COMMONWEALTH WAR GRAVES COMMISSION SUPERANNUATION SCHEME

COMMONWEALTH WAR GRAVES

Members Report 2021

Dear Member

Welcome to the 2021 Trustees Report to Members which provides members with information on the progress of the Commonwealth War Graves Commission Superannuation Scheme over the last year and other news and information which we trust you will find of interest.

This report provides a summary of the work performed on your behalf during the period, and we hope it will give you a greater understanding of key issues governing the progress of the Scheme. A copy of the full Trustees' Annual Report and Accounts is available from the Scheme's administrators, Capita, whose address can be found at the back of this report.

The Trustees' work over the last year has focussed on a number of important issues, including:-

- **Finalising the triennial actuarial valuation of the Scheme as at 31 March 2020**

  The triennial actuarial valuation for the Scheme has been completed and details appear later in this report. The valuation showed a significant funding deficit and the Trustees engaged in extensive discussions with the Commission on how to remedy the situation. The Trustees are happy to report that an agreement was reached and are grateful for the support of the Commission. An annual funding update as at 31 March 2021 has also been completed and a Summary Funding Statement detailing the outcome of the funding update can be found in the pocket at the back of this report.

- **Investment strategy review and new Statement of Investment Principles**

  During the Scheme year the Trustees, in conjunction with their investment adviser, carried out a comprehensive review of the investment strategy. This resulted in changes to the strategic asset allocation in order to reduce the Scheme's level of interest rate and inflation risk, the appointment of BNY Mellon and Insight to manage the Scheme's diversified growth funds (in place of Ninety One and in conjunction with Schroders), the appointment of Legal & General to manage a new synthetic equity fund and the appointment of TwentyFour to manage a new absolute return bond fund. Further details are provided later in the report.

  The Scheme's Statement of Investment Principles has been updated to reflect these amendments.

- **GMP Equalisation**

  The Trustees have continued to work through the many complex and technical issues associated with GMP Equalisation with their advisers.

- **Member website**

  In order that members may view all information relating to the Commission and the Scheme via one website, the information previously held on the member website established by the Trustees has been transferred to the Commonwealth War Graves Commission's website. You can now view documents relating to the Scheme on the following link: https://www.cwgc.org/who-we-are/pension-scheme/.

- **COVID-19**

  Over the past year the Trustees have closely monitored the Scheme's investments in light of the impact of COVID-19. During the early part of 2020 we saw some significant falls in the value of some investments. Whilst some volatility remains the Scheme's assets have since recovered to previous levels. As at 31 March 2021 the Scheme's funding position had improved to 102% from 87% as at 31 March 2020 which was primarily as a result of higher than expected investment returns being achieved over the 12 month period. As the Scheme's funding level is subject to fluctuations, the Trustees continue to monitor the situation and take professional advice as appropriate.

  The Trustees have continued to hold regular quarterly meetings with their advisers to discuss matters relating to the administration and investment performance of the Scheme. These have been held online but we hope that some meetings will be held in person again very soon.

If you would like further information about the Scheme or any of the issues covered in this report, then please contact Capita or the Secretary to the Trustees. I would also like to encourage any members with any specific issues or concerns relating to the operation of the Scheme to contact myself and / or the Scheme Secretary; we can then more closely manage the provision of the required information to you and deal with any queries that you may have. All relevant contact details are included on the final page of this report.

Finally, I would like to wish all members a very healthy and prosperous 2022.

Chris Farrell
Chair of the Trustees

The Trustees

The responsibility for overseeing the running of the Scheme rests with the Trustees. The Scheme is set up as a trust and it is a fundamental duty of the Trustees to administer the Scheme in line with the provisions of the Scheme's Trust Deed and Rules. The Trustees therefore work closely with the Commission to ensure that, with the help of professional advisers, the Scheme is run in accordance with the Trust Deed and Rules and the legislation governing UK pension schemes, and that ultimately there will be sufficient funds available to pay members' benefits.

In total the Trustees met seven times during the year. This consisted of four routine meetings to discuss matters relating to the administration and investment performance of the Scheme and three special meetings relating to the triennial valuation, GMP equalisation and the annual report and accounts. The Trustees also regularly attend seminars and training sessions in order to remain up to date on pension issues and legislative changes.

