess the impact and predict a temperature rise based on their available data. Isio were actively engaged in the area to verify the accuracy of those models and to provide independent analysis. In response to a question regarding whether administration costs would increase as a result of regulatory changes, Mr Singh explained that managers would be required to comply with regulation changes for all of their clients, and that it was therefore expected that managers would spread any increased administrative costs across their clients on an equitable basis. Regarding the Bailie Gifford Paris Aligned

Equity Fund, and its categorisation as amber within the report despite being chosen as an investment fund due to its green credentials, Mr Singh advised that the Fund excluded fossil fuels and high emissions from investment, and that the Fund sought to improve the emissions levels of the companies that it invested in. In response to a request, Mr Singh undertook to present progress updates rather than solely provide a snapshot with future reports.

DECISION

NOTED the report.

7. REVIEW OF UK STEWARDSHIP CODE (2021)

With reference to paragraph 5 of the Minute of the meeting held on 15 September 2021 there had been circulated copies of a report by the Acting Chief Financial Officer which sought to review and approve the Stewardship Code application for submission by 31 October. The Stewardship Code was not a statutory requirement, however both the UK Ministry of Housing, Communities & Local Government and the TPR recommended that administering authorities of Local Government Pension Scheme (LGPS) funds should become signatories to the code. The Committee agreed on 15 September 2021 that the Fund should apply to become signatories. An application to become a signatory was submitted to the Financial Reporting Council (FRC) in October 2021 reflecting the Funds activities for 2020 but was unsuccessful. The feedback received was positive and provided guidance of the areas where future applications be improved on to improve the chances of a successful application. The feedback provided by FRC had been reviewed and incorporated into a draft application for 2021 was contained in Appendix 1 to the report. The Local Authority Pension Fund Forum (LAPFF) was an established organisation representing 85 LGPS and 6 LGPS pools across the UK. Membership of LAPFF would enhance the engagement activities of the Fund. A Summary of the benefits of joining LAPFF were contained in Appendix 2 to the report. In response to a question regarding the amount of pensions paid during 2021/22, the Acting Chief Executive clarified that a typographical error was present on page 3 of the Stewardship code submission – where reference to “£265.3m” should read “£26.53m”. The submitted document had been amended accordingly.

DECISION

AGREED:-

- (a) to approve the proposed application for the Fund to become a signatory to the Stewardship code contained in Appendix 1 to the report;**
- (b) the submission to the Financial Reporting Council; and**
- (c) membership of the Fund to the Local Authority Pension Fund Forum.**

8. INFORMATION UPDATE

- 8.1** There had been circulated copies of a briefing paper by the Acting Chief Financial Officer which provided an update on a number of areas which were being monitored and areas where work was progressing. Full reports on the individual areas would be tabled as decisions and actions were required. The HR Shared Services Manager explained that a full business continuity exercise for the Scottish Borders Council Pension Administration system had last been carried out in September 2021, and that the 2022 test was planned for September 2022. Officers had completed the questionnaire related to the LGPS Cyber Scorecard offered by AON in collaboration with PLSA. A further update would be provided at a future meeting. The Annual Benefit Statements for the year ended 31 March 2022 had been produced and were available for all active and deferred members. The final results for Cost Cap valuations had been released and suggested no changes to member benefits contribution rates.

- 8.2 With regards to the Scheme Advisory Board (SAB), the Chairman explained that he was appointed Chair of the Scheme in August. As part of a structural review four detailed business cases for different options had been prepared. The project manager whom had carried out that work had declined to continue in post. The estimated cost for the next steps was upwards of £100k, with no clear estimate produced. There remained disagreement between the union and employer sides on how to proceed, and a joint letter to Ministers had not been agreed upon. Extensive discussions had also taken place regarding the national care service proposals. The Chairman confirmed that he had written to the Scottish Government regarding the potential of the reforms to affect the viability of Local Government Pension Schemes as part of his role on the SAB. In response to a question regarding the potential impact of a mooted merger between the Lothian and Falkirk Pension Funds, the Chairman advised that the merger was voluntary in nature and that the SAB were in favour of mergers on a voluntary basis, but not those which were compulsory. Ms Robb highlighted the training opportunities that were available, and, in response to a question regarding diary clashes, explained that training providers scheduled their events in such a way as to avoid clashes but fund managers could unfortunately schedule their events in conflict with others.

DECISION

NOTED the briefing paper.

CHAIRMAN

The Chairman advised the meeting that Ms Kirsty Robb was leaving her post with Scottish Borders Council to take up a role with Borders College. The Chairman extended his gratitude to Ms Robb for her tireless work with the Fund and wished her well in her future endeavours. Those in attendance echoed the Chairman's farewell. Ms Robb advised that she would attend future meetings of the Joint Pension Fund and Pension Board as Borders College's representative on the Pension Board.

9. **PRIVATE BUSINESS**

AGREED under Section 50A(4) of the Local Government (Scotland) Act 1973 to excluded the public from the meeting during consideration of the business contained in the following items on the grounds that they involved the likely disclosure of exempt information as defined in paragraph 6 and 8 of Part 1 of Schedule 7A to the Act.

SUMMARY OF PRIVATE BUSINESS

10. **MINUTE**

The Committee noted the Private Minute of the meeting of 29 June 2022.

11. **INVESTMENT PERFORMANCE QUARTER TO 30 JUNE 2022**

The Committee noted a report by Isio on investment performance.

The meeting concluded at 11.35 am

Pension Fund Committee

19 October 2022

Dear Committee Members

Scottish Borders Council Pension Fund

Audit of 2021/22 annual report accounts

Independent auditor's report

1. Our audit work on the 2021/22 annual report and accounts is now substantially complete. Subject to the satisfactory conclusion of any outstanding matters and receipt of a revised set of annual accounts for final review, we anticipate being able to issue unqualified audit opinions in the independent auditor's report on 24 November 2022 (the proposed report is attached at [Appendix A](#)).

Annual audit report

2. Under International Standards on Auditing in the UK, we report specific matters arising from the audit of the financial statements to those charged with governance of a body in sufficient time to enable appropriate action. We present for the Pension Fund Committee consideration our draft annual report on the 2021/22 audit. The section headed "Significant findings from the audit in accordance with ISA 260" sets out the issues identified in respect of the annual accounts.

3. The report also sets out conclusions from our consideration of the four audit dimensions that frame the wider scope of public audit as set out in the Code of Audit Practice.

4. This report will be issued in final form after the annual accounts have been certified.

Unadjusted misstatements

5. We also report to those charged with governance all unadjusted misstatements which we have identified during our audit, other than those of a trivial nature and request that these misstatements be corrected.

6. We identified three unadjusted errors during the audit relating to late level 3 valuations, a difference in level 1 valuations and omission of investment management expenses. If corrected for, these would have increased the net investment assets in the balance sheet by £1.5million.

Fraud, subsequent events and compliance with laws and regulations

7. In presenting this report to the Pension Fund Committee, we seek confirmation from those charged with governance of any instances of any actual, suspected or alleged fraud; any subsequent events that have occurred since the date of the financial statements; or material non-compliance with laws and regulations affecting the entity that should be brought to our attention.

Representations from Acting Chief Financial Officer

8. As part of the completion of our audit, we are seeking written representations from the Acting Chief Financial Officer on aspects of the annual accounts, including the judgements and estimates made.

9. A letter of representation template is attached at [Appendix B](#). This should be signed and returned to us by the Acting Chief Financial Officer with the signed annual accounts prior to the independent auditor's report being certified.

Yours faithfully,

Gillian Woolman MA FCA CPFA
Audit Director

Appendix A: Proposed Independent Auditor's Report

Independent auditor's report to the members of Scottish Borders Council as administering authority for Scottish Borders Council Pension Fund and the Accounts Commission

Reporting on the audit of the financial statements

Opinion on financial statements

I certify that I have audited the financial statements in the annual report of Scottish Borders Council Pension Fund for the year ended 31 March 2022 under Part VII of the Local Government (Scotland) Act 1973. The financial statements comprise the Fund Account, the Net Assets Statement and notes to the accounts, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and UK adopted international accounting standards, as interpreted and adapted by the Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (the 2021/22 Code).

In my opinion the accompanying financial statements:

- give a true and fair view in accordance with applicable law and the 2021/22 Code of the financial transactions of the fund during the year ended 31 March 2022 and of the amount and disposition at that date of its assets and liabilities;
- have been properly prepared in accordance with UK adopted international accounting standards, as interpreted and adapted by the 2021/22 Code; and
- have been prepared in accordance with the requirements of the Local Government (Scotland) Act 1973, The Local Authority Accounts (Scotland) Regulations 2014, and the Local Government in Scotland Act 2003.

Basis for opinion

I conducted my audit in accordance with applicable law and International Standards on Auditing (UK) (ISAs (UK)), as required by the [Code of Audit Practice](#) approved by the Accounts Commission for Scotland. My responsibilities under those standards are further described in the auditor's responsibilities for the audit of the financial statements section of my report. I was appointed under arrangements approved by the Accounts Commission on 18 July 2016. The period of total uninterrupted appointment is 6 years. I am independent of the fund in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK including the Financial Reporting Council's Ethical Standard, and I have fulfilled my other ethical responsibilities in accordance with these requirements. Non-audit services prohibited by the Ethical Standard were not provided to the council. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Conclusions relating to going concern basis of accounting

I have concluded that the use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the fund's

ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from when the financial statements are authorised for issue.

These conclusions are not intended to, nor do they, provide assurance on the fund's current or future financial sustainability. However, I report on the fund's arrangements for financial sustainability in a separate Annual Audit Report available from the [Audit Scotland website](#).

Risks of material misstatement

I report in my Annual Audit Report the most significant assessed risks of material misstatement that I identified and my judgements thereon.

Responsibilities of the Acting Chief Financial Officer and Scottish Borders Council Pension Fund Committee for the financial statements

As explained more fully in the Statement of Responsibilities, the Acting Chief Financial Officer is responsible for the preparation of financial statements that give a true and fair view in accordance with the financial reporting framework, and for such internal control as the Acting Chief Financial Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Acting Chief Financial Officer is responsible for assessing the fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless there is an intention to discontinue the fund's operations.

The Scottish Borders Council Pension Fund Committee is responsible for overseeing the financial reporting process.

Auditor's responsibilities for the audit of the financial statements

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. I design procedures in line with my responsibilities outlined above to detect material misstatements in respect of irregularities, including fraud. Procedures include:

- obtaining an understanding of the applicable legal and regulatory framework and how the fund is complying with that framework;
- identifying which laws and regulations are significant in the context of the fund;
- assessing the susceptibility of the financial statements to material misstatement, including how fraud might occur; and
- considering whether the audit team collectively has the appropriate competence and capabilities to identify or recognise non-compliance with laws and regulations.

The extent to which my procedures are capable of detecting irregularities, including fraud, is affected by the inherent difficulty in detecting irregularities, the effectiveness of the fund's controls, and the nature, timing and extent of the audit procedures performed.

Irregularities that result from fraud are inherently more difficult to detect than irregularities that result from error as fraud may involve collusion, intentional omissions, misrepresentations, or the override of internal control. The capability of the audit to detect fraud and other irregularities depends on factors such as the skilfulness of the perpetrator, the frequency and extent of manipulation, the degree of collusion involved, the relative size of individual amounts manipulated, and the seniority of those individuals involved.

A further description of the auditor's responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website www.frc.org.uk/auditorsresponsibilities. This description forms part of my auditor's report.

Reporting on other requirements

Other information

The Acting Chief Financial Officer is responsible for other information in the annual report. The other information comprises the Management Commentary, Annual Governance Statement, Annual Governance Compliance Statement, Statement of Responsibilities and other reports included in the annual report other than the financial statements and my auditor's report thereon.

My responsibility is to read all the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the course of the audit or otherwise appears to be materially misstated. If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact. I have nothing to report in this regard.

My opinion on the financial statements does not cover the other information and I do not express any form of assurance conclusion thereon except on the Management Commentary, Annual Governance Statement and Annual Governance Compliance Statement to the extent explicitly stated in the following opinions prescribed by the Accounts Commission.

Opinions prescribed by the Accounts Commission on the Management Commentary, Annual Governance Statement and Annual Governance Compliance Statement

In my opinion, based on the work undertaken in the course of the audit:

- the information given in the Management Commentary for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with statutory guidance issued under the Local Government in Scotland Act 2003;
- the information given in the Annual Governance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Delivering Good Governance in Local Government: Framework (2016): and

- the information given in the Annual Governance Compliance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with The Local Government Pension Scheme (Scotland) Regulations 2018.

Matters on which I am required to report by exception

I am required by the Accounts Commission to report to you if, in my opinion:

- adequate accounting records have not been kept; or
- the financial statements are not in agreement with the accounting records; or
- I have not received all the information and explanations I require for my audit.

I have nothing to report in respect of these matters.

Conclusions on wider scope responsibilities

In addition to my responsibilities for the annual accounts, my conclusions on the wider scope responsibilities specified in the Code of Audit Practice, including those in respect of Best Value, are set out in my Annual Audit Report.

Use of my report

This report is made solely to the parties to whom it is addressed in accordance with Part VII of the Local Government (Scotland) Act 1973 and for no other purpose. In accordance with paragraph 120 of the Code of Audit Practice, I do not undertake to have responsibilities to members or officers, in their individual capacities, or to third parties.

Gillian Woolman MA FCA CPFA
Audit Director
Audit Scotland
102 West Port
Edinburgh
EH3 9DN

Appendix B: Letter of Representation (ISA 580)

Gillian Woolman, Audit Director
Audit Scotland
4th Floor
102 West Port
Edinburgh
EH3 9DN

Dear Ms Woolman

Scottish Borders Council Pension Fund Annual Accounts 2021/22

1. This representation letter is provided about your audit of the annual accounts of Scottish Borders Council Pension Fund for the year ended 31 March 2022 for the purpose of expressing an opinion as to whether the financial statements give a true and fair view in accordance with the financial reporting framework, and for expressing other opinions on the management commentary, annual governance statement and annual governance compliance statement.

2. I confirm to the best of my knowledge and belief and having made such enquiries as I considered necessary, the following representations given to you in connection with your audit of Scottish Borders Council Pension Fund annual accounts for the year ended 31 March 2022.

General

3. I have fulfilled my statutory responsibilities for the preparation of the 2021/22 annual accounts. All the accounting records, documentation and other matters which I am aware are relevant to the preparation of the annual accounts have been made available to you for the purposes of your audit. All transactions undertaken by Scottish Borders Council Pension Fund have been recorded in the accounting records and are properly reflected in the financial statements.

4. I confirm that the effects of uncorrected misstatements are immaterial, individually and in aggregate, to the financial statements as a whole. I am not aware of any uncorrected misstatements other than those reported by you.

Financial Reporting Framework

5. The annual accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (2021/22 accounting code), and in accordance with the requirements of the Local Government (Scotland) Act 1973, the Local Government in Scotland Act 2003 and The Local Authority Accounts (Scotland) Regulations 2014.

6. In accordance with the 2014 regulations, I have ensured that the financial statements give a true and fair view of the financial position of the Scottish Borders Council Pension Fund at 31 March 2022 and the transactions for 2021/22.

Accounting Policies & Estimates

7. All significant accounting policies applied are as shown in the notes to the financial statements. The accounting policies are determined by the 2021/22 accounting code where applicable. Where the code does not specifically apply I have used judgement in developing and applying an accounting policy that results in information that is relevant and reliable. All

accounting policies applied are appropriate to Scottish Borders Council Pension Fund circumstances and have been consistently applied.

8. The significant assumptions used in making accounting estimates are reasonable and properly reflected in the financial statements. Judgements used in making estimates have been based on the latest available, reliable information. Estimates have been revised where there are changes in the circumstances on which the original estimate was based or as a result of new information or experience.

Going Concern Basis of Accounting

9. I have assessed Scottish Borders Council Pension Fund's ability to continue to use the going concern basis of accounting and have concluded that it is appropriate. I am not aware of any material uncertainties that may cast significant doubt on Scottish Borders Council Pension Fund's ability to continue as a going concern.

Banking and Cash Flow Arrangements

10. Scottish Borders Council Pension Fund maintains separate bank accounts and while these accounts form part of Scottish Borders Council's treasury management arrangements, the pension fund can demonstrate that there is no borrowing from the administering authority. Amounts due to the administering authority to cover daily cash flows such as payments through the council's systems are reimbursed on a regular basis.

Assets

11. For the year ended 31 March 2022, the amounts included in the Net Assets Statement reflects investments managed both internally and externally by appointed fund managers and the global custodian on behalf of the funds. Amounts have been calculated in accordance with approved bases of valuation and fairly represent the values at 31 March 2022. In making these assertions I am reliant on the opinions of the appointed fund managers. As far as we can reasonably ascertain, all assets are free from any lien, encumbrance, or charge except as disclosed in the financial statements.

Liabilities

12. All liabilities at 31 March 2022 of which I am aware have been recognised in the annual accounts.

13. There are no plans or intentions that are likely to affect the carrying value or classification of the liabilities recognised in the financial statements.

14. The pension assumptions made by the actuary in the IAS 26 and IAS 19 Report for the Scottish Borders Council Pension Fund have been considered and I confirm that they are consistent with management's own view.

Contingent liabilities

15. There are no significant contingent liabilities, other than those disclosed in Note 28 to the financial statements, arising either under formal agreement or through formal undertakings requiring disclosure in the accounts. All known contingent liabilities have been fully and properly disclosed, including any outstanding legal claims which have not been provided under the Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 and IAS 37.

Fraud

16. I have provided you with all information in relation to:

- my assessment of the risk that the financial statements may be materially misstated because of fraud
- any allegations of fraud or suspected fraud affecting the financial statements
- fraud or suspected fraud that I am aware of involving management, employees who have a significant role in internal control, or others that could have a material effect on the financial statements.

Laws and Regulations

17. I have disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing financial statements.

Related Party Transactions

18. All material transactions with related parties have been appropriately accounted for and disclosed in the financial statements in accordance with the 2021/22 accounting code. I have made available to you the identity of all the Scottish Borders Council Pension Fund related parties and all the related party relationships and transactions of which I am aware.

Management commentary

19. I confirm that the Management Commentary has been prepared in accordance with the statutory guidance and the information is consistent with the financial statements.

Corporate Governance

20. I acknowledge, as officer with the responsibility for the proper administration of the funds' financial affairs under section 95 of the Local Government (Scotland) Act 1973, my responsibility for the corporate governance arrangements and internal controls. I confirm that the Scottish Borders Council Pension Fund has undertaken a review of the system of internal control during 2021/22 to establish the extent to which it complies with proper practices set out in the Delivering Good Governance in Local Government: Framework 2016. I have disclosed to you all deficiencies in internal control identified from this review or of which I am otherwise aware.

21. I confirm that the Annual Governance Statement has been prepared in accordance with the Delivering Good Governance in Local Government: Framework 2016 and the information is consistent with the financial statements. There have been no changes in the corporate governance arrangements or issues identified, since 31 March 2022, which require to be reflected.

Events Subsequent to the Date of the Net Assets Statement

22. There have been no material events since the date of the Net Assets Statements which necessitate revision of the figures in the financial statements or notes thereto including contingent assets and liabilities.

23. Since the date of the Net Assets Statements no events or transactions have occurred, which though properly excluded from the financial statements, are of such importance that they should be brought to your notice.

Yours sincerely

Suzanne Douglas CPFA

Acting Chief Financial Officer

Scottish Borders Council Pension Fund 2021/22 Annual Audit Report



Prepared for Scottish Borders Council as administering authority for Scottish Borders Council Pension Fund and the Controller of Audit

October 2022

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Key messages

2021/22 annual report and accounts

- 1 Our audit opinions on the annual report and accounts are unmodified.
- 2 The financial statements of Scottish Borders Council Pension Fund give a true and fair view of the state of affairs of the Fund as at 31 March 2022 and have been properly prepared in accordance with the financial reporting framework.

Financial management

- 3 The Fund pays out more than it collects annually from fund members, with investment returns making up the difference. The value of the Fund increased by 5.9% to £911 million during 2021/22, but investment performance was below the benchmark return set for the year.
- 4 The Fund has appropriate and effective financial management arrangements in place which includes comprehensive reporting of investment performance.

Financial sustainability

- 5 Recent triennial valuations provide assurance over the financial sustainability of the fund and the viability of its funding strategy.
- 6 The Fund reviewed its investment strategy following the March 2020 triennial valuation and will continue to diversify the investment structure to support income generation.

Governance and transparency

- 7 Governance arrangements have been appropriate and operated effectively.
- 8 There is effective scrutiny, challenge and informed decision-making by committee.
- 9 The Fund actively considers Environmental, Social and Governance matters as part of its Investment Strategy.

Best Value

- 10 The Fund has an appropriate best value framework in place which includes effective arrangements for monitoring investment performance and scrutinising management expenses.

- 11** Scottish Borders Council Pension Fund was awarded Local Government Pension Scheme (LGPS) Fund of the Year (assets under £2.5bn) at the LAPF Investments Awards.
- 12** 2021/22 was a challenging year for Scottish Local Government Pension Schemes. Ten of the eleven funds still reported positive movements in net assets during the year, but only three of those funds, not including Scottish Borders, reported above benchmark returns.

Introduction

1. This report is a summary of our findings arising from the 2021/22 audit of Scottish Borders Council Pension Fund (the Fund).
2. The scope of our audit was set out in our Annual Audit Plan presented to the March 2022 meeting of the Pension Fund Committee and to the March 2022 Audit and Scrutiny Committee. This report comprises:
 - an audit of the Fund's annual report and accounts
 - consideration of the wider dimensions of financial management, financial sustainability, governance and transparency, and value for money, that frame the wider scope of public audit set out in the [Code of Audit Practice 2016](#).
3. The main elements of our audit work in 2021/22 have been:
 - an audit of the Fund's 2021/22 annual report and accounts including the issue of an independent auditor's report setting out our opinions
 - a review of the Fund's main financial systems
 - consideration of the four audit dimensions of financial management, financial sustainability, governance and transparency and value for money.

Added Value

4. We add value to the Fund through the audit by:
 - identifying and providing insight on significant risks, and making clear and relevant recommendations
 - sharing intelligence and good practice through our national reports ([Appendix 3](#)) and good practice guides
 - providing clear and focused conclusions on the appropriateness, effectiveness and impact of corporate governance, performance management arrangements and financial sustainability.

Responsibilities and reporting

5. Scottish Borders Council is the administering authority for the Scottish Borders Council Pension Fund. The council delegates this responsibility to the Pension Fund Committee. The committee is responsible for establishing effective governance arrangements and ensuring that financial management is

effective. The Pension Fund Committee also recommends the annual report and accounts for approval by the Council. The Council's Audit and Scrutiny Committee is responsible for reviewing the effectiveness of internal control arrangements.

6. Our responsibilities as independent auditors are established by the Local Government (Scotland) Act 1973, the [Code of Audit Practice 2016](#), and supplementary guidance, and International Standards on Auditing in the UK.

7. As public sector auditors we give independent opinions on the annual accounts. Additionally, we also conclude on:

- the effectiveness of the Fund's performance management arrangements
- suitability and effectiveness of corporate governance arrangements and financial position
- arrangements for securing financial sustainability.

8. Further details of the respective responsibilities of management and the auditor can be found in the [Code of Audit Practice 2016](#) and supplementary guidance.

9. This report raises matters from the audit of the annual accounts and consideration of the audit dimensions. Weaknesses or risks identified are only those which have come to our attention during our normal audit work and may not be all that exist. Communicating these does not absolve management from its responsibility to address the issues we raise and to maintain adequate systems of control.

10. Our annual audit report contains an agreed action plan at [Appendix 1](#) setting out specific recommendations, responsible officers, and dates for implementation. It also includes any outstanding actions from last year and progress against these.

Auditor Independence

11. Auditors appointed by the Accounts Commission or Auditor General must comply with the Code of Audit Practice and relevant supporting guidance. When auditing the financial statements auditors must comply with professional standards issued by the Financial Reporting Council and those of the professional accountancy bodies.

12. We can confirm that we comply with the Financial Reporting Council's Ethical Standard. We can also confirm that we have not undertaken any non-audit related services and therefore the 2021/22 audit fee of £22,110 as set out in our Annual Audit Plan remains unchanged.

13. This report is addressed to both the members of the Pension Fund Committee and the Controller of Audit and will be published on Audit Scotland's website www.audit-scotland.gov.uk in due course.

Audit appointment from 2022/23

14. The Accounts Commission is responsible for the appointment of external auditors to local government bodies. External auditors are usually appointed for a five-year term either from Audit Scotland's Audit Services Group or a private firm of accountants. The current appointment round was due to end in 2020/21 but this was extended for a year so that 2021/22 is the last year of the current appointment round.

15. The procurement process for the new round of audit appointments covering 2022/23 to 2026/27 was completed in May 2022 and Audit Scotland has again been appointed as the external auditor for Scottish Borders Council Pension Fund. Although Audit Scotland remain the board's external auditors, to maintain the independence and objectivity of the audit team, the engagement lead and other staff working on the audit will be changed for the 2022/23 audit. The outgoing audit team will work with officers and the new audit team to ensure a smooth transition.

16. A new [Code of Audit Practice](#) applies to public sector audits for financial years starting on or after 1 April 2022. It replaces the Code issued in May 2016.

17. We would like to thank Committee members and other staff, particularly those in finance and the pensions administration team for their co-operation and assistance over the last six years.

1. Audit of 2021/22 annual report and accounts

The principal means of accounting for the stewardship of resources and performance

Main judgements

Our audit opinions on the annual report and accounts are unmodified.

The financial statements of Scottish Borders Council Pension Fund give a true and fair view of the state of affairs of the Fund as at 31 March 2022 and have been properly prepared in accordance with the financial reporting framework.

Our audit opinions on the annual report and accounts are unmodified

18. The annual report and accounts for the year ended 31 March 2022 were approved by the Scottish Borders Council on 24th November 2022. We reported, within the independent auditor's report that:

- the financial statements give a true and fair view and were properly prepared in accordance with the financial reporting framework
- the management commentary, annual governance statement and governance compliance statement were all consistent with the financial statements and properly prepared in accordance with the guidance.

The Covid-19 pandemic had no impact on audit evidence

19. The completeness and accuracy of accounting records and the extent of information and explanations that we required for our audit were not affected by the Covid-19 outbreak.

20. The working papers provided with the unaudited accounts were of a good standard and finance staff provided support to the audit team during the audit. This helped ensure that the audit of the annual accounts process ran smoothly.

The annual report and accounts were submitted in line with our agreed audit timetable

21. Submission dates for the audited annual report and accounts for 2020/21 and 2021/22 were deferred in line with the later dates for producing the annual accounts because of the impact of Covid-19. Audit Scotland has set target

dates for 2021/22 which transition to more regular timescales. For 2021/22, the deadline for the audited annual report and accounts is 31 October 2022. We will present our Annual Audit Report to the Pension Fund Committee in October 2022, but due to diary commitments, the accounts will now be signed off in November 2022.

