BARNETT WADDINGHAM
beyond the expected

University of Sussex Pension and Assurance Scheme

Scheme Registration Number 10089233

Annual report for the year ended 31 March 2021

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The Trustee's Report

Introduction

This report relates to the operation of the University of Sussex Pension and Assurance Scheme ("the Scheme") during the year ended 31 March 2021.

The Scheme was established with effect from 1 October 1961, to provide retirement and death benefits for all eligible employees of the University of Sussex (the Sponsoring Employer) under a definitive Trust Deed dated 17 September 1962 and supplementary Trust Deed dated 16 December 1991, and later to include the Institute of Development Studies. A new definitive Trust Deed and Rules was introduced with effect from 14 June 2018 replacing all previous deeds from that date.

The Scheme changed from an insured fund to a managed fund investment plan on 1 October 1980. At the same time the accounting reference date was changed to 31 March.

Full details of the Scheme's benefits can be found in the member's explanatory booklet (see "Contact for further information" on page 6)

In line with changes in legislation, the Scheme ceased to be contracted out on a money purchase (COMPS) basis and became contracted out on a salary related (COSR) basis with effect from 6 April 2012. The changes in legislation abolished "protected rights" which were built up by members of COMPS prior to this date. Protected Rights represented 'rebates' (savings) on National Insurance received by members and the Sponsoring Employer.

The Scheme closed to new entrants from 1 April 2009. A Deed of Amendment has been created to allow the Trustee discretionary power to admit new joiners to the Scheme despite it being closed to new entrants. This is a result of the Institute of Development Studies, a Participating Employer, considering its position in relation to the Scheme and wishing to manage its exposure to employer debt in the Scheme by way of admitting a member prior to a potential future employment cessation event.

Management of the Scheme

The Scheme has a corporate Trustee, The University of Sussex Pension & Assurance Scheme Trustee Limited. The names of the directors who served during the year and those serving at the date of approval of this report are as follows:

Name	Nominated/appointed by	Date of appointment/resignation
T Armour	Member	Resigned September 2020
B Bassett	Member	
CT Crook (Chair)	Employer	
JA Guillemard	Employer	Resigned January 2021
K Perry	Member	
J Hamilton	Employer	
A Robertson	Employer	Resigned January 2020
RA Spencer	Employer	
E Stephen	Member	
SP Goddard	Employer	Appointed 2 February 2021

The power of appointment of a new director and the power of removal of a Director of the Corporate Trustee is vested in the Employer and this power must be exercised by deed. The directors of the corporate Trustee are referred to as "the Trustee" throughout the rest of this report.

The Trustee's Report (Cont)

Member Nominated Directors are nominated by the active and pensioner members, and will serve a term of office up to six years. The Trustee held four full meetings during the year under review. Each Trustee is entitled to receive at least ten days' notice of meetings, although in practice dates are normally fixed well in advance. The Scheme Rules provide that decisions of the Trustee may be made by a majority of the Trustee directors present at any meeting and the Chair has a casting vote.

The Trustee has delegated the day-to-day management and operation of the Scheme's affairs to professional organisations.

Changes to Scheme Rules

There have been no changes to Scheme Rules during the year under review.

The Sponsoring Employer

The name and address of the Sponsoring Employer is as follows:

University of Sussex, Sussex House, Falmer, Brighton, BN1 9RH

In addition, the Scheme has one Participating Employer:

The Institute of Development Studies, Sussex House, Falmer, Brighton, BN1 9RH.

Scheme advisers

The Trustee retains a number of professional advisers in connection with the operation of the Scheme. The advisers currently appointed are as follows:

Scheme Actuary	Kirstie Nicholls FIA
Advising Actuaries	Mercer Limited
Independent Auditor	RSM UK Audit LLP
Investment Managers	Legal and General Investment Management
Legal Advisers	Blake Morgan
Investment Advisers	Momentum Investment Solutions & Consulting (resigned 31 July 2020) Broadstone Corporate Benefits Limited (appointed 1 August 2020)
Administrator of the Scheme benefits	Barnett Waddingham LLP
Custodians of the Scheme assets	HSBC Bank Plc & Citibank NA
Bankers	National Westminster Bank Plc
Secretary to the Trustee	Tracey Llewellyn

The Trustee's Report (Cont)

Changes in and other matters relating to Scheme advisers

Kirstie Nicholls took a sabbatical during the year and was replaced as Scheme Actuary by Mark Whitcombe for the period 1 May 2020 to 30 October 2020, with Kirstie Nicholls being reappointed on 1 November 2020. As required by Regulations made under the Pensions Act 1995 both Scheme Actuaries confirmed in their respective notices of resignation that they knew of no circumstances connected with their resignations that significantly affected the interests of the members, prospective members or beneficiaries of the Scheme.

Other than as noted above, there have been no changes to Scheme advisers and other matters during the Scheme year under review.

Financial development of the Scheme

During the year the value of the net assets increased by £21,223,000 to £142,576,000 as at 31 March 2021. The increase comprised net withdrawals from dealings with members of £1,716,000 together with a net increase from the return on investments of £22,939,000.

GMP reconciliation

On 26 October 2018 the High Court handed down a judgment involving the Lloyds Banking Group's defined benefit pension schemes. The judgement concluded the schemes should be amended to equalise pension benefits for men and women in relation to guaranteed minimum pension benefits. The issues determined by the judgement arise in relation to many other defined benefit pension schemes.

The Trustee of the Scheme is aware that the issue will affect the Scheme, and has already considered this in detail. Work is ongoing as further guidance becomes available. Under the ruling schemes are required to backdate benefit adjustments in relation to GMP equalisation and provide interest on the backdated amounts. Further details are disclosed in Note 22 of the financial statements.

On 20 November 2020, the High Court handed down a further judgment on the GMP equalisation case in relation to the Lloyds banking group pension schemes. This follows from the original judgment in October 2018 which confirmed that schemes need to equalise pensions for the effect of unequal GMPs between males and females. This latest judgment confirms that defined benefit schemes which provide GMPs need to revisit and where necessary top up historic Cash Equivalent Transfer Values that were calculated based on unequalised benefits. The issues determined by the judgment arise in relation to many other defined benefit pension schemes.

The Trustee will be considering this at a future meeting and decisions will be made as to the next steps. Any adjustments necessary will be recognised in the financial statements in future years. At the date of signing these accounts, it is not possible to estimate the value of any such adjustments at this time.

The Trustee's Report (Cont)

Going Concern

In making an assessment of the fund's ability to meet its future financial obligations and continue to operate effectively as a going concern the Board has considered the following:

- the assets and liabilities of the Scheme which raise no concerns about meeting pension obligations as they fall due;
- regular updates from the sponsoring employer including reporting by the University of Sussex on its own liquidity and going concern assessments, including the result of stress testing cash flows;
- the covenant of the employer which remains strong and in the view of the Board can underpin the existing actuarial deficit and any likely future actuarial shortfalls;
- the continued intention of the Board and the sponsoring employer to run the Scheme as an open scheme with no intention to wind up or buy out liabilities of the Scheme.

Given the continuing operating uncertainty while the Covid19 pandemic continues, the Board received regular updates and will continue to monitor the position of the sponsoring employer.

The Board has concluded as a result of its assessment that the fund is able to meet its future financial obligations, has sufficient financial resources to continue operating successfully as a going concern and therefore believes it is appropriate to prepare these accounts on the going concern basis.

Scheme Audit

The financial statements and related notes on pages 21 to 29 have been prepared and audited in accordance with regulations made under sections 41(1) and (6) of the Pensions Act 1995.

Tax status of Scheme

The Scheme is a registered pension scheme under Chapter 2 of Part 4 of the Finance Act 2004 and, to the Trustee's knowledge, there is no reason why the Scheme's registered status should be prejudiced or withdrawn.

The Trustee's Report (Cont)

Scheme membership

	Number as at start of year	Changes in year	Number as at end of year
Active members	117		
left (deferred pensioners)		(4)	
retired		(14)	
died		(1)	
			98
Deferred pensioners*	704		
Late notification		7	
new		4	
transferred out		(1)	
retired		(24)	
died		(1)	
GMP reconciliation adjustment		28	
			717
Pensioners and dependants	826		
new retired		36	
new dependants		9	
died		(24)	
			847
Grand total members	1,647		1,662

The member numbers shown above reflect the number of member records held by the Scheme. Pensioners include individuals receiving a pension upon the death of their spouse.

*Deferred pensioners include 184 (2020: 185) members whose only benefit in the Scheme is a money purchase benefit from a former Protected Rights pot.

Pension increases

Under the Scheme Rules, Guaranteed Minimum Pensions (GMPs) in payment which accrued after 5 April 1988 are increased in accordance with legislative requirements. Pensions in payment (in excess of any GMP) are increased in accordance with the Pension (Increase) Act 1971 as if they were official pensions under that Act, subject to a maximum increase set out in the Scheme Rules.

During the year deferred benefits were increased in accordance with the Scheme Rules and legislative requirements. GMPs in payment which accrue after 5 April 1988 were increased in accordance with legislative requirements. Pensions in payment (in excess of GMPs in payment) were increased by 1.7%.

No discretionary increases were applied during the year.

Transfer values

All cash equivalents (transfer values) paid during the year were calculated and verified in the manner required by the Pensions Act 1993. No discretionary benefits are included in the calculation of transfer values.

A cash equivalent is the amount which a Scheme member is entitled under social security legislation to have applied as a transfer payment to another permitted pension arrangement or a buy-out policy.

The Trustee's Report (Cont)

Data Protection Act 2018 and General Data Protection Regulation

Under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 regulations, pension scheme trustees are classed as data controllers, with legal responsibility for compliance falling to them. Scheme Actuaries are also classed as data controllers (jointly with the trustees) in accordance with guidance issued by the Actuarial Profession. Barnett Waddingham LLP act as a data processer as the administrators of the Scheme.

The Trustee has worked with its advisers to receive relevant training, and continues to do so to ensure continued compliance with data protection legislation.

Codes of Practice

The Trustee is aware of and adheres to the Codes of Practice issued by The Pensions Regulator ("TPR"). The objectives of these codes are to protect members' benefits, reduce the risk of calls on the Pension Protection Fund ("PPF") and to promote good administration.