Under the Pensions Act 2004, scheme trustees are required to ensure that at least one third of trustees are nominated and selected by the members. The Scheme is currently administered by five Trustees - of these three were nominated by the Commission and two are Member Nominated Trustees (MNTs).

One of the Commission nominated Trustees is Karen Jamison who joined the Commission in 2012 and is Head of Management Accounts. The other Commission nominated Trustee, Martin Duffy, is an experienced Trustee who is fully independent from the Commission as he has no link through employment or as a beneficiary of the Scheme. The Commission has also recently undertaken an exercise to select and appoint a new Independent Trustee to the Trustee Board to replace PTL Governance Limited who stepped down in 2020. Following the completion of a tender process in which representatives of the Trustees participated, we are pleased to confirm that Paul Watson of Capital Cranfield Trustees Limited has joined the Trustee Board from 12 November 2021.

The current MNT arrangements allow all eligible deferred and pensioner members to stand as MNTs and to nominate and select other members to act as MNTs. The current MNTs are Chris Farrell who is serving his second term of office as an MNT and Bernard McGee who is serving his first term. The current term of office for both MNTs runs for 5 years until 31 August 2023.

Kettering London Road cemetery

The current Trustees of the Scheme are:-

Commission Nominated

Martin Duffy
Independent Trustee

Karen Jamison
Commission Employee – Member of the Scheme

Capital Cranfield Trustees Limited
Independent Trustee

Member Nominated

Chris Farrell
Commission Employee – Pensioner Member of the Scheme and Chairman of the Trustees

Bernard McGee
Pensioner Member of the Scheme

Secretary to the Trustees

Sue Kettle
Capita Pension Solutions

Scheme Members

The following table shows how the membership of the Scheme changed over the year to 31 March 2021:-

	31 March 2021	31 March 2020
Members with Deferred Benefits	254	265
Pensioners	404	416
Total	**658**	**681**

Following the Scheme's closure to future accrual on 31 March 2016, all active members became deferred members of the Scheme from 1 April 2016.

The Trustees' Advisers

Although the Trustees have overall responsibility for running the Scheme, they have appointed professional advisers to assist in the management of the Scheme. The Scheme's current advisers are:-

Actuary
Matt Gurden from the Government Actuary's Department (GAD). Working closely with the Trustees and the Commission, the Actuary keeps the financial health of the Scheme under review.

Auditors
Mazars LLP carry out an annual audit of the Scheme.

Investment Managers
Schroder Investment Management Limited

Ninety One Fund Managers UK Limited (until August 2021)

BNY Mellon Investment Management (from September 2021)

Insight Investment (from September 2021)

Legal & General Assurance (Pensions Management) Limited

TwentyFour Asset Management (from September 2021)

Threadneedle Asset Management Limited

Investment Adviser
Capita Pension Solutions provides investment advice to the Trustees.

Administrators
Capita Pension Solutions maintains the records and carries out the administration of the Scheme.

Legal Adviser
DLA Piper UK LLP provides legal advice to the Trustees. The Legal Adviser reviews and updates the Trust Deed and Rules to reflect decisions made by the Trustees as well as legislative changes introduced by the Government.

Bankers
Royal Bank of Scotland plc

Bergen cemetery

Investments and Fund Performance

Investment Strategy

The Trustees have produced a Statement of Investment Principles (SIP), which sets out the Trustees' policies on investments. The Statement of Investment Principles has recently been updated following the implementation of a new investment strategy. A copy of the current SIP can be viewed on the Commission's website at https://www.cwgc.org/who-we-are/pension-scheme/; alternatively, a copy can be obtained on request from the Scheme Secretary.

The investment strategy that was in place until August 2021 is detailed in the table below. It aimed to improve the Scheme's overall investment efficiency by increasing the long-term expected return whilst reducing the overall investment risk.

Asset Class	Strategic Asset Allocation%	
Global Equity	25.00	
Emerging Market Equity	3.75	
Emerging Market Debt	3.75	
Property	7.50	
Diversified Growth Funds	35.00	
Total Growth Assets		*75.00*
Liability Driven Investments (LDI)	25.00	
Total Risk-reducing Assets		*25.00*
Total	**100.0**	

During the Scheme year the Trustees, in conjunction with their investment adviser, carried out a review of the investment strategy and decided to implement a number of changes to the strategic asset allocation in order to reduce the Scheme's level of interest rate and inflation risk. This has been achieved by increasing the allocation to LDI funds and at the same time restructuring the LDI portfolio to increase the hedge on the liabilities from around 48% of liabilities to around 73%.