22. The unaudited annual report and accounts were received in line with our agreed audit timetable on 30 June 2022.

There were no objections raised to the annual report and accounts

23. The Local Authority Accounts (Scotland) Regulations 2014 require local government bodies to publish a public notice on their website that includes details of the period for inspecting and objecting to the accounts. This must remain on the website throughout the inspection period. The notice for Scottish Borders Council Pension Fund was published on the website of the administering authority (Scottish Borders Council) and complies with the regulations. No objections were received to the Scottish Borders Council Pension Fund accounts.

Overall materiality is £9.1 million

24. We apply the concept of materiality in both planning and performing the audit and in evaluating the effect of identified misstatement on the audit and of uncorrected misstatements, if any, on the financial statements and in forming the opinion in the independent auditor's report. We identify a benchmark on which to base overall materiality, such as gross assets, and apply what we judge to be the most appropriate percentage level for calculating materiality values.

25. The determination of materiality is based on professional judgement and is informed by our understanding of the entity and what users are likely to be most concerned about in the financial statements. In assessing performance materiality, we have considered factors such as our findings from previous audits, any changes in business processes and the entity's control environment including fraud risks.

26. Our initial assessment of materiality for the annual report and accounts was carried out during the planning phase of the audit. This was reviewed on receipt of the unaudited annual report and accounts and is summarised in [Exhibit 1](#).

Exhibit 1 Materiality values

Materiality level	Amount
Overall materiality	£9.1 million
Performance materiality	£5.9 million

Materiality level	Amount
Reporting threshold	£250 thousand
Specific materiality (applied to benefits expenditure and contributions income in the fund account)	£2.5 million
Specific performance materiality	£1.5 million

Source: Audit Scotland

We have no significant findings to report on the annual report and accounts

27. International Standard on Auditing (UK) 260 requires us to communicate significant findings from the audit to those charged with governance, including our view about the qualitative aspects of the body's accounting practices. We have no issues to report from the audit.

We have obtained audit assurances over the significant financial statements' risks identified in our 2021/22 Annual Audit Plan

28. We have obtained audit assurances over the identified significant risks of material misstatement to the financial statements. [Exhibit 2](#) sets out the significant risks of material misstatement to the financial statements we identified in our 2021/22 Annual Audit Plan. It summarises the further audit procedures we performed during the year to obtain assurances over these risks and the conclusions from the work completed.

Exhibit 2

Significant risks of material misstatement in the financial statements

Audit risk	Assurance procedure	Results and conclusions
<p>1. Risk of material misstatement due to fraud caused by the management override of controls</p> <p>As stated in International Standard on Auditing (UK) 240, management is in a unique position to perpetrate fraud because of management's ability to override controls that</p>	<ul style="list-style-type: none"> Assess the design and implementation of controls over journal entry processing. Make inquiries of individuals involved in the financial reporting process about inappropriate or unusual activity relating to the processing of journal entries and other adjustments. 	<p>No issues identified.</p> <p>No issues identified.</p>

Audit risk	Assurance procedure	Results and conclusions
<p>otherwise appear to be operating effectively.</p>	<ul style="list-style-type: none"> • Test journals at the year-end and post-closing entries and focus on significant risk areas. • Consider the need to test journal entries and other adjustments during the period. • Evaluate significant transactions outside the normal course of business. • Assess the adequacy of controls in place for identifying and disclosing related party relationship and transactions in the financial statements. • Assess any changes to the methods and underlying assumptions used to prepare accounting estimates compared to the prior year. • Focussed testing of accounting accruals and prepayments. 	<p>No unusual or inappropriate transactions were identified as part of our detailed journal testing.</p> <p>No unusual or inappropriate transactions were identified as part of our detailed journal testing.</p> <p>Substantive testing of transactions throughout the year were concluded as satisfactory.</p> <p>No issues identified.</p> <p>No changes to methods identified.</p> <p>Focussed testing on accruals and prepayments did not identify any instances of management override of controls.</p> <p>Conclusion: We have not identified any indication of management override in the year leading to material misstatement or significant concern.</p>
<p>2. Estimations applied to level 3 investments</p> <p>The pension fund has a significant portfolio of level 3 investments, for example unquoted equities, where valuations involve the application of a variety of estimates in determining appropriate valuations. This</p>	<ul style="list-style-type: none"> • Confirmation of year end valuations to valuation reports and/or other supporting documentation. • We will review user entity controls in relation to the use of service organisations. • Review the relevant investment manager 	<p>No significant issues identified.</p> <p>No issues identified.</p>

Audit risk	Assurance procedure	Results and conclusions
<p>subjectivity gives rise to a significant risk of material misstatement in the financial statements.</p>	<p>controls' reports for qualifications or exceptions that may affect the audit risk.</p> <ul style="list-style-type: none"> Review the arrangements in place at the Fund to assess investment managers' governance arrangements. Review the disclosures included in the accounts to ensure these are adequate in directing the user of the accounts to acknowledge the areas of major sources of estimation and uncertainty with regards to level 3 assets. 	<p>No issues identified.</p> <p>See Appendix 1 Recommendation 4</p> <p>No issues identified.</p> <p>Conclusion: From our review of investment manager reports, review of disclosures and our review of the user entity controls in relation to the use of a service organisation, we did not identify any significant issues in relation to this risk.</p>

Other areas of audit focus

29. We identified in our 2021/22 Annual Audit Plan areas where we considered there to be other risks of material misstatement to the financial statements. Based on our assessment of the likelihood and magnitude of the risk, we did not consider these to represent significant risks. The areas of specific audit focus were:

- Estimations applied to the actuarial valuation: The actuarial valuation depends on a range of financial and demographic estimations about the future. The subjectivity around these estimates gives rise to a risk of material misstatement in the financial statements.
- Valuation of level 1 and level 2 assets: Investments held by the Pension Fund are subject to market price fluctuations and a degree of estimation. The Pension Fund holds material level 1 (where valuation derived directly from unadjusted quoted active market price) and level 2 (where the instrument is traded in a market not considered to be active or where the fair value is determined using valuation techniques based on market prices). Due to the material amounts and in particular, the degree of subjectivity and complexity in the valuation of level 2, this gives rise to a risk of material misstatement in the financial statements.

30. We kept these areas under review throughout our audit and based on the findings of the audit procedures performed, there are no matters which we need to bring to your attention.

Other matters arising from the audit of the financial statements

31. Pension Recalculation: In our 2020/21 audit, we reported an error with a pension lump sum payment. Management agreed to recalculate the member's options and to re-engage with the member. During our 2021/22 audit we identified a further error and alerted management. This is detailed in [Appendix 1](#) setting out specific recommendations, responsible officers, and dates for implementation.

32. Pension Overpayment: The aforementioned error has resulted in an overpayment. As it was an error made by officers who are employed by the council (with salary costs recharged to the pension fund), and not the individual, it was agreed no recovery of overpayment would be sought. The cost has been borne by the pension fund and not the council. Whilst a scheme of delegation is in place for the council there is a need to consider an appropriate scheme of delegation for decisions that impact on the pension fund. This should include information on what circumstances would give rise to not seek recovery of overpayment, and what entity should bear the cost of that overpayment. This is detailed in [Appendix 1](#) setting out specific recommendations, responsible officers, and dates for implementation.

33. Investment Management Expenses: We identified that £0.128m was omitted from the investment management expenses. This was a timing error caused by information not completely available at the time of the preparation of the accounts. We reviewed each of the cost transparency initiative templates, completed by fund managers, provided after the year end and this total reflects the total of costs omitted. We recommend a new process is put in place for the collection and recording of investment management fees to ensure these are complete. This is detailed in [Appendix 1](#) setting out specific recommendations, responsible officers, and dates for implementation.

Recommendation 2

As part of the accounts preparation process, management should ensure that investment managers provide information to the fund on a timely basis.

Identified misstatements of £2.9 million were not adjusted in the accounts. These were less than our performance materiality and we did not need to further revise our audit approach

34. Total misstatements identified had a net value of £1.5million. Misstatements identified related to:

- **Level 3 late valuations** Misstatements identified were £2.2million, which if adjusted, would have increased investment asset values by £2.2 million. These consist of late valuations received for Level 3 assets. The

valuations for these assets are included in the accounts with a lagged valuation date of 31 December 2021. The valuations were not available when the unaudited accounts were issued. The final valuations were received during our audit.

- **Investment management expenses** Misstatements identified were £0.12m. Investment managers had not provided complete information at the time of the accounts preparation. If these had been adjusted, there would be no overall impact as both management expenses and change to market value would be adjusted.
- **Baillie Gifford Global Investments** Information included in the custodian values on comparison with the fund manager values differed by £0.625m. The fund had used the custodian values for accounts preparation purposes. The differences are mainly timing related, with the majority driven by the fund manager cutting a share price of a suspended trading investment company. If these had been adjusted, this would have decreased investment asset values by £0.625m.

35. After discussions with management, we concluded that adjustments for these were not required as the total net adjustment required to investment assets of £1.5 million is below our performance materiality level.

36. We have concluded that the misstatements identified arose from issues that have been isolated and identified in their entirety, and do not indicate any systemic error. Items not adjusted are detailed in [Appendix 2](#).

Progress was made on prior year recommendations

37. The Fund has made progress in implementing our prior year audit recommendations. For actions not yet implemented, revised responses and timescales have been agreed with management and are set out in [Appendix 1](#).

2. Financial management

Financial management is about financial capacity, sound budgetary processes and whether the control environment and internal controls are operating effectively.

Main judgements

The Fund pays out more than it collects annually from fund members, with investment returns making up the difference. The value of the Fund increased by 5.9% to £911 million during 2021/22, but investment performance was below the benchmark return set for the year.

The Fund has appropriate and effective financial management arrangements in place which includes comprehensive reporting of investment performance.

The annual performance of the Fund was significantly impacted by Covid-19 and other world events

38. When considering the investment performance of the Fund during 2021/22, it is important to recognise the impact of Covid-19 and other world events on financial markets and investments. The global impact of the pandemic and the conflict in Ukraine has significantly increased market volatility. The Fund's performance by the conclusion of 2021/22 is summarised in [Exhibit 3](#).

Exhibit 3

Assets, funding level and investment performance

Increase in net assets	Funding level	Investment performance
£911 million	110%	7.3%
Closing net assets as at 31 March 2022 (+5.9%)	2020 Funding Valuation	Average annual return on investments over 5 years
£860 million	114%	5.9%
Opening net assets at 1 April 2021	2017 Funding Valuation	Return on investments 2021/22

Source: 2021/22 Scottish Borders Council Pension Fund unaudited annual report and accounts

39. Despite the volatile market conditions, the Fund has seen a positive performance of 5.9%, against a benchmark of 10.6% for 2021/22. The net assets of the Fund increased from £860 million at 31 March 2021 to £911 million at 31 March 2022. During 1st April 2021 to 31st December 2021, investment assets continued to grow, with a peak of £938m as at 31st December 2021. In the last quarter of 2021/22, there was significant market volatility for most major asset classes. This was attributed to concerns over rising inflation, monetary policy and the Russia-Ukraine war.

40. Hymans Robertson estimated the pension liabilities decreased by 2.8% to £1,057 million at 31 March 2022 (2020/21 – £1,088 million). This estimate uses assumptions in line with International Accounting Standard (IAS) 26 requirements, for the purposes of the Fund's financial statements.

The Fund has appropriate and effective financial management arrangements in place which includes comprehensive reporting of investment performance

41. The Acting Chief Financial Officer for Scottish Borders Council is the Proper Officer responsible for Scottish Borders Council Pension Fund. The financial regulations of Scottish Borders Council, as administering authority, apply to the Fund. We consider these to be current, comprehensive and support good financial management.

42. The Pension Fund Committee receives administration and performance reports at its quarterly meetings. These reports are comprehensive and include fund performance trends, investment manager performance against benchmarks and movements in asset allocations. From attendance at Committee we observed and concluded that reports presented to members are subject to appropriate review and scrutiny.

43. Overall, we have concluded that the Fund has appropriate and effective financial management arrangements in place, including comprehensive reporting of investment performance.

Financial systems of internal control operated effectively

44. As part of our audit, we identify and inspect the key internal controls in those accounting systems which we regard as significant to produce the financial statements. Our objective is to gain assurance that the Fund has systems of recording and processing transactions which provide a sound basis for the preparation of the financial statements.

45. Our work in 2021/22 covered the key controls over the systems used for pension administration activity and the pension fund's investments. The Fund also uses the financial systems of the administering authority, Scottish Borders Council. The main council systems used by the Fund are the general ledger system and the payroll system. Our review of the controls in operation within these systems was conducted as part of our audit of Scottish Borders Council.

46. Our review of the systems used by the Fund and the administering authority did not identify any significant control weaknesses which could affect the Fund's

ability to report financial and other relevant data in the financial statements, and we concluded that systems of internal control for the Fund operated effectively during 2021/22.

47. Whilst we concluded that overall systems of internal control are operating effectively, we noted that some general documentation and administrative control procedures had not been completed. This was initially raised in our 2020/21 AAR. We understand some control procedures were historically completed in paper format, which have not been updated to reflect the move to home working. This is detailed in [Appendix 1](#) setting out specific recommendations, responsible officers, and dates for implementation.

Prior year recommendation 6

Management should review administrative procedures in place and update these to reflect the move to home working. Management should also ensure that officers are familiar with their responsibilities for the completion of supporting paperwork to evidence processes have been completed and reviewed in a timely manner.

Standards of conduct and arrangements for prevention and detection of fraud and error were appropriate

48. Scottish Borders Council Pension Fund is responsible for establishing arrangements for the prevention and detection of fraud, error and irregularities, bribery, and corruption and to ensure that their affairs are managed in accordance with proper standards of conduct by putting proper arrangements in place.

49. The risk profile of public bodies during 2021/22 has been significantly affected by the Covid-19 pandemic. This is likely to have increased the risk of fraud and error as control environments and internal controls have had to change to allow for services to operate effectively and respond to issues in a timely manner.

50. The Fund relies on the Council's arrangements for the prevention and detection of fraud and corruption. We have reviewed the arrangements put in place by the Council to address any heightened risks and concluded that there are appropriate arrangements for the prevention and detection of fraud, error and irregularities.

3. Financial sustainability

Financial sustainability looks forward to the medium and long term to consider whether the Fund maintains the capacity to meet the current and future needs of its members.

Main judgements

Recent triennial valuations provide assurance over the financial sustainability of the fund and the viability of its funding strategy.

The investment strategy was reviewed following the March 2020 triennial valuation and will continue to diversify the investment structure to support income generation.

Recent triennial valuations provide assurance over the financial sustainability of the fund and the viability of its funding strategy

51. The results of the 2020 full triennial valuation of the Scottish Borders Council Pension Fund showed a funding level of 110%. This is a slight drop from 114% in the 2017 valuation, but it still means that, overall, the investment assets were higher than the projected liabilities.

Medium term financial planning arrangements are appropriate and effective

52. There is considerable volatility in pension funding and the results of the triennial valuation are in effect a snapshot of the Fund at 31 March 2020. Following each triennial valuation, the Fund reviews and revises its funding strategy. The funding strategy is a summary of the Fund's approach to funding liabilities. The investment strategy outlines the types of investment to be held and the amount held in the different types of investment

53. The last review was carried out in 2021 after the results of the 2020 triennial valuation. The revised investment strategy reflects the Fund's decision to focus on income generation to build capacity to fund annual benefits as cash flows from dealings with members continue to be negative. The Fund has considered this as part of its investment strategy and is further diversifying its investment structure to increase investment in income generating assets. This has been a proactive response from the Fund to move to more income bearing assets to pay annual pensions as the fund matures.

54. The Fund has begun implementing the key changes agreed as part of the review. This includes the restructuring of the Fund's equity portfolio, the

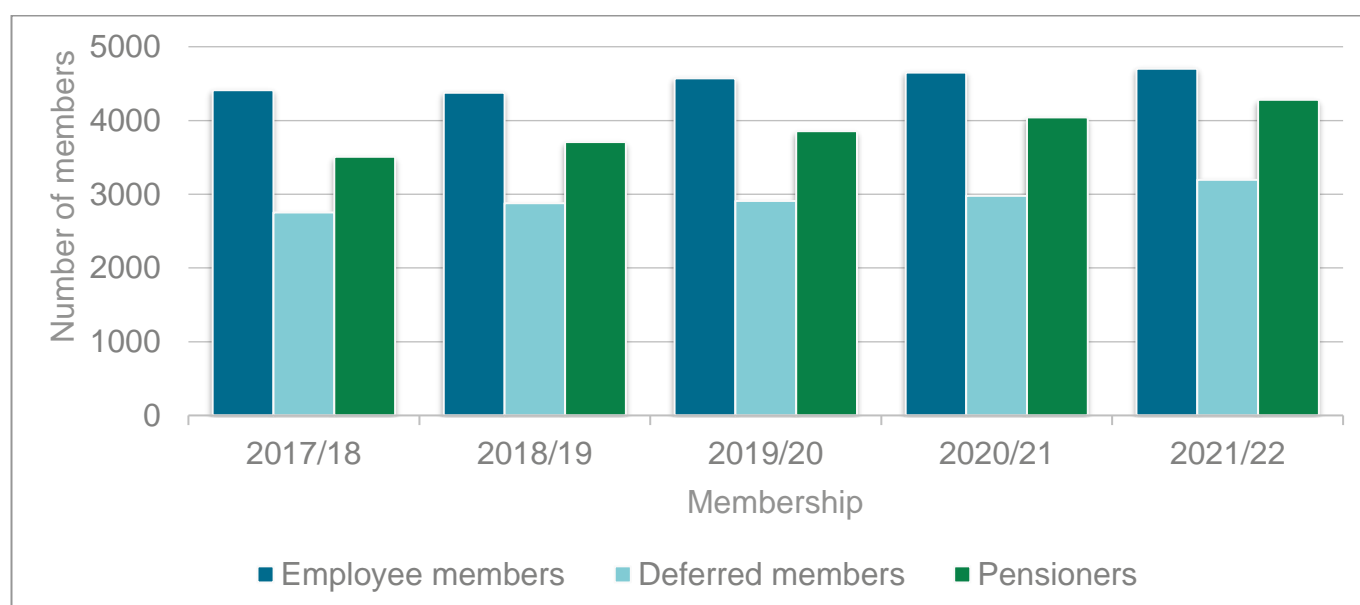
implementation of a new pooled infrastructure equity mandate and the restructuring of the property portfolio.

Fund membership levels continue to increase but the ratio of active members to pensioners is reducing

55. The Fund is a multi-employer fund with one Local Authority, and 16 other employers. The current membership profile is shown at [Exhibit 4](#).

56. The Fund gives its members a guarantee that in exchange for contributions during their employment, it will pay a pension until the end of each members' life. It is important that the fund maintains the capacity to meet the current and future pension entitlements of its members.

Exhibit 4 Scottish Borders Council Pension Fund membership



Source: Scottish Borders Council Pension Fund 2021/22 unaudited financial statements

57. Membership of the fund increased by 514 to 12,178 members at 31 March 2022; an increase in membership of 4.4%. The impact of auto-enrolment continues to contribute to the increase in employee members.

58. In 2021/22 the number of pensioners receiving a pension from Scottish Borders Council Pension Fund increased by over 240 and the number of pensioner members continues to increase steadily each year. The number of active members continues to outweigh the number of pensioners but the ratio of active members to pensioners has reduced over the past five years.

59. Cash flows from dealings with members continue to be negative with more paid out in benefits than that received from contributions. The cash flow position impacts the investment strategy as income from investments rather than

contributions is needed to pay pensions The fund has been maturing since 2013/14. The Fund has considered this as part of its investment strategy and is further diversifying its investment structure to increase investment in income generating assets. This has been a proactive response from the Fund to move to more income bearing assets to pay annual pensions as the fund matures.

Future rates of employer contributions

60. Following the triennial valuation in 2020, the actuary agreed employer contribution rates with individual employers from 1 April 2021. For the majority of employers, the current funding surplus is being used to subsidise and stabilise contribution rates. For one employer, their rate includes an element of deficit recovery contributions to support the employer's financial planning. The approximate split of all contributions received in year is set out at [Exhibit 5](#).

Exhibit 5 Contributions in 2021/22

	Administering authority £m	Other scheduled bodies £m	Admitted bodies £m	Total £m
Employer contributions	13.94	0.74	2.35	17.03
Employee contributions	4.60	0.25	0.65	5.5

Source: Scottish Borders Council Fund 2021/22 audited financial statements and supporting working papers

4. Governance and transparency

The effectiveness of scrutiny and oversight and the transparent reporting of information

Main judgements

Governance arrangements are appropriate and operate effectively.

There is effective scrutiny, challenge and informed decision making by committee.

The Fund actively considers Environmental, Social and Governance matters as part of its Investment Strategy.

Governance arrangements are appropriate and operate effectively

61. Scottish Borders Council is the administering body for Scottish Borders Council Pension Fund. The Council has delegated responsibility for governance to the Pension Fund Committee. This committee, supported by the Board (made up of four scheme employer representatives and four trade union representatives), is responsible for establishing arrangements that ensure the proper conduct of the affairs of the Fund. It is also responsible for ensuring that decisions are made within the terms of the Local Government Pension Scheme.

62. Following the local government elections in May 2022 a new Pension Fund Committee was appointed. This included 5 councillors who served on the Committee during 2021/22 and 2 councillors who were newly appointed to the committee.

63. Due to the specialised nature of the Fund, it is vital that members have appropriate knowledge and understanding to provide appropriate challenge and scrutiny. The Fund prepares an annual training programme which covers training, including The Pensions Regulator Trustee Toolkit training, and other essential training that will assist members in discharging their fiduciary duty.

64. Members are required to carry out appropriate levels of training to ensure they can perform their required duties. There is no formal induction in place for new members to the Fund. Per the training policy, new members are required to complete the Pension Regulator Toolkit within six months of joining. Members are required to attend at least two meetings per year, not all members

completed this requirement for 2021/22. This is detailed in [Appendix 1](#) setting out specific recommendations, responsible officers, and dates for implementation.

65. Scottish Borders Council Pension Fund amended its governance arrangements in response to the pandemic. The impact of Covid-19 from March 2020 has been set out in the Annual Governance Statement in the Fund's annual report and accounts.

66. We have concluded that overall, Scottish Borders Council Pension Fund has appropriate governance arrangements in place which support effective scrutiny, challenge and decision-making.

Recommendation 3

Management should work with the Pension Board and Pension Committee to ensure members are aware of their attendance requirements.

There are effective arrangements for complying with the Pensions Regulator Public Service Code

67. The Public Sector Pensions Act 2013 provided for extended regulatory oversight by the Pensions Regulator. The Pensions Regulator issued a code on the governance and administration of public service pension schemes in January 2015 which funds are expected to comply with.

68. There were no breaches of the Code that required to be reported to the Pensions Regulator in 2021/22.

Performance reporting was of a good standard

69. The Management Commentary included in the annual report and accounts should provide information on a body, its main objectives and the principal risks faced. It should provide a fair, balanced and understandable analysis of a body's performance as well as helping stakeholders understand the financial statements.

70. The Fund's 2021/22 management commentary is of good quality and is written with the stakeholder in mind. It presents some complex areas in an understandable style which increases transparency in reporting the financial performance and financial position.

The Fund actively considers Environmental, Social and Governance matters as part of its Investment Strategy.

71. The Fund believes that a positive approach to Environmental, Social and Governance (ESG) issues can have a positive impact on the financial performance of investments.

72. The Fund approved a revised Statement of Responsible Investment Policy on 17 March 2022 which details the Fund's approach to responsible investment and arrangements to monitor manager performance against the principles in this policy. The overwhelming majority of fund managers engaged with Scottish Borders Council Pension Fund (99.8%) are signatories to the United Nations Principles for Responsible Investment. The Fund became a signatory to Climate Action 100+ in March 2020. As a signatory the Fund supports Climate Action 100+ in its engagement with the boards and senior management of companies around the world to implement a strong governance framework, take actions to reduce greenhouse gas emissions and provide enhanced corporate disclosures. The Fund actively engages with fund managers to ensure they are incorporating ESG opportunities to increase investment in sustainable funds. This is demonstrated by the £94m investment with LGIM in their Global ESG Passive Equity fund and the transition of £114m from the Baillie Gifford Global Equity Fund to their Global Paris Aligned Fund.

5. Best Value

Using resources effectively and continually improving services

Main judgements

The Fund has an appropriate best value framework in place which includes effective arrangements for monitoring investment performance and scrutinising management expenses.

Scottish Borders Council Pension Fund was awarded Local Government Pension Scheme (LGPS) Fund of the Year (assets under £2.5bn) at the LAPF Investments Awards.

2021/22 was a challenging year for Scottish Local Government Pension Schemes. Ten of the eleven funds still reported positive movements in net assets during the year, but only three of those funds, not including Scottish Borders, reported above benchmark returns.

2021/22 was a challenging year for Scottish Local Government Pension Schemes. Ten of the eleven funds still reported positive movements in net assets during the year, but only three funds reported above benchmark returns.

73. As shown in [Exhibit 6](#), 2021/22 was a challenging year for Scottish Local Government Pension Schemes due to the impact of Covid-19 and other world events on financial markets and investments. Ten of the eleven funds still reported positive movements in net assets during the year, but only three funds reported above benchmark returns, with investment performance ranging from -2% to 13%. Scottish Borders Council Pension Fund's increase of 5.9% placed it near the bottom of this range and reflected the greater impact of the wider market conditions on the value of equity markets over the last 12 months.

Exhibit 6**LGPS pension funds 2021/22 – Net return on investment and benchmark return**

Source: 2021/22 LGPS pension fund unaudited financial statements

The pension administration function has performed well against targets

74. The Scottish Borders Council Pension Fund Committee meets on a quarterly basis and receives regular reports on both fund administration and investment performance. The focus of measuring the performance of pensions administration includes both member experience and statutory compliance.

75. The Fund's business plan sets out a range of service standards against which administration performance is monitored. The Pensions Team were able to comply with the legislative requirement to issue annual benefit statements. This was achieved with some staff attending their normal workplace, whilst the majority worked from home. During 2021/22 the Pensions Administration Team focussed all efforts on ensuring the statutory elements of the service, as highlighted by the Pensions Regulator, continued to be provided, with all payments to pensioners being issued on time.

76. The administration function's performance against its targets for Service Standards have been affected by the pressures of the pandemic, alongside an increasing workload. However, performance in several priority areas has remained high, including issuing 100% of annual benefit statements on time.

77. During 2021/22, the Fund implemented Members Self Service. This has helped reduce the number of routine enquiries from scheme members as they are able to obtain information directly via the self-service functionality. Key administration tasks reported for 2021/22 included 1,367 pension estimates. With the implementation of Members Self Service, over 12,500 benefit calculations were run. This should help improve performance going forward.