The Pensions Regulator: Record Keeping

TPR issues guidance on all aspects of pension scheme data record keeping to all those responsible for the data (the trustees) and those who administer pension schemes. The guidance covers both common data and also conditional data (the data that is used to calculate benefits and is therefore scheme specific). The guidance sets out good practice in helping trustees to assess risks associated with record keeping. Improved data means that trustees and employers will be able to make a more precise assessment of their financial liabilities. Schemes are expected to keep their data under regular review and set targets for the improvement in the standard of data recorded. More information can be found at:

http://www.thepensionsregulator.gov.uk/guidance/guidance-record-keeping.aspx

Contact for further information

If, as a Scheme member, you wish to obtain further information about the Scheme, including copies of the Scheme documentation, your own pension position or who to contact in the event of a problem or complaint, please write to or telephone:

Mrs Tracey Llewellyn, Secretary to the Trustee, University of Sussex, Sussex House, Falmer, Brighton, BN1 9RH

Telephone: 01273 678201

Email address: T.Llewellyn@sussex.ac.uk

Alternatively you may contact the Scheme administrators online at:
https://logon.bwebstream.com/shared/contact

The Trustee's Report (Cont)

Statement of Trustee's Responsibilities

The financial statements, which are prepared in accordance with UK Generally Accepted Accounting Practice, including the Financial Reporting Standard applicable in the UK (FRS 102) are the responsibility of the Trustee. Pension scheme regulations require, and the Trustee is responsible for ensuring, that those financial statements:

- show a true and fair view of the financial transactions of the Scheme during the Scheme year and of the amount and disposition at the end of the Scheme year of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the Scheme year, and
- contain the information specified in Regulation 3A of The Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, including a statement whether the financial statements have been prepared in accordance with the relevant financial reporting framework applicable to occupational pension schemes.

In discharging the above responsibilities, the Trustee is responsible for selecting suitable accounting policies, to be applied consistently, making any estimates and judgements on a prudent and reasonable basis, and for the preparation of the financial statements on a going concern basis unless it is inappropriate to presume that the Scheme will not be wound up.

The Trustee is also responsible for making available certain other information about the Scheme in the form of an annual report.

The Trustee also has a general responsibility for ensuring that adequate accounting records are kept and for taking such steps as are reasonably open to them to safeguard the assets of the Scheme and to prevent and detect fraud and other irregularities including the maintenance of an appropriate system of internal control.

The Trustee is responsible under pensions legislation for preparing, maintaining and from time to time reviewing and if necessary revising a schedule of contributions showing the rates of contributions payable towards the Scheme by or on behalf of the Employer and the active members of the Scheme and the dates on or before which such contributions are to be paid. The Trustee is also responsible for keeping records in respect of contributions received in respect of any active member of the Scheme and for adopting risk-based processes to monitor whether contributions are made to the Scheme by the Employer in accordance with the schedule of contributions. Where breaches of the schedule occur, the Trustee is required by the Pensions Acts 1995 and 2004 to consider making reports to The Pensions Regulator and the members.

The Trustee is responsible for the maintenance and integrity of the pension and financial information included on the http://www.sussex.ac.uk/humanresources/payrollandpensions/pensions/uspas

The Trustee's Report (Cont)

Report on Actuarial Liabilities

Under Section 222 of the Pensions Act 2004, the Scheme is subject to the Statutory Funding Objective, which is to have sufficient and appropriate assets to cover its Technical Provisions. The Technical Provisions represent the present value of the benefits members are entitled to at the valuation date. This is assessed using the assumptions agreed between the Trustees and the employer and set out in the Statement of Funding Principles, which is available to Scheme members on request.

The most recent full actuarial valuation of the Scheme was carried out as at 31 March 2018. This showed that on that date:

The value of the Technical Provisions was:	£151.2 million
The value of the assets was:	£122.9 million

Therefore the Scheme had a funding deficit of £28.3 million corresponding to a funding level of 81%.

An actuarial update of the Scheme was carried out as at 31 March 2020. This showed that on that date:

The value of the Technical Provisions was:	£163.5 million
The value of the assets was:	£121.4 million

Therefore the Scheme had a funding deficit of £42.1 million corresponding to a funding level of 74%.

The method and significant actuarial assumptions used to determine the technical provisions are as follows (all assumptions adopted are set out in the Appendix to the Statement of Funding Principles):

Method

The actuarial method to be used in the calculation of the Technical Provisions is the Projected Unit Method.

Actuarial assumptions – The key assumptions used are:

Discount interest rate: The discount rate is based on an estimate of the yield available on a notional portfolio of UK Government conventional gilt stocks whose cash flows approximately match the Scheme's estimated benefit cashflows, with an additional amount to reflect the prudent allowance the Trustee has agreed for additional investment returns in respect of the assets held.

This additional amount is 2% p.a. in respect of growth assets and 0.3% p.a. for matching assets.

If, following a review of the Statement of Investment Principles, the investment strategy of the Scheme changes after completion of the valuation then the assumed rate of pre and post retirement investment return may also change at subsequent funding updates to reflect the different expected investment returns from the new asset mix.

Future Retail Price Index inflation: The assumption for the rate of increase in the Retail Price Index (RPI) will be taken to be the investment market's expectation for inflation as indicated by the difference between an estimate of the yields available on notional portfolios of conventional and index-linked UK Government bonds whose cashflows approximately match the Scheme's estimated benefit cashflows. An adjustment has been made (assumed to be 0.2% for the purposes of the 2018 valuation) to the assumption to reflect market views that the prices of nominal gilts include a 'risk premium' to reflect, for example, future inflation uncertainty.

The Trustee's Report (Cont)

Report on Actuarial Liabilities (Cont)

Future Consumer Price Index inflation: Derived from the RPI inflation assumption with an appropriate adjustment to recognise the difference between expectations of future RPI increases and future CPI increases. The adjustment will be reviewed at each valuation; at the 31 March 2018 valuation the adjustment was a deduction of 1.0% per annum.

Pension increases: The assumption for the rate of pension increases will be a term structure derived from price inflation annual forward rates allowing for the maximum and minimum annual increase entitlements. The Jarrow-Yildirim model is used to derive rates with appropriate floors and caps from forward rates of price inflation. There is no allowance for discretionary increases.

Pay increases: The assumption for salary increases has been determined after consulting the Employers. The Trustee will use an assumption of 2.00% in 2018, 1.25% in 2019, followed by 2.10% p.a. thereafter (i.e. in line with the CPI assumption). No additional allowance has been made for promotional increases.

Mortality: The mortality assumptions will be based on up-to-date information published by the Continuous Mortality Investigation (CMI) and National Statistics, making allowance for future improvements in longevity and adjusted as considered appropriate for the membership profile of the Scheme The mortality tables used in the actuarial valuation as at 31 March 2018 are S2PA Year of Birth tables weighted by 96% for male members and 92% for female members. Future mortality improvements are assumed to be in line with the CMI 2017 model with a long term improvement rate of 1.5% p.a.

The financial statements on pages 21 to 29 do not take into account liabilities which fall due after the year end. As part of the triennial valuation, the Scheme Actuary considers the funding position of the Scheme and the level of contributions payable.

The Trustee's Report (Cont)

Investments

During the period under review, assets were managed by Legal & General Assurance (Pensions Management) Limited ("L&G"). The underlying management is delegated to Legal & General Investment Management, who was appointed by the Scheme on 20 November 2003.

A Statement of Investment Principles has been produced as required under Section 35 of the Pensions Act 1995, Section 244 of the Pensions Act 2004, the Occupational Pension Scheme (Investment) Regulations 2005, the Pension Protection Fund (Pensionable Service) and Occupational Pension Scheme (Investment and Disclosure) (Amendment and Modification) Regulations 2018, and the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019, and a copy is available on request.

Custodians

The Trustee is responsible for ensuring the Scheme's assets continue to be securely held. It reviews the custodian arrangements from time to time and the Scheme Auditors are authorised to make whatever investigations they deem are necessary as part of the annual audit procedure.

The Scheme's managed fund units are held under unitised policies in the name of the Trustee and the assets underlying the units are held by independent corporate custodians which are regularly reviewed by independent auditors.

L&G use HSBC and Citibank as custodians.

Environmental, Social and Governance Considerations

The Trustee believes that environmental, social and corporate governance issues including the impact of, and potential policy response to, climate change can be financially material to long-term investment portfolios and should therefore be considered as part of the Scheme's investment process. Having also considered non-financial matters, and acknowledging that these are potentially important, given the pooled fund nature of the Scheme's investment arrangements the Trustee acknowledges that it cannot directly influence the selection, retention and realisation of investments. It is recognised that pooled funds represent the most practical approach, given the size of the Scheme's assets, and that these will be governed by the individual policies of the investment manager.

The Scheme's equity investments are managed on a passive index-tracking basis via pooled funds, i.e. the funds aim to track the relevant regional equity market index, which is in contrast to an actively managed approach where an investment manager can be more selective about the individual companies that it chooses to invest in. Therefore, for passive index-tracking funds, the investment manager has little flexibility other than to invest in the equity of the businesses in the proportion that they make up the appropriate underlying index. The Trustee believes that the passive index-tracking approach is appropriate and reflects its preference for a relatively low cost, low governance and simple approach to investing in equities.

The Trustee's Report (Cont)

However, the investment manager is recognised as a market leader in the areas of ESG and engaging with businesses, and through its engagement activities, including voting, the investment manager encourages all of its investee companies to incorporate appropriate sustainability and ESG (including climate change risk) policies into their corporate strategies. The investment manager has a separate dedicated ESG and engagement team which ensures that their approach to ESG is consistently applied throughout the firm and across all of the businesses in which it invests.

The Scheme's investment in pooled corporate bond funds is managed on a semi-active basis, and the investment manager takes into account ESG factors, and the potential financial impact of these, within its investment process for the selection, retention and realisation of investments. The Trustee acknowledges that as bond holders the investment manager will not typically have as much influence on a business as an equity holder, for example, bond holders are unlikely to have voting rights.

The investment manager produces regular reports on its activities in the area of ESG, including the initiatives it takes to influence companies and market participants (including governments and regulators).

Responsibility for monitoring the make-up and development of the capital structure of investee companies is delegated to the investment manager. The Trustee expects the extent to which the investment manager monitors capital structure to be appropriate to the nature of the mandate.

Views of Members and Beneficiaries

The Scheme is comprised of a diverse membership, expected to hold a broad range of views on ethical, political, social, environmental, and quality of life issues. The Trustee therefore does not explicitly seek to reflect any specific views through the implementation of the investment strategy.

Stewardship: Exercise of voting rights and engagement activities

The Trustee believes that good stewardship can enhance long-term portfolio performance and is therefore in the best interests of the Scheme's beneficiaries and aligned with fiduciary duty.

Given that the Scheme's investments are in pooled funds, the investment manager is responsible for the exercising of rights (including voting rights) and stewardship obligations related to the Scheme's investments, and the Trustee encourages the manager to exercise those rights.