Under the new strategy 72.5% of the Scheme's assets are allocated to growth assets and 27.5% to matching assets. The Trustees agreed to continue holding most of the Scheme's growth assets in global equities, property and diversified growth funds but to replace emerging market equities and emerging market debt with synthetic equity and absolute return credit funds. An explanation of these two new funds is provided below.

Schroders continues to manage diversified growth funds on behalf of the Scheme but all diversified growth funds with Ninety One have been disinvested due to the investment manager's continuing underperformance. BNY Mellon and Insight have been appointed with effect from September 2021 to manage the Scheme's diversified growth funds in conjunction with Schroders and the allocation is split equally between the three managers.

With effect from September 2021 Legal & General has been appointed to manage the new synthetic equity fund and TwentyFour has been appointed to manage the new absolute return bond fund. The new investment strategy is detailed in the table below.

Asset Class	**Strategic Asset Allocation%**	
Global Equity	20.5	
Synthetic Equity	4.5	
Absolute Return Credit	5.0	
Property	6.5	
Diversified Growth Funds	36.00	
Total Growth Assets		*72.5*
Liability Driven Investments (LDI)	27.5	
Total Risk-reducing Assets		*27.5*
Total	**100.0**	

New investment funds

- **Synthetic equity funds** – This is a more efficient way of holding equity exposure whilst allowing more risk to be taken. Equity exposure is gained through the use of derivative contracts rather than by physically investing in equities. The key benefit of synthetic equity exposure is that it can free up cash, which can provide a cash pool or be invested elsewhere in a low risk investment. The downside risk is that the return can be very volatile.

- **Absolute return bond funds** – These are low risk corporate bonds which invest in short-dated credits with one or two years left to maturity. They provide a reasonable return above gilts.

These asset allocation changes were implemented after the Scheme year and we will report on the performance of the new funds in next year's member report.

We mentioned in last year's Member Report that from 1 October 2020 the Trustees are required to produce an annual statement which provides details about the extent to which the stewardship and engagement policy has been followed during the year and details of the voting behaviour of the Scheme's investment managers. The Trustees have produced their first implementation statement and a copy can be viewed on the Commission's website at https://www.cwgc.org/who-we-are/pension-scheme/.

Portsmouth Naval Memorial

Monitoring of Performance

Together with their Investment Adviser, the Trustees supervise and closely monitor the performance of the managers and ensure that the specific asset allocations and strategy agreed with the Trustees, have in fact been complied with to minimise investment risk relative to the Scheme liabilities.

Throughout the course of the Scheme year Schroders, Ninety One, Legal & General and Threadneedle managed their respective parts of the Fund in accordance with the Statement of Investment Principles. The Scheme's investments are held in pooled funds in which different asset categories are allocated and managed by the investment managers.

The asset allocation of the Scheme's investments at 31 March 2021 was as follows:-

	Actual Asset Allocation	Strategic Asset Allocation
L&G All World Equity Fund	25.7%	25%
L&G Emerging Market Equity Fund	4.1%	3.75%
L&G EM Local Currency Government Bond Fund	2.9%	3.75%
Threadneedle Property Unit Trust	6.6%	7.5%
Schroder Life Diversified Growth Fund and Ninety One Diversified Growth Fund	33.6%	35%
Schroder LDI Portfolio	27.2%	25%

Oban (Pennyfuir) cemetery

Scheme Return

The returns on the Scheme's investment funds over the year to 31 March 2021 are shown below.

	Fund Return
L&G All World Equity Fund	39.5%
L&G Emerging Market Equity Fund	40.5%
L&G EM Local Currency Government Bond Fund	1.4%
Threadneedle Property Unit Trust	2.0%
Schroder Life Diversified Growth Fund	24.2%
Ninety One Diversified Growth Fund	24.0%
Schroder LDI Portfolio*	1.7%

* LDI portfolio return reflects a notional portfolio constructed to provide a fully funded hedging exposure.