The continuing impact of Covid-19 and the conflict in Ukraine on global markets reduced expected annual returns

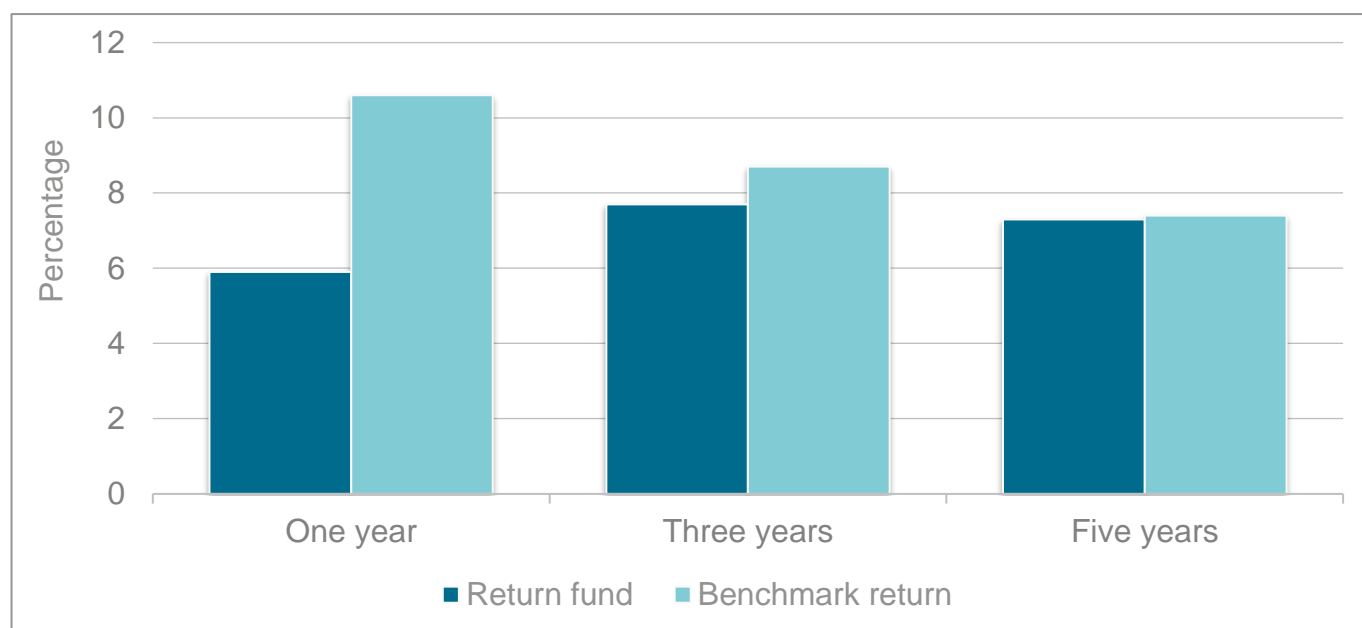
78. The Fund appoints several external investment managers. Individual investment manager performance is reviewed regularly by the Pension Fund Investment and Performance Sub-Committee Committee and the Fund's investments team also carries out annual diligence reviews for each appointed fund manager.

79. Financial markets have been exceptionally volatile in recent years due to the ongoing Covid-19 pandemic and more recently as result of the conflict in Ukraine. Returns against most asset classes, especially equities, reduced significantly. Throughout 2021/22, investment returns continued to increase each quarter, with a peak value of £938m as at Dec 2021. Performance of the Fund's assets was mixed in quarter 4. This was due to the challenging and volatile market conditions including concerns over rising inflation, tapering monetary policy, and the Russia-Ukraine war. Investment assets dropped by £29m in quarter 4.

80. [Exhibit 7](#) shows that over the year, the Fund generated a return of 5.9% against a benchmark of 10.6%. Over the medium to longer term, the Fund has underperformed against its three-, five- and ten-years benchmarks.

Exhibit 7

Fund investment performance



Source: Scottish Borders Council Pension Fund 2021/22 unaudited financial statements

Investment management expenses

81. There are three main categories of management expense, with the largest being investment management costs. Other expenses are the cost of the administration services provided by the Council and oversight and governance costs.

82. Investment management expenses have increased from £5.3 million in 2020/21 to £5.6 million in 2021/22. The main reason for the increase in expenses relates to the 5.9% increase in asset value.

83. The Fund has encouraged all its listed equity investment managers to sign up to the Code of Transparency and has engaged with managers of other assets classes to do so as and when cost templates become available.

84. The Fund has adequate arrangements in place for monitoring investment performance and scrutinising investment management expenses.

National performance audit reports

85. Audit Scotland carries out a national performance audit programme on behalf of the Accounts Commission and the Auditor General for Scotland. During 2021/22, we published reports which may be of interest to the Fund. These are outlined in [Appendix 3](#) accompanying this report.

Appendix 1

Action plan 2021/22

2021/22 recommendations

Issue/risk	Recommendation	Agreed management action/timing
<p>1. Pension Overpayment</p> <p>Through our audit work we identified one case where the council made an error in the calculation of a benefit. As it was an error made by the council, and not the individual, no recovery of overpayment was sought. The cost has been borne by the pension fund and not the council.</p> <p>Risk</p> <p>That governance arrangements are not sufficient to support decision making for pension fund matters.</p>	<p>Whilst a scheme of delegation is in place for the council there is a need to consider an appropriate scheme of delegation for decisions that impact on the pension fund. This should include guidance on what circumstances would give rise to not seek recovery of overpayment, and what entity should bear the cost of that overpayment.</p> <p>Paragraph 31</p>	<p>Formal overpayment policy for the Pension Fund drafted and will be presented to Pension Fund Committee and Board for approval.</p> <p>Responsible officer</p> <p>HR Shared Services Manager</p> <p>Agreed date</p> <p>31 December 2022</p>
<p>2. Investment management expenses</p> <p>Around £0.128m of investment management expenses were not notified by the investment manager in time for closedown of the accounts and were not therefore included within the accounts.</p> <p>Risk</p> <p>The transparency of costs related to investment management expenses is not properly reflected in the accounts.</p>	<p>As part of the accounts preparation process, management should ensure that investment managers provide information to the fund on a timely basis.</p> <p>Paragraph 32</p>	<p>Management will ensure that there is a specific focus during the accounts preparation process on ensuring that information is provided by investment managers on a timely basis.</p> <p>Responsible officer</p> <p>Acting Chief Financial Officer</p> <p>Agreed date</p> <p>31st March 2023</p>

Issue/risk	Recommendation	Agreed management action/timing
<p>3. Member attendance</p> <p>Pension Committee and Pension Board members are required to attend at least two meetings of the Pension Fund Committee and Board per year. For 2021/22 a member of the committee and a member of the pension board only attended one meeting.</p> <p>Risk</p> <p>Members are not present to monitor and scrutinise Pension Fund performance effectively.</p>	<p>Management should work with the Pension Board and Pension Committee to ensure members are aware of their attendance requirements.</p> <p>Paragraph 65</p>	<p>Management will ensure that members are aware of their attendance requirements for the Pension Board and Pension Committee through Elected Member training and induction processes.</p> <p>Responsible officer</p> <p>Acting Chief Financial Officer</p> <p>Agreed date</p> <p>31st December 2022</p>
<p>4. Annual due diligence review of investment managers</p> <p>Annually, the fund issues governance questionnaires to fund managers requesting specific information such as internal controls reports. These should be reviewed to check for any concerns which may impact the fund. For 2021/22 whilst the questionnaires were issued, it was evident these had not been subject to review by management.</p> <p>Risk</p> <p>That investments held by managers are exposed to unnecessary risks.</p>	<p>Management should ensure that governance questionnaires and supporting information received by each fund manager are reviewed to ensure they are aware of any issues arising which could impact the investments they hold.</p>	<p>Agreed, management will ensure governance questionnaires are reviewed in line with the recommendation.</p> <p>Responsible officer</p> <p>Acting Chief Financial Officer</p> <p>Agreed date</p> <p>31st March 2023</p>

Follow-up of prior year recommendations

Issue/risk	Recommendation	Agreed management action/timing
<p>5. Pension Recalculation</p> <p>Audit testing identified one error included within a member's lump sum pension calculation. The options presented to the member were not based on accurate information. This is considered to be an isolated error. Management relied on a model used by other LGPS Funds to calculate the pension due; this model had not however been updated to reflect the specific circumstances of the member. This error was also missed on independent review of the pension calculation.</p> <p>Risk</p> <p>There is a risk that calculations are not accurate, and members are not presented with the correct pension options.</p>	<p>For unusual or exceptional pension benefits, management should ensure that there are additional quality assurance arrangements in place for the review of calculations.</p> <p><u>Update for 2021/22</u></p> <p>We reviewed the recalculated options presented to the member. We identified a further error within the calculation and alerted management. Additional audit testing was not required as we could readily conclude that this was an isolated case.</p>	<p>In Progress</p> <p>Continue to review unusual or exceptional benefits with management reviewing in line with relevant legislation/regulations.</p> <p>Responsible officer HR Shared Services Manager</p> <p>Revised date 31 October 2022 and ongoing thereafter</p>
<p>6. Administrative Procedures</p> <p>Audit testing identified administrative procedures in paper format have not been updated nor completed with the move to home working. This includes the completion of checklists for specific tasks such as procedures following retirement of an employee and leavers checklists. We also identified there is no documented checks on pension calculation figures.</p>	<p>Management should review administrative procedures in place and update these to reflect the move to home working. Management should also ensure that officers are familiar with their responsibilities for the completion of supporting paperwork to evidence processes have been completed and reviewed in a timely manner.</p> <p><u>Update for 2021/22</u></p>	<p>In Progress</p> <p>Revised action</p> <p>Reminder to be issued to all members of the Pensions Team to ensure all checklists/calculations are fully signed off.</p> <p>Responsible officer HR Shared Services Manager</p>

Issue/risk	Recommendation	Agreed management action/timing
<p>Risk</p> <p>There is a risk all required tasks are not completed and errors not identified in a timely manner.</p>	<p>Whilst we noted improvements in some areas, such as documented checks on calculation figures, we found not all areas had been actioned/replaced with the move to home working. For example, documented checklists of completion of specific tasks.</p>	<p>Revised date</p> <p>31 October 2022</p>
<p>7. Pensioner validation using ATMOS reports</p> <p>As part of our review of pension payment controls, we requested a sample of ATMOS match reports for testing. These reports are used by management to identify deceased pensioners so that pension payments are stopped in a timely manner, minimising overpayments.</p> <p>The ATMOS match reports we received for testing were five months old. Therefore, there is no evidence that the matches have been investigated by management in a timely manner.</p> <p>Risk</p> <p>There is a risk that, without prompt investigation by management, pensions are being overpaid.</p>	<p>ATMOS reports should be reviewed, and any matches investigated in a timely manner to prevent any overpayments to deceased pensioners.</p> <p><u>Update for 2020/21</u></p> <p>This was not actioned for the financial year 2020/21.</p>	<p>Complete</p> <p>During 2021/22, the fund signed up to the National NI Database. This is a data sharing project with other LGPS pension funds in England, Wales and Scotland. This is used alongside the Tell Us Once notification system. Each month, the team uploads all member data to the NI Database. On a weekly basis, a member of the HRSS team logs in to the Tell Us Once notification system and checks for any matches. This allows HRSS to stop any pensions promptly and take action thereafter. This is an improved process introduced during 2021/22 which negates the requirement to review ATMOS reports. We reviewed this new process as part of our controls work and no issues were identified.</p>
<p>8. Validation of overseas pensioners</p> <p>Validation of pensioners is considered a key control that should be in place to ensure that pensioners in receipt of pensions are still eligible to receive payment.</p>	<p>The existing process in place should be reviewed to ensure it is still appropriate. The process should be actioned on a frequent basis to ensure existence of overseas pensioners.</p> <p><u>Update for 2020/21</u></p>	<p>Complete</p> <p>This was completed for 2021/22. Management should continue to ensure this process is carried out periodically.</p>

Issue/risk	Recommendation	Agreed management action/timing
<p>We identified that, whilst letters and statements are issued to overseas pensioners, the process to ensure their existence, has not been carried out during 2019/20.</p> <p>Risk</p> <p>There is a risk that without adequate controls being in place to validate the existence of pensioners, pensions are paid to deceased pensioners</p>	<p>This was last completed by Scottish Borders Council Pension Fund in September 2020. This process should be completed annually.</p>	
<p>9. Reconciliation of pensions paid figure</p> <p>There is no monetary reconciliation performed to show the total pensions paid figure agrees with the ledger. Therefore, the total pensions paid figure cannot be tied back to the ledger.</p> <p>The HRSS manager advised that there has never been a reconciliation performed between pensions paid figure and the financial ledger.</p> <p>A monthly report run for differences in payments from one month to the next is available but unfortunately due to work pressures and staff shortages this has not been completed for this financial year. This would be an effective control over the pensions paid figure on a month-by-month basis.</p> <p>Risk</p> <p>The figures in the financial ledger could be under or overstated.</p>	<p>The pensions paid figure should be reconciled month on month and variances to the ledger investigated. Management should perform monthly reconciliations between the pensions paid figure and the ledger.</p> <p><u>Update 2019/20</u></p> <p>Whilst there is an automated nature to the transfer of the figures between the payroll system and ledger data, there is a residual risk that manual intervention to the financial ledger codes may impact ledger data. The inclusion of this control will strengthen the control environment.</p> <p><u>Update for 2020/21</u></p> <p>Reconciliations were provided for periods 6-12 for the 2020/21 period. As this had not been actioned for the full period, a complete reconciliation was not available for audit purposes.</p>	<p>Complete</p> <p>We were provided with a complete reconciliation detailing the gross payments to pensioners tied back to the general ledger postings.</p>

Appendix 2

Summary of uncorrected misstatements

We report all uncorrected misstatements in the annual report and accounts that are individually greater than our reporting thresholds and request they be corrected.

The table below summarises uncorrected misstatements that were noted during our audit testing and were not corrected in the financial statements. Cumulatively these errors are below our performance materiality level as explained in [Exhibit 1](#). We are satisfied that these errors do not have a material impact on the financial statements.

Account areas	Pension Fund Account		Pension Fund Net Assets Statement	
	Dr £000	Cr £000	Dr £000	Cr £000
1. Management expenses	0.12m			
2. Change in market value		(0.12m)		
3. Investment assets			2.2m	
4. Change in market value		(2.2m)		
5. Investment assets				(0.625m)
6. Change in market value		0.625m		
Net impact		(1.575m)	1.575m	

Appendix 3

Summary of national performance reports 2021/22 and briefing papers

May

[Local government in Scotland Overview 2021](#)

June

[Covid 19: Personal protective equipment](#)

July

[Community justice: Sustainable alternatives to custody](#)

September

[Covid 19: Vaccination programme](#)

January

[Planning for skills](#)

[Social care briefing](#)

February

[NHS in Scotland 2021](#)

March

[Local government in Scotland: Financial Overview 20/21](#)

[Drug and alcohol: An update](#)

[Scotland's economy: Supporting businesses through the Covid 19 pandemic](#)

Scottish Borders Council Pension Fund 2021/22 Annual Audit Report

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FINAL ANNUAL REPORT AND ACCOUNTS 2021/22

Report by Acting Chief Financial Officer

JOINT MEETING OF PENSION FUND COMMITTEE AND PENSION FUND BOARD

19 October 2022

1 PURPOSE AND SUMMARY

- 1.1 This report provided the Joint Pension Fund Committee and Pension Fund Board with an opportunity to scrutinize the final Annual Report and Accounts for the Pension Fund for 2021/22 prior to their submission to the Audit Committee and then Scottish Borders Council for signature.**
- 1.2 The Local Government Pension Scheme Amendment (Scotland) Regulations 2010 specify the elements which must be contained in the Annual Report and Accounts, the list of these are contained in para 4.1. The final Annual Report and Accounts contained in Appendix 1 fully meets these requirements.
- 1.3 Audit Scotland has completed their audit and have provided an unqualified independent audit opinion.
- 1.4 The Scottish Borders Council's Pension Fund Annual Audit Report highlighted four new recommendations and followed up five recommendations from previous audits. Actions plans have been agreed for each of the recommendations.
- 1.5 This report has been presented to members of both the Pension Fund Committee and the Pension Fund Board for them to recommend the final Annual Report and Accounts for 2021/22 (the Annual Report) for approval prior to submission to Scottish Borders Council for signature.

2 RECOMMENDATIONS

- 2.1 It is recommended that the Pension Fund Committee agree to approve the Annual Report and Accounts for 2021/22 for Officer signature and Council approval.**

3 BACKGROUND

3.1 The Local Government Pension Scheme Amendment (Scotland) Regulations 2010 specifies that the Annual report must contain:

- a) report on the management and financial performance during the year,
- b) statement on the investment policy for the Fund,
- c) pensions administration arrangements during the year,
- d) actuarial valuation statement,
- e) governance compliance statement,
- f) fund account and net asset statement,
- g) annual report on pension administration strategy, and
- h) details of where to access current Funding Strategy Statement and Statement of Investment Principles.

4 ANNUAL REPORT AND ACCOUNTS 2021/22

- 4.1 The final Annual Report and Accounts for 2021/22 (the Annual Report) is attached at Appendix 1. The Annual Report will also be presented to Audit and Scrutiny Committee on the 14 November 2022 for noting.
- 4.2 The draft Annual Report was made available for public inspection for a 3-week period commencing 1 July 2022 and has been subject to a full external audit by Audit Scotland.
- 4.3 Audit Scotland has completed their audit and have provided an unqualified independent audit opinion.
- 4.4 The Scottish Borders Council's Pension Fund Annual Audit Report highlighted four new recommendations and followed up five recommendations from previous audits. The areas in question are shown in Appendix 1 "Action Plan 2021/22" of the External Auditor's Annual Pension Fund Audit Report. The areas identified are:

2021/22 Recommendations:

- Whilst a scheme of delegation is in place for the council there is a need to consider an appropriate scheme of delegation for decisions that impact on the pension fund. This should include guidance on what circumstances would give rise to not seek recovery of overpayment, and what entity should bear the cost of that overpayment.
- As part of the accounts preparation process, management should ensure that investment managers provide information to the fund on a timely basis.
- Management should work with the Pension Board and Pension Committee to ensure members are aware of their attendance requirements.
- Management should ensure that governance questionnaires and supporting information received by each fund manager are reviewed to ensure they are aware of any issues arising which could impact the investments they hold.

Previous audit Recommendations followed up:

- For unusual or exceptional pension benefits, management should ensure that there are additional quality assurance arrangements in place for the review of calculations.
- Management should review administrative procedures in place and update these to reflect the move to home working. Management should also ensure that officers are familiar with their responsibilities for the completion of supporting paperwork to evidence processes have been completed and reviewed in a timely manner.
- ATMOS reports should be reviewed, and any matches investigated in a timely manner to prevent any overpayments to deceased pensioners.
- The existing overseas pensioners process in place should be reviewed to ensure it is still appropriate. The process should be actioned on a frequent basis to ensure existence of overseas pensioners.
- The pensions paid figure should be reconciled month on month and variances to the ledger investigated. Management should perform monthly reconciliations between the pensions paid figure and the ledger.

These recommendations have been accepted by Management and will be enacted within the agreed timescales.

5 IMPLICATIONS

5.1 Financial

There are no financial implications relating to this proposal.

5.2 Risk and Mitigations

This report is part of the governance framework to manage the operation of the Pension Fund and reflects the compliance with the best practice recommendations. Risk are managed in line with the Corporate Risk Management framework, with risks and controls monitored and reported on a quarterly basis.

5.3 Integrated Impact Assessment

There is no impact or relevance to Equality Duty or the Fairer Scotland Duty for this report. This is routine good governance required under the Local Government Pension Scheme (Governance) (Scotland) Regulations 2014. Nevertheless, a light touch assessment has been conducted and this will be published on SBC's Equality and Diversity Pages of the website demonstrates that equality, diversity and socio-economic factors have duly been considered when preparing this report.

5.4 Sustainable Development Goals

There are no direct economic, social or environmental issues with this reports which would affect the Council's sustainability.

5.5 Climate Change

There are no direct climate change impacts as a result of this report.

5.6 Rural Proofing

It is anticipated there will be no adverse impact on the rural area from the contents of this report.

5.7 Data Protection Impact Statement

There are no personal data implications arising from the proposals contained in this report.

5.8 Changes to Scheme of Administration or Scheme of Delegation

No changes to the Scheme of Administration or Delegation are required as a result of this report.

6 CONSULTATION

6.1 The Monitoring Officer/Chief Legal Officer, the Chief Officer Audit and Risk, the Director (People Performance & Change), the Clerk to the Council and Corporate Communications are being consulted and any comments will be reported at the meeting.

Approved by

Name Suzy Douglas
Title Acting Chief Financial Officer

Author(s)

Name	Designation and Contact Number
Suzy Douglas	Financial Services Manager

Background Papers:

Previous Minute Reference: Joint Pension Fund Committee and Pension Fund Board, 29 June 2022

Note – You can get this document on tape, in Braille, large print and various computer formats by contacting the address below. Pension & Investments Team can also give information on other language translations as well as providing additional copies.

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Scottish Borders Council Pension Fund

annual report and accounts

for the year to 31 March 2022



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SECTION 1

INTRODUCTION

CHAIRMAN'S REPORT

Introduction

Welcome to the Annual Report and Accounts for the Scottish Borders Council Pension Fund for the year ended 31 March 2022. This Annual Report has been produced to provide Elected Members, Scheme Members and Employers and other interested parties with information concerning the administration and performance of the Fund in financial year 2021/22.

Highlights of the Year

Pension Fund Committee/Pension Board

The Fund has continued to strengthen its governance and stewardship of the Fund over the year. This work was recognized at the LAMP Investments Awards which saw the Fund winning the LGPS Fund of Year (assets under £2.5bn).

The Joint meetings of the Committee and Board continued as virtual meetings during 2021/22 ensuring all necessary governance and decision making continued. Most Members fully engaged successfully with new ways of working online, including meeting their individual training requirements.

The Investment and Performance Sub-Committee, met all of the Fund's investment managers during the year, which allowed the committee full scrutiny and oversight of the assets under management.

Funding

The Fund's 2020 Triennial valuation resulted in a funding position of 110% and contributions rates maintained for the first 2 years, despite uncertainties arising from court cases, such as the McCloud judgement and the LGPS cost cap mechanism. The Fund continues to monitor this position and the effect of the changes required to resolve the judgements. The strong performance of the Fund's investments has resulted in this continued strong funding position.

Investment Assets

The volatile market conditions caused by the continuation of Covid-19 and the growing political conditions with Russia has resulted in very difficult market environments. Despite this the fund has

grown by £50m with an overall positive 5.9% performance.

Statement of Responsible Investment

The Committee believes that a positive approach to Environmental, Social and Governance (ESG) issues can positively affect the investment performance of the Fund. The Fund fully reviewed and updated its policy, to include key priorities and improved monitoring. The Fund also continues to monitor and work with all its managers to ensure ESG is fully integrated into all their investment decisions.

The Fund undertook a full strategic asset review during 2021/22 with responsible investment being a key focus of the review. The review resulted in the transition of its global equities with Baillie Gifford into their Global Alpha Paris Aligned fund and to change the passive equity allocation with UBS to ESG focused passive fund. These changes add further to the Funds move to increased responsible investment. The Fund also continued to support the Climate Action 100+ initiative, as a signatory, which is an initiative actively working to ensure the Paris Agreement on climate change targets are met.

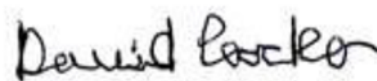
Pensions Administration

Key targets have been met by the Pension Administration team with all payments processed on time and annual benefit statements issued within the required timescales. The implementation of the Member Self Service portal is a welcome addition for scheme members which enhances communication and access to real time quotes with no detrimental impact on administrative resources.

Covid-19 continued to bring challenges, which the service has met, with good progress made on the delivery of actions set out in the Pension Fund's business plan. Updates were made to the Communication Policy and Pensions Admin Strategy to reflect this and the implementation of the new portal and website.

Acknowledgement

I would like to thank the Members of the Pension Fund Committee, Pension Fund Board, officers of the Council, our investment managers, Isio and the Fund Actuary Hymans Robertson for their hard work during the year and their ongoing commitment to ensuring the Fund's continued success.



Chairman, Pension Fund Committee
Scottish Borders Council

MANAGEMENT COMMENTARY SUMMARY

OVERVIEW OF FUND BUSINESS

Under the statutory provision of the Local Government Pension Scheme Scottish Borders Council is designated as an “Administering Authority” and is required to operate and maintain a pension fund – Scottish Borders Council Pension Fund (“the Fund”).

The Fund is used to pay pensions, lump sum benefits and other entitlements to scheme members and their dependants. Contributions to the Fund are made by employee members and by participating employers. The Fund also receives income from its investments, which includes equities, bonds, property, infrastructure, private credit and diversified alternatives.

The Fund operates under the regulations of the Local Government Pension Scheme, which is a public-sector pension arrangement. Scheme membership is made up of active, deferred and pensioner members. To be able to join the scheme, a person must be employed by a relevant employer and not eligible to join another public-sector pension scheme. Teachers are not included as they have a separate national pension scheme.

STRATEGY AND OBJECTIVES

Scottish Borders Council Pension Fund’s primary aim is “to provide for members, pension and lump sum benefits on their retirement or for their dependants, benefits on death before or after retirement, on a defined benefits basis”. All the longer term policies, objectives and strategies of the Fund reflect this aim.

The Scottish Borders Council Pension Fund Committee agree all policies and strategies. Scrutiny of these decisions are provided by Scottish Borders Council Pension Fund Board. All key policies and strategies are located on the Fund’s website.

KEY NUMBERS OF THE FUND

- Total membership of 12,178 (11,664 in 2020/21)
- Total pension paid £25.4m (£25.1m 2020/21)
- Total contributions received £22.6m (£20.6m 2020/21)
- Total investments held £909.4m (£859.7m 2020/21)
- Investment performance of 5.9% for 2021/22 (20.1% 2020/21)

GOVERNANCE

The Pension Fund Committee aims to ensure the Fund is managed effectively, transparently and in compliance with regulations. A review of the governance arrangements and performance is undertaken on an annual basis. The review has confirmed the Fund is fully compliant with the Local Government Pension Scheme (Scotland) Regulations 2014 requirements.

As required within the Local Government Pension Scheme (Government)(Scotland) regulations the Fund has an established Pension Fund Board which meets jointly with the Pension Fund Committee. The Pension Fund Board is responsible for assisting the Fund in securing compliance with the regulations and other legislation relating to the administration and governance of the Fund. The Pension Fund Board has 4 members representing the employers and 4 trade union members representing the employees.

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The Fund, annually, agrees a three year business plan which sets out the action plan to deliver the key work areas identified to ensure objectives continue to be met and any new legislative requirements are built into work plans. The actions are monitored and reported to the Joint Pension Fund Committee and Pension Fund Board. The key actions completed in 2021/22 were:-

- Full review and update of the Funding Strategy Statement with inclusion of new cessation policy and correct employer contribution rates received.
- Completion of the agreed training programme for all members of the Pension Fund Committee and Pension Fund Board.
- Full review of Strategic Asset Allocation completed and implementation commenced.
- Completion of a procurement exercise for ESG passive equity manager and Infrastructure manager per the approved strategic asset allocation.
- Implementation and roll out of Members Self Service.
- Review completed of Responsible investment policy further enhancing the Funds commitment to responsible investing.
- Review completed of services provided by IT providers to ensure data is secure and adheres to cyber security requirements.