The Trustee expects its investment manager to monitor investee companies and engage with management on all relevant stewardship matters.

In the Trustee's view, the investment manager takes its engagement responsibilities seriously, and encourages best practice in this area. The investment manager's dedicated engagement team ensures that their engagement policy is consistently applied across all of its investee companies. The manager engages in a broad number of areas, including ESG, diversity, remuneration, sustainability, Board composition, and exercises its voting policy accordingly. The manager publishes regular reports detailing its engagement activities and voting records. The manager regularly votes against companies where it believes this is in its clients' best interests.

The Trustee expects the Scheme's investment manager to discharge its responsibilities in accordance with the principles of the Financial Reporting Council's 2012 UK Stewardship Code ("the Code") as updated, as far as it is able. The manager reports on the extent of their adherence to the Code, alongside their broader stewardship activities on at least an annual basis.

The Trustee's Report (Cont)

Investment Strategy

The investment objective of the Scheme is to maintain a portfolio of suitable assets of appropriate liquidity which will generate investment returns to meet, together with future contributions, the benefits of the Scheme payable under the Trust Deed and Rules as they fall due.

The Trustee sets the investment strategy for the Scheme taking into account considerations such as the strength of the employer covenant, the long term liabilities of the Scheme and the funding agreed with the University. The investment strategy is set out in the Scheme's Statement of Investment Principles (SIP).

Performance

A summary of the overall performance of the assets for the Scheme for periods to 31 March 2021 is provided in the table below.

	12 months (%)		3 years (p.a.) (%)		5 years (p.a.) (%)	
	Fund	Index	Fund	Index	Fund	Index
UK Equity Index	26.8	26.7	3.3	3.2	6.5	6.3
North America Equity Index	42.8	42.8	17.8	17.7	17.5	17.4
North America Equity Index – GBP Hedged	55.8	55.9	14.8	14.7	14.5	14.5
Europe (ex-UK) Equity Index	34.7	34.8	8.4	8.4	11.2	11.1
Europe (ex-UK) Equity Index – GBP Hedged	40.9	41.0	9.7	9.7	10.4	10.4
Japan Equity Index	26.2	26.3	7.0	7.0	11.9	11.8
Asia Pacific (ex-Japan) Developed Equity Index	50.5	50.5	9.0	9.1	12.7	12.6
World Emerging Markets Equity Index	40.6	40.5	7.4	7.4	12.8	12.7
All Stocks Index-Linked Gilts Index	2.3	2.3	3.3	3.3	5.9	5.9
Maturing Buy & Maintain Credit 2025-2029	8.3	N/A	-	-	-	-
Maturing Buy & Maintain Credit 2030-2034	8.0	N/A	-	-	-	-
Cash Fund	0.1	0.0	0.5	0.4	0.4	0.3

Overall Scheme Performance	
1 year	19.7%
3 years (p.a.)	6.4%
5 years (p.a.)	8.4%

Performance provided gross of fees.

The Trustee's Report (Cont)

Investment Markets

Given the extent of the sell-off seen in equity markets last March, as the extent of economic impact of the COVID-19 pandemic dawned on investors, the performance of global risk assets over the past twelve months has extremely strong. Global equity markets initially surged on the back of an extraordinary level of support policies announced by central banks and governments. In addition, the successful development, approval, and subsequent roll-out of a number of vaccines helped investors look beyond the re-introduction of lockdowns and social/travel restrictions of the winter months, and provided hope that some degree of 'normality' could return in the not so distant future.

Over the last twelve months, global equities have gained more than 50% (in local currency terms in some regions). North American equity markets saw the strongest return (c.55%), largely driven by technology stocks, whilst markets also responded positively to a Democratic win in November's US Presidential election. However, the UK market significantly underperformed over the year, despite recording a gain of 27% (which would have been impressive in 'normal' times). A toxic cocktail of equity dividend cuts, the impact of localised COVID-19 restrictions, and ongoing Brexit concerns (prior to the signing of December's trade agreement with the European Union) all weighed on UK market returns. The positive market backdrop was also reflected in the commodities market, where the price of oil nearly trebled over the last year.

Fixed income markets have seen a significant correction in the first three months of 2021. Following the announcement of further US fiscal stimulus in January, investors re-appraised their inflation expectations, and the prospect of interest rates rises as a future policy tool to combat rampant inflation, resulting in sharp falls in capital values of fixed interest government bond markets. The more economically-sensitive areas of bond markets recorded positive returns over the year. Both investment grade and high yield bond markets managed to hold on to some of their earlier gains made on the back of an improvement in market sentiment and the US Federal Reserve announcing last April that it would start to buy corporate bonds as part of its money printing programme.

The rise in government bond (gilt) yields at the start of 2021 will be welcome news for UK pension schemes, who will have seen significant falls in the value of their liabilities following a sustained period of increasing liabilities.

The Trustee's Report (Cont)

The returns from major global asset classes during the twelve months, three years and five years to 31 March 2021 are set out in the table below.

Asset Class	1 Year (%)	3 Years (% p.a.)	5 Years (% p.a.)
Equities			
UK Equities	26.7	3.2	6.3
North American Equities	42.8	17.7	17.4
European Equities (ex UK)	34.9	8.4	11.3
Japanese Equities	26.3	7.0	11.8
Pacific Basin Equities (ex Japan)	50.6	9.2	12.7
Emerging Market Equities	40.8	7.7	13.0
Equities (£-Hedged)			
North American Equities (Hedged)	58.0	17.0	16.4
European Equities (ex UK) (Hedged)	40.8	9.2	10.1
Japanese Equities (Hedged)	43.8	7.8	10.5
Pacific Basin Equities (ex Japan) (Hedged)	49.2	9.2	11.7
Emerging Market Equities (Hedged)	53.1	9.9	13.0
Bonds			
UK Gilts (All Stocks)	-5.5	2.5	2.9
UK Gilts (Over 15 Years)	-10.4	3.3	4.8
UK Index-Linked Gilts (All Stocks)	2.3	3.3	5.8
UK Corporate Bonds (All Stocks)	7.0	4.0	4.5
UK Corporate Bonds (Over 15 Years)	9.2	5.9	7.0
Overseas Government Bonds	-9.9	2.4	2.7
Other Asset Classes			
Commercial Property	2.6	2.7	4.6
Cash	0.2	0.5	0.5
Oil	188.9	-3.0	9.1
Gold	5.7	8.8	6.7

Source: Refinitiv Datastream, managers

Approval of Trustee's Report

This report was approved by the Trustee on

Date: 16TH SEPTEMBER 2021.

Signed on behalf of the Trustee:

Trustee Director

C.T. CROOK

Independent Auditor's Report to the Trustee of the University of Sussex Pension and Assurance Scheme

Opinion

We have audited the Financial Statements of the University of Sussex Pension and Assurance Scheme for the year ended 31 March 2021 which comprise Fund Account, the Statement of Net Assets available for benefits and notes to the Financial Statements, including significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards including FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the Financial Statements:

- show a true and fair view of the financial transactions of the Scheme during the year ended 31 March 2021, and of the amount and disposition at that date of its assets and liabilities, other than the liabilities to pay pensions and benefits after the end of the year;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, made under the Pensions Act 1995.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the Financial Statements section of our report. We are independent of the Scheme in accordance with the ethical requirements that are relevant to our audit of the Financial Statements in the UK, including the FRC's Ethical Standard and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the financial documents, we have concluded that the Scheme's Trustees' use of the going concern basis of accounting in the preparation of the Financial Statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Scheme's ability to continue as a going concern for a period of at least twelve months from when the Financial Statements are authorised for issue.

Our responsibilities and the responsibilities of the Scheme's Trustees with respect to going concern are described in the relevant sections of this report.

Other information

The other information comprises the information included in the annual report, other than the Financial Statements and our Auditor's report thereon. The Scheme's Trustees are responsible for the other information contained within the annual report. Our opinion on the Financial Statements does not cover the other information and we do not express any form of assurance conclusion thereon.

Independent Auditor's Report to the Trustee of the University of Sussex Pension and Assurance Scheme (Cont)

Our responsibility is to read the other information, and in doing so, consider whether the other information is materially inconsistent with the Financial Statements or our knowledge obtained in the course of the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether this gives rise to a material misstatement in the Financial Statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Responsibilities of the Trustee

As explained more fully in the Trustees' responsibilities statement page 7, the Trustees are responsible for the preparation of Financial Statements and for being satisfied that they give a true and fair view, and for such internal control as the Trustees determine 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 Trustees are responsible for assessing the Scheme'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 the Trustees either intend to liquidate the Scheme or to cease operations, or have no realistic alternative but to do so.

Auditors' responsibilities for the audit of the financial statements

Our 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 our 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 economic decisions of users taken on the basis of these Financial Statements.

The extent to which the Audit was considered capable of detecting irregularities, including fraud

Irregularities are instances of non-compliance with laws and regulations. The objectives of our audit are to obtain sufficient appropriate audit evidence regarding compliance with laws and regulations that have a direct effect on the determination of material amounts and disclosures in the Financial Statements, to perform audit procedures to help identify instances of non-compliance with other laws and regulations that may have a material effect on the Financial Statements, and to respond appropriately to identified or suspected non-compliance with laws and regulations identified during the audit.

In relation to fraud, the objectives of our audit are to identify and assess the risk of material misstatement of the Financial Statements due to fraud, to obtain sufficient appropriate audit evidence regarding the assessed risks of material misstatement due to fraud through designing and implementing appropriate responses and to respond appropriately to fraud or suspected fraud identified during the audit.

However, it is the primary responsibility of management, with the oversight of those charged with governance, to ensure that the entity's operations are conducted in accordance with the provisions of laws and regulations and for the prevention and detection of fraud.

Independent Auditor's Report to the Trustee of the University of Sussex Pension and Assurance Scheme (Cont)

In identifying and assessing risks of material misstatement in respect of irregularities, including fraud, the audit engagement team:

- obtained an understanding of the nature of the environment, including the legal and regulatory framework that the Scheme operates in and how the Scheme is complying with the legal and regulatory framework;
- inquired of management, and those charged with governance, about their own identification and assessment of the risks of irregularities, including any known actual, suspected or alleged instances of fraud;
- discussed matters about non-compliance with laws and regulations and how fraud might occur including assessment of how and where the Financial Statements may be susceptible to fraud.

As a result of these procedures we consider the most significant laws and regulations that have a direct impact on the Financial Statements are the Pensions Act 1995 and 2004 and regulations made under them and FRS 102, including the Financial Reports of Pension Schemes 2018 (the Pensions SORP). We performed audit procedures to detect non-compliances which may have a material impact on the Financial Statements which included reviewing financial statement disclosures.