The spread of COVID-19 created uncertainty for global growth outlook and sparked volatility in financial markets during the first quarter of 2020. In particular, UK and global equities plummeted in value during the first quarter of 2020 due to the coronavirus pandemic, with the FTSE 100 suffering its worst quarter in 30 years. However, all asset classes bounced back during the second quarter of 2020, largely due to governments introducing stimulus plans, such as the UK's furlough scheme, and central banks increasing quantitative easing and reducing base interest rates to all-time lows. Markets have largely managed to retain these positions of recovery.

The Trustees continue to monitor closely the impact of COVID-19 and other political / economic factors on the Scheme's assets and liabilities.

The Scheme's Accounts

Fund value at 1 April 2020	**£80,297,505**
Money going into the Scheme	
Commission contributions	£ 2,800,000
Total income	£ 2,800,000
Money coming out of the Scheme	
Benefits payable (pensions and lump sum retirement and death benefits)	(£ 4,174,723)
Leaving service benefits	(£ 76,250)
Administrative expenses	(£ 49)
Total expenditure	(£ 4,251,022)
Income less expenditure	(£ 1,451,022)
Change in market value of investments	£14,936,898
Fund value at 31 March 2021	**£93,783,381**

The Scheme Accounts have been audited by Mazars LLP and received an unqualified opinion that they represent a true and fair view of the Scheme's financial affairs.

Pension Increases

Your pension in retirement is increased each year to keep in line with the cost of living in the country in which you are based. The table below shows how pensions have increased over the last three years.

	2020/21 %	2019/20 %	2018/19 %
United Kingdom	1.7	2.4	3.0
Canada	0.66	2.02	2.45
South Africa	2.14	4.47	4.38

Annual pension increases within the Scheme applied to pensions in payment for those based on UK conditions of service follow the statutory increases for Public Sector schemes.

St Pancras cemetery

Actuarial Report

Every three years our Scheme goes through a detailed financial analysis called an Actuarial Valuation, at which an assessment is made of both our current and future assets and liabilities. Each year in between, an annual review is completed to check how the funding position has changed in the previous 12 months.

The most recent triennial actuarial valuation of the Scheme was carried out as at 31 March 2020.

The valuation showed that over the three-year period to 31 March 2020, there had been a worsening in the Scheme's financial position, with the funding level decreasing from 95% as at 31 March 2017 to 87% as at 31 March 2020. This deterioration was primarily attributable to the weak investment return over the period since the previous valuation, which was particularly impacted by large equity market falls in March 2020 due to the coronavirus pandemic. The change in financial market conditions also contributed to the deterioration. However, offsetting factors were lower than expected pension increases, changes to the mortality assumptions and the deficit contributions paid by the Commission.

As a result of the shortfall identified by the 2020 actuarial valuation, the Commission has agreed to pay additional contributions as detailed in the table below.

Year ending	Contribution (£)
31/03/2021	2,800,000*
31/03/2022	850,000**
31/03/2023	850,000
31/03/2024	850,000
31/03/2025	850,000
31/03/2026	850,000

Year ending	Contribution (£)
31/03/2027	850,000
31/03/2028	850,000
31/03/2029	850,000
31/03/2030	850,000

* These contributions have already been paid

** This contribution is being paid in monthly instalments

These contributions together with the expected returns on the Scheme assets are expected to eliminate the shortfall by 31 March 2030, although the funding level is expected to fluctuate as market conditions change. The contribution requirements will be reconsidered following the next actuarial valuation which is due to be carried out as at 31 March 2023.

An interim funding update has been carried out as at 31 March 2021 and this shows that the Scheme's funding level has increased over the year from 87% as at 31 March 2020 to 102% as at 31 March 2021. This improvement was largely attributable to investment returns over the year being higher than expected, the deficit contributions paid by the Commission and actual pension increases being lower than assumed. This was partially offset by changes in market conditions over the year and the interest on the deficit.

Falmouth cemetery

Current Issues

Normal Minimum Pension Age

Whilst the Government recognises that individuals should have the freedom and choice in how they use their money, they believe that it is also necessary to have mechanisms in place to ensure that savings are used for their intended purpose, i.e. a sufficient income in retirement. This was the driving force behind the introduction of the Normal Minimum Pension Age (NMPA) in 2006.