Due to limited access to the office due to Covid-19 the review of Employer covenants has been re-scheduled to be completed by December 2022. The finalisation of the GMP reconciliation has also been delayed due to the Pensions Administration team processing the recalculation of Pensions and Lump Sums following the late settlement of the SJC Pay Award for Scottish Borders Council employees, which was backdated to January 2021. There have been no further legislative changes announced in relation to the remedy for McCloud; the Fund awaits confirmation of the requirements before developing an action plan to avoid repeated requests for information from the Employers.

The Fund has agreed the following key areas of development and improvement within its 2022/23 Business Plan.

- Review of all forms of communication material.
- Accuracy of Pension records including requirements for pension dashboard
- System improvement to support home working
- Submission of application for the Stewardship Code.
- Commence preparation for 2023 triennial valuation
- Review of the Funds strategic asset allocation following the 31 March 2020 valuation.
- Implementation of approved Responsible Investment policy and its monitoring requirements.
- Review and implementation of The Pension Regulator's "Single Code".

RISKS AND UNCERTAINTIES

Awareness and management of risks is a key control of the Funds strategic and operational activities. The Pension Fund is committed to a strong control environment to ensure risks are identified, understood, managed and monitored appropriately.

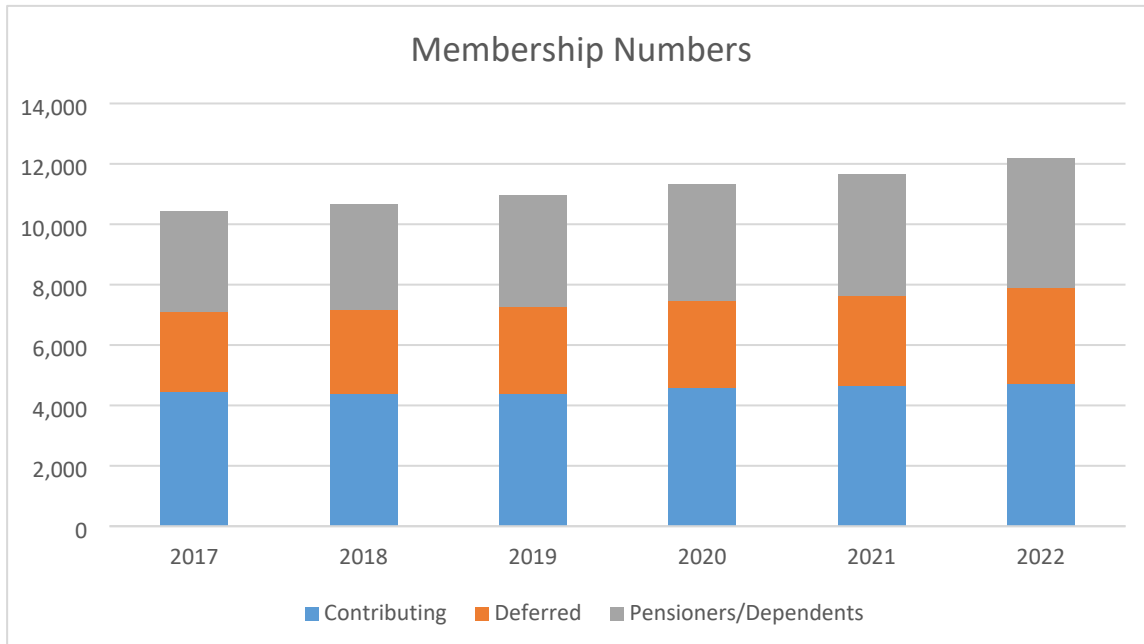
A full risk register is maintained by the Fund in line with CIPFA guidance and the Council's approach to risk management. Each risk identified is assessed for likelihood and impact with no controls in place and after controls are applied. Further controls are identified and progress monitored and reported to the Joint Pension Fund Committee and Pension Fund Board on a quarterly basis as part of Risk update reports. The Fund currently has 51 identified risks spread over Assets & investments, Employer, Resource & skill, Liability, Administrative, Regulatory & Compliance and Reputation. There is one risk remaining as a red assessment at 31 March 2022 which is "Legislation and other regulatory framework changes impacting on the Fund". The Fund is managing and monitoring this risk by ensuring it actively participates in all consultations and keeps abreast of all legislative and regulatory changes. Further information on risk management and risks can be found on page 17.

ADMINISTRATION AND MEMBERSHIP

The Pension Administration Strategy sets out the performance standards required by both Scottish Borders Council, as the administrating authority and all employers of the Fund. The performance of the Fund against these standards is reported on an annual basis to the Joint Pension Fund Committee and Pension Fund Board. Performance against key performance indicators were very good with all targets being met, all contributions being received on time and no regulatory breaches which required to be reported to the Pension Regulator.

The Fund has paid pensions benefits of £25.4m during the year (£25.1m in 2020/21) and received contributions of £22.6m (£20.6m in 2020/21). The Fund is a mature fund but has seen a small reversal of this position during 2021/22 due to an increase in transfers in during the period. The Fund had a net withdrawal of £0.1m (£6.5m in 2020/21) during the year which was funded from investment returns. Throughout the Covid-19 crisis, pensions have been paid on time and contributions have been collected in accordance with scheme regulations in all instances. The ability for staff to work from home has allowed the administration function to continue to perform as normal through the adoption of alternative working practices. Further information on the performance of Pension Administration and the Pension Administration Strategy can be found in section 4.

The maturing nature of the Fund is reflected in the membership numbers which are shown in the table over. Overall members at 31 March 2022 increased during the year to 12,178 but active contribution members now only represent 39% of the membership compared to 43% at 31 March 2017. The continued decrease in active members has resulted in the Fund looking to investments to provide income to ensure cash is available to pay the pensions as they are due.



COMMUNICATION

The Fund’s Communication Policy seeks to ensure communication in an efficient manner to all stakeholders. Communication is undertaken in a number of ways including the Fund website, annual newsletters and statements, emails, face to face meetings including video calls and telephone.

Due to Covid-19 the annual employer meeting was once again held virtually with additional information being shared virtually. Information was posted on the website for both members and employers including information on the Shared Costs AVC, pension increases, guidance on how to sign up to online access for payslips and all publications such as the Annual Report. The deployment of the Member Self Service functionality in August 2021 added an additional dimension to the communication methods and allowed us to move towards a more digital approach in line with best practice and expectation of the scheme members. A new version of the website was deployed during the year and following a drop off in visits over November and December there was a significant increase in the number of hits recorded on the website from January to March 2022.

FUNDING

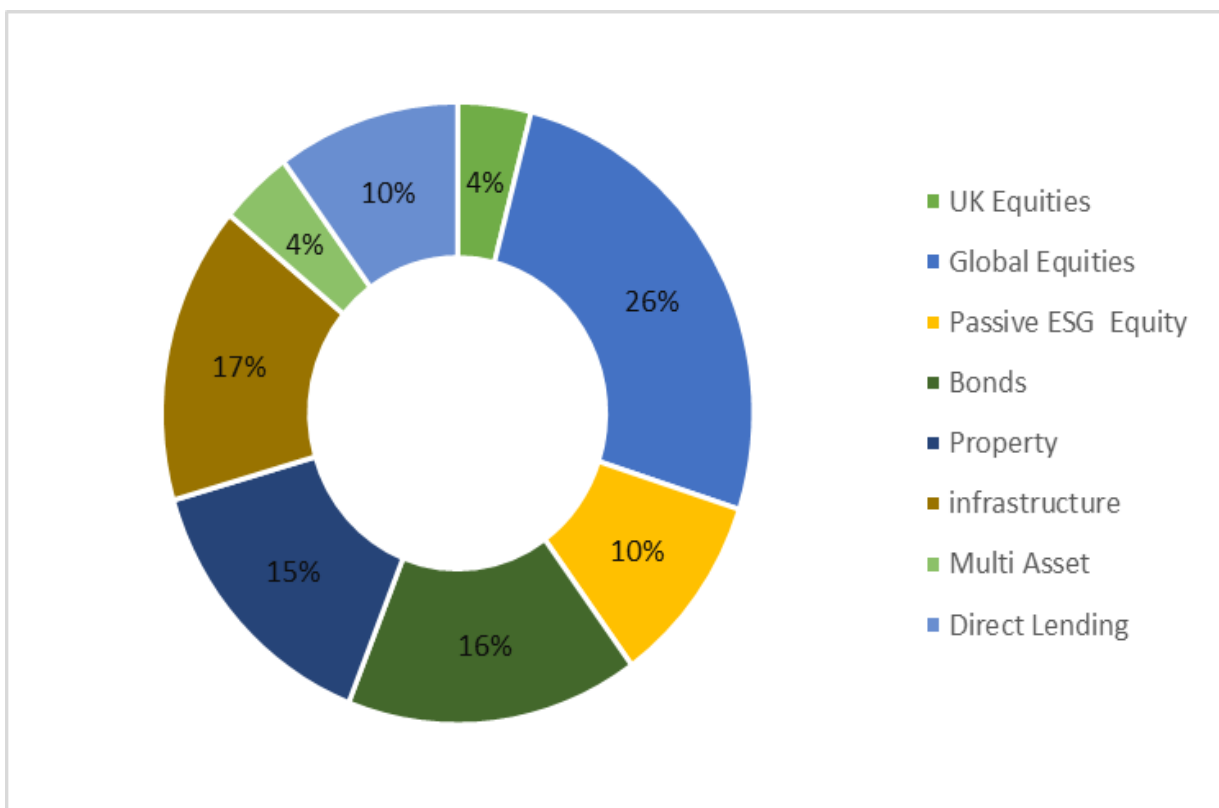
The three yearly Actuarial Valuation for 31 March 2020 was completed in March 2021 which resulted in a funding position of 110% (114% at 31 March 2017) for the Fund. The next formal valuation of the Fund will be as at 31 March 2023. Interim monitoring has been undertaken between the 2020 valuation during the year. Monitoring of the funding position is undertaken on a quarterly basis and reported to the Pension Fund Committee.

Uncertainties caused by GMP reconciliation, the scheme cost cap mechanism and legal challenges on the grounds of age discrimination, arising from the McCloud judgement may have an impact on the funding position. The 2020 valuation has included allowance for McCloud but not cost cap. The impact of any changes required due to the cost cap mechanism are currently unknown and therefore not able to be valued.

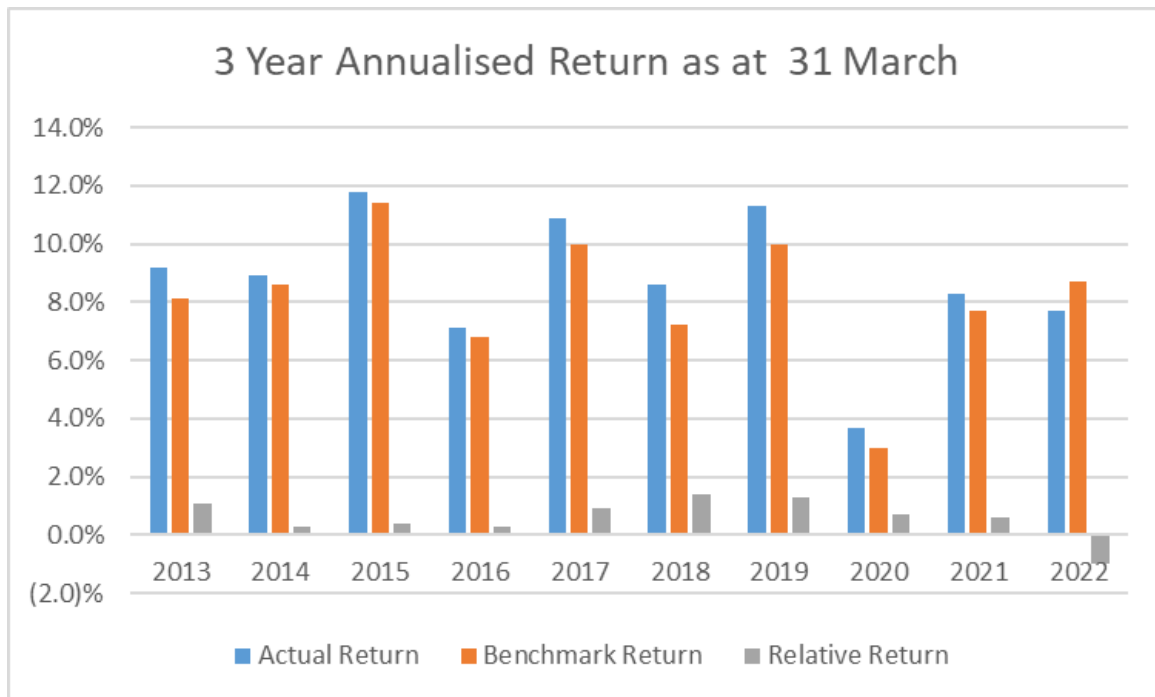
The Funding Strategy Statement approved on 4 March 2021 sets out the approach to funding. Further detail can be found in section 5 of the report and the full version of the Funding Strategy Statement is available via the Scottish Borders Council Pension Fund website.

INVESTMENT RETURNS

The Fund's investment objective is to support the Funding Strategy by adopting an investment strategy and structure, which incorporates an appropriate balance between risk and return. Following the 2020 Triennial Valuation, the Fund approved a revised asset allocation, which is shown in the diagram below. The revised asset allocation further spreads investments over a number of key asset markets, thus further spreading the risk and increasing the diversification of the Fund. Good progress has been made during the year in the implementation of the revised strategy.



The Fund's investment returns delivered a positive return of 5.9% during 2021/22 (20.1% 2020/21) against a benchmark of 10.6% (18.3% 2020/21) for the year to 31 March 2022. Overall the Fund's assets increased by £50m from 31 March 2021. The 2021/22 performance although under its benchmark was a positive return in volatile and difficult market conditions. The table over details the 3 year annualised return which is also slightly under benchmark for 2021/22.



Investment markets during April 2021 and December 2021 saw equities markets delivering strong returns due to sustained economic recovery from Covid-19, supported by fiscal and monetary measures taken by governments and central banks. However, some of these gains were lost during January to March 2022 following Russia’s invasion of Ukraine.

Global credit markets experienced a difficult 12 months. UK investment grade credit performance was negative due to rising interest rate expectations and in light of heightened inflationary pressures.

Work to fully implement the strategy has continued, with equity exposure decreasing and the funds being invested in longer term illiquid assets such as infrastructure and infrastructure debt. The Fund has increased its infrastructure and infrastructure debt investment over the year by £17m.

The Strategy has also resulted in increased levels of investment income which has allowed the Fund to meet the increasing net withdrawal for dealing with payments to members.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE ISSUES

The Fund has an overriding obligation to act in the best interest of the scheme beneficiaries. As part of this role the Fund believes that a positive approach to Environmental, Social and Corporate Governance issues can positively affect the financial performance of investments.

The Fund has, in line with its Statement of Responsible Investment Policy, completed its third annual monitoring report on all the Fund’s managers. 16 out of the 17 managers are signatories of UNPRI with the one remaining manager only representing 0.3% of the Fund’s assets. The Fund has during the year declined investment opportunities offered by managers not signatories of UNPRI.

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The Fund has also during 2021/22 undertaken a full review of its Responsible Investment Policy and on 17th March 2022 approved 6 key responsible investment objectives. These are

- SDG 13 – Climate Change
- SDG 7 – Affordable & Clean Energy
- SDG 1 – No Poverty
- SDG 2 – Zero Hunger
- SDG 3 – Good Health & Well-being
- SDG 10 – Reduce Inequalities

Work has commenced in the assessment and collection of data to allow reporting and monitoring of SDG13 Climate change and SDG 7 Affordable & clean energy. Due to the lack of robust measurement criteria or data the remaining objectives will be reviewed regularly as data collection is developed.

The Fund also as part of its Strategic Asset Allocation review invested £94m into a Global ESG passive fund with LGIM and transitioned £114m of global equities into the Baillie Gifford Global Alpha Paris Aligned. Both investments further enhance the Fund's commitment to responsible investment.

The Fund continues to look for further opportunities to enhance its commitment to sustainability and climate change which will form key criterion in future investment and procurement decision making.

CLIMATE ACTION 100+

The Fund, as a signatory, continued to support the work undertaken by Climate Action 100+ which is working with Investors and Fund Managers to reduce carbon emission and ensure the Paris Agreement targets are met. The three main aims are:-

- Holding the increase in the global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognising that this would significantly reduce the risks and impacts of climate change;
- Increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development in a manner that does not threaten food production; and
- Making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development.

Further information on the Fund's investments can be found in section 6 of this report.

ACKNOWLEDGMENT

The contribution and commitment of all elected members, employer and employee representatives and staff involved in ensuring the continued success of the Scottish Borders Council Pension Fund, particularly during this most challenging of years, is gratefully acknowledged.

Councillor David Parker
Chair

Pension Fund Committee

David Robertson
Acting Chief Executive

Scottish Borders Council

Suzanne Douglas CPFA
Acting Chief Financial
Officer

Scottish Borders Council

KEY TRENDS

Membership	2017/18	2018/19	2019/20	2020/21	2021/22
Active Members	4,409	4,376	4,573	4,647	4,703
Deferred Members	2,751	2,878	2,909	2,977	3,194
Pensioners	3,507	3,707	3,856	4,040	4,281
Total Members	10,667	10,961	11,338	11,664	12,178

Investments	2017/18 £000	2018/19 £000	2019/20 £000	2020/21 £000	2021/22 £000
Opening Net Value	653,207	685,681	731,048	712,319	859,794
Movement in year	32,475	45,367	(18,728)	147,475	49,587
Closing Net Value	685,681	731,048	712,319	859,794	909,381
Investment Income	8,195	13,314	13,938	12,749	17,600
Investment Fees	8,192	5,848	5,296	5,310	5,668

	2017/18 £000	2018/19 £000	2019/20 £000	2020/21 £000	2021/22 £000
Administrative costs	(292)	(391)	(363)	(352)	(378)
Oversight & Governance costs	(233)	(289)	(263)	(318)	(349)
Pensions Income	19,610	20,647	21,200	21,727	25,939
Pensions Expenditure	(22,189)	(24,257)	(26,555)	(28,296)	(26,071)
Net Pensions Cash flow	(2,579)	(3,610)	(5,355)	(6,569)	(132)

SECTION 2

GOVERNANCE

SCHEME ADMINISTRATION

The Scottish Borders Council Pension Fund (the Fund) is Part of the Local Government Pension Scheme (LGPS) and is administered by Scottish Borders Council (the Administering Authority).

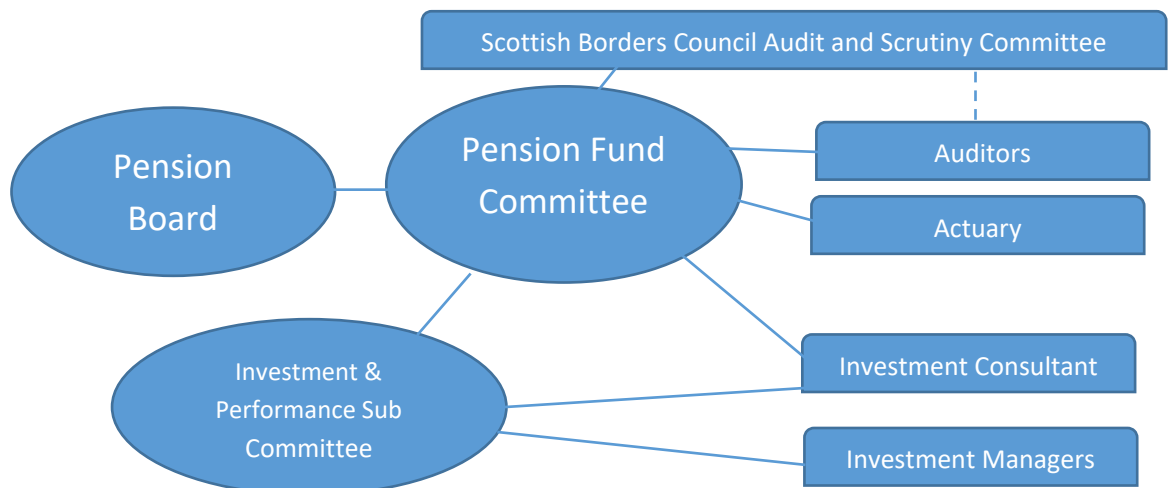
The Fund is administered in accordance with the Public Services Pensions Act 2013 and the Local Government Pension Scheme (Governance)(Scotland) Regulations 2014. The Fund adheres to Scottish Borders Council policies for managing conflicts of interests, codes of conducts and register of interests.

Suzy Douglas – Acting Chief Financial Officer (Section 95 Officer) is responsible for the financial administration of the Fund.

SCHEME GOVERNANCE

The Governance structure of the Fund can be seen below including the roles each of the parties undertakes. The Pension Fund Committee and Pension Board meet jointly four times a year, with papers and minutes being available one week prior to the meeting.

Scottish Borders Council Pension Fund Governance:-



Pension Fund Committee – is the main decision making body for the Fund and is comprised of seven Scottish Borders Council Councillors; the Convener, one member of the Executive, three members of the Administration and two members of the opposition.

Pension Board – assists the Committee in securing compliance with the regulations, other legislation and requirements of the Pensions Regulator. The Board consists of four employer representatives and four employee Union representatives.

Investment & Performance Sub-Committee – develops investment strategy and monitors investment performance. Consists of the Pension Fund Committee Members, one employer and one employee representative from the Pension Board.

Actuary – provides advice on funding. This role is currently undertaken by Hyman Robertson.

Investment Consultant – provides advice on all aspects of investment objectives, strategy and monitoring. This role is currently undertaken by Isio.

Investment Managers – manage the investment portfolios.

Auditors – provide audit assurance that the Fund is adhering to regulations, other legislation and requirements of the Pension Regulator. The internal audit function is provided by Scottish Borders Council’s Internal Audit department and the external audit function is provided by Audit Scotland.

Scottish Borders Council Audit & Scrutiny Committee – provides independent scrutiny of the Pension Fund Committee’s adequacy, effectiveness and systems of internal control.

PENSION FUND COMMITTEE

Members of the Pension Fund Committee have a fiduciary responsibility to the Pension Fund members and employers that are similar to those holding office of trustee in the private sector. The Members of the Committee are responsible for the decision making of the Fund and hold meetings four times a year. The Committee is comprised of seven Councillors of Scottish Borders Council. The membership is shown below:-



Councillor David Parker - Chair



Councillor Simon Mountford – Vice Chair



Councillor Pam Brown
from 26/5/2022



Councillor Watson McAteer
from 26/5/2022



Councillor Carol Hamilton



Councillor Donald Moffat



Councillor Sandy Scott

Councillor Jim Brown to 4/5/2022

Councillor Gordon Edgar to 4/5/2022

PENSION FUND BOARD

The Local Government Pension Scheme (Government)(Scotland) regulations require each administering authority to have a Pension Board, responsible for assisting the Fund in securing compliance with the regulations and other legislation relating to the administration and governance of the Fund.

The Pension Board comprises an equal number of employee and employer representatives appointed by scheme employers and relevant trade unions.

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As at 31 March 2022 the Scottish Borders Council Pension Board membership comprised the following:-

Employer Representatives:

- Councillor Sandy Aitchison – Scottish Borders Council to 4/5/2022
- Hazel Robertson – Borders College
- Linda Ross – LIVE Borders to 5/4/2022
- Anthony Daye – South of Scotland Enterprise

Employee Representatives:

- David Bell – UNITE
- Malcolm Drysdale - GMB
- Marc Everett - UNISON
- Kay Marie Hughes – UNISON

In accordance with the regulations the Pension Fund Board meets jointly at the same place and time as the Pension Fund Committee to allow consideration of the same agenda, presentations and advice from external advisors. The Chair of the Pension Fund Committee acts as Chair of the joint meeting. The Pension Board meet separately, immediately following the joint meeting.

INVESTMENT & PERFORMANCE SUB-COMMITTEE

The Investment and Performance Sub Committee is responsible for making recommendations to the Pension Fund Committee on all areas of investment management including the Statement of Investment Principles and the management of Investment Managers. The Sub-Committee comprises Pension Fund Committee Members and an employee and employer representative from the Pension Board. The Sub-Committee meets three times a year.

RISK MANAGEMENT

The Fund is committed to a strong control environment to ensure that risks are identified, understood, managed and monitored appropriately.

The Risk Register for the Pension Fund has been developed in line with CIPFA guidance and the Council's approach to risk management and assesses risk using a scoring methodology based on likelihood and impact.

A full risk review was undertaken in June 2021. All identified actions are monitored and reported on a quarterly cycle, with the addition of any new risks that have materialised during the intervening period from the full risk review.

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The headings under which the Council consider risk and the analysis of the level and number of risks are set out below:

Risk Category	Risk Assessment					
	Before Controls			After Controls		
	Red	Amber	Green	Red	Amber	Green
Asset & Investment	5	7	-	-	9	3
Employer	1	6	-	-	2	5
Resource & Skill	-	5	-	-	1	4
Liability	2	5	-	-	2	5
Administrative	-	8	-	-	1	7
Regulatory & Compliance	4	2	-	1	3	2
Reputation	2	4	-	-	2	4
Total Number of Risks	14	37	0	1	20	30

RED -Very High (15-25)
AMBER – High (6-12)
GREEN – Low (1-5)

The one risk remaining as a red assessment, as at 31 March 2022, is “Legislation and other regulatory framework changes impacting on the Fund”. The Fund is managing and monitoring this risk by ensuring it actively participates in all consultations and keeps abreast of all legislative and regulatory changes.

TRAINING POLICY & PRACTICE STATEMENT

The Council recognises the importance of ensuring that all staff and members, charged with the financial administration and decision making of the Scottish Borders Council Pension Fund, are fully equipped with the knowledge and skills to discharge the duties and responsibilities allocated to them. It therefore seeks to utilise individuals who are both capable and experienced. Training for staff and members of the Pension Fund Committee and Pension Board is provided to enable them to acquire and maintain an appropriate level of expertise, knowledge and skill.

The approved Training Policy adopts the key recommendations of the CIPFA Code of Practice on Public Sector Pensions Finance Knowledge and Skills. The Policy also reflects guidance issued by the Scottish Public Pensions Agency and The Pension Regulator concerning skills and knowledge requirements.

The Training Policy applies to members of the Pension Fund Committee and the Pension Board. It requires all members to complete the Pension Regulator’s Toolkit within six months of joining the Board and to attend at least two training events a year. The Policy also requires an annual training plan to be agreed. The 2021/22 plan was approved on 10 June 2021 and was based on assessment returns completed by all members. The table over shows all members attended two or more events. The toolkit has been completed by all members of the Committee and seven members of the Board.