The audit engagement team identified the risk of management override of controls as an area where the Financial Statements were most susceptible to material misstatement due to fraud. Audit procedures performed included but were not limited to testing manual journal entries and other adjustments, evaluating the business rationale in relation to significant, unusual transactions and transactions entered into outside the normal course of business and challenging judgments and estimates.

A further description of our responsibilities for the audit of the Financial Statements is located on the Financial Reporting Council's website at http://www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Use of our report

This report is made solely to the Scheme's Trustees as a body, in accordance with Regulation 3 of the Occupational Pension Schemes (Requirements to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996 made under the Pensions Act 1995. Our audit work has been undertaken so that we might state to the Scheme's Trustees those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Scheme and the Scheme's Trustees as a body, for our audit work, for this report, or for the opinions we have formed.

RSM UK Audit LLP

RSM UK AUDIT LLP
Statutory Auditor
Chartered Accountants
Portland, 25 High Street
Crawley, West Sussex
RH10 1BG

Date: 16 September 2021

Summary of contributions payable in the year

During the year, the contributions payable to the Scheme by the Employer under the Schedule of Contributions were as follows:

	£000
Employer normal contributions	641
Employer deficit funding contributions	3,479
Employer salary sacrifice contributions	223
Members' normal contributions	21
Contributions payable under the Schedules of Contributions	4,364

Signed on behalf of the Trustee:

Trustee Director

C. T. CROOK

Date: 16TH SEPTEMBER 2021

Independent Auditor's Statement about Contributions to the Trustee of the University of Sussex Pension and Assurance Scheme

Statement about contributions payable under schedule of contributions

We have examined the summary of contributions payable to the University of Sussex Pension and Assurance Scheme on page 19, in respect of the Scheme year ended 31 March 2021, to which this statement is attached.

In our opinion the contributions for the Scheme year ended 31 March 2021 as reported in the attached summary of contributions on page 19 and payable under the Schedule of Contributions have in all material respects been paid at least in accordance with the Schedule of Contributions certified by the actuary on 4 April 2019.

Scope of work on statement about contributions

Our examination involves obtaining evidence sufficient to give reasonable assurance that contributions reported on page 19 have in all material respects been paid at least in accordance with the Schedule of Contributions. This includes an examination, on a test basis, of evidence relevant to the amounts of contributions payable to the Scheme and the timing of those payments under the Schedule of Contributions.

Respective responsibilities of the Trustee and the auditor

As explained more fully in the Statement of Trustee' Responsibilities, the Scheme's Trustee is responsible for ensuring that there is prepared, maintained and from time to time revised a Schedule of Contributions showing the rates and due dates of certain contributions payable towards the Scheme by or on behalf of the Employer and the active members of the Scheme. The Trustee is also responsible for keeping records in respect of contributions received in respect of active members of the Scheme and for monitoring whether contributions are made to the Scheme by the employer in accordance with the Schedule of Contributions.

It is our responsibility to provide a statement about contributions paid under the Schedule of Contributions and to report our opinion to you.

Use of our statement

This statement is made solely to the Scheme's Trustee as a body, in accordance with the Pensions Act 1995. Our audit work has been undertaken so that we might state to the Scheme's Trustee those matters we are required to state to them in an auditor's statement and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Scheme and the Scheme's Trustee as a body, for our audit work, for this statement, or for the opinions we have formed.

RSM UK Audit LLP

RSM UK AUDIT LLP
Statutory Auditor
Chartered Accountants
Portland, 25 High Street,
Crawley, West Sussex
RH10 1BG

Date: 16 September 2021

The Financial Statements

Fund Account

for the year ended 31 March 2021

	Note	31 March 2021	31 March 2020
		£000	£000
Contributions and benefits			
Employer contributions		4,343	4,331
Employee contributions		21	25
Total contributions	4	4,364	4,356
Other Income	5	163	-
		4,527	-
Benefits paid or payable	6	(5,847)	(5,037)
Payments to and on account of leavers	7	-	(35)
Administrative expenses	8	(379)	(319)
Other payments	9	(17)	(25)
		(6,243)	(5,416)
Net withdrawals from dealings with members		(1,716)	(1,060)
Returns on investments			
Investment Income	10	-	2
Change in market value of investments	11	23,120	(5,969)
Investment management expenses	12	(181)	(203)
Net returns on investments		22,939	(6,170)
Net increase / (decrease) in the fund during the year		21,223	(7,230)
Net assets of the Scheme			
At 1 April		121,353	128,583
At 31 March		142,576	121,353

The notes on pages 23 to 30 form part of these financial statements.

Statement of Net Assets

Available for benefits as at 31 March 2021

	Note	31 March 2021	31 March 2020
		£000	£000
Investment assets:	11		
Pooled investment vehicles	14	141,969	120,679
		141,969	120,679
Current assets	18	749	829
Current liabilities	19	(142)	(155)
Net assets of the Scheme at 31 March available for benefits		142,576	121,353

The financial statements summarise the transactions of the Scheme and deal with the net assets at the disposal of the Trustee. They do not take account of obligations to pay pensions and benefits which fall due after the end of the Scheme year. The actuarial position of the Scheme, which takes into account such obligations, is dealt with in the Report on Actuarial Liabilities on pages 8 to 9 of the Annual Report and these financial statements should be read in conjunction with this report.

The notes on pages 23 to 30 form part of these financial statements.

These financial statements were approved by the Trustee on

Date: 16TH SEPTEMBER 2021

Signed on behalf of the Trustee:

Trustee Director

C. T. CROOK.

Notes to the Financial Statements

1. Basis of preparation

The individual financial statements have been prepared in accordance with the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, Financial Reporting Standard 102 – The Financial Reporting Standard applicable in the UK and Republic of Ireland, and the guidance set out in the Statement of Recommended Practice (Revised 2018).

The Financial Statements have been prepared on the going concern basis. As noted in the Trustee's Report on page 3, the Trustee has assessed the impact of the COVID-19 pandemic in terms of its effect on the Scheme's assets, technical provisions and the employer covenant. The employer continues to provide regular updates to the Trustee and will continue to report any material uncertainty that casts significant doubt upon the ability of the Scheme to continue on a going concern. From the perspective of the Scheme, the Trustee remains confident that the Employer will continue to support the Scheme and the benefits arising from it. The Trustee continues to prepare the accounts on a going concern basis.

At the date of signing these financial statements the Trustee believes that; due to its investments structure and the strength of the employer the Scheme is comfortably able to cover its related outgoings until at least 12 months from the date of signing.

2. Identification of the financial statements

The Scheme is established as a trust under English law. The address for enquiries to the Scheme is included in the Trustee's Report.

3. Accounting policies

The principal accounting policies of the Scheme which are applied consistently are as follows:

Currency

- The Scheme's functional and presentational currency is pounds sterling.

Contributions

- Employee contributions are accounted for by the Trustee when they are deducted from pay by the Employer.
- Employer normal contributions that are expressed as a rate of salary are accounted for on the same basis as the employees' contributions, in accordance with the Schedule of Contributions in force during the year.
- Employer normal contributions include contributions in respect of salary sacrifice arrangements made available to the members by the Employer.
- Employer additional contributions are accounted for in accordance with the agreement under which they are payable.
- Employer deficit funding contributions are accounted for on the due dates on which they are payable under the Schedule of Contributions or on receipt if earlier with the agreement of the Employer and Trustee.

Payments to members

- Pensions in payment are accounted for in the period to which they relate.
- Benefits are accounted for in the period in which the member notifies the Trustee of their decision on the type or amount of benefit to be taken, or if there is no member choice, on the date of retiring or leaving.
- Individual transfers in or out of the Scheme are accounted for when member liability is accepted or discharged which is normally when the transfer amount is paid or received.

Expenses

- Expenses are accounted for on an accruals basis.
- Investment management expenses are accounted for on an accruals basis.

Notes to the Financial Statements (Cont)

Investment income

- Investment income arising from the underlying investments of the pooled investment vehicles is reinvested within the pooled investment vehicles and reflected in the unit price. Thus, it is reported within "Change in market value".
- Interest on cash balances are accounted for on an accruals basis.

Investments

- The change in market value of investments during the year comprises all increases and decreases in the market value of investments held at any time during the year, including profits and losses realised on sales of investments during the year.
- Unitised pooled investment vehicles have been valued at the latest available bid price or single price provided by the pooled investment manager.
- Annuities purchased by the Trustee which fully provide the benefits for certain members are not included as assets of the Scheme as they are deemed not material. The cost of purchasing these annuities is reported under benefits payable within the Fund Account.

4. Contributions

	2021	2020
	£000	£000
Employer contributions		
Normal	641	712
Deficit funding	3,479	3,371
Salary sacrifice	223	248
Employee contributions		
Normal	21	25
	4,364	4,356

Deficit contributions of £275,085 are payable monthly, inflating at 3.2% per annum each year with the first increase effective from 1 August 2019. The contributions are payable until 28 February 2025.

5. Other income

	2021	2020
	£	£
Claims on term insurance policies	163	-

6. Benefits paid or payable

	2021	2020
	£000	£000
Pensions	4,739	4,613
Commutation of pensions and lump sum retirement benefits	845	390
Lump sum death benefits	263	34
	5,847	5,037

7. Payments to and on account of leavers

	2021	2020
	£000	£000
Individual transfers to other Schemes	-	36
Payments for members joining state schemes	-	(1)
	-	35

Notes to the Financial Statements (Cont)

8. Administrative expenses

	2021 £000	2020 £000
Administration and processing	223	205
Actuarial fees	113	85
Audit fee	23	14
Legal and other professional fees	20	15
	379	319

The PPF Levy is paid directly by the Employer. All other administrative expenses are paid by the Scheme.

9. Other payments

	2021 £000	2020 £000
Premiums on term insurance policies	17	25

A policy is held with Zurich Assurance Limited to cover the Scheme against lump sum payments in the event of a member's death during service up to normal retirement date as well as in other, pre-specified circumstances.

10. Investment income

	2021 £000	2020 £000
Interest on cash deposits	-	2

11. Reconciliation of investments

	Value at 31 March 2020 £000	Purchases at cost £000	Sales proceeds £000	Change in market value £000	Value at 31 March 2021 £000
Pooled investment vehicles	120,679	7,225	(9,055)	23,120	141,969

*A total of £89,434 in respect of deferred pensioner benefits where the member only has a money purchase benefit in the Scheme from a former Protected Rights pot is included in the total Scheme assets at 31 March 2021.

The pooled investment vehicles in which the Scheme has invested are all operated or managed by companies registered in the United Kingdom.