The NMPA is the minimum age that pension savings can usually be accessed without triggering penal tax charges on both you as an individual and the Scheme. The NMPA was initially set at age 50 but rose to age 55 in April 2010. Following the consultation in 2014 on Freedom and Choice in Pensions, the Government noted its intention to raise the NMPA to age 57 in 2028 and has now confirmed that the NMPA will rise to age 57 on 6 April 2028.

If you joined the Scheme before 6 April 2006 and have a Normal Pension Age of 60, subject to satisfying certain regulatory conditions, you will retain the right to retire from age 50 onwards.

Pension Scams – Be Aware!

The Trustees would like to remind you to be aware of pension scammers who are known to target members of pension schemes. If you are not yet receiving a pension and it is suggested that you consider transferring your pension out of the Scheme, you should make sure that you consult a financial adviser who is regulated by the Financial Conduct Authority. If you are already receiving a pension it is, of course, not possible to transfer your pension.

The Trustees take steps to look out for any potential scams taking place, however they cannot prevent members from transferring their benefits out of the Scheme. If you transfer your pension to an unauthorised scheme, you could lose your entire pension savings and in addition face a substantial tax charge. We urge all members to remain vigilant when approached in respect of their pension savings and to look out for the following which are key indicators that you may have been targeted by a pensions scam:

- Being approached out of the blue by phone, text or even door-to-door
- Being asked to transfer your investments overseas

- Being pressured into transferring money very quickly
- Being told you can access your pension before age 55

If anyone approaches you directly to offer transfer advice, be on your guard. The government has banned cold calling for pensions, so if anyone calls you out of the blue about yours, just hang up – it could be a scam. You can also visit the ScamSmart website at www.fca.org.uk/scamsmart to check the firm you are dealing with is regulated and to see whether what you are being offered is a known scam or has the signs of a scam.

Please remember that you can't change your mind once you've transferred out of a DB pension. It is therefore really important that you get guidance or advice before making a decision. MoneyHelper offers free specialist pensions guidance and will help answer any questions you may have. The MoneyHelper website address is https://www.moneyhelper.org.uk. If your transfer value is more than £30,000, you are required by law to take advice from a suitably qualified financial adviser regulated by the Financial Conduct Authority (FCA), before you can transfer your benefits to a DC pension scheme. There may be other circumstances where you will be required to obtain guidance from MoneyHelper before your transfer can proceed. The Scheme Administrator will notify you if this is the case.

Take your time to make all the checks you need – you can find suggested questions to ask your adviser on the FCA's website by visiting: https://fca.org.uk/consumers/what-ask-adviser

Further information on pension transfers can be found by visiting: https://www.fca.org.uk/consumers/pension-transfer

You can find more information on pension scams from the Pensions Regulator by visiting: www.thepensionsregulator.gov.uk/pension-scams

New transfer conditions

New regulations to help fight against pension scams came into force on 30 November 2021. These new regulations require one of two prescribed conditions to be met for statutory transfers to take place from the Scheme. If neither condition is met, you will not have a statutory right to transfer from the Scheme and the request to transfer can be declined. Not all pension scams can be prevented but these new procedures for processing pension transfers will help trustees and administrators identify high risk transfers and help stop potential scams.

Preparing for Starting and Stopping Pensions

Although the Scheme Administrator holds some information about members, it is not possible to begin paying a pension or to stop paying one and start paying a spouse's or dependant's pension without receiving certain documentation. The Trustees think that it may be helpful for members to understand what will be required so that they can ensure that the relevant information and documentation is readily available at the appropriate time.

RETIREMENT

The Scheme Administrator will contact you approximately 6 months before your Normal Pension Age with details of the options available to you in respect of your retirement benefits.

You will be asked to complete and return the following forms:

- ***Retirement Option Form*** – in order to confirm your chosen option.
- ***Bank Mandate*** – this will enable your benefits to be paid to you. You will have to include your National Insurance number and details of your bank/building society account (including the account name, sort code and account number) on this form.
- ***Marital Status Declaration*** – to confirm your marital status.
- ***Lifetime Allowance Form*** – to establish whether you have sufficient Lifetime Allowance available to pay your retirement benefits without triggering a recovery tax charge. You will need to provide details of the benefits you hold in other pension schemes to enable the Administrator to complete this assessment.

Verification of Identity

The Scheme Administrator will need to verify your identity before any payments can be made to you. Proof of your identity, address and, where applicable, your marital status will be required. In this respect you will be requested to provide original copies of the certificates and documents detailed below.