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Training attendance

No of events	Committee Members		Board Members	
	%	Number	%	Number
6	42.8%	3	-	-
5	-	-	12.5%	1
4	14.3%	1	25.0%	2
3	14.3%	1	50.0%	4
2	28.6%	2	12.5%	1

The training covered the following areas:

- Financial Markets and Investment Products
- Investment Concepts and Terminology
- Environmental, Governance and Social governance
- Fund governance and Stewardship
- Key Pension Administration issues
- Regulatory Environment

All members are also required to attend, as a minimum, two meetings of the joint Pension Fund Committee and Pension Board a year. The table below shows Six Members of the Pension Fund Committee and seven members of the Pension Fund Board have met the attendance requirement for 2021/22

No of meetings	Committee Members		Board Members	
	%	Number	%	Number
5 meetings	57%	4	-	-
4 meetings	29%	2	63%	5
3 meetings	-	-	25%	2
2 meetings	-	-	-	-
Less than 2	14%	1	12%	1

ANNUAL GOVERNANCE STATEMENT

The Local Government Pension Scheme (Scotland) Regulations 2014 requires Administering Authorities to measure their governance arrangements set out against standards set by Scottish Ministers. These standards are established via a number of best practice principles.

The key document summarising the governance arrangements for the Pension Fund is the Governance Policy and Compliance Statement (as amended on 29 June 2022) which is available on the Council's website: [Governance Policy and Compliance Statement](#)

Governance Framework

The key elements of the Pension Fund's governance arrangements include:

- a) Scottish Borders Council is the Administering Authority for the Local Government Pension Scheme for the Scottish Borders geographical area. The Council has acknowledged its responsibility for ensuring that there is a sound system of governance (incorporating the systems of internal control) and this is reflected in the Council's governance arrangements.
- b) The Council has delegated its responsibilities as Scheme Manager, to the Pension Fund Committee. The Members of the Committee act as quasi-trustees and oversee the management of the Scottish Borders Council Pension Fund. The overall responsibility of ensuring there is a sound system of governance remains with the Chief Executive.
- c) The Pension Board meets jointly with the Committee, and formalises the involvement of the employers and trade unions representing the membership. All members of the Committee and Board are covered equally by the Training Policy to give them full opportunity to contribute effectively.
- d) The approval of the Pension Fund Business Plan covering the period 2021/22 – 2023/24, to improve planning and monitoring of the performance of the Fund and to demonstrate the "Myners Principle" relating to effective decision making. The Business Plan supports the delivery of the objectives of the Fund which are to deliver a high quality pension service to members that is managed effectively, transparently and is compliant. The Business Plan ensures actions are included to address issues raised in the Annual Governance Statement.
- e) The Pension Fund appoints professional advisers and external service providers, covering investment advisory, custodian and actuarial services.
- f) The system of internal financial control operates within a financial strategy and is based on a framework of delegation and accountability for officers and Councillors embodied in procedural standing orders, financial regulations, Scheme of Delegation and Scheme of Administration. This is supported by a framework of administrative procedures including the segregation of duties, and regular financial management information. In particular, the system includes comprehensive accounting systems that record income and expenditure for both member and investment activities, regular reviews of investment reports that measure investment returns against agreed benchmarks and targets, and independent performance reviews of the Fund by the investment consultant and performance monitoring service provider.
- g) The Pension Fund follows the Council's approach to risk management and assesses risk using a scoring methodology and subjects the Risk Register to regular review.
- h) The Acting Chief Financial Officer (Section 95 Officer) for the Council is responsible for ensuring the proper administration of the financial affairs of the Pension Fund. This includes ensuring appropriate professional advice is sought and is given to the Pension Fund on all financial matters, keeping proper financial records and accounts, and maintaining an effective system of internal financial control. The Fund complies with the CIPFA Statement on "The Role of the Chief Financial Officer in Local Government 2016." The Chief Executive left the Council on the 12th September 2022. Interim arrangements were agreed by Scottish Borders Council on the 12th July 2022 and have been enacted, with an acting Chief Executive and an acting Chief Financial Officer appointed while the Council undertakes a formal recruitment process.

- i) The Director – People, Performance and Change is responsible for the pension benefit policy oversight and day-to-day administration of member benefits in accordance with statutory legislation and the approved Pension Administration Strategy.
- j) The Chief Officer Audit & Risk (Head of Internal Audit) provides an independent and objective annual opinion on the effectiveness of internal control, risk management and governance based on the delivery of an approved plan of systematic and continuous internal audit review in conformance with the Public Sector Internal Audit Standards.
- k) The Pension Fund responds to findings and recommendations of external audit and internal audit, as appropriate. The Audit and Scrutiny Committee is integral to overseeing independent and objective assurance and monitoring improvements in internal control and governance.

Review of Framework

The Council as Administering Authority of the Pension Fund, conducts an annual review of the effectiveness of its overall governance framework which is presented to the Audit and Scrutiny Committee whose role includes high level oversight of the Pension Fund's governance, risk management, and internal control arrangements.

The review is informed by the work of an officer assessment of the Fund's compliance with the best practice principles, details of which are set out in the Governance Compliance Statement 2021-22 (page 23 -27).

The review of the effectiveness of the system of internal financial control is informed by the work of professional accountancy staff within the Council, the assurances from the Chief Officer Audit & Risk's annual internal audit report on the work of internal audit, and by the external auditors' reports.

The review cycle for the Risk Register is undertaken in line with agreed practice and the current status is summarised in the Risk Management Statement.

Internal Audit Opinion

The Chief Officer Audit & Risk's opinion is that the systems of internal control operating within the Scottish Borders Council Pension Fund during 2021/22 are sound, and governance and risk management arrangements are effective

During 2021/22 the Internal Audit work included:

- An appraisal of the operation of corporate governance and risk management arrangements;
- A review of key controls including pension administration and financial management arrangements in place;
- A review of performance against objectives, including relevant performance information.

The Fund has effective governance arrangements in place through the joint meetings of the Pension Fund Committee and the Pension Fund Board that support scrutiny and transparency of decisions made. A Skills and Knowledge self-assessment is carried out annually by Members, a Training Plan is proposed to meet those needs, and Members' participation in training events is monitored to ensure Training policy commitments are met. Risk Management is fully embedded into the culture of the Pension Fund with evidence of risk deliberations in decision-making and

regular reviews / updates of the Pension Fund risk register being carried out and reported to the joint meetings of the Committee and Board to demonstrate appropriate scrutiny and oversight of risk management.

There was no specific testing of Pensioner Payroll payments within Internal Audit work on Business World ERP System Key Controls which focused on new areas of system functionality. Reliance can be placed on the previous year's Internal Audit work which concluded comprehensive assurance on key controls and processes to ensure that payroll transactions are valid, complete and accurate. Internal Audit reviewed reports associated with Pensions resulting from the National Fraud Initiative (NFI) Data Matching exercise for 2020/2021. There was one discrepancy highlighted, this has been investigated and arrangements are in place for the repayment of the monies to the Fund.

Best practice suggested that having a Business Plan for the Pension Fund was a good way of demonstrating compliance with the "Myners Principle" relating to effective decision making. The Business Plan 2021/22 to 2023/24 for the Pension Fund was approved by the Joint Pension Fund Committee and Pension Fund Board on 10 June 2021. It identified an Action Plan which would be delivered during the next three years to support the aims and objectives of the Pension Fund. The HR Shared Services Manager gave a demonstration of the Self Service Pension System under development at the joint Committee and Board meeting on 16 September 2021. This system would save considerable time for the Pension Administration team, and provide pension scheme members with a valuable tool. A Business Plan Performance Update, outlining progress on the Business Plan actions at mid-year, was presented to the Joint Pension Fund Committee and Pension Fund Board meeting on 14 December 2021. Quarter Performance Updates are presented in private by the Investment Advisor at the joint Committee and Board meetings. Pension Administration Performance is reported annually to the joint Committee and Board for its inclusion in the Fund's Annual Report and Accounts.

Internal Audit were involved in the testing phase of the Member Self-Service facility (MSS) which has been developed for members of the Councils pension fund. This provides direct access for active and deferred scheme members to view personalised pension data on the portal and was completed in time for the Annual Benefit Statement issue. Work is ongoing to increase uptake.

External access to Business World ERP system for pension members to view payslips and P60s is in place. Work continues to promote this facility.

The 2021/22 annual internal self-assessment against the Public Sector Internal Audit Standards (PSIAS) demonstrates sufficient evidence that the Council's Internal Audit section conforms with the Definition of Internal Auditing, Code of Ethics, Attribute Standards and Performance Standards.

Improvement Areas of Governance

The Committee agrees a three year business plan on an annual basis to ensure the ongoing management and development of the Fund is in line with the longer term policy, objectives and strategy of the Fund. The plan sets out the key actions and sets timescales of each. The progress of the actions are reported mid-year to the Committee. The actions completed from the 2021/22 business plan are as follows;

- Full review and update of the Funding Strategy Statement with inclusion of new cessation policy and correct employer contribution rates received.
- Completion of the agreed training programme for all members of the Pension Fund Committee and Pension Fund Board.

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- Full review of Strategic Asset Allocation completed and implementation commenced.
- Completion of a procurement exercise for ESG passive equity manager and Infrastructure manager per the approved strategic asset allocation.
- Implementation and roll out of Members Self Service.
- Review completed of Responsible investment policy further enhancing the Funds commitment to responsible investing.
- Review completed of services provided by IT providers to ensure data is secure and adheres to cyber security requirements.

The following areas have been identified and included in the 2022/23 action plan submitted to the Joint Pension Fund Committee and Board for approval. These will enhance the existing governance arrangements:

- Review of all forms of communication material.
- Accuracy of Pension records including requirements for pension dashboard.
- System improvement to support home working.
- Submission of application for the Stewardship Code.
- Commence preparation for 2023 triennial valuation.
- Review of the Fund's strategic asset allocation following the 31 March 2020 valuation.
- Implementation of approved Responsible Investment Policy and its monitoring requirements.
- Review and implementation of The Pension Regulator's "Single Code".

Impact of COVID-19

At the start of the global Covid-19 pandemic Scottish Borders Council agreed temporary decision making arrangements to minimise social contact during the pandemic. It was agreed all formal Council and Committee meetings be cancelled unless required for statutory reasons and additional powers delegated to the Chief Executive in consultation with Officers and Members. Business continuity plans were implemented with staff mainly working at home with full access to systems and files.

During 2021/22 all meetings were held virtually. The overall governance of the Fund remained in place with all meetings being held and papers and decisions being made available via the internet. All services have been fully maintained and all payments made in a timely manner. Investments which initially fell at the start of the pandemic bounced back quickly and additional monitoring meetings with Officers and fund managers were held to ensure risks were identified and mitigating measures put in place. A full review will be undertaken and future business continuity plans updated to reflect findings.

Certification

It is our opinion that reasonable assurance can be placed upon the adequacy and effectiveness of Scottish Borders Council Pension Fund's systems of internal control, governance and risk management. The annual review demonstrates sufficient evidence that the Pension Fund's Governance Policy is operating effectively and that the Pension Fund fully complies with the best practice principles as demonstrated in the Governance Policy and Compliance Statement (pages 24- 28).

**Councillor David Parker
Chair
Pension Fund Committee**

**David Robertson
Acting Chief Executive
Scottish Borders Council**

ANNUAL GOVERNANCE COMPLIANCE STATEMENT

The Local Government Pension Scheme (Scotland) Regulations 2014 require Administering Authorities to measure their governance arrangements against standards set out by Scottish Ministers. These standards are established via a number of best practice principles. The following table contains an assessment of the Fund's compliance with these principles.

Principle		Full Compliance	Comments
Structure			
A	The management of the administration of benefits and strategic management of Fund assets clearly rests with the main committee established by the appointing Council.	Yes	<p>Scottish Borders Council acts as administering authority for the Pension Fund and delegates its responsibilities as Scheme Manager to the Pension Fund Committee (the Committee).</p> <p>The Committee comprises seven Councillors.</p> <p>The Council's Scheme of Administration sets out the Committee's remit.</p>
B	Representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.	Yes	<p>The Pensions Board (the Board) formalises the involvement of the employers and trade unions representing the membership.</p> <p>The Fund's Board has eight members (four employer representatives and four trade union representatives) covering all pension fund members.</p> <p>The Board's constitution is in line with the regulations, a copy of which is included in the Fund's Governance Policy and Compliance Statement.</p> <p>The Board meets jointly with the Committee and the Board's Constitution and the Scheme of Administration set out how disputes between the two bodies should be resolved.</p> <p>The Investment and Performance Sub-Committee (the Sub-Committee) established under the Committee. Its remit is set out in the Scheme of Administration. Membership of the Sub-Committee is seven elected Members from the Pension Fund Committee and two (non-voting) members from the Pension Board.</p>

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Principle		Full Compliance	Comments
C	Where a secondary committee or panel has been established, the structure ensures effective communication across both levels	Yes	Minutes of the Sub-Committee and any other Sub-Groups are submitted to the Pension Fund Committee for approval. Two members from the Pension Board and all Members of the Committee are part of the Sub-Committee which has a remit to monitor investment performance.
D	Where a secondary committee or panel has been established, at least one seat of the main committee is allocated for a member from the secondary committee or panel.	Yes	The Scheme of Administration states that any Sub-Group established will have member(s) of the Committee as part of its membership.
Committee Membership and Representation			
A	All key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include: (i) employing authorities (including non-scheme employers, e.g. admitted bodies) (ii) scheme members (including deferred and pensioner scheme members) (iii) where appropriate, independent professional observers, and (iv) expert advisors (on an ad-hoc basis)	Yes	The Pension Board and Pension Fund Committee meet jointly ensuring employer and member (trade union) representation at meetings. The Investment Sub-Committee has two non-voting members from the Pension Board. The Independent Investment Consultant, Finance and HR Officers also attend in an advisory capacity.
B	Where lay members sit on a main or secondary committee, they are treated equally in terms of access to papers, meetings and training They are given full opportunity to contribute to	Yes	All members of the Committee and Board are covered equally by the Training Policy (as amended annually in June). The Board was established by Council on 2 April 2015. The Scheme of Administration for the Pension Fund Committee, and the Pension Board Constitution, provide for joint meetings, with equal rights to receive

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Principle		Full Compliance	Comments
	the decision making process, with or without voting rights.		papers and access meetings.
Selection and role of lay members			
A	That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee.	Yes	For Councillors this is part of the Council's Code of Governance along with the Members' induction programme. In addition, the Fund's Training Policy provides for an annual training needs assessment, and an annual programme of training to be made available to all members of the Committee and Board. All new members of the Committee and Board are also required, within six months of joining, to complete the Pension Regulator Trustee Toolkit.
B	At the start of any meeting, committee members are invited to declare any financial or pecuniary interest related to specific matters on the agenda	Yes	Part of the Council's Code of Governance requires the declaration of Members' interests for all committees as a standard agenda item.
Voting			
A	The policy of individual administrating authorities on voting rights is clear and transparent, including justification for not extending voting rights to each body or group represented on main LGPS committees.	Yes	This is set out in the Council's Scheme of Administration and the Pension Board's Constitution.
Training/Facility time/Expenses			
A	In relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses	Yes	Councillors expenses are managed under the Council's policies. The Training Policy also covers the reimbursement of training related expenses.

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Principle		Full Compliance	Comments
	in respect of members involved in the decision-making process.		
B	Where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum.	Yes	The training policy for all members of the Pension Board and Pension Fund Committee is approved annually at the joint meeting in June.
C	The administering authority considers the adoption of annual training plans for committee members and maintains a log of all such training undertaken.	Yes	The Annual Training Plan is produced and implemented with logs of training attendance maintained. Compliance to the plan is reported to the Joint Pension Fund Committee and Board.
Meetings (frequency/quorum)			
A	An administering authority's main committee or committees meet at least quarterly	Yes	The joint meetings of the Pension Fund Committee and Pension Board are quarterly.
B	An administering authority's secondary committee or panel meet at least twice a year and is synchronised with the main committee dates.	Yes	The Investment Sub-Committee meets every four months between the joint Committee/Board meetings.
C	An administering authority who does not include lay members in their formal governance arrangements, must provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.	Not applicable	The Pension Board formally provides for stakeholders' engagement.
Access			
A	Subject to any rules in the Council's Constitution, all members of main and secondary committees or	Yes	Papers sent to all Committee/Board members as detailed in the Scheme of Administration.

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Principle		Full Compliance	Comments
	panels have equal access to committee papers, documents and advice that falls to be considered at meetings of the main committee		
Scope			
A	Administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements	Yes	The Scheme of Administration sets out the Committee as having a remit which covers all matters relating to the Council's role as Administering Authority for the Scottish Borders Council Pension Fund, within the terms of all relevant Local Government Pension Scheme legislation and the requirements of the Pension Regulator.
Publicity			
A	Administering authorities have published details of their governance arrangements in such a way that stakeholders, with an interest in the way in which the scheme is governed, can express an interest if wanting to be part of those arrangements.	Yes	Scottish Borders Council Pension Fund has a standalone website with all governance documents and Fund information. A link is provided to Minutes and public papers available via the Council's website.

SECTION 3

FINANCIAL STATEMENTS

STATEMENT OF RESPONSIBILITIES

COUNCIL'S RESPONSIBILITIES

Scottish Borders Council as the administering authority for Scottish Borders Council Pension Fund is required to:

- Make arrangements for the proper administration of Scottish Borders Council Pension Fund's financial affairs and to ensure that the proper officer of the authority has responsibility for the administration of those affairs in relation to Scottish Borders Council Pension Fund. That officer is the Acting Chief Financial Officer.
- Manage the affairs of Scottish Borders Council Pension Fund to secure the economic, efficient and effective use of resources and safeguard its assets.
- Ensure the Annual Accounts are prepared in accordance with legislation (The Local Authority Accounts (Scotland) Regulations 2014) and so far as is compatible with that legislation, in accordance with proper accounting practices (Section 12 of the Local Government in Scotland Act 2003).
- Approve Scottish Borders Council Pension Fund Annual Accounts for signature.

ACTING CHIEF FINANCIAL OFFICER'S RESPONSIBILITIES

The Acting Chief Financial Officer is responsible for the preparation of Scottish Borders Council Pension Fund's Annual Accounts in accordance with proper practices as required by legislation and as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom (the Accounting Code).

In preparing the Annual Accounts, the Acting Chief Financial Officer has:

- Selected suitable accounting policies and then applied them consistently.
- Made judgements and estimates that were reasonable and prudent.
- Complied with legislation, and
- Complied with the local authority Accounting Code (in so far as it is compatible with legislation).

The Acting Chief Financial Officer has also:

- Kept adequate, up to date accounting records.
- Taken reasonable steps for the prevention and detection of fraud and other irregularities.

I certify that the financial statements give a true and fair view of the financial position of Scottish Borders Council Pension Fund as at 31 March 2022 and the transactions of the Fund for the year then ended.

Councillor David Parker
Chair
Pension Fund Committee

Suzanne Douglas CPFA
Acting Chief Financial Officer
Scottish Borders Council

FUND ACCOUNT for year ending 31 March 2022

2020/21 £'000		2021/22 £'000	Notes
	Dealings with members, employers and others directly involved in the scheme:		
20,666	Contributions	22,593	7
1,061	Transfers in from other pension funds	3,346	8
21,727		25,939	
(25,157)	Benefits	(25,390)	9
(3,139)	Payments To And On Account Of Leavers	(681)	10
(28,296)		(26,071)	
(6,569)	Net Additions/(Withdrawals) from Dealings with Members	(132)	
(5,979)	Management expenses	(6,395)	11
	Return on Investments:		
12,749	Investment Income	17,600	12
146,680	Profits and (Losses) on Disposal of Investments and Changes in the Market Value of Investments	40,765	14
(45)	Taxes on Income	(387)	
159,384	Net Return on Investments	57,978	
146,836	Net Increase/(Decrease) in the Fund during the Year	51,451	
712,858	Opening Net Assets of the Scheme	859,694	
859,694	Closing Net Assets of the Scheme	911,145	

The Fund Account shows the payments to pensioners, contribution receipts from employers and scheme members, and the income, expenditure and change in market value of the Fund's investments.

NET ASSETS STATEMENT as at 31 March 2022

2020/21 £'000		2021/22 £'000	Notes
860,013	Investment Assets	910,784	14
(219)	Investment Liabilities	(1,403)	14
859,794	Total net investment	909,381	
	Current Assets & Liabilities		
2,614	Current Assets	4,174	21
(2,714)	Current Liabilities	(2,410)	22
(100)		1,764	
859,694	Net Assets of the Fund available to fund benefits at the period end	911,145	

The Net Assets Statement represents the value of assets and liabilities as at 31 March (excluding liability to pay pensioners).

The unaudited accounts were issued on 29 June 2022 and the audited accounts were authorised for issue on 24 November 2022.

Suzanne Douglas CPFA
Acting Chief Financial Officer
Scottish Borders Council

NOTES TO THE ACCOUNTS

1 DESCRIPTION OF THE FUND

A) General

The Scottish Borders Council Pension Fund (the Fund) is part of the Local Government Pension Scheme (LGPS) and is administered by Scottish Borders Council.

The LGPS scheme is governed by the Public Service Pensions Act 2013. The Fund is administered by the Council in accordance with the following secondary legislation:

- The Local Government Pension Scheme (Scotland) Regulations 2018 (as amended).
- The Local Government Pension Scheme (Transitional Provisions and Savings) (Scotland) Regulations 2014.
- The Local Government Pension Scheme (Management and Investment of Funds) (Scotland) Regulations 2016.
- The Local Government Pension Scheme (Governance) (Scotland) Regulations 2015.

It is a contributory defined benefit pension scheme administered by Scottish Borders Council to provide pensions and other benefits for pensionable employees of Scottish Borders Council and a range of other scheduled and admitted bodies within the Scottish Borders area.

Organisations participating in the Fund include:

- Scheduled Bodies – which are local authorities and similar bodies whose staff are automatically entitled to be members of the Fund.
- Admitted Bodies – which are other organisations that participate in the Fund under an admission agreement between the Fund and the relevant organisation.

B) Funding

Pensions and other benefits are funded by contributions from employees, employers and investment earnings.

The Pension Fund is subject to a triennial valuation by an independent, qualified Actuary, whose report indicates the required future employer's contributions. For 2021/22 this was based on the valuation undertaken as at the 31 March 2020, as amended by specific changes, agreed by the Committee relating to an individual employer. The overall contribution rate was 18% for the Fund as a whole; however employers' contribution rates during 2021/22 ranged from 18% to 21.1%.

Contributions from active members of the Fund are paid on a tiered basis, the contribution rate being determined by the amount of salary falling into each earnings tier. These rates are made in accordance with the 2008 Regulations and ranged from 5.5% to 12.0% of pensionable pay for the financial year ending 31 March 2022. From 1 April 2015 these contributions are based on the LGPS Regulations 2014 in line with the updated LGPS Scheme.

C) Benefits

The Local Government Pension Scheme is a defined benefit scheme. From 1st April 2015 benefits are accrued at a rate of 1/49th of pensionable pay on a career average basis. Prior to that date benefits were accrued on a final salary basis. These benefits are fully protected on the basis under which they were accrued.

The table below gives a summary of the scheme benefits:

Membership up to 31 March 2009		Membership from 1 April 2009 to 31 March 2015		Membership from 1 April 2015
Annual pension = (service years/days x final pay)/80	+	Annual pension = (service years/days x final pay)/60	+	Annual pension = Pensionable pay each year /49 (half that if in 50/50 section)
+		+		+
Automatic lump sum of 3 x annual pension.		No automatic tax free lump sum but can convert pension.		No automatic tax free lump sum but can convert pension.
+		+		+
<ul style="list-style-type: none"> • Annual revaluation and pensions increase in line with CPI inflation • Partners and dependents pensions • Ill health protection • Death in service protection 				

Further details can be found on the Scottish Borders Council Pension Fund website.

All benefits are paid in accordance with the Local Government Pension Scheme regulations.

2 BASIS OF PREPARATION OF THE FINANCIAL STATEMENTS

The financial statements summarise the Fund's transactions for the 2021/22 financial year and its position as at the 31 March 2022. The accounts have been prepared in accordance with the *Code of Practice on Local Authority Accounting in the United Kingdom 2021/22* (the Code) which is based upon International Financial Reporting Standards (IFRS), as amended for the UK public sector. In addition, consideration has been given to the *Local Government Pension Scheme Fund Accounts 2020/21 - example accounts and disclosure checklist* published by the Chartered Institute of Public Finance Accountants (CIPFA).

The financial statements also present the net assets available to pay pension benefits. These do not take account of obligations to pay pensions and benefits which fall due after the end of the financial year. Local authorities responsible for administering a Pension Fund that forms part of the LGPS are required by The Local Government Pension Scheme (Scotland) Regulations 2014 to publish a Pension Fund Annual Report, which is required to include a Fund Account and Net Assets Statement prepared in accordance with proper accounting practices.

The accounts have been prepared on a going concern basis.

3 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Fund Account

Accruals Basis

In accordance with the Code, the Fund's Financial Statements are generally prepared on an accruals basis. The Net Assets Statement does not include liabilities to pay pensions and benefits after the end of the Fund year and the accruals concept is applied accordingly. Receipts and payments in respect of the transfer of benefits from and to other schemes are treated on a cash basis.

Contributions Income

Normal contributions, both from members and employers, are accounted for on an accruals basis at the percentage rate recommended by the Fund Actuary in the payroll period to which they relate. Employers augmented contributions and pension strain contributions are accounted for in the period in which the liability arises. Any amounts in respect of strain on the Fund due in a year but unpaid are classed as a current financial asset.

Transfers to and from other schemes

Transfer values represent the amounts received and paid during the year for members who have either joined or left the Fund during the financial year and are calculated in accordance with the LGPS Regulations. Individual transfers in/out are accounted for when the member liability is accepted or discharged.

Investment Income

i) Interest income

Interest is recognised in the Fund Account as it accrues, using the effective interest rate of the financial instrument as at the date of acquisition or origination.

ii) Dividend income

Dividend income is recognised on the date the shares are quoted ex-dividend. Any income not received by the end of the reporting period is disclosed in the net assets statement as a current financial asset.

iii) Distributions from pooled funds

Distributions from pooled funds are recognised at the date of issue.

iv) Movement in the net market value of investments

Changes in the net market value of investments are recognised as income and comprise all realised and unrealised profits/losses during the year.

Benefits Payable

Pensions and lump-sum benefits payable include all amounts known to be due as at the end of the financial year. Any amounts due but unpaid are disclosed in the Net Assets Statement as current liabilities.

Taxation

The Fund is a registered public service scheme under section 1(1) of Schedule 36 of the Finance Act 2004 and as such is exempt from UK income tax on interest received and from capital gains tax on the proceeds of investments sold. Income from overseas investments suffers withholding tax in the country of origin, unless exemption is permitted. Irrecoverable tax is accounted for as a Fund expense as it arises.

Administration Expenses

All administration expenses are accounted for on an accruals basis. Central Support Costs from Scottish Borders Council have been recharged to the Fund on the basis of time spent by staff on the service. The recharge includes overheads apportioned to this activity.

Investment Management Expenses

Fees of the external investment managers and custodian are agreed in the respective mandates or subscription agreements 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. Management fees also include transaction costs incurred by the managers.

Investment management expenses incurred by funds in the UK have come under increasing scrutiny in recent years resulting in establishment of the Cost Transparency Initiative (CTI) and the launch of collection templates in 2019. All managers of the Fund have submitted their investment expenses information on the new template which will ensure consistency of reporting.