Indirect costs are incurred through the bid-offer spread on investments within pooled investment vehicles and charges made within those vehicles. The amount of indirect costs is not separately provided to the Scheme. There are no direct transaction costs.

12. Investment management expenses

	2021 £000	2020 £000
Administration, management and custody	181	203

13. Taxation

The Scheme is a registered pension scheme under Chapter 2 of Part 4 of the Finance Act 2004 and is therefore exempt from income tax and capital gains tax.

Notes to the Financial Statements (Cont)

14. Pooled investment vehicles

The Scheme's investments in pooled investment vehicles at the year-end comprised:

	2021	2020
	£000	£000
Equities	73,259	54,371
Bonds	68,275	65,972
Cash	435	336
	141,969	120,679

15. Fair value determination

The fair value of financial instruments has been estimated using the following fair value hierarchy:

Level 1: The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the measurement date.

Level 2: Inputs other than quoted prices included within Level 1 that are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly.

Level 3: Inputs are unobservable (i.e. for which market data is unavailable) for the asset or liability.

The Scheme's investment assets have been fair valued using the above hierarchy levels as follows:

	As at 31 March 2021			
	Level 1	Level 2	Level 3	Total
	£000	£000	£000	£000
Pooled investment vehicles	-	141,969	-	141,969

	As at 31 March 2020			
	Level 1	Level 2	Level 3	Total
	£000	£000	£000	£000
Pooled investment vehicles	-	120,679	-	120,679

16. Investment risk disclosures

Investment risks

FRS102 requires the disclosure of information in relation to certain investment risks as follows:

- Credit risk – one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.
- Market risk – comprises the following three types of risk:
  1. Interest rate risk: The risk that the fair value or future cashflows of a financial asset will fluctuate because of changes in market interest rates
  2. Currency risk: The risk that the fair value or future cashflows of a financial asset will fluctuate because of changes in foreign exchange rates
  3. Other price risk: The risk that the fair value or future cashflows of a financial asset will fluctuate because of changes in market prices (other than those due to interest rates and currency).

The Trustee determines its investment strategy after taking advice from a professional investment adviser. The Scheme has exposure to these risks because of the investments it makes in following the investment strategy set out below. The Trustee manages investment risks, including credit risk and market risk, within agreed risk limits which are set taking into account the Scheme's strategic investment objectives. These investment objectives and risk limits are implemented through the investment management agreements in place with the Scheme's investment managers and monitored by the Trustee by regular reviews of the investment portfolio.

Notes to the Financial Statements (Cont)

16. Investment risk disclosures (Cont)

Further information on the Trustee's approach to risk management, credit and market risk is set out below. This does not include AVC investments as these are not considered significant in relation to the overall investments of the Scheme.

Investment strategy

The investment objective of the Scheme is to maintain a portfolio of suitable assets of appropriate liquidity which will generate investment returns to meet, together with future contributions, the benefits of the Scheme payable under the Trust Deed and Rules as they fall due.

The Trustee sets the investment strategy for the Scheme taking into account considerations such as the strength of the employer covenant, the long term liabilities of the Scheme and the funding agreed with the Employer. The investment strategy is set out in the Scheme's Statement of Investment Principles (SIP).

Summary

The Scheme's invested assets and *direct* risks as at 31 March 2021 are summarised in the table below.

Fund	Credit Risk	Currency Risk	Interest Rate Risk	Other Price Risk	2021 Value £m	2020 Value £m
Direct Holdings						
Pooled investment vehicles	●	○	○	○	142.0	120.1

Key: ● = Significant risk exposure, ◑ = Partial risk exposure, ○ = Immaterial/no risk exposure

The Scheme's invested assets and *indirect* risks as at 31 March 2021 are summarised in the table below.

Fund	Credit Risk	Currency Risk	Interest Rate Risk	Other Price Risk	2021 Value £m	2020 Value £m
Pooled Investment Vehicles						
UK Equity Index	○	○	○	●	24.2	18.6
North America Equity Index	○	●	○	●	11.4	8.7
North America Equity Index – GBP Hedged	○	○	○	●	11.5	8.7
Europe (ex-UK) Equity Index	○	●	○	●	4.3	3.3
Europe (ex-UK) Equity Index – GBP Hedged	○	○	○	●	4.4	3.3
Japan Equity Index	○	●	○	●	3.2	2.6
Asia Pacific (ex-Japan) Developed Equity Index	○	●	○	●	3.6	2.7
World Emerging Markets Equity Index	○	●	○	●	8.7	6.4
All Stocks Index-Linked Gilts Index	◑	○	●	●	39.5	38.8
Maturing Buy & Maintain Credit 2025-2029	●	○	●	○	25.9	24.6
Maturing Buy & Maintain Credit 2030-2034	●	○	●	○	4.8	2.1
Cash Fund	◑	○	●	○	0.5	0.3

Key: ● = Significant risk exposure, ◑ = Partial risk exposure, ○ = Immaterial/no risk exposure

Notes to the Financial Statements (Cont)

16. Investment risk disclosures (Cont)

Credit risk

Direct credit risk arising from pooled investment vehicles is mitigated by the underlying assets of the pooled arrangements being ring-fenced from the pooled managers, the regulatory environments in which the pooled managers operate, and the ongoing due diligence of the pooled manager. The Trustee carries out due diligence checks on the appointment of a new pooled investment manager and on an ongoing basis monitors any changes to the operating environment of the pooled manager.

Indirectly the Scheme has exposure to credit risk within some of the funds held. This risk is delegated to the manager, who monitors the magnitude of credit risk and exposure to bonds rated below investment grade over time, as the manager changes the underlying investments.

The manager also appoints custodians to further mitigate any credit risk.

Currency risk

The Scheme is exposed to currency risk because the unhedged overseas equity funds have overseas investments which are non-Sterling. The exposure to foreign currencies will vary over time as the manager changes its underlying investments. The Trustee considers the overseas currency exposure in the context of the overall investment strategy and believes it is appropriate.

Interest rate risk

The L&G All Stocks Index-Linked Gilts Index Fund, the L&G Maturing Buy & Maintain Credit Funds and the Cash Fund are subject to indirect interest rate risk. This risk is delegated to the manager and the exposure will vary over time as the underlying investments within the fund are altered by the manager.

Other price risk

All the equity funds and the L&G All Stocks Index-Linked Gilts Index Fund are subject to other price risk. The exposure to other price risk within the pooled funds will vary over time depending on how the managers change the underlying asset allocation. The Trustee believes that this risk is appropriately managed via diversification between the different asset classes and within each asset class. The Trustee monitors this risk on a regular basis, looking at the performance of the manager, asset class and holding, and works with its investment adviser to consider the appropriateness of all risk exposures within the portfolio. The Trustee receives an investment report on the overall management of the fund. This report is received quarterly.

17. Concentration of investments

The following investments each account for more than 5% of the Scheme's net assets at the year-end:

	2021		2020	
	£000	%	£000	%
Legal & General All Stocks Index Linked Gilts	39,565	27.8	39,319	32.3
Legal & General Maturing B&M C 2025-2029	25,808	18.1	24,552	20.2
Legal & General UK Equity Index Fund	25,209	17.7	16,840	13.8
Legal & General North America Equity Index Fund	11,375	8.0	9,231	7.6
Legal & General North America Equity Index Fund – GBP Hedged	12,084	8.5	8,754	7.2
Legal & General World Emerging Markets Equity Index	8,680	6.1	6,724	5.5

Notes to the Financial Statements (Cont)

18. Current assets

	2021	2020
	£000	£000
Contributions due from employer in respect of:		
Employers	342	342
Employees	19	22
Overpaid pensions	1	1
Sundry debtors	3	7
Cash balances	384	457
	749	829

Contributions due to the Scheme at the year-end have been paid subsequent to the year-end in accordance with the Schedule of Contributions.

19. Current liabilities

	2021	2020
	£000	£000
Unpaid benefits	(47)	(47)
Accrued expenses	(95)	(108)
	(142)	(155)

20. Related party transactions

The Scheme has received contributions in respect of five Trustee Directors who are or were contributing members of the Scheme during the year and has also paid benefits to one Trustee Directors who is a beneficiary of the Scheme.

The Sponsoring Employer has also paid the PPF Levy expense directly in line with the Schedule of Contributions.

All of the above transactions were made in accordance with the Scheme Rules.

21. Employer-related investments

Contributions are normally received by the Trustee in the subsequent month to that in which they are due. Under the accruals basis of accounting, these contributions are therefore shown as outstanding. However, as the contributions were received in line with the Schedule of Contributions after the year-end, they do not become employer-related investments.

There were no direct or indirect employer-related investments held during the year or at the year-end.

22. Capital commitments

There were no capital commitments at the year-end.

Notes to the Financial Statements (Cont)

23. GMP Equalisation

As explained on page 3 of the Trustee's Report, on 26 October 2018, the High Court ruled that Guaranteed Minimum Pension (GMP) benefits provided to members of pension schemes must be recalculated to reflect equalisation requirements between 17 May 1990 and 6 April 1997. As a result of the ruling, the Trustee of the Scheme will need to equalise GMPs between men and women and are required to backdate benefit adjustments in relation to GMP equalisation and provide interest on the backdated amounts.

At this point in time a method of equalisation for the Scheme has not yet been agreed by the Trustee and the Employers. The Trustee expects to consider the approach to be taken after obtaining legal and actuarial advice as well as reviewing the expected guidance from the Pensions Regulator and DWP.

The Trustee has not yet carried out any liability estimates in relation to GMP equalisation, however it has established a reserve of 1% of the technical provisions liability in the statutory funding valuation carried out as at 31 March 2018. Based on an initial assessment of the likely backdated amounts and related interest the Trustee does not expect these to be material to the financial statements and therefore have not included a liability in respect of these matters in these financial statements. They will be accounted for in the year they are determined.

On 20 November 2020, the High Court handed down a second judgment involving the Lloyds Banking Group's defined benefit pension schemes. This latest judgment confirms that defined benefit schemes which provide GMPs need to revisit and where necessary top up historic Cash Equivalent Transfer Values that were calculated based on unequalised benefits. Again, the issues determined by the judgment arise in relation to many other defined benefit pension schemes. Any adjustments necessary will be recognised in the financial statements in future years. At the date of signing these financial statements it is not possible to estimate the value of any such adjustments.

Certificate of Adequacy of Contributions

Name of the Scheme	University of Sussex Pension & Assurance Scheme

Adequacy of rates of contributions

1. I certify that, in my opinion, the rates of contributions shown in this Schedule of Contributions are such that the statutory funding objective could have been expected on 31 March 2018 to be met by the end of the period specified in the Recovery Plan dated 12 March 2019.