- ***Proof of your identity*** – you will be asked to provide one of the following documents:
  - Your passport
  - Your photocard driving licence
- ***Proof of your address*** – you will be required to provide proof of your address, which must be issued in your name and dated within the last 3 months. Examples of satisfactory proof of address documents include one of the following:
  - Statement from a bank/credit card/building society
  - Utility bill – telephone/electricity/gas/ water/ mortgage
  - A document issued by the Government or Local Authority
- ***Proof of your marital status where you have indicated a status other than single*** – if you have indicated that you are married or in a civil partnership, you will need to provide:
  - Your marriage/civil partnership certificate
  - Your spouse's/civil partner's birth certificate

If you are a UK resident, the Scheme Administrator can usually accept scanned copies or photographs of your certified passport or driving licence and other documents which will then be verified using an online verification tool. Whilst the Scheme Administrator endeavours to complete as much of the process as possible electronically, from time to time they may need to request original documentation.

It is recommended that any original documents are sent to the Scheme Administrator by a recorded delivery service; they will then be returned using the same service by which they were sent.

SPOUSE'S PENSION

Upon receipt of notification that a member has passed away, the following document will be provided by the Scheme Administrator for completion:

- **Death Notification and Questionnaire** – this will enable the Scheme Administrator to assess whether any benefits are payable. Wherever possible, the form should be completed by your personal representative (which may be a person, solicitor or other third party who is acting on behalf of your estate). The following information will be required:
  - Details about you including your date of birth and National Insurance number
  - Details about your spouse/civil partner including their date of birth, date of marriage/civil partnership and National Insurance number.*
  - Details regarding any dependent children or an adult dependant

  * This section must be signed by your spouse/civil partner unless there is authority in place to sign on their behalf (for example Power of Attorney). Evidence of authority to sign on behalf of the spouse/ civil partner must be provided.

Your personal representative will also be asked to provide an original Death Certificate for you along with the following documents, where applicable:

- ***A copy of your Will***
- ***Grant of Representation***
- ***Original birth and marriage/civil partnership certificates*** in respect of your spouse/civil partner
- ***Original birth certificate*** in respect of a dependent child or children or adult dependant

If you are a UK resident, the same conditions apply regarding the provision of scanned copies of documents as detailed under the retirement section above.

Keeping Us Informed

Keeping our records up to date is vital to the smooth running of the Scheme. Please therefore contact the Scheme Administrator whenever you:

- change your address or, if you are in regular receipt of a pension, you change your bank account details
- wish to change your death benefit nomination
- want information about the Scheme or your benefits

Also, we greatly value your feedback on the service being provided by the Scheme Administrator so if you have comments to make please pass these to the Secretary.

Further Information

If you have any questions about the Scheme, or would like any more information, please contact the Scheme Administrator:-

Administrator - Commonwealth War Graves Commission Superannuation Scheme

Capita Pension Solutions
PO Box 555
Stead House
Darlington DL1 9YT

Tel: **0333 222 0085**
Email:
Edinburghpensions1@capita.com

Jamie Guille in the HR Service Centre at the Commission runs the Commission's side of Pension Administration and can be contacted as follows:-

Jamie Guille
Reward Supervisor
Commonwealth War Graves Commission
2 Marlow Road
Maidenhead
Berkshire SL6 7DX

Tel: **+44 (0) 1628 507131**
Email: **jamie.guille@cwgc.org**

You can also contact Sue Kettle, the Scheme's Secretary, at:

Capita Pension Solutions
65 Gresham Street
London
EC2V 7NQ

Tel: **07891 523172**
Email: **susan.kettle@capita.com**

Or you can contact Chris Farrell, Chair of the Trustees, as follows:-

Tel: **00 33 (0)607 156875**
Email: **chris.farrell@cwgc.org**

If you are unable to resolve a problem with the Scheme through these normal channels, you may wish to pursue a complaint through the Scheme's formal dispute resolution procedure. A copy of the procedure is available on request from the Secretary.

COMMONWEALTH WAR GRAVES COMMISSION SUPERANNUATION SCHEME **MEMBERS REPORT** 2021

COMMONWEALTH WAR GRAVES

Front cover – Stratford upon Avon cemetery