Net Assets Statement

Valuation of Investments

The values of investments as shown in the net assets statement have been determined as follows:

- Market-quoted investments – Investments listed on recognised Stock Exchanges are valued at the bid price on the close of business on 31 March.

- Unquoted investments – directly held investments include investments in limited partnerships, shares in unlisted companies, trusts and bonds. Other unquoted securities typically include pooled investments in property, infrastructure, debt securities and private equity. The valuation of these pools or directly held securities is undertaken by the investment manager or responsible entity and advised as a unit or security price. The valuation standards followed in these valuations adhere to industry guidelines or to standards set by the constituent documents of the pool or the management agreement.
- Pooled investment vehicles – are valued at bid price on the close of business on 31 March.
- Private equity/debt and infrastructure assets are independently valued by the appointed Fund Manager and General Partners. Fair value is calculated by applying Private Equity and Venture Capital Valuation Guidelines.

The processes of the fund managers, who are listed in Note 14b, (page 45) are subject to external audit and verification and this is reported in their respective assurance reports on internal controls (in accordance with Technical Release AAF 01/06).

Foreign Currency Transactions

Dividends, interest and purchases and sales of investments in foreign currencies have been accounted for at spot market rates at the date of transaction. End of year spot market exchange rates are used to value cash balances held in foreign currency bank accounts market values of overseas investments.

Derivatives

The Fund uses derivative financial instruments to manage its exposure to specific risks (in particular currency) arising from its investment activities. The Fund does not hold derivatives for speculative purposes.

Derivative contract assets are fair valued at bid prices and liabilities are fair valued at offer prices. Changes in the fair value of the derivative contracts are included in the change in market value.

The future value of forward currency contracts is based on market forward exchange rates at the year-end and determined as the gain or loss that would arise if the outstanding contracts were matched at the year-end with an equal and opposite contract.

Cash and Cash Equivalents

Cash comprises cash in hand and demand deposits. Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash and are subject to minimal risk of change in value.

Actuarial Present Value of Promised Retirement Benefits

The actuarial present value of promised retirement benefits is assessed on a triennial basis by the scheme Actuary in accordance with the requirements of International Accounting Standards (IAS) 19 and relevant actuarial standards. As permitted under IAS 26, the Fund has opted to disclose the actuarial present value of promised retirement benefits by way of a note to the Net Assets Statement (Note 20, page 58).

Additional Voluntary Contributions (AVCs)

The Fund provides an additional voluntary contributions (AVC) scheme for its members, the assets of which are invested separately from those of the Fund. The Fund has appointed Standard Life to act as AVC provider. AVCs are paid to the AVC provider by employees and are specifically for providing additional benefits for individual contributors. Each AVC contributor receives an annual statement showing the amount held in their account and the movements in the year.

AVCs are not included in the accounts in accordance with section 4(2) (b) of the Local Government Pension Scheme (Management and investment Funds) (Scotland) Regulations 2010 (SSI 2010/233) but are disclosed as a note only (Note 23).

Accounting Standards that were issued but not yet adopted.

There are no accounting standards which have not yet been adopted.

4 CRITICAL JUDGEMENTS IN APPLYING ACCOUNTING POLICIES

Pension Fund Liability

The Pension Fund liability is calculated every three years by the appointed Actuary (currently Hymans Robertson), with annual updates in the intervening years. The methodology used is in line with the accepted guidelines and in accordance with IAS 19. Assumptions underpinning the valuations are agreed with the Actuary and are summarised on page 57. This estimate is subject to significant variances based on changes to the underlying assumptions.

5 ASSUMPTIONS MADE ABOUT THE FUTURE AND OTHER MAJOR SOURCES OF ESTIMATION AND UNCERTAINTY

The preparation of financial statements requires management to make judgements, estimates and assumptions that affect the amounts reported for assets and liabilities at the balance sheet date and the amounts reported for the revenues and expenses during the year. Estimates and assumptions take into account historical experience, current trends and other relevant factors. However, the nature of estimation means that the actual outcomes could differ from the assumptions and estimates.

The items in the financial statements at 31 March 2022 for which there is a significant risk of material adjustment in the forthcoming financial year are as follows:

Item	Uncertainties	Effect if actual results differ from assumptions
Actuarial Present Value of Promised Retirement Benefits (Note 20, page 58).	Estimation of the net liability to pay pensions in the future depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on pension fund assets. Hymans Robertson is	The effects on the net pension liability of changes in individual assumptions can be measured. - A 0.1% decrease in the discount rate assumption would result in a increase in the pension liability of £20m

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	<p>engaged to provide the Fund with expert advice about the assumptions to be applied.</p>	<ul style="list-style-type: none"> - A 0.1% increase in the Consumer Price Index assumption for inflation would increase the value of the liabilities by £18m - A 0.1% increase in the long-term rate of salary increase would increase value of the liabilities by £2m, and - A 1 year increase in assumed life expectancy would increase the liability by £42m <p><i>Source – IAS26 report 2022</i></p>
<p>Portfolio of Level 3 assets held</p>	<p>Level 3 assets are those which do not have observable market data. The valuations are provided by administrators of the funds and are validated by independent administrators. Such valuations are prepared in accordance with the valuation principles of IFRS and GAAP. There is, however a degree of estimation involved in the valuations.</p>	<p>The total assets held in Level 3 £323.7m and include Private Credit, Property, Infrastructure and Alternatives. There is a risk that this investment may be under or overstated in the accounts. Based on historical data and current market trends actual valuation could be between £356.3m and £291.1m</p>

6 EVENTS AFTER THE REPORTING DATE

There are no known events since 31 March 2022 which directly affect these accounts.

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7 CONTRIBUTIONS RECEIVABLE

2020/21				2021/22		
Employers	Members	Total		Employers	Members	Total
£'000	£'000	£'000		£'000	£'000	£'000
15,472	5,135	20,607	Normal	17,030	5,506	22,536
28	-	28	Special/Pension Fund Strain	42	-	42
-	31	31	Additional Voluntary	-	15	15
15,500	5,166	20,666	Total	17,072	5,521	22,593

2020/21		2021/22
£'000		£'000
17,739	Administering Authority	18,597
917	Scheduled Bodies	989
2,010	Admitted Bodies	3,007
20,666		22,593

8 TRANSFERS IN

There were no group transfers in to the scheme during 2021/22 or 2020/21 and the total of £3.346m (2020/21: £1.061m) represents the total of transfer values in respect of individual members joining the scheme.

9 BENEFITS PAYABLE

2020/21		2021/22
£'000		£'000
19,754	Pension Payments	20,410
4,727	Commutation and lump sum retirement benefits	4,254
676	Lump Sums death benefits	726
25,157		25,390

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2020/21		2021/22
£'000		£'000
22,918	Administering Authority	22,361
438	Scheduled Bodies	845
1,801	Admitted Bodies	2,184
25,157		25,390

10 PAYMENTS TO AND ON ACCOUNT OF LEAVERS

2020/21		2021/22
£'000		£'000
49	Refunds to members leaving service	82
1,286	Individual Transfers	599
1,804	Group Transfers	-
3,139		681

11 MANAGEMENT EXPENSES

2020/21		2021/22
£'000		£'000
352	Administrative costs	378
5,310	Investment management expenses	5,668
317	Oversight and governance costs	349
5,979	Total	6,395

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11(a) Investment Management Expenses

	Total	Management fees	Transaction cost
2021/22	£'000	£'000	£'000
Equities	1,035	772	263
Pooled Investments	2,290	1,648	642
Private Equity/Infrastructure	1,400	1,274	126
Property	880	442	438
Total	5,605	4,136	1,469
Custody fees	63		
Total	5,668		
	Total	Management fees	Transaction cost
2020/21	£'000	£'000	£'000
Equities	1,027	738	289
Pooled Investments	2,917	2,415	502
Private Equity/Infrastructure	722	620	102
Property	560	232	328
Total	5,226	4,005	1,221
Custody fees	84		
Total	5,310		

12 INVESTMENT INCOME

2020/21		2021/22
£'000		£'000
2,571	Dividends from equities	2,931
6,521	Income from Pooled Investment vehicles	8,523
3,657	Income from Pooled Property Investment vehicles	6,146
0	Interest on Cash Deposits	0
12,749		17,600

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13 OTHER FUND ACCOUNT DISCLOSURES

13(a) External Audit Costs

In 2021/22 the agreed audit fee for the year was £22,110 (2020/21 £21,510). The external auditor is Audit Scotland.

14 INVESTMENTS

Market Value at 31 March 2021 £'000		Market Value at 31 March 2022 £'000
	Investment Assets	
217,762	Equities	140,492
172,971	Pooled Equities	212,653
179,002	Pooled Bonds	184,351
110,739	Pooled Other	116,036
95,298	Pooled Property Investments	139,927
69,690	Private Equity/Infrastructure	86,838
-	Diversified Alternatives	-
-	Derivative Contracts	-
13,132	Cash Deposits	28,737
994	Investment Income Due	858
425	Amounts receivable for sales	892
860,013	Total Investment Assets	910,784
	Investment Liabilities	
(219)	Amounts payable for purchases	(1,403)
859,794	Net Investment Assets	909,381

14(a) Reconciliation of Movement in Investment and Derivatives

The table below follows the guidance of the standard presentation for the movement in investments.

	Opening Market Value 1/4/2021 £'000	Purchases & Derivative Payments £'000	Sales & Derivative Receipts £'000	Change to Market value during year £'000	Closing Market Value 31/3/2022 £'000
Equities	217,762	48,057	(116,948)	(8,379)	140,492
Pooled Investments	462,713	104,403	(84,906)	30,830	513,040
Pooled Property Investments	95,298	53,906	(23,065)	13,788	139,927
Private Equity/Infrastructure	69,691	17,715	(5,417)	4,849	86,838

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Derivative Contracts	-		(1)	1	0
	845,464	224,081	(230,337)	41,089	880,297
Other Investment Balances					
Cash Deposits	13,132			(337)	28,737
Amount receivable for sales	424				892
Investment Income due	993				858
Spot FX Contract	1			10	-
Amount Payable on Purchase	(220)				(1,403)
Net Investments	859,794			40,762	909,381

Significant Transactions during the year:

The Fund approved a revised Investment Strategy approved in June 2021. The review maintained the allocation for equities but approved the movement of the passive equities into a ESG focused passive fund and the movement of Baillie Gifford Global Equities into their Paris Aligned Global Equity Fund. The review also introduced an allocation to Housing, increased the allocation to Long Lease property and increased the allocation to infrastructure. The Fund has made good progress on the implementation of these changes with the full funding of the new ESG passive equity fund with LGIM and has fully implemented the increased allocation to Long Lease property with Blackrock.

14(b) Investment Analysed by Fund Managers

Investment Management was undertaken on behalf of the Fund during the financial year by 20 firms of investment managers, these are shown below. The Fund has also during 2021/22, continued to make investments into infrastructure, via collaborative working with Lothian Pension Fund and directly with Macquarie. As at 31 March 2022 the market value of the assets under management, broken down by manager and mandate (including cash held within each mandate) was:

31-Mar-21		31-Mar-22			
£'000	%			£'000	%
51,592	6.0	UBS	Pooled Fund -UK Equities	0	-
61,178	7.1	Baillie Gifford	UK Equities	29,134	3.2
164,059	19.1	Baillie Gifford	Global Equities	114,705	12.6
118,407	13.8	Morgan Stanley	Pooled Fund - Global Equities	118,980	13.0
-	-	LGIM	Pooled Fund – Passive Global Equities	93,673	10.3

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116,311	13.5	M&G	Pooled Fund - Diversified Income	117,271	12.9
62,691	7.3	M&G	Pooled Fund - Bonds	67,080	7.3
37,221	4.3	UBS	Pooled Fund -Property	26,563	2.9
58,181	6.7	Blackrock	Pooled Fund – Property	121,500	13.3
59,823	7.0	LGT	Pooled Fund - Alternatives	67,882	7.4
27,424	3.2	Partners Group	Pooled Fund – Private Credit	31,517	3.5
24,728	2.9	Permira	Pooled Fund – Private Credit	15,578	1.7
3,100	0.4	Alinda	Infrastructure	3,443	0.4
3,449	0.4	KKR	Infrastructure	2,940	0.3
1,226	0.1	Infrared	Infrastructure	1,107	0.1
13,595	1.6	Dalmore	Infrastructure	14,263	1.6
1,421	0.2	Brookfield	Infrastructure	3,602	0.4
1,636	0.2	Macquarie	Infrastructure	3,249	0.4
1,701	0.2	Equitix	Infrastructure	2,013	0.2
2,162	0.3	Gaia	Infrastructure	3,097	0.3
2,342	0.3	Oaktree	Infrastructure	66	0.0
-	-	Gresham House	Infrastructure	7	0.0
39,059	4.5	Macquarie	Pooled Fund -Infrastructure Debt	53,053	5.8
8,488	0.9	Internal	Internally Managed Cash & Investments	18,658	2.4
859,794				909,381	

The benchmarks and performance targets for each manager as at the 31 March 2022 are contained in the Statement of Investment Principles published on the Pension Fund website.

Investments representing more than 5% of Net Assets

The value of the following investments exceeds 5% of the total value of the net assets of the Pension Fund at 31 March 2022. Each of the investments comprises units in a managed fund.

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	As at 31 March 2021		As at 31 March 2022	
	£'000	% of Fund	£'000	% of Fund
Blackrock – Long Lease Property	58,181	6.8	121,500	13.3
Morgan Stanley Global Brands Fund	118,407	13.8	118,980	13.0
M&G Alpha Opportunities Fund	116,311	13.5	117,271	12.9
LGIM – Future World Global Equity Index			93,673	10.3
LGT Crown SBC Segregated Portfolio	59,823	7.0	67,882	7.4
M&G Index Linked	62,691	7.3	67,080	7.3

Fund Performance

The total Fund return for the year was 5.9% with a relative return under benchmark of 4.7%. Over three years the Fund has generated an annualised return of 7.7% per annum, with a relative return under benchmark of 1.0% per annum. Further information on this is contained in Section 6 -- Investments.

14 (c) Stock Lending

The Fund may participate in the stock lending programme managed by its Global Custodian, Northern Trust. All loans are fully collateralised. As at 31 March 2022 stock with a market value of £9.1m was on loan.

14(d) Property Holdings

The Fund's investment in its property portfolio comprises of pooled investments with UBS and Blackrock. There are no directly owned properties.

15 ANALYSIS OF DERIVATIVES

The Funds approach to derivatives is to allow individual managers to decide to participate in derivative contracts subject to limits set out in their investment management agreements. The Fund holds cash assets to allow for cash flow purposes. Fund managers will also, on occasions, hold forward currency contracts. There were no derivatives held at 31 March 2022 or 31 March 2021.

16 FAIR VALUE BASIS OF VALUATION

Assets and liability valuations are classified into three levels according to quality and reliability of information used to determine fair values.

1. Level 1 - are those where fair values are derived from unadjusted quoted prices in active markets for identical assets and liabilities. Products classified as Level 1 comprise quoted equities and unit trusts. Prices are quoted at bid prices.
2. Level 2 - are those where quoted market prices are not available; for example, where an instrument is traded in a market that is not considered to be active, or where valuation techniques are used to determine fair value and where these techniques use inputs that are based significantly on observable market data.
3. Level 3 - are those where at least one input that could have a significant effect on the instrument's valuation is not based on observable market data. Such instruments would include unquoted equity investments, which are valued using various valuation techniques that require significant judgement in determining appropriate assumptions.

16(a) Fair Value Hierarchy

Values as at 31 March 2022	Quoted market price	Using observable inputs	With significant unobservable inputs	Total
	Level 1	Level 2	Level 3	
	£'000	£000's	£000's	£000's
Financial assets at fair value through profit & loss				
Equities	139,802	-	690	140,492
Pooled Investments	303,330	94,835	68,071	466,236
Pooled Property Investments	-	18,610	121,317	139,927
Private Equity/Infrastructure	-	-	133,642	133,642
Cash Deposits	28,737	-	-	28,737
Other Investment assets	-	-	-	-
Investment Income due	858	-	-	858
Amounts receivable for sales	-	892	-	892
Net Investment Assets	472,727	114,337	323,720	910,784
Financial liabilities at fair value through profit & loss				

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Payable for investment purchase		(1,403)		(1,403)
Total	472,727	112,934	323,720	909,381

Values as at 31 March 2021	Quoted market price	Using observable inputs	With significant unobservable inputs	Total
	Level 1	Level 2	Level 3	
	£'000	£000's	£000's	£000's
Financial assets at fair value through profit & loss				
Equities	217,762			217,762
Pooled Investments	349,001	2,972	110,739	462,712
Pooled Property Investments		29,795	65,503	95,298
Private Equity/Infrastructure			69,691	69,691
Cash Deposits	13,132			13,132
Investment Income due		2		2
Amounts receivable for sales	990	3		993
Net Investment Assets		423		423
Financial liabilities at fair value through profit & loss	580,885	33,195	245,933	860,013
Financial liabilities at fair value through profit & loss				
Payable for investment purchase		(219)		(219)
Total	580,885	32,976	245,933	859,794

16(b) Transfers between Levels 1 and 2

There have been no funds transferred from level 1 to level 2 during the year.

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16(c) Reconciliation of Fair Value Measurements within level 3.

	Market Value 1 April 2021 £'000	Transfer in to level 3 £000	Purchases during year & derivative payments £'000	Sales during the year and derivative receipts £'000	Unrealised gains/ (losses) £'000	Realised gains/ (losses) £'000	Market Value 31 March 2022 £'000
Overseas Venture Capital	9,985		2,063	(3,264)	391	729	9,904
Overseas Equity Funds	59,822		34	-	8,027	-	67,883
Private Credit Funds	50,916		10,508	(13,806)	(440)	(185)	46,993
UK Property	65,505		54,265	(7,909)	8,656	800	121,317
UK Venture Capital	59,705		15,696	(2,146)	3,170	508	76,933
Overseas Equities	-	830	-	-	(140)	-	690
	245,933	830	82,566	(27,125)	19,664	1,852	323,720
	Market Value 1 April 2020 £'000	Transfer in to level 3 £000	Purchases during year & derivative payments £'000	Sales during the year and derivative receipts £'000	Unrealised gains/ (losses) £'000	Realised gains/ (losses) £'000	Market Value 31 March 2021 £'000
Alternatives	50,583			(50,583)	(11,200)	11,200	-
Overseas Venture Capital	8,508		2,541	(1,321)	(227)	484	9,985
Overseas Equity Funds			50,583		9,239		59,822
Private Credit funds	51,230		3,998	(5,099)	787		50,916
UK Property	66,088		1,200		(1,783)		65,505
UK Venture Capital	49,950		7,257	(333)	2,831		59,705
Total	226,359		65,579	(57,336)	(353)	11,684	245,933

Transfers to level 3 reflect the investment into Infrastructure as part of the implementation of the revised Investment Strategy and the holdings with Brilliance China which have been temporarily suspended from trading in Hong Kong due to financial irregularities of a subsidiary in the group.

Purchases and sales during the year reflect the implementation of the revised Investment Strategy.

Unrealised and realised gains and losses are recognised in the changes in value of investments line of the Fund Account.

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Sensitivity of Assets Valued at Level 3

Having considered historical data and current market trends, and consulted with independent advisors, the Fund has determined the valuation methods described above are likely to be accurate within the following ranges, and has set out below the consequent potential impact on the closing value of investments held at 31 March 2022.

	Assessed valuation range (+/-) %	Value at 31 March 2022 £'000	Value on increase £'000	Value on decrease £'000
Overseas Venture Capital	15.0	9,904	11,389	8,418
Overseas Equities Fund	13.5	67,883	77,047	58,718
Private Credit	10.5	46,993	51,927	42,058
UK Property	8.0	121,317	131,022	111,612
UK Venture Capital	9.5	76,933	84,241	69,624
Overseas Equities	5.5	690	727	652
Total		323,720	356,353	291,082

17 CLASSIFICATION OF FINANCIAL INSTRUMENTS

The following table analyses the carrying amount of financial instruments by category and net assets statement heading. No financial instruments were reclassified during the accounting period.

31 March 2021				31 March 2022		
Fair value through profit & loss £'000	Loans & Receivables £'000	Financial Liabilities at amortised cost £'000		Fair value through profit & loss £'000	Loans & Receivables £'000	Financial Liabilities at amortised cost £'000
			Financial assets			
217,762	-	-	Equities	140,492	-	-
462,713	-	-	Pooled Investments	513,040	-	-
95,298	-	-	Pooled Property Investments	139,927	-	-
69,691	-	-	Infrastructure	86,838	-	-

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-	13,132	-	Cash		28,737	
-	994	-	Other Investment balances		858	
-	423	-	Debtors		892	
845,464	14,549	-		880,297	30,487	
			Financial Liabilities			
-	-	(219)	Creditors			(1,403)
-	-					
845,464	14,549	(219)	Total			(1,403)
	859,794				909,381	

17 (a) Net Gains and Losses on Financial Instruments

31 March 2021 £000		31 March 2022 £000
	Financial assets	
146,959	Designated at fair value through profit & loss	41,089
	Loans & receivables	11
-	Financial Liabilities	-
9	Fair value through profit & Loss	1
(288)	Loans & receivables	(336)
146,680	Total	40,765

The Pension Fund has not entered into any financial guarantees that are required to be accounted for as financial instruments.

18 NATURE AND EXTENT OF RISKS ARISING FROM FINANCIAL INSTRUMENTS

Risk and Risk Management

The Fund's primary long-term risk is that the Fund's assets will fall short of its liabilities (i.e. promised benefits payable to members). Therefore the aim of investment risk management is to minimise the risk of an overall reduction in the value of the Fund and to maximise the opportunity for gains across the whole Fund portfolio. The Fund achieves this through asset diversification to reduce exposure to market risk (price risk, currency risk and interest rate risk) and credit risk to an

acceptable level. In addition, the Fund manages its liquidity risk to ensure there is sufficient liquidity to meet the Fund's forecast cash flows.

Responsibility for managing the Fund's risk rests with the Pension Fund Committee. A Risk Register for the Fund has been established to identify and analyse the risks that the Fund faces and the key messages from this process are covered in the Risk Management Statement on page 16. The Market Risk and Credit Risk aspects below come under the risk category of Assets and Investment in the Risk Register, whilst Liquidity Risk is a separate category of risk. In addition, the Funding Strategy Statement and Statement of Investment Principles address risk management considerations as they apply to the particular objectives of each document.

Market Risk

Market risk is the risk of loss from fluctuations in equity and commodity prices, interest and foreign exchange rates and credit spreads. The Fund is exposed to market risk from its investment activities, particularly through its equity holdings. The level of risk exposure depends on market conditions, expectations of future price and yield movements and the asset mix. The objective of the Fund's risk management strategy is to identify, manage and control market risk exposure within acceptable parameters, whilst optimising the return on risk.

In general, excessive volatility in market risk is managed through the diversification of the portfolio in terms of geographical and industry sectors and individual securities. To mitigate market risk, the Council and its Investment Consultants undertake appropriate monitoring of market conditions and benchmark analysis.

Other Price Risk

Other price risk represents the risk that the value of a financial instrument will fluctuate as a result of changes in market prices (other than those arising from interest rate risk or foreign exchange risk) whether those changes are caused by factors specific to the individual instrument or its issuer or factors affecting all such instruments in the market.

The Fund is exposed to share price risk, arising from investments held by the Fund for which the future price is uncertain. All securities investments present a risk of loss of capital. The maximum risk resulting from financial instruments is determined by the fair value of the financial instruments.

The Fund's investment managers mitigate this price risk through diversification and the selection of securities and other financial instruments is monitored by the Council to ensure it is within limits specified in the Fund's Investment Strategy.

Other Price Risk – Sensitivity Analysis

In consultation with the Fund's independent provider of performance and analytical data it has been determined that the following movements in market price risk are reasonably possible for this reporting period.

Asset Type	Potential Market Movement %
UK Equities	20.5

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Global Equities	20.4
UK Bonds	11.5
Property	8.9
Alternatives	10.5
Cash	1.0

Potential price changes are determined based on the observed historical volatility of asset class returns. The potential volatilities are consistent with a one standard deviation movement in the change in value of the assets over the latest three years. Had the market price of the Fund investments increased/decreased in line with the above, the change in the net assets available to pay benefits in the market price could have been as follows:

Asset Type	Value as at 31 Mar 22 £'000	+/- % Change *	Value on Increase £'000	Value on Decrease £'000
UK Equities	29,134	20.5	35,107	23,164
Global Equities	327,672	20.4	394,376	260,968
UK Bonds	67,080	11.5	74,794	59,366
Property	148,064	8.9	161,237	134,890
Alternatives	319,088	10.5	352,701	285,476
Cash	18,343	1.0	18,526	18,160
Total Assets	909,381		1,036,741	782,024

**The percentage change for total assets includes the impact of correlation across asset classes.*

Interest Rate Risk

The Fund invests in financial assets for the primary purpose of obtaining a return on investments. These investments are subject to interest rate risks, which represent the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

The Fund's interest rate risk is routinely monitored by the Council and its Investment Consultants, including monitoring the exposure to interest rates and assessment of actual interest rates against the relevant benchmarks.

The Fund's direct exposure to interest rate movements as at 31 March 2021 and 31 March 2022 is set out below and includes investment and operational cash balances. These disclosures present interest rate risk based on the underlying financial assets at fair value:

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Asset Type	At 31 March 2021	At 31 March 2022
	£'000	£'000
Cash and Cash Equivalents	10,091	21,310

Interest rate risk sensitivity analysis

The Council recognises that interest rates can vary and can affect both income to the Fund and the value of the net assets available to pay benefits.

The analysis that follows assumes that all other variables, in particular exchange rates, remain constant, and shows the effect in the year on the net assets available to pay benefits of a +/- 100 Basis Points (BPS) change in interest rates:

Asset Type	Value as at 31 Mar 22 £'000	Effect on Asset Values	
		Favourable Rate Move + 100 BPS £'000	Unfavourable Rate Move -100 BPS £'000
Cash and Cash Equivalents	21,310	213	(213)

Currency Risk

Currency risk represents the risk that the fair value of future cash flow of a financial instrument will fluctuate because of changes in foreign exchange rates. The Fund is exposed to currency risk on financial instruments that are denominated in any currency other than the functional currency of the Fund (£UK). The Fund is invested in equities overseas that are denominated in currencies other than £UK.

The following table summarises the Fund's currency exposure at 31 March 2022:

Currency exposure by asset type	As 31 March 2022 £'000
Overseas Equities	110,218
Overseas Fixed Income Funds	117,271
Overseas Equity Funds	280,535
Overseas venture capital	9,904
Total	517,928

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Currency risk – sensitivity analysis

Asset Type	Value as at 31 Mar 22 £'000	+/- % Change *	Value on Increase £'000	Value on Decrease £'000
Overseas Equities	110,218	9.2	120,358	100,078
Overseas Fixed income	117,271	8.2	126,888	107,655
Overseas Equity Funds	280,535	9.1	306,063	255,006
Overseas venture capital	9,904	8.6	10,756	9,052
Total Assets	517,928		564,024	471,791

Credit Risk

Credit risk represents the risk that the counterparty to a transaction or a financial instrument will fail to discharge an obligation and cause the Fund to incur a financial loss. The market values of investments generally reflect an assessment of credit in their pricing and consequently the risk of loss is implicitly provided for in the carrying value of the Fund's financial assets and liabilities. The selection of high quality counterparties, brokers and financial institutions minimises credit risk that may occur through the failure to settle a transaction in a timely manner.