Adherence to statement of funding principles

2. I hereby certify that, in my opinion, this Schedule of Contributions is consistent with the statement of funding principles dated 12 March 2019.

The certification of the adequacy of the rates of contributions for the purpose of securing that the statutory funding objective can be expected to be met is not a certification of their adequacy for the purpose of securing the Scheme's liabilities by the purchase of annuities, if the Scheme were to be wound up.

Signature	Unnichalls
Name	Kirstie Nicholls
Date of signing	4 April 2019.
Qualification	Fellow of the Institute and Faculty of Actuaries
Name of employer	Mercer Limited
Address	Mercer One Christchurch Way Woking GU21 6JG

Schedule of Contributions

The University of Sussex Pension & Assurance Scheme ("the Scheme")

Status of this document

This Schedule has been prepared by the University of Sussex Pension & Assurance Scheme Trustee Limited, the Trustee of the University of Sussex Pension & Assurance Scheme ("the Trustee") to satisfy the requirements of section 227 of the Pensions Act 2004, after obtaining the advice of Kirstie Nicholls, the Actuary to the Scheme appointed by the Trustee.

This document is the 9th Schedule of Contributions put in place for the Scheme. It supersedes all earlier versions.

After discussions, a pattern of contributions was agreed by the Trustee, the University of Sussex and the Institute of Development Studies (together "the Employers"), on 8 February 2019.

The Trustee and the Employers have signed this Schedule to indicate that it represents an accurate record of the agreed pattern of contributions.

The Schedule is effective from the date it is certified by the Scheme Actuary.

Contributions to be paid to the Scheme from 1 April 2019 to 28 February 2025

Members' contributions

Active members shall pay contributions monthly at the rate of 9% of Pensionable Earnings, or such rate as may be required under the Rules of the Scheme from time to time.

These contributions will be deducted from salary by the Employers and paid towards the Scheme by the 19th of the following calendar month or by the 22nd of the following month if paid electronically.

Where an active member participates in the Pension Salary Exchange, the active member shall not be required to contribute and instead the Employer will pay the contributions on the member's behalf.

This Schedule does not cover the Employers' commitment to pay across to the Trustee additional voluntary contributions (AVCs) made by members.

Employers' contributions in respect of future accrual of benefits

The Employers will normally pay contributions as set out below but can, where agreed with the Trustee, pay contributions earlier than indicated.

The Employers shall pay contributions no less frequently than monthly, at least on the following basis:

Periods up to 31 March 2019:

- 28.1% of Pensionable Earnings, less member contributions (other than Additional Voluntary Contributions)

Periods From 1 April 2019:

- 32.5% of Pensionable Earnings, less member contributions (other than Additional Voluntary Contributions)

Contributions shall fall due on the last day of each calendar month in respect of that month, and shall be paid by the 19th of the subsequent month or by the 22nd of the following month if paid electronically. However, the Trustee and Employers can agree for payments to be made earlier if appropriate and, if so, the date of payment will become the due date.

Employers' contributions in respect of the shortfall in funding as per the Recovery Plan of 12 March 019

To correct the shortfall, the Employers will pay a contribution of at least £275,085 each month from 1 April 2019 to 28 February 2025 increasing at 3.2% each year on 1 August, with the first such increase being 1 August 2019.

Contributions will continue to be paid in line with the previous Recovery Plan up to 1 April 2019.

As above, these contributions shall normally fall due on the last day of each calendar month in respect of that month, and shall be paid by the 19th of the subsequent month. However, the Trustee and Employers can agree for payments to be made earlier than their due dates if appropriate and, if so, the date of payment will become the due date.

Employers' contributions in respect of benefit augmentations

In addition the Employers shall pay the cost, as determined by the Scheme Actuary, of any benefit augmentations requested by the Employers and approved by the Trustee.

Employers' contributions in respect of administration and other costs

The above contribution rate in respect of future accrual includes an allowance of 0.9% p.a. of Pensionable Earnings in respect of the cost of life insurance.

The shortfall-correction contributions include an allowance for Scheme administration expenses of £383,569 per annum, increasing at 3.1% per annum.

The Employers will, in addition to the contributions set out above, pay to the Scheme the levy payable to the Pension Protection Fund, based on the invoice received from the PPF each year.

Pensionable Earnings

For the purposes of this Schedule, Pensionable Earnings are defined in the Scheme's Trust Deed and Rules as altered by the deed of amendment dated 13 October 2011, i.e. a member's basic salary or wage plus any contractual permanent additions notified as pensionable plus, for a member participating in Pensions Salary Exchange, any additional earnings that would have been included in the members basic salary or wage if he had not been participating.

The monthly contributions are calculated using monthly Pensionable Earnings determined from monthly earnings.

Arrangements for other parties to make payments to the Scheme

There are no arrangements for anyone other than the Employers or a Scheme member to contribute to the Scheme.

Dates of review of this Schedule

This Schedule of Contributions will be reviewed by the Trustee and the Employers no later than 15 months after the effective date of each actuarial valuation, due every three years.

Employers and Trustee agreement

This Schedule of Contributions has been agreed by the Employers and the Trustee on 12 March 2019.

Signed on behalf of the University of Sussex	
Name	TIM WESTLAKE
Position	COO
Date of signing	12/3/19
Signed on behalf of the Institute of Development Studies	T.P. Catherall
Name	TIM CATHERALL
Position	DIRECTOR OF FINANCE & OPS
Date of signing	1/4/19
Signed on behalf of the University of Sussex Pension & Assurance Scheme Trustee Limited	
Name	CHRISTOPHER CROOK
Position	CHAIR USPAS TRUSTEE BOARD
Date of signing	2/4/19

Implementation Statement

The purpose of this Statement is to provide information, which is required to be disclosed in accordance with the Occupational Pension Schemes (Investment and Disclosure) (Amendment) 2019 Regulations. In particular, it confirms how the investment principles, objectives and policies contained within the Trustee's Statement of Investment Principles (SIP) dated 28 September 2020 have been implemented. The SIP provides further background details on the Scheme's investment arrangements, and this should be read in conjunction with the Trustee's Chair's Statement dated 29 September 2020.

This Statement covers the period 1 April 2020 to 31 March 2021.

Money Purchase benefits and underpins

The Scheme holds a small amount of money purchase assets (less than £80,000), which are a result of former protected rights benefits in respect of c.180 members. Separately, members' benefits that are determined by a defined benefit formula based on length of service and pay have a money purchase underpin attaching to them. In practice, the Trustee expects that these underpins are unlikely to bite for any members.

The Scheme does not operate default investment arrangements within the meaning of the Pensions Act 2008. For this reason, the Trustee believes that the disclosures required in relation to default investment arrangements are not applicable to this Statement.

The value of the money purchase benefits and underpin is determined by notional units in an 'investment fund' which is calculated based on the weighted unit price of the total Scheme assets, therefore there is no fund range or member choice to consider. Therefore, this Statement focuses on the defined benefit assets. More details can be found in the Chair's Statement available online at www.sussex.ac.uk/humanresources/payrollandpensions/pensions.

Investment manager and funds in use

The investment funds used are set out in the table below, which are all managed by Legal & General Investment Management (LGIM).

Asset Class	Fund	Target Asset Allocation
UK equities	LGIM UK Equity Index	17.0%
Global equities	LGIM North America Equity Index	8.0%
Global equities	LGIM North America Equity Index – GBP Currency Hedged	8.0%
Global equities	LGIM Europe (ex UK) Equity Index	3.0%
Global equities	LGIM Europe (ex UK) Equity Index – GBP Currency Hedged	3.0%
Global equities	LGIM Japan Equity Index	2.5%
Global equities	LGIM Asia Pacific (ex Japan) Equity Index	2.5%
Global equities	LGIM World Emerging Markets Equity Index	6.0%
Corporate bonds	LGIM Maturing Buy & Maintain Credit Funds	20.0%
Government bonds	LGIM All Stocks Index-Linked Gilts Index	30.0%
Total		**100.0%**

Implementation Statement (Cont)

Strategy Review

There have been no changes to the investment manager or target asset allocation over the year.

Scheme Governance

The Trustee board is responsible for making investment decisions, and seeks advice as appropriate from Broadstone Corporate Benefits Limited ('Broadstone'), as the Trustee's investment consultant.

The Trustee does not actively obtain views of the membership of the Scheme to help form the policies set out in the SIP as the Trustee's primary objective is to meet the benefits of the Scheme as they fall due, and the current investment strategy in place is intended to meet this objective. In addition, the Scheme is comprised of a diverse membership, which the Trustee expects to hold a broad range of views on ethical, political, social, environmental, and quality of life issues.

There were no changes to the objectives put in place for Broadstone since their appointment on 12 August 2020. The Trustee is due to formally review these objectives by November 2022, or earlier if required.

There were no changes to the investment management agreement with LGIM during the year.

Trustee Knowledge and Understanding

The Trustee board has the appropriate knowledge and understanding to ensure its policies on financially and non-financially material considerations, as well as engagement and voting activities, are and remain appropriate for the Scheme. The Trustee has developed its knowledge and understanding over the year, and further details are set out in the Chair's Statement covering the period to 31 March 2021.

Statement of Investment Principles

The Trustee last reviewed the Statement of Investment Principles (SIP) in September 2020, which was updated to comply with the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019. The SIP also confirms Broadstone as the Scheme's investment consultant.

The Trustee has a policy on financially material considerations relating to Environmental, Social and Governance (ESG) issues, including the risk associated with the impact of climate change. In addition, the Trustee has a policy on the exercise of rights and engagement activities, and a policy on non-financial considerations. These policies are set out below and are detailed in the SIP.

There were no departures from the policies set out in the SIP, including the Trustee's policies on financially and non-financially material considerations, during the year.

Implementation Statement (Cont)

Policy on financially and non-financially material considerations

Trustee's Policy:

The Trustee believes that environmental, social and corporate governance issues including the impact of, and potential policy response to, climate change can be financially material to long-term investment portfolios and should therefore be considered as part of the Scheme's investment process. Having also considered non-financial matters, and acknowledging that these are potentially important, given the pooled fund nature of the Scheme's investment arrangements the Trustee acknowledges that it cannot directly influence the selection, retention and realisation of investments. It is recognised that pooled funds represent the most practical approach, given the size of the Scheme's assets, and that these will be governed by the individual policies of the investment manager.

The Scheme's equity investments are managed on a passive index-tracking basis via pooled funds, i.e. the funds aim to track the relevant regional equity market index, which is in contrast to an actively managed approach where an investment manager can be more selective about the individual companies that it chooses to invest in. Therefore, for passive index-tracking funds, the investment manager has little flexibility other than to invest in the equity of the businesses in the proportion that they make up the appropriate underlying index. The Trustee believes that the passive index-tracking approach is appropriate and reflects its preference for a relatively low cost, low governance and simple approach to investing in equities.

However, the investment manager is recognised as a market leader in the areas of ESG and engaging with businesses, and through its engagement activities, including voting, the investment manager encourages all of its investee companies to incorporate appropriate sustainability and ESG (including climate change risk) policies into their corporate strategies. The investment manager has a separate dedicated ESG and engagement team which ensures that their approach to ESG is consistently applied throughout the firm and across all of the businesses in which it invests.

The Scheme's investment in pooled corporate bond funds is managed on a semi-active basis, and the investment manager takes into account ESG factors, and the potential financial impact of these, within its investment process for the selection, retention and realisation of investments. The Trustee acknowledges that as bond holders the investment manager will not typically have as much influence on a business as an equity holder, for example, bond holders are unlikely to have voting rights.

The investment manager produces regular reports on its activities in the area of ESG, including the initiatives it takes to influence companies and market participants (including governments and regulators).

Responsibility for monitoring the make-up and development of the capital structure of investee companies is delegated to the investment manager. The Trustee expects the extent to which the investment manager monitors capital structure to be appropriate to the nature of the mandate.

The Scheme is comprised of a diverse membership, expected to hold a broad range of views on ethical, political, social, environmental, and quality of life issues. The Trustee therefore does not explicitly seek to reflect any specific views through the implementation of the investment strategy.

Implementation Statement (Cont)

There have been no changes to the Trustee's policy, nor any departures from its policy, during the year.

The Trustee notes that the manner by which financially material ESG factors will be taken into account in an investment strategy or pooled fund offering will depend on the underlying asset classes within the pooled fund offering and the management style (e.g. active or passive).

The Trustee is satisfied that the funds currently invested in by the Scheme are managed in accordance with its views on financially material considerations, as set out below, and in particular with regards to the selection, retention, and realisation of the underlying investments held.

The Trustee has access to updates on governance and engagement activities by the investment manager, and input from the investment advisors on ESG matters. These views are also taken into account when appointing and reviewing investment managers.

The Trustee acknowledges that they are delegating the consideration of financially material factors in relation to determining the underlying holdings to its investment manager, given they are investing in pooled funds.

A summary of the Trustee's views for each asset class in which the Scheme invests is outlined below.

Asset Class	Actively or Passively Managed?	Comments
Equities	Passive	The Trustee acknowledges that the investment manager must invest in line with specified indices and, therefore, may not be able to disinvest from a particular security if it has concerns relating to ESG. The Trustee does expect the investment manager to take into account ESG considerations by engaging with companies that form the index, and by exercising voting rights on these companies.
Corporate bonds	Active	The Trustee expects the investment manager to take financially material ESG factors into account, given the active management style of the fund and the ability of the manager to use its discretion to generate higher risk adjusted returns. The Trustee also expects its investment manager to engage with investee companies, where possible, although they appreciate that fixed income assets do not typically attract voting rights.
Government bonds	Passive	The Trustee believes there is less scope for the consideration of ESG issues to improve risk-adjusted returns in this asset class because of the nature of the securities.

Implementation Statement (Cont)

Policy on the exercise of voting rights and engagement activities

Trustee's Policy:	***The Trustee believes that good stewardship can enhance long-term portfolio performance and is therefore in the best interests of the Scheme's beneficiaries and aligned with fiduciary duty.*** ***Given that the Scheme's investments are in pooled funds, the investment manager is responsible for the exercising of rights (including voting rights) and stewardship obligations related to the Scheme's investments, and the Trustee encourages the manager to exercise those rights.*** ***The Trustee expects its investment manager to monitor investee companies and engage with management on all relevant stewardship matters.*** ***In the Trustee's view, the investment manager takes its engagement responsibilities seriously, and encourages best practice in this area. The investment manager's dedicated engagement team ensures that their engagement policy is consistently applied across all of its investee companies. The manager engages in a broad number of areas, including ESG, diversity, remuneration, sustainability, Board composition, etc, and exercises its voting policy accordingly. The manager publishes regular reports detailing its engagement activities and voting records. The manager regularly votes against companies where it believes this is in its clients' best interests.*** ***The Trustee expects the Scheme's investment manager to discharge its responsibilities in accordance with the principles of the Financial Reporting Council's 2012 UK Stewardship Code ("the Code") as updated, as far as it is able. The manager reports on the extent of their adherence to the Code, alongside their broader stewardship activities on at least an annual basis***

There have been no changes to the Trustee's policy, nor any departures from its policy, during the year. In particular, all voting activities have been delegated to the investment manager, as the Trustee does not have any legal right to vote on the underlying holdings, given the pooled nature of the Scheme's investments.

The Trustee currently invests in pooled investment funds with the investment manager, and it acknowledges that this limits the ability to directly influence the investment manager.

However, the Trustee meets with LGIM periodically to engage with them on how they have taken ESG issues and voting rights into account for the investment approaches they manage on behalf of the Trustee. As a result, the Trustee has a greater understanding of LGIM's approach to ESG and has established regular activity reporting, including a summary of voting.

To complement this monitoring, the Trustee receives stewardship and governance reports from LGIM on a quarterly basis.

Within the current investment arrangements, the equity funds contain equity holdings, and therefore have voting rights attached. LGIM use a third party proxy voter to implement their voting policies when exercising voting rights. The third party proxy voter used is confirmed in the table below.

The Trustee has delegated engagement activities to its investment manager, and LGIM reports to the Trustee on how they have voted on behalf of the Trustee for the underlying holdings. A summary of the latest available voting data made by the investment manager from 1 April 2020 to 31 March 2021 on behalf of the Trustee is provided in the table below.

Implementation Statement (Cont)

Pooled Fund	Third Party Proxy Voter	Resolutions Voted On	Resolutions Voted:		
			For	Against	Abstained
LGIM UK Equity Index	ISS	12,574	93%	7%	0%
LGIM North America Equity Index	ISS	9,495	72%	28%	0%
LGIM North America Equity Index – GBP Hedged	ISS	9,495	72%	28%	0%
LGIM Europe (ex UK) Equity Index	ISS	11,399	84%	15%	1%
LGIM Europe (ex UK) Equity Index – GBP Hedged	ISS	11,399	84%	15%	1%
LGIM Japan Equity Index	ISS	6,518	86%	14%	0%
LGIM Asia Pacific (ex Japan) Equity Index	ISS	3,774	74%	26%	0%
LGIM World Emerging Markets Equity Index	ISS	35,996	85%	14%	1%

The Trustee has requested details of the significant votes and engagement activities made on behalf of the Trustee. Details of some significant votes and engagement activities are provided below:

- LGIM voted in favour of a resolution for Proctor & Gamble to report on their efforts to eliminate deforestation, as part of LGIM's five-year strategy to tackle climate change. P&G set a goal for 100% of the raw material palm oil to be from sustainable sources, but has only achieved one third, whilst suppliers have also been linked to illegal deforestation, a key driver of climate change. LGIM has asked P&G to respond to the concerns raised and continue to engage on the topic, and will monitor P&G's disclosure for improvement.
- LGIM engaged with International Consolidated Airline Group who were negatively impacted by the COVID-19 crisis and as a result took up governmental support packages and cut 30% of its workforce. LGIM were concerned about the high level of bonus payments proposed, which are 80% to 90% of salary for current executives, and voted against the resolution in September 2020. LGIM considers this vote significant as it illustrates the importance for investors of monitoring investee companies' responses to the COVID-19 crisis.
- A new report from ShareAction, a non-governmental organisation looking at resolutions related to human rights and diversity during the 2020 proxy voting season, highlighted LGIM as a top supporter. LGIM voted in favour of 100% of the resolutions relating to human rights and diversity, taking voting action against companies falling below their minimum standards on ESG issues.

The Trustee is comfortable with the investment manager's approach for exercising rights and conducting engagement activities, and specifically that they attempt to maximise shareholder value as a long-term investor. The Trustee also considers the investment manager's policies on stewardship and engagement when selecting and reviewing investment managers.

Implementation Statement (Cont)

Monitoring of Investment Arrangements

In addition to any reviews of the investment manager or its approach, and direct engagement with the investment manager (as detailed above), the Trustee receives performance reports on a quarterly basis from LGIM to ensure the investment objectives set out in the SIP are being met.

Signed: ____________________

Date: 16TH SEPTEMBER 2021

On behalf of the Trustee of the University of Sussex Pension & Assurance Scheme

Annual Governance Statement

UNIVERSITY OF SUSSEX PENSION AND ASSURANCE SCHEME (USPAS) ('THE SCHEME')

ANNUAL GOVERNANCE STATEMENT

As Chair of the Directors of the University of Sussex Pension & Assurance Scheme Trustee Limited, I present this statement of governance in relation to the Scheme's money purchase benefits over the period from 1 April 2020 to 31 March 2021. This statement covers the money purchase benefits under the Scheme which are in respect of former Protected Rights pots and separately 'money purchase' underpins in respect of the DB benefits. All of the Additional Voluntary Contribution funds (AVCs) have now been drawn as benefits and no further AVC assets remain within the Scheme.

This Statement does not contain advice in respect of actions that members should take and is not intended to be used for that purpose. If members need advice, they can get help finding a regulated financial adviser through the Government's MoneyHelper website at **www.moneyhelper.org.uk/en/pensions-and-retirement/taking-your-pension/find-a-retirement-adviser**.

Annual governance statement

The Occupational Pension Schemes (Charges and Governance) Regulations 2015 ('the Regulations') require trustees of **money purchase pension schemes** to prepare an annual statement that discloses how they have governed certain aspects of the scheme. A money purchase scheme is one where broadly, each member has their own savings pot into which both employer and member contributions are paid. The retirement benefits eventually paid to members are not known in advance but depend instead on factors such as the amounts of contributions that are paid, the investment returns that they earn and the charges that are deducted from savings. Members' outcomes at retirement are therefore partly affected by how well the Trustee carries out their investment governance functions as well as their ability to negotiate charges and services that provide good value for members. The purpose of the annual statement is for the Trustee to explain how they have exercised their responsibilities in these crucial areas.

Impact on the University of Sussex Pension and Assurance Scheme ('the Scheme')

The University of Sussex Pension and Assurance Scheme holds a small amount of money purchase assets, less than £90,000, which were as a result of former protected rights benefits – the 184 members that hold these benefits have no other benefits within the Scheme.