The Fund is separately addressed within the Council's Annual Treasury Strategy and this document sets out the Fund's approach to credit risk for internally managed funds. Deposits are not made with banks and financial institutions unless they are rated independently and meet the Council's credit criteria. The Fund has also set limits as to the maximum percentage of the deposits placed with any one class of financial institution.

The Fund believes it has managed its exposure to credit risk, and the Fund has had no experience of default or uncollectable deposits over the past five financial years. The Fund's cash holding under its internal treasury management arrangements at 31 March 2022, including current account cash, was £2.9m (31 March 2021: £1.9m). This was held with the following institutions:

	Rating	Balance at 31 March 2021 £'000	Balance at 31 March 2022 £'000
Bank Current Accounts			
Bank of Scotland	A+	1,952	2,967
Northern Trust	AA	8,139	18,343
Total		10,091	21,310

Liquidity Risk

Liquidity risk represents the risk that the Fund will not be able to meet its financial obligations as they fall due. The Council therefore takes steps to ensure that the Pension Fund has adequate cash resources to meet its commitments.

The Council has immediate access to its internally managed Pension Fund cash holdings through use of instant access accounts or money market funds.

The Fund defines liquid assets as assets that can be converted to cash within three months. Illiquid assets are those assets which will take longer than three months to convert in to cash. As at 31 March 2022, the Fund's illiquid assets under this definition are some of the Property fund of funds holdings and the infrastructure holdings.

19 FUNDING ARRANGEMENTS

In line with the Local Government Pension Scheme Regulations 2018, the Fund's Actuary undertakes a funding valuation every three years for the purpose of setting employer contribution rates for the forthcoming triennial period.

The Actuarial Valuation assesses the health of the fund and provides a check that the Funding Strategy and assumptions used are appropriate.

2020 Actuarial Valuation

The 2020 Actuarial Valuation was undertaken for the Fund as at 31 March 2020 (full report available on the Scottish Borders Council Pension Fund website). The Valuation was completed during the financial year 2020/21 by the Funds actuaries, Hyman Robertson. It has been undertaken in accordance with Regulation 60 of the Local Government Pension Scheme (Administration) (Scotland) Regulations 2014.

The funding level of the Fund as at the 31 March 2020 was 110%, compared to the 31 March 2017 valuation of 114% and this corresponded to a surplus of £63m. The following table summarises the funding position.

Past Service Funding Position – Scottish Borders Council Pension Fund		
Valuation Date as at 31 March	2017 £m	2020 £m
Value of the Scheme Liabilities	(573)	(650)
Smoothed Asset Value	654	713
Surplus/ (Deficit)	81	63
Funding Level	114%	110%

The value of the scheme liabilities is an estimate of the assets required to pay pensions over the coming years. The smoothed asset value is the contributions received from employers and members as well as investment returns. The surplus or deficit on the Fund is the difference between the two.

The next detailed Actuarial Valuation will be carried out for the Fund as at 31st March 2023.

Valuation Assumptions

The valuation of the Fund has been undertaken using the projected unit method under which the salary increase for each member is assumed to increase until they leave active service by death, retirement or withdrawal from service.

Financial Assumptions

The principal assumptions used in the last triennial valuation (to March 2020) were:

	2017 Valuation	2020 Valuation
	% p.a.	% p.a.
Investment Return	5.0	3.8
Pay Increases – Long Term	3.8	2.6
Pension Increases	2.8	1.9
Discount Rate	5.0	3.8

Demographic Assumptions

The mortality assumptions used and applied to all members are bespoke set of Vita Curves tailored to fit the membership profile of the Fund. The assumptions are shown below.

Life Expectancy after age 65		31 March 2017	31 March 2020
Pensioners	Male	21.7	20.9
	Female	24.3	23.5
Non Pensioners	Male	23.5	21.9
	Female	26.2	25.4

Commutation Assumption

It is assumed that future retirees will commute pension to provide a lump sum of 50% of the maximum allowed under HMRC rules.

50:50 option

It is assumed that 0% of active members will take up the 50:50 option in the LGPS 2014 scheme.

20 ACTUARIAL PRESENT VALUE OF PROMISED RETIREMENT BENEFITS

In addition to the Triennial Funding Valuation, the Fund's Actuary also undertakes a valuation of pension fund liabilities (actuarial present value of promised retirement benefits) at the accounting date as required by International Accounting Standard (IAS) 26, and calculated in line with IAS 19 assumptions.

This uses the same base data as the Triennial Funding Valuation rolled forward to the current financial year, taking account of changes in membership numbers and updating assumptions to the current year. This valuation is not carried out on the same basis as that used for setting Fund employer contribution rates and the Fund Account does not take account of liabilities to pay pensions and other benefits in the future.

The actuarial present values, calculated in line with IAS 19, are set out in the table below.

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	Net Pension Asset/(Liability) as at:		
	31 March 2020 £m	31 March 2021 £m	31 March 2022 £m
Present value of the defined benefit obligations	(887)	(1,088)	(1,057)
Fair Value of Fund Assets* (bid value)	713	860	909
Net Asset/(Liability)	(174)	(228)	(148)

The McCloud judgement, which relates to age discrimination arising from public sector pension scheme transition arrangements has been included in the obligations figures above. The obligations also include a calculation for the Guaranteed Minimum Pension (GMP) equalisation which guidance from Treasury is awaited. The GMP reconciliation exercise is still ongoing but is unlikely to be significant, no allowance has therefore been made in the obligations. The allowance included in the obligations is used for statutory accounting purposes by the Fund and complies with the requirements of IAS 26. The assumptions underlying the figure are detailed below:

	At 31 March 2020	At 31 March 2021	At 31 March 2022
	% p.a.	% p.a.	% p.a.
Discount Rate	2.3	2.00	2.7
Pay Increases – Long Term	2.9	3.5	3.9
Pension Increases	1.9	2.8	3.2

As noted above, liabilities are calculated on an IAS 19 basis and therefore will differ from the results of the 2020 Triennial Funding Valuation (see Note 19) because IAS 19 stipulates a discount rate, rather than a rate that reflects the market rate for investment returns on the Fund's assets.

21 CURRENT ASSETS

Current Assets	As 31 March 2021 £'000	As 31 March 2022 £'000
Short term debtors		
Contributions Due – Employees	30	22
Contributions Due - Employers	87	67
	117	89
Transfer value receivable (joiners)	456	1,013
Sundry Debtors	7	13
Prepayments	82	92
Total	662	1,207
Cash Balances	1,952	2,967
Total	2,614	4,174

22 CURRENT LIABILITIES

Current Liabilities	As 31 March 2021 £'000	As 31 March 2022 £'000
Transfer value payable (leavers)	566	258
Sundry Creditors	1,939	1,582
Benefits payable	209	570
Total	2,714	2,410

23 ADDITIONAL VOLUNTARY CONTRIBUTIONS

Additional Voluntary Contributions are invested separately from the main Fund, securing additional benefits on a money purchase basis for those members that have elected to contribute. All AVCs are managed by Standard Life and the value at 31 March 2022 was £1.949m (2021 £1.636m). During the year contributions in totalled £0.458m, while payments out of the AVC fund totalled £0.202m. In accordance with regulation 4(2)(b) of the Government Pension Scheme (Management and Investment of Funds)(Scotland) Regulations 2009 (SI 2009/3093), AVCs are not included in the Pension Fund balance sheet.

24 AGENCY SERVICES

There are no agency service agreements in place.

25 RELATED PARTY TRANSACTIONS

During the year, the Pension Fund had an average balance of £1.40m (2021: £1.43m) of cash administered by Scottish Borders Council within separate external banking arrangements, which earned interest of £0.001m (2021 £0.005m). The Council charged the Pension Fund £0.320m (2021 £0.281m) in respect of expenses incurred in administering the Fund. There are no additional related party transactions that require to be disclosed. The Pension Fund balance due to Scottish

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Borders Council by the Pension Fund at the balance sheet date and disclosed in the net assets statement was as follows:

As at 31 March	2021 £'000	2022 £'000
Due (to)/from Scottish Borders Council	(244)	(50)

Governance

Six members of the Pension Fund Committee were active members of the Pension Fund during 2021/22. One member of the Pension Fund Committee was in receipt of pension benefits from the Fund.

26 KEY MANAGEMENT PERSONNEL

The key management personnel, during 2020/21 and 2021/22, of the Fund is Scottish Borders Council Director- Finance & Corporate Governance. Total remuneration payable is set out below. As the Fund does not employ any staff directly a full remuneration report is not required.

31 March 2021 £000's		31 March 2022 £000's
111	Short-term benefits	113
-	Post-employment benefits	-
7	Other long-term benefits	5
-	Termination benefits	-
118	Total	118

The figures above reflect the full remuneration as reported in Scottish Borders Council Accounts. The Pension Fund is recharged 10% of the above post.

27 CONTINGENT ASSETS

One of the admitted body employers in the Pension Fund holds an insurance bond to guard against the possibility of being unable to meet their pension obligations. This bond is drawn in favour of the Pension Fund and payment will only be triggered in the event of employer default.

28 CONTINGENT LIABILITIES

GMP Equalisation

On 26 October 2018, the High Court ruled that Guaranteed Minimum Pensions (GMP) should be equalised between men and women to address the discrepancies in members' benefits arising from the contracting out of the additional state pension between 17 May 1990 and 6 April 1997. The Fund recognises the potential for liabilities arising from GMP equalisation. As guidance has not yet been issued by the Treasury it is not possible to quantify the impact this will have on the Fund at this time, however, an allowance for full GMP indexation was included within the 31 March 2020 funding valuation position and therefore the allowance is automatically included within the 31 March 2022 accounts.

GMP Reconciliation

The exercise known as GMP Reconciliation to reconcile HM Revenue contracted out records with those of pension funds is reaching a conclusion. The full cost implication of this is not yet known.

Scottish Ministers are expected to legislate that any LGPS pensions that have been overpaid due to incorrect GMPs being held should not be reduced. Instead it is expected that overpayments will be ring fenced and frozen at their current level. Final information has been received from HMRC and will be added to the Pensions Administration System, this has been delayed since 2021-22 due to other competing priorities.

Goodwin

The Goodwin tribunal relates to a recent employment tribunal that changes the pension entitlement of male survivors in opposite sex marriages to take into account the female member's service from 6 April 1978. Previously, the male spouse survivor's entitlement was based on service accrued from 6 April 1988. The change is backdated to 5 December 2005. The change therefore affects the pension of male spouse survivors where their entitlement arose (i.e. where the female member died) on or after 5 December 2005. It is too early to know what the likely effect may be on LGPS members' benefits at this time.

29 POST BALANCE SHEET EVENTS

The unaudited Statement of Accounts was issued by the Acting Chief Financial Officer on 30 June 2022. Events taking place after this date are not reflected in the financial statements or notes.

SECTION 4

ADMINISTRATION

PENSION ADMINISTRATION STRATEGY

The Pension Administration Strategy approved in 14 December 2021 sets out the procedures and performance standards required by both Scottish Borders Council, as administering authority and the employers with the Fund. The procedures and performance standards are agreed to ensure the efficient and effective administration of the pension scheme. The strategy aims to ensure that

- A high quality pension service is delivered to all scheme members
- Pension benefits are paid accurately and on time
- Successful partnership working develops between the Fund and its employers
- Performance standards are understood, achieved and reported; and
- Performance and service delivery comply with the Local Government Pension Scheme (LGPS) regulations, other related legislation and The Pension Regulator’s Codes of Practice.

PERFORMANCE

The Pension Administration Strategy sets out the statutory responsibilities of Scottish Borders Council as the administering authority. Service standards and key performance measures are agreed. The performance against these agreed standards and measures are reported annually to the Scottish Borders Council Pension Fund Committee and Pension Fund Board. The performance for the year to 31 March 2022 is set out below.

Employer Performance Measures

Service Standards

Standard – target completion 90%	Volume	%age Met
New starts notification – within 20 working days	905	99.45%
Change notification – within 20 days	872	100%
Retirement info – at least 20 working days before	289	100%
Early leaver notification – within 20 working days	663	100%
Death in service notification – within 10 working days	4	100%

Contribution Payments

The following tables compare the date contribution payments are received against the target date, of 19th of the month, for each of the Scheduled and Active Admitted Bodies.

Employer Body	By Target Date	Late	% On Time
Scottish Borders Council	12	-	100%
Visit Scotland	12	-	100%
Borders College	12	-	100%
Scottish Borders Housing Association	12	-	100%

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Jedburgh Leisure Facilities Trust	12	-	100%
Borders Sport and Leisure Trust	12	-	100%
AMEY Community Limited	12	-	100%
SB Cares	12	-	100%
CGI	12	-	100%
South of Scotland Enterprise	13	-	100%

There were no late payments received during 2021-22.

Administering Authority Performance Measures

Service Standards

Standard	Volume	Target	%age Met
Estimates – Transfer In	51	20 days	68.00%
Estimates – Transfer Out	64	20 days	56.25%
Estimate – All Other	1,367	10 days	

With the continuation of homeworking, due to the pandemic, staff remained focused on ensuring payments were made on time and adapting to new working practices it was accepted that it was not going to be possible to record all queries received as in previous years. Therefore, it has not been possible to provide the split as previous. We also saw a move towards queries coming in via email and Members Self Service, which is reflected in the table below.

Type of Query	Volume	Target	%age Met
Phone Calls logged	59	5 days	100%
Phone Calls to team	6,022	Not measured	
Emails to pensions@scotborders.gov.uk mailbox	4,102	Not measured	
Emails to team members directly	6,692	Not measured	
Correspondence via Members Self Service	550	Not measured	
Total	17,425		

Other Measures

Area	Measure	Completed
Employer Liaison Meetings	1 per annum	15th March 2022
Benefit Statements	by end of August	Issued by 16th August 2021

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The seventh liaison meeting, held virtually, with all Admitted and Scheduled Bodies was held during 2021/22 and re-enforced the changes that had been made to the annual reporting with the Fund Actuary from the 2020/21 year end and afforded the employers the chance to ask questions to the Pensions Team. Going forward we will continue to hold the liaison meeting towards the end of the financial year where we will discuss up-coming legislative changes and requirements for the year end processing.

The Annual Benefit Statements were issued in paper format to Deferred Members and loaded into the Member Self Service (MSS) portal, all Deferred Members were invited to sign up for MSS and advised that they will be published here going forward. The Annual Benefit Statements for Active Members were published to MSS and personal invitations to sign up were issued to all members either via the email address held on system or through the Employers.

Key Administration Tasks

Task	Total received
New entrants	878
Early leavers	663
Retirements	289
Deaths in service	4
Deaths in deferment	3
Deaths in retirement	120
New Widows(ers), Child Pensions	63
Estimates	1367
Pension credit members	0
Pay all Pensioners on 15th of the month or prior working day when 15th is a non-banking day	100% achieved

Member Self Service Statistics

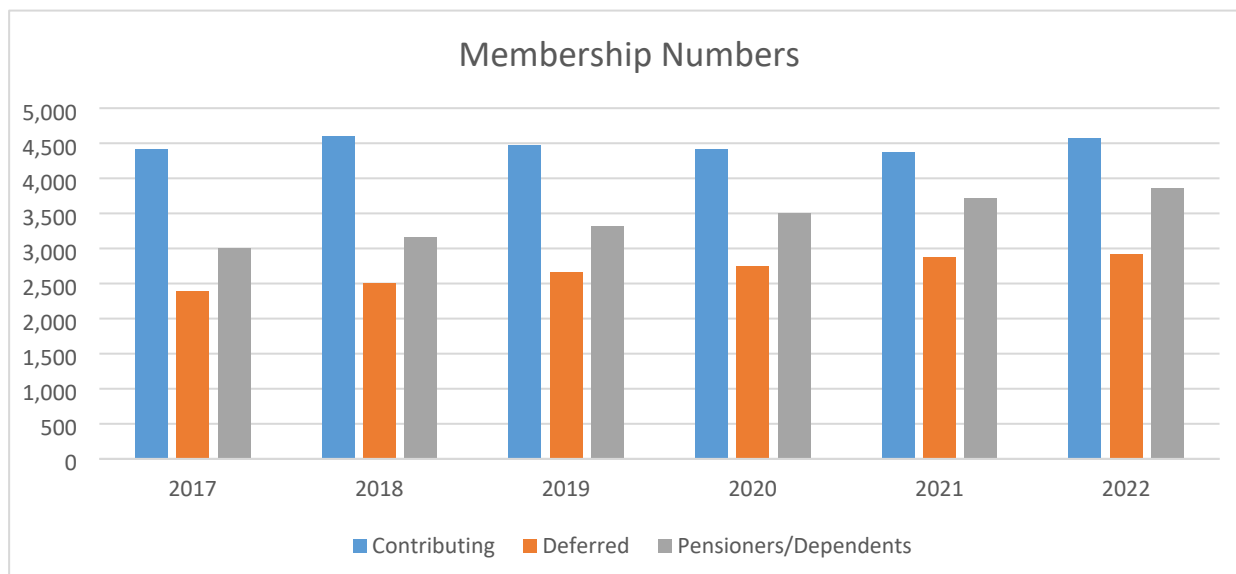
Task	Total Active	Target	% Completed in target
Active Members	4,703	100%	27.52%
Deferred Members	3,194	100%	
Benefit calculations run	12,579		

MEMBERSHIP

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.

Teachers are not included as they are enrolled as members of schemes managed and administered by the Scottish Public Pension Agency.

The current membership of the Fund is 12,178, of which 4,703 are actively contributing and 4,281 are in receipt of their benefits. The table over provides a summary of the trends in membership:



There are 17 employer organisations with the Fund including the Council itself. Membership by employer is analysed in the table below.

Membership Details as at 31 March 2022	Number of Contributors	Pensioners	Deferred Pensioners	Total
Scheduled Bodies:				
Scottish Borders Council	4,158	3,806	2,756	10,720
Borders College	211	104	81	396
	4,369	3,910	2,837	11,116
Scottish Borders Housing Association	60	109	73	242
LIVE Borders	119	70	77	266
Jedburgh Leisure Facilities Trust	2	2	-	4
Amey Community Limited (TUPEE Staff only)	2	10	2	14
CGI (TUPEE Staff only)	26	10	9	45
South of Scotland Enterprise	125	1	1	127
	334	202	162	698

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SB Cares	-	126	170	296
Gala Youth Project	-	2	-	2
Scottish Borders Careers	-	3	1	4
L&B Community Justice Authority	-	3	6	9
BC Consultants	-	16	14	30
Others	-	19	4	23
	-	169	195	364
Total	4,703	4,281	3,194	12,178

COMMUNICATION POLICY AND PERFORMANCE

COMMUNICATION POLICY

The Fund approved the current Communications Policy on 16 September 2021. The overall aim of the Communications Policy is to provide communication in an efficient manner to all stakeholders, ensuring that it is: -

- Delivered in a timely efficient and effective manner
- Provides relevant content to the audience, with a clear purpose and message
- Well written, avoiding being of a technical nature wherever possible based on the differing needs of the stakeholders
- Becoming increasingly digital.

The objective of this policy is to ensure that: -

- Pension regulations and the policies of the Fund are communicated in a clear and informative manner
- Benefits of the scheme are promoted to ensure this is recognised as an integral part of the employee reward package
- Information is provided in the most appropriate manner to allow scheme members to make more informed decisions relating to their pensions
- Communication methods are continually evaluated, assessed and redesigned where necessary to ensure continuing effectiveness

The communication methods utilized are:-

Fund website to provide information to as many stakeholders as possible at a time that suits them we provide access to the following: -

- Scheme policies
- Scheme benefits
- Contact details
- Links to other useful sites

The Fund has deployed a secure portal for all active and deferred members of the LGPS, which provides direct access for scheme members to view personalised pension data and further enhances the communications with active and deferred scheme members in a modern digital manner. The portal also allows members to carry out the following: -

- View all the details they need about their LGPS Pension in real time
- Carry out pension quotes on demand without needing to contact [The Pensions Team](#)
- Annual Benefit Statements available to view

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- Check and update nominations of beneficiary
- Upload any documents that the Pensions Team request
- Use the contact facility to raise any questions in an electronic manner
- Provide feedback on the MSS application

Scottish Borders Council Website for Pension Committee and Local Pension Board agendas and minutes can be found on the main Council website, www.scotborders.gov.uk. The Fund uses both surface and e-mail to send and receive general correspondence. Roadshows and presentations are available to employer workplaces and attend roadshows, seminars, induction and pre-retirement presentations on request, a minimum period of four weeks' notice will be required to allow for appropriate preparations. Scheme members can arrange to visit our offices to speak to a member of our Pensions Administration Team, they can arrange to pre-book appointments by e-mail or telephone.

The introduction of the Pension Fund website in June 2018 has allowed members to access information and documents. The table below details the number of visits to the site since it was launched to end of March 2022. The scheme website can be found at www.scottishborderscouncilpensionfund.org



COMMUNICATION PERFORMANCE

The following communications took place during 2021/22

- The Employer Liaison meeting was held as a virtual meeting due to the restrictions in place as a result of the Covid-19 situation. In addition to the meeting an email was issued to all employers providing the details of the requirements for the year end reporting for the scheme and action to be taken in preparation for the coming years' payroll
- Deployment of Member Self Service with emails issued to all active members to encourage sign up and provide access to the Annual Benefit Statement
- Annual Benefit Statements were issued in hard copy format to all deferred members including information on how to sign up for the Member Self Service portal and newsletter
- Information continues to be posted within the Scottish Borders Council Pension Fund website, this included the following: -

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- Notice that we were unable to issue payslips and guidance on how to sign up for online access to payslips
- Information regarding Pensions Increase
- Details of Shared Cost AVC

SECTION 5

FUNDING

FUNDING STRATEGY STATEMENT

The Local Government Pension Scheme regulations require each administering authority to publish and maintain a Funding Strategy Statement.

The purpose of the Funding Strategy Statement is:

- To establish a clear and transparent fund specific strategy which will identify how employers' pension liabilities are best met going forward;
- To support the regulatory framework to maintain as nearly constant employer contribution rates as possible; and
- To take a prudent longer-term view of funding the liabilities

These objectives are desirable individually but may be mutually conflicting. The Statement sets out how the administering authority balances the potentially conflicting aims of affordability and stability of contributions, transparency of processes, and prudence in the funding basis.

The latest Funding Strategy Statement (FSS) was approved by the Pension Fund Committee on 4 March 2021 and a copy of this document can be found at [Funding Strategy Statement](#). Key elements of the Funding Strategy Statement are the Funding Objective and Funding Strategy for the Pension Fund, an extract of these are included below.

Aims and Purpose of the Fund (Section 1, page 2 of FSS)

Aims To:

- manage employers' liabilities effectively and ensure that sufficient resources are available to meet all liabilities as they fall due;
- enable primary contribution rates to be kept as nearly constant as possible and (subject to the Administering Authority not taking undue risks) at reasonable cost to all relevant parties (such as the taxpayers, scheduled and admitted bodies), while achieving and maintaining Fund solvency and long-term cost efficiency, which should be assessed in light of the risk profile of the fund and employers, and the risk appetite of the administering authority and employers alike; and
- Seek returns on investment within reasonable risk parameters.

Purpose To:

- Pay pensions, lump sums and other benefits to scheme members as provided for under the Regulations;
- Meet the costs associated in administering the Fund; and
- Receive contributions, transfer values and investment income.

Funding Strategy (Section 5, page 5 of FSS)

The Funding Strategy seeks to achieve (via employee and employer contributions and investment income) three key objectives:

- A funding level of 100%, as assessed by the Fund's appointed actuary, triennially, in accordance with the Regulations;

- Ensuring the solvency of the Fund and the long-term cost efficiency of the Scheme; and
- As stable an employer contribution rate as is practical.

ACTUARIAL STATEMENT

The Local Government Pension Scheme regulations require each administering authority to obtain an Actuarial Valuation of the assets and liabilities of the Fund every three years. The last valuation was at 31 March 2020. The regulations require each administering authority, after consultation with such persons as they consider appropriate, to prepare, maintain and publish a written statement setting out their Funding Strategy.

In completing the valuation the Actuary must have regard to the current version of the administering authority's Funding Strategy statement.

The Actuarial Valuation is essentially a measurement of the Fund's liabilities and assets. The Funding Strategy deals with how the liabilities will be managed. In practice, review of the Funding Strategy Statement and completion of the Actuarial Valuation are carried out in tandem to ensure that measurement and management processes are cohesive.

Triennial Valuation 2020

The Triennial Funding Valuation as at the 31 March 2020 was undertaken during 2020 and the final certified report was presented to the joint meeting of the Pension Fund Committee and Pension Board on 4 March 2021. The valuation was undertaken in accordance with Regulation 60 of the Local Government Pension Scheme (Administration)(Scotland) Regulations 2014. A copy of the report is available via the Council's committee papers website [Pension Fund/Board Committee papers](#)

The outcome of the 2020 Valuation was a funding level of 110% a slight reduction in the position assessed at 2017 of 114%. The funding position equates to a surplus of over £63m and the advice of the Actuary is that this surplus be used over time to partially offset increases in the primary employer's contribution rate of 21.9%. The Fund's common pool contributions rate remains stable for the first two years but due to uncertainties around the impact of McCloud and the Cost Cap Mechanism rates will be increased by 0.5% from 1 April 2023. Employers out with the common pool have seen individual employer rates change for specific circumstances.

Valuation Date as at 31 March	Past Service Funding Position – Scottish Borders Council Pension Fund		
	2014 £m	2017 £m	2020 £m
Value of the Scheme Liabilities	487	(573)	(650)
Smoothed Asset Value	490	654	713
Surplus/ (Deficit)	3	81	63
Funding Level	101%	114%	110%

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Note 19 to the Statement of Accounts on page 57, contains details of the outcome and assumptions used in the 2020 Valuation and the impact that it had on employer contribution rates.

A major contributing factor to the improvement in the funding level has been the strong investment performance that the Fund has achieved over the past three years.

Employer Contribution Rates

As part of the 2020 Actuarial Valuation, the Actuary certified the primary rate at 21.9%. However in agreement with the Actuary a secondary rate of 3.96% has been deducted to allow the common rate of contribution as 18% of payroll for the next two years with an increase of 0.5% on 1 April 2023. The secondary rate will reduce the surplus of £63m over 50 years.