Separately the DB members' pensions at retirement are calculated on a defined benefit formula based on pay and length of service (1/60th of Final Pensionable Salary for each year of Pensionable Service), irrespective of investment returns or fund charges. However, these defined benefits have a money purchase underpin attaching to them. This means that the member contribution (currently 9% of Pensionable Salary) and any contributions paid prior to 6 April 2012 in respect of contracting out on a money purchase basis are notionally invested for each member in each pay period. When a member retires or transfers out, pension rights calculated on the defined benefit formula described above are compared against the benefits that could be provided from the accumulated notional value of the money purchase underpin. If the latter benefits are greater, the member's benefits will be topped up accordingly.

The money purchase underpin did not apply for any member during the reporting period and ongoing analysis indicates that money purchase underpins are very unlikely to exert any influence on members' outcomes in retirement.

The details which are covered in this statement to meet the Regulatory requirements are:

1. Details of the investment under the Scheme which members have assets invested;
2. Charges and transaction costs borne by members within the Scheme including an illustration of the cumulative effect of these charges;
3. Value for members;
4. The processing of core financial transactions; and
5. The Trustee's compliance with the statutory knowledge and understanding (TKU) requirements.

Covid-19

The beginning of 2020 saw the global outbreak of COVID-19 (Coronavirus) which continues to impact the global investment markets, affecting investors, companies and employees across the world. As a Trustee we take a long-term outlook for the performance of investments in the Scheme. Along with our advisors, we carefully monitor the Schemes' investments and have done so on a day-to-day basis with the continued development of the COVID-19 situation. We continue to keep our members informed and our priority remains to pay pension benefits as and when they become due both now and in the future to our members.

During the period the Trustee and their providers have, where needed, activated business continuity measures during this unprecedented time of national lockdowns. I am pleased to confirm that all of the Scheme's operations have been maintained successfully while these measures have been deployed. The Trustee has adopted an approach of managing Trustee meetings on-line. It is recognised that the Scheme administrator also had to quickly adapt to facilitating home working but the Trustee has not experienced any significant service disruption from the Scheme's administrator or investment managers in the period.

Default investment arrangement

The Trustee does not operate default investment arrangements within the meaning of the Pensions Act 2008 in relation to the money purchase benefits and underpins and the Scheme is not an auto-enrolment scheme. For this reason the Trustee believes that the disclosures required in the Regulations with regard to default investment arrangements are not applicable to this statement. For the same reason, the Trustee's Statement of Investment Principles (SIP), dated 28 September 2020, copy attached for completeness, does not contain wording relating to default investment arrangements. A copy of this Chair's Statement and the latest SIP are available on line within the HR section of the University's website (www.sussex.ac.uk/humanresources/payrollandpensions/pensions/uspas/uspas).

The value of the money purchase benefits and underpin is determined by notional units in an "investment fund" which is calculated based on the weighted unit price of the total Scheme assets, therefore there is no fund range or member choice to consider with regard to this element.

However, for completeness, below is the table of the Scheme's underlying investments, the target allocation and investment charge ranges applied in respect of the Scheme's assets.

Fund	**Benchmark Fund Allocation**	**Annual Management Charge**
UK Equity Index Fund	17.0%	0.100% p.a. on the first £10m 0.075% p.a. on the next £10m 0.060% p.a. on the next £30m 0.050% p.a. on the balance above £50m
North America Equity Index Fund	8.0%	0.200% p.a. on the first £1m 0.175% p.a. on the next £1.5m 0.150% p.a. on the next £7.5m 0.125% p.a. on the next £20m 0.100% p.a. on the next £20m 0.080% p.a. on the balance above £50m
North America Equity Index Fund – GBP Currency Hedged	8.0%	0.225% p.a. on the first £1m 0.200% p.a. on the next £1.5m 0.175% p.a. on the next £7.5m 0.150% p.a. on the next £20m 0.125% p.a. on the next £20m 0.105% p.a. on the balance above £50m
Europe (ex UK) Equity Index Fund	3.0%	0.250% p.a. on the first £1m 0.225% p.a. on the next £1.5m 0.200% p.a. on the next £7.5m 0.175% p.a. on the next £20m 0.150% p.a. on the next £20m 0.125% p.a. on the balance above £50m
Europe (ex UK) Equity Index Fund – GBP Currency Hedged	3.0%	0.275% p.a. on the first £1m 0.250% p.a. on the next £1.5m 0.225% p.a. on the next £7.5m 0.200% p.a. on the next £20m 0.175% p.a. on the next £20m 0.150% p.a. on the balance above £50m

Fund	Benchmark Fund Allocation	Annual Management Charge
Japan Equity Index Fund	2.5%	0.225% p.a. on the first £1m 0.200% p.a. on the next £1.5m 0.175% p.a. on the next £7.5m 0.150% p.a. on the next £20m 0.125% p.a. on the next £20m 0.100% p.a. on the balance above £50m
Asia Pacific (ex Japan) Equity Index Fund	2.5%	0.275% p.a. on the first £1m 0.250% p.a. on the next £1.5m 0.225% p.a. on the next £7.5m 0.200% p.a. on the next £20m 0.175% p.a. on the next £20m 0.150% p.a. on the balance above £50m
World Emerging Markets Equity Index Fund	6.0%	0.450% p.a. on the first £5m 0.350% p.a. on the next £5m 0.300% p.a. on the balance above £10m
All Stocks Index-Linked Gilts Index Fund	30.0%	0.100% p.a. on the first £5m 0.075% p.a. on the next £5m 0.050% p.a. on the next £20m 0.030% p.a. on the balance above £30m
Maturing Buy and Maintain Credit Fund	20.0%	0.100% on all assets

The charges deducted from the Scheme's investment funds relate entirely to investment management services and are detailed in the Statement of Investment Principles. No transaction costs are attributable to these notional investments.

The Trustee is responsible for the Scheme's investment governance which includes setting and monitoring the investment strategy. The Trustee takes regular advice from the Scheme's investment adviser and reviews the investment performance reports which are produced quarterly by the investment manager. A formal review of the investments was undertaken which concluded with the Statement of Investment Principles being adopted on 22 January 2020 (subsequently updated in September 2020 to adopt the latest reporting requirements). The outcome of the last review saw the investment in a new corporate bond issue and revised strategy for quarterly rebalancing. Whilst investment performance has been monitored throughout the period there has been no formal investment strategy review in the period covered by this Statement.

Reporting Charges and Transaction Costs

Over a period of time, the charges and transaction costs that are taken out of a member's pension savings can reduce that amount available to the member at retirement. The Trustee has set out below illustrations of the impact of charges on money purchase benefits under the Scheme, although as the underlying investments form part of the overall Scheme's assets there are a number of assumptions which have had to be used to prepare this illustration. The illustrations have taken account of the statutory guidance and in accordance with the regulatory requirements, we have prepared illustrations detailing the impact of the costs and charges typically paid by a member of the Scheme on their retirement savings pot.

To illustrate the impact of charges and costs on a typical member's pension pot, we have provided an example in the table below on the projected investment based on the benchmarked fund allocation under the Scheme and its expected return. This illustration takes into account the average pot size of the money purchase benefits recognising that no further contributions are paid into these benefits; investment returns above inflation (before charges and costs); adjustment for the effects for costs; and, charges and time.

We have shown example illustrations of what money invested in a pot based on the benchmarked fund allocation could be worth in 1, 2, 3, 5, 10, 15, 20, 25, and 30 years' time (allowing for the youngest member holding these benefits to reach age 65) taking inflation, investment costs and charges into account. These figures are shown in today's money, meaning they take into account expected inflation. For example, this shows that £470 invested by a member in the fund today, in 30 years' time, is expected to be worth £1,350, after charges, in today's money. The figures shown in the table below are just illustrations and are not a guarantee of future values.

Projected Money Purchase Fund		
Year End	Pot Size with no Charges Incurred	Pot Size with Charges Incurred
0	£470	£470
1	£490	£490
2	£510	£500
3	£520	£520
5	£560	£560
10	£680	£670
15	£820	£800
20	£980	£950
25	£1,180	£1,130
30	£1,420	£1,350

To ensure that these calculations are representative of the membership, the Trustee has made some assumptions in the producing these illustrations:

1. Values shown are estimated projections and are not guarantees or predictions.
2. The values have been rounded to the nearest £10 for illustration purposes.
3. The illustration allows for the youngest member with a money purchase benefit at age 35 (youngest member illustration) and continues for a period of 30 years until age 65 (normal retirement age).
4. The starting pot size is assumed to be £470, which is the average pot size, with no future contributions being paid.
5. Inflation is assumed to be 2.5% each year.
6. The projected growth rates before charges and costs is 3.75%.
7. The charge applied has been assumed at 0.16% per annum.

Charges and value for members

The Trustee is required to assess the extent to which member borne charges and transaction costs represent good value for members. It is difficult to give a precise legal definition of "good value", but the Trustee considers that it broadly means that the combination of costs and the quality of what is provided in return for those costs is appropriate for the Scheme membership as a whole, when compared to other options available in the market.

As mentioned, money purchase benefits are notionally invested in accordance with the Scheme's average asset allocation. Members are restricted to the one fund which is essentially targeting the funding of the Scheme's DB liabilities and does not take into account member choice or their individual circumstances (such as retirement destination, retirement age and risk appetite).

That said individual member money purchase benefits are very small, with an average fund value of less than £500 and in respect of the Scheme's money purchase underpins benefits it is extremely rare for these to 'bite' in practice. In other words, benefits calculated on the 1/60th formula described above are expected to almost always be far greater than those provided by the money purchase underpin.

The charges deducted from the Scheme's investment funds relate entirely to investment management services and are detailed in the Statement of Investment Principles. No transaction costs are attributable to these notional investments.

The Trustee has assessed that the size of the individual members' money purchase benefits which are generally of a low monetary value and therefore unlikely to see more favourable terms in comparison to benefits of similar size, and effectively benefit from the governance structure of the Scheme, therefore provide reasonable value for the members. Similarly the underpins are typically low when compared with the value of the attaching defined benefit rights and, as such, are unlikely to deliver any material value to members. For as long as this situation prevails, the Trustee's investment governance activities will likely have regard mainly to the Scheme's defined benefit obligations.

Core financial transactions

As required by the Administration Regulations, the Trustee must ensure that core financial transactions are processed promptly and accurately. Core financial transactions are (broadly) as set out below noting that not all of these will be relevant for the money purchase benefits under the Scheme:

- Investment of contributions made to the Scheme by members and their employer(s);
- Transfers into and out of the Scheme of assets relating to members;
- Switches of members' investments between different funds within the Scheme; and
- Payments from the Scheme to or in respect of members (e.g. payment of death benefits and on retirement).