Individual and pooled employers' rates vary from the common contribution rate (18.0%) depending on the demographic and actuarial factors particular to each employer. The table below highlights the key employer contribution rates (i.e. the rate which employers in the Fund pay):

Employers Contribution Grouping	Employers Contribution Rate	
	2020/21	2021/22
Scottish Borders Council Common Pool	18.0%	18.0%
Scottish Borders Housing Association – Individual	20.3%	20.3%
CGI	21.1%	21.1%
South of Scotland Enterprise	20.6%	20.6%

Valuation for Statutory Accounts at 31 March 2022

Note 20 to the Statement of Accounts on page 58, contains the present Actuarial Valuation for the Fund as required by the International Accounting Standard (IAS) 26. This shows a net liability for the Fund of £148m. However, the liabilities for this figure are calculated on an IAS 19 basis and therefore will differ from the results of the 2020 Triennial Funding Valuation because IAS 19 stipulates a specific discount rate to enable comparability rather than a rate that reflects the market rate for investment returns on the Fund's assets. It is therefore not appropriate to use this as a measure for setting employer contribution rates or assessing the overall long term funding health of the Fund. The full version of the Actuary report and the current Funding Strategy is available via the Pension Fund website: [Pension Fund](#)

SECTION 6

INVESTMENTS

STATEMENT OF INVESTMENT PRINCIPLES

The Statement of Investment Principles (SIP) is the Funds' investment policy document and is reviewed regularly. The SIP is updated to reflect any changes agreed by the Pension Fund Committee, the latest approved document, approved on 17 March 2022, can be found at [Statement of Investment Principles](#).

The Local Government Pension Scheme (Management and Investment of Funds)(Scotland) Regulations 1998 as amended, require administering authorities to prepare, maintain and publish a Statement of Investment Principles (SIP) which includes the policy on:

- The types of investment to be held
- The balance between different types of investment
- The risk considerations, including the ways in which risks are to be measured and managed
- The expected return on investments
- Realising of investments
- Taking account of social, environmental or ethical considerations in investments
- Exercising the rights (including voting rights) attaching to investments
- Stock Lending.

The Pension Fund Committee is responsible for making decisions in relation to the SIP and approving any decisions in relation to any changes to fund managers, investment advisers and custodian. The Pension Fund Investment and Performance Sub-Committee reviews the SIP and monitors the performance of managers. The Sub-Committee makes recommendations to the Pension Fund Committee in relation to these areas.

The key objectives of the Fund which form key considerations when agreeing the SIP are:-

- Build up assets to produce levels of employer contributions
- Seek to maintain a positive ratio of assets to liabilities for the Fund
- Produce long term investment returns in line with Triennial Valuation assumptions.

The 2017 Triennial Valuation reported a funding position of 114% with investment returns targeted at 5% per annum. Following the 2020 Triennial Valuation which reported a funding position of 110% and investment target returns of 3.8% the Fund undertook a review of its Statement of Investment Principles and its target asset allocation.

These objectives are reflected in the underlying investment principles, which are considered in the development and agreement of the Fund's Investment Strategy. The key principles are shown below:

- **Long term perspective** – by the nature of the Fund's liabilities and employers, the Fund is able to take a long-term view and position its Investment Strategy on this basis.
- **Diversification** – the Fund seeks to diversify its investments in order to benefit from a variety of return patterns and to manage risk.
- **Maturing nature** – the contributions received are less than the benefits currently paid to pensioners meaning the Fund is a maturing Fund. Income generation is therefore required.
- **Stewardship** – the Fund is a responsible investor and adopts policies and practices which acknowledge the importance of environmental, social and governance (ESG) issues.

INVESTMENT STRATEGY

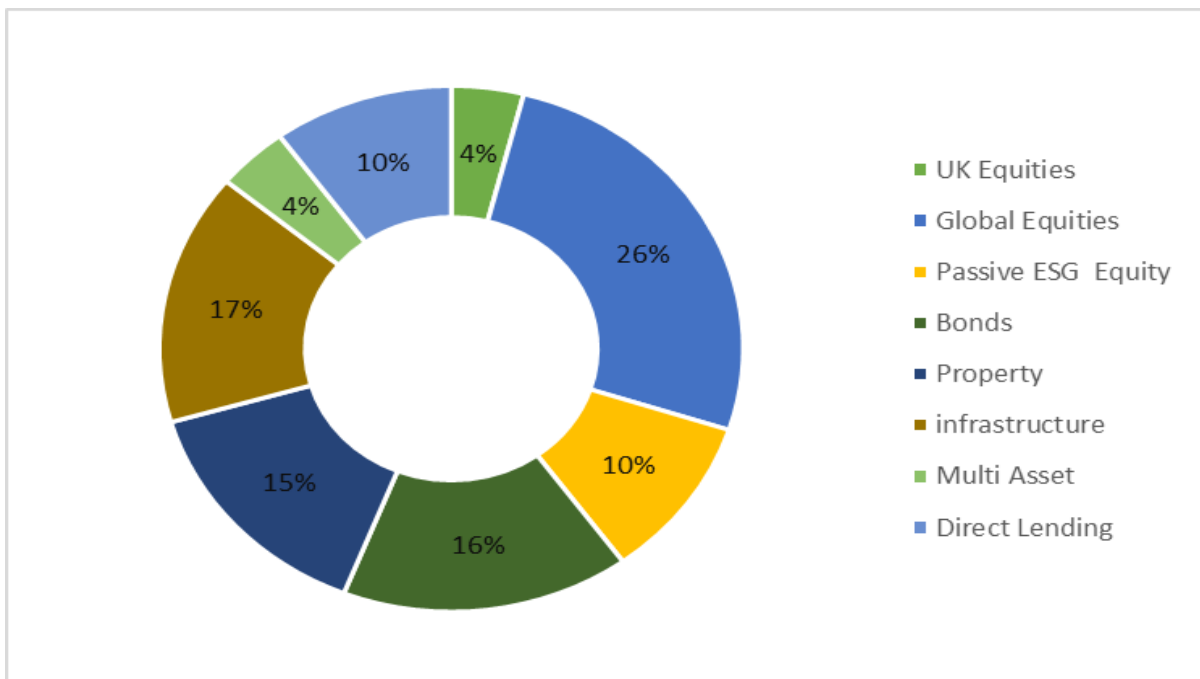
The Fund's investment objective is to support the Funding Strategy by adopting an Investment strategy and structure, which incorporates an appropriate balance between risk and return.

Following the 2020 Triennial Valuation, which showed the Fund at 110% funded, the Fund looked to increase diversification from volatile equity markets and to spread the risk across an increased number of managers.

In common with many other Local Government Pension Schemes funds, the valuation showed:

- Pensioner and deferred liabilities outweigh active member liabilities and;
- Cash-flow contributions from members was lower than benefits paid to pensions, meaning the Fund is in a net outflow.

Using the asset liability model, which assess risk/return against liabilities as the basis for modelling a revised Investment Strategy was approved in June 2021. The diagram below shows the revised approved strategic asset allocation.



The strategic asset allocation approved maintained the allocation for equities but approved the movement of the passive equities into a ESG focused passive fund and the movement of Baillie Gifford Global equities into their Paris Aligned global equity fund. The review also introduced and allocation to Housing, increased the allocation to Long Lease property and increased the allocation to infrastructure. These changes were made to increase the alignment of investments with liabilities and to increase the income generating investments to ensure funds are available to pay liabilities as they become due.

The strategic asset allocation also diversifies the risk exposure in its use of managers. The Fund currently has 11 Fund Managers over 13 funds; excluding Infrastructure. Shown below are the current Fund Managers,

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BLACKROCK



Morgan Stanley



The Funds infrastructure investment is split over two areas of infrastructure debt with Macquarie and a portfolio of investments developed in collaboration with Lothian Pension Fund. The Fund Managers for these are shown below:



Brookfield



DALMORE CAPITAL



KKR



OAKTREE

The implementation of the Investment Strategy commenced in June 2021 saw the appointment of LGIM for ESG Passive Equity and IFM for Infrastructure (funding not yet drawn down). The table over shows the position as at 31 March 2022 against the Strategy:

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Asset Class	Asset Allocation at 31/3/21 %	Asset Allocation at 31/3/22 %	Strategic Benchmark %
UK Equity	13.1	3.2	4.0
Global Equity	32.9	36.0	36.0
Bonds	20.8	20.3	16.0
Alternatives	13.0	12.7	14.0
Property	11.1	16.3	14.5
Infrastructure	8.1	9.5	15.5
Cash	1.0	2.0	0.0
Total	100.0	100.0	100.0

Investment Manager Allocation

Each external Investment Manager is appointed to manage a specified % allocation of total fund investment assets. The breakdown of the Fund's assets by Investment Manager, mandate type and asset class at 31 March 2021 and 31 March 2022 are shown in the table below

Manager	Mandate Type	31 Mar 2021 (%)	31 Mar 2022 (%)
UBS	Pooled Fund -UK Equities	6.0	0.0
Baillie Gifford	UK Equities	7.1	3.2
Baillie Gifford	Global Equities	19.1	12.6
Morgan Stanley	Pooled Fund - Global Equities	13.8	13.0
LGIM	Pooled Fund – Global Passive Equities	-	10.3
M&G	Pooled Fund - Diversified Income	13.5	12.9
M&G	Pooled Fund - Bonds	7.3	7.3
UBS	Pooled Fund -Property	4.3	2.9
Blackrock	Pooled Fund – Property	6.8	13.3
LGT	Pooled Fund - Alternatives	6.9	7.4

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Partners Group	Pooled Fund – Private Credit	3.2	3.5
Permira	Pooled Fund – Private Credit	2.9	1.7
KKR	Infrastructure	0.4	0.3
Infrared	Infrastructure	0.1	0.1
Dalmore	Infrastructure	1.6	1.6
Brookfield	Infrastructure	0.2	0.4
Macquarie	Infrastructure	0.2	0.4
Equitix	Infrastructure	0.2	0.2
Allinda	Infrastructure	0.4	0.4
Gaia LP	Infrastructure	0.2	0.3
Oaktree	Infrastructure	0.3	0.0
Macquarie	Pooled Fund -Infrastructure Debt	4.5	5.8
Cash	Internally Managed Cash & Investments	1.0	2.4

Holdings

The table below shows the top 20 direct holdings at 31 March 2022. All holdings are held with the Baillie Gifford Global and UK equities portfolios.

Company	Market Value of Holding £ m	Company	Market Value of Holding £ m
Anthem Inc Com	4.5	Alphabet Inc Cap	3.9
Microsoft Corp	3.8	Moodys Corp	3.6
Taiwan Semicon	3.0	Amazon Com Inc	2.9
Prosus N.V	2.9	Tesla Inc	2.7
Gallager Arthur J & Co	2.7	Pernod Ricard NPV	2.4
Service Corp Intl	2.4	Mastercard Inc	2.2
Prudential	2.2	AIA Group Ltd	2.1
Olympus Corp	2.0	CBRE Group	1.9
The Trade Desk Inc	1.8	Cloudflare Ince	1.7

Thermo Fisher Corp

1.7

Estee Lauder Companies

1.6

INVESTMENT PERFORMANCE

MARKET CONTEXT

The start of 2021/22 was dominated by continuing effects of Covid-19 across the globe as countries continued to implement supportive monetary policies and fiscal support to their economies which were received positively by the markets.

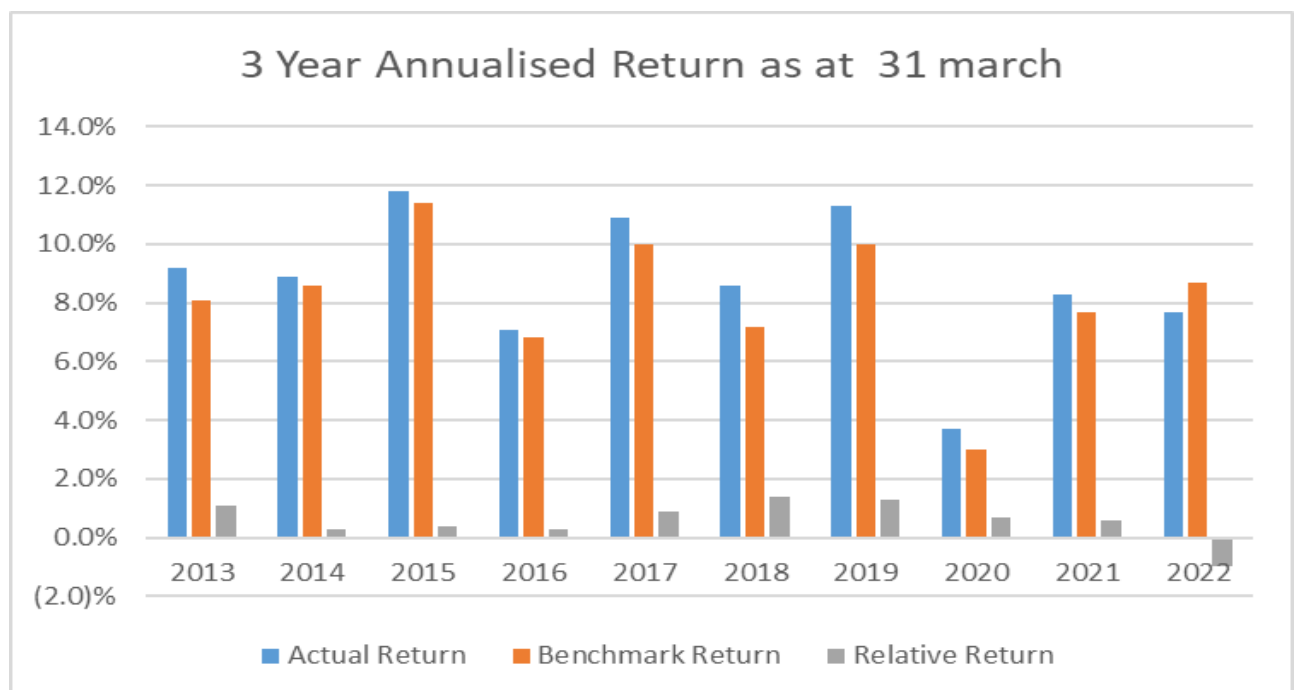
February 2022 saw Russia's invasion of Ukraine resulting in significant ramifications for asset classes globally. The expected impact of economic sanctions and supply chain issues underpinned equity markets volatility and a widening credit spread (meaning valuation fell). Commodity prices also spiked, given the region is a key exporter of several important raw materials including oil, gas and wheat. This contribute to a further surge in inflation.

Nominal and real gilt yields rose sharply driven by the Bank of England raising the base interest rate twice and the increasingly inflationary outlook. Given the high inflationary environment, index linked gilts outperformed nominal gilts, albeit still driving negative returns.

Real assets such as long lease property and infrastructure have been resilient and posted positive performance during the year despite the global volatility.

FUND PERFORMANCE

The Fund's investment returns delivered a positive return of 5.9% during 2021/22 (20.1% 2020/21) against a benchmark of 10.6% (18.3% 2020/21) for the year to 31 March 2022. Overall the Fund's assets increased by £50m from 31 March 2021. The 2021/22 performance although under its benchmark was a positive return in volatile and difficult market conditions. The table over details the 3 year annualised return once which is also slightly under benchmark for 2021/22.



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Each quarter, the Investment Consultants, Isio, reported on the Fund's quarterly performance by individual Investment Manager and mandate to the Joint Pension Fund Committee and Pension Board. The Investment and Performance Sub Committee also met each Manager during the year giving Committee Members an opportunity to gain a deeper understanding of the investments, their decision making processes and their performance.

The Fund achieved a positive return of 5.9% against a benchmark of 10.6% for the year.

The table below provides an analysis of how the Fund's investments performed against the Fund's benchmark.

Return on Investment as at 31/3/2022	1 year rolling return		3 year rolling return	
	Fund %	Bench ¹ %	Fund %	Bench ¹ %
Total Fund	5.9	10.6	7.7	8.7
Global Equities	0.5	14.0	12.3	14.7
UK Equities	0.9	13.2	2.5	5.6
Bonds	2.9	3.9	4.5	3.5
Alternatives	8.1	5.3	6.3	4.7
Property	17.3	15.0	6.1	7.2
Cash	-	-	-	-

The table over shows the key driver of fund underperformance over the 1 and 3 years were UK and Global Equities, particularly over the 1 year period. This was driven by marked underperformance from Baillie Gifford and their growth style over the periods

Over the 1 year period Bonds also underperformed slightly with Alternatives and Property outperforming. Over the 3 year period Bonds and Alternatives outperformed their respective benchmark whilst Property, UK and Global Equities underperformed.



RESPONSIBLE INVESTMENT

Scottish Borders Council Pension Fund's (SBCPF) overriding obligation is to act in the best interests of the scheme beneficiaries. In this fiduciary role the Fund believes that a positive approach to Environmental, Social and Corporate Governance (ESG) issues can positively affect the financial performance of investments whereas a failure to address these considerations can have a detrimental effect. In accordance with Trustee fiduciary duty, it is imperative that we act 'prudently, responsibly and honestly' and therefore consider both short term and long-term risks when making investment decisions.

The Fund approved a revised Statement of Responsible Investment Policy on 17 March 2022 setting out the approach to responsible investment and arrangements to monitoring manager performance against the principles of the policy on an annual basis. The key principles within the policy are:

- All new managers adhere to and report on the United Nations Principles for Responsible Investment (UNPRI) Code & Stewardship Code, Managers will be expected to use ESG factors as a tool for gathering information to improve decision making, thereby managing risks.
- The Fund minimises any harm to the environment and society, whilst ensuring it builds up a portfolio of assets that are best placed to meet its future liabilities.
- The Fund wishes to see its environmental footprint minimised, its social responsibilities maximised and the highest standards of employee relations and corporate governance maintained.
- The Fund requires its Investment Managers to adhere to these standards in all their investments activities and plans to monitor how these standards are upheld for the following set of overarching principles.

The approved Policy also approved 6 key responsible investment objectives. These are

- SDG 13 – Climate Change
- SDG 7 – Affordable & Clean Energy
- SDG 1 – No Poverty
- SDG 2 – Zero Hunger
- SDG 3 – Good Health & Well-being
- SDG 10 – Reduce Inequalities

Work has commenced in the assessment and collection of data to allow reporting and monitoring of SDG13 Climate change and SDG 7 Affordable & clean energy. Due to the lack of robust measurement criteria or data the remaining objectives will be reviewed regularly as data collection is developed.

The Fund actively engages with managers to ensure they are meeting these key principles and is incorporating ESG considerations into their investment decisions.

The Responsible Investment Policy also requires the Fund to review and report on an annual basis the performance of Managers. The third monitoring report was presented and approved by the Pension Fund Committee on 14 December 2021. The key highlights of this report are as follows:

- 16 out of 17 Managers are signatories of UNPIR representing 99.8% of the Fund.

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- Internal scoring methodology scored 98.8%; of the funds managed by managers, scored 80% or more than the total available scores, compared to 96.8% in the previous monitoring period.

For managers scoring less than 80% in the internal scoring methodology additional monitoring and engagement was undertaken.

The Fund actively investigates opportunities to increase investment in sustainable funds. This active management resulted in a £94m investment with LGIM in their Global ESG Passive Equity fund and the transition of £114m from the Baillie Gifford Global Equity Fund to their Global Paris Aligned Fund.



Climate Change is a global challenge, which will have a significant impact on the global economy, corporations and society as a whole. The Paris Agreement of the United Nations Framework Convention on Climate Change sets three main aims:

- Holding the increase in the global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognising that this would significantly reduce the risks and impacts of climate change;
- Increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten food production; and
- Making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development.



The Pension Fund as part of its responsible investment policy has become a signatory to Climate Action 100+ which was launched in December 2017 with the support of 225 investors representing \$26.3 trillion of assets. It now has 575 investors with assets of \$54 trillion under management. Scottish Borders Council Pension Fund became a signatory to this in March 2020.

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As a signatory the Fund gives it support to the Climate Action 100+ in its engagement with boards and senior management of companies to:

- Implement a strong governance framework which clearly articulates the board's accountability and oversight of climate change risks and opportunities;
- Take action to reduce greenhouse gas emissions across the value chain, consistent with the Paris Agreement's goals of limiting global average temperature increase to well below 2°C above pre-industrial levels;
- Provide enhanced corporate disclosure in line with the final recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) to enable investors to assess the robustness of companies' business plans against a range of climate and improve investment decision making.

Due to the work of Climate Action 100 and other there were a record 215 climate-related shareholder resolutions in the recent 2022 proxy season. Work undertaken also saw the first ever net zero accounting related resolution at a FSTE 100 AGM. Climate Action 100 with support of signatories like Scottish Borders Council Pension Fund continue to work with companies to make improvements and commitments to Climate change targets.

SECTION 7

INDEPENDENT AUDITORS REPORT

Independent auditor's report to the members of Scottish Borders Council as administering authority for Scottish Borders Council Pension Fund and the Accounts Commission

Reporting on the audit of the financial statements

Opinion on financial statements

I certify that I have audited the financial statements in the annual report of Scottish Borders Council Pension Fund for the year ended 31 March 2022 under Part VII of the Local Government (Scotland) Act 1973. The financial statements comprise the Fund Account, the Net Assets Statement and notes to the accounts, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and UK adopted international accounting standards, as interpreted and adapted by the Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (the 2021/22 Code).

In my opinion the accompanying financial statements:

- give a true and fair view in accordance with applicable law and the 2021/22 Code of the financial transactions of the fund during the year ended 31 March 2022 and of the amount and disposition at that date of its assets and liabilities;
- have been properly prepared in accordance with UK adopted international accounting standards, as interpreted and adapted by the 2021/22 Code; and
- have been prepared in accordance with the requirements of the Local Government (Scotland) Act 1973, The Local Authority Accounts (Scotland) Regulations 2014, and the Local Government in Scotland Act 2003.

Basis for opinion

I conducted my audit in accordance with applicable law and International Standards on Auditing (UK) (ISAs (UK)), as required by the [Code of Audit Practice](#) approved by the Accounts Commission for Scotland. My responsibilities under those standards are further described in the auditor's responsibilities for the audit of the financial statements section of my report. I was appointed under arrangements approved by the Accounts Commission on 18 July 2016. The period of total uninterrupted appointment is 6 years. I am independent of the fund in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK including the Financial Reporting Council's Ethical Standard, and I have fulfilled my other ethical responsibilities in accordance with these requirements. Non-audit services prohibited by the Ethical Standard were not provided to the council. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Conclusions relating to going concern basis of accounting

I have concluded that the use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the fund's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from when the financial statements are authorised for issue.

These conclusions are not intended to, nor do they, provide assurance on the fund's current or future financial sustainability. However, I report on the fund's arrangements for financial sustainability in a separate Annual Audit Report available from the [Audit Scotland website](#).

Risks of material misstatement

I report in my Annual Audit Report the most significant assessed risks of material misstatement that I identified and my judgements thereon.

Responsibilities of the Acting Chief Financial Officer and Scottish Borders Council Pension Fund Committee for the financial statements

As explained more fully in the Statement of Responsibilities, the Acting Chief Financial Officer is responsible for the preparation of financial statements that give a true and fair view in accordance with the financial reporting framework, and for such internal control as the Acting Chief Financial Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Acting Chief Financial Officer is responsible for assessing the fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless there is an intention to discontinue the fund's operations.

The Scottish Borders Council Pension Fund Committee is responsible for overseeing the financial reporting process.

Auditor's responsibilities for the audit of the financial statements

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. I design procedures in line with my responsibilities outlined above to

detect material misstatements in respect of irregularities, including fraud. Procedures include:

- obtaining an understanding of the applicable legal and regulatory framework and how the fund is complying with that framework;
- identifying which laws and regulations are significant in the context of the fund;
- assessing the susceptibility of the financial statements to material misstatement, including how fraud might occur; and
- considering whether the audit team collectively has the appropriate competence and capabilities to identify or recognise non-compliance with laws and regulations.

The extent to which my procedures are capable of detecting irregularities, including fraud, is affected by the inherent difficulty in detecting irregularities, the effectiveness of the fund's controls, and the nature, timing and extent of the audit procedures performed.

Irregularities that result from fraud are inherently more difficult to detect than irregularities that result from error as fraud may involve collusion, intentional omissions, misrepresentations, or the override of internal control. The capability of the audit to detect fraud and other irregularities depends on factors such as the skilfulness of the perpetrator, the frequency and extent of manipulation, the degree of collusion involved, the relative size of individual amounts manipulated, and the seniority of those individuals involved.

A further description of the auditor's responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website www.frc.org.uk/auditorsresponsibilities. This description forms part of my auditor's report.

Reporting on other requirements

Other information

The Acting Chief Financial Officer is responsible for other information in the annual report. The other information comprises the Management Commentary, Annual Governance Statement, Annual Governance Compliance Statement, Statement of Responsibilities and other reports included in the annual report other than the financial statements and my auditor's report thereon.

My responsibility is to read all the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the course of the audit or otherwise appears to be materially misstated. If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have

performed, I conclude that there is a material misstatement of this other information, I am required to report that fact. I have nothing to report in this regard.

My opinion on the financial statements does not cover the other information and I do not express any form of assurance conclusion thereon except on the Management Commentary, Annual Governance Statement and Annual Governance Compliance Statement to the extent explicitly stated in the following opinions prescribed by the Accounts Commission.

Opinions prescribed by the Accounts Commission on the Management Commentary, Annual Governance Statement and Annual Governance Compliance Statement

In my opinion, based on the work undertaken in the course of the audit:

- the information given in the Management Commentary for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with statutory guidance issued under the Local Government in Scotland Act 2003;
- the information given in the Annual Governance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Delivering Good Governance in Local Government: Framework (2016): and
- the information given in the Annual Governance Compliance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with The Local Government Pension Scheme (Scotland) Regulations 2018.

Matters on which I am required to report by exception

I am required by the Accounts Commission to report to you if, in my opinion:

- adequate accounting records have not been kept; or
- the financial statements are not in agreement with the accounting records; or
- I have not received all the information and explanations I require for my audit.

I have nothing to report in respect of these matters.

Conclusions on wider scope responsibilities

In addition to my responsibilities for the annual accounts, my conclusions on the wider scope responsibilities specified in the Code of Audit Practice, including those in respect of Best Value, are set out in my Annual Audit Report.

Use of my report

This report is made solely to the parties to whom it is addressed in accordance with Part VII of the Local Government (Scotland) Act 1973 and for no other purpose. In accordance with paragraph 120 of the Code of Audit Practice, I do not undertake to have responsibilities to members or officers, in their individual capacities, or to third parties.

Gillian Woolman MA FCA CPFA
Audit Director
Audit Scotland
102 West Port
Edinburgh
EH3 9DN

CONTACT DETAILS

For further information and advice on administration, benefits and scheme membership please contact:

Pensions Team

Telephone 01835 – 825052/3

E-mail pensions@scotborders.gov.uk

Scheme members should have a copy of the “Employees’ Guide to the Local Government Pension Scheme Administered by the Scottish Borders Council”, and can obtain their own copy of an Annual Report on request.

or visit Scottish Borders Council Pension Fund website at:
www.scottishborderscouncilpensionfund.org

For further information on the Fund’s investments, please contact

Suzanne Douglas

Telephone 01835 – 824000 ext 5881

Acting Chief Financial Officer

E-mail Sdouglas@scotborders.gov.uk

You can get this document on audio CD, in large print, and various other formats by contacting us at the address below. In addition, contact the address below for information on language translations, additional copies, or to arrange for an officer to meet with you to explain any areas of the publication that you would like clarified.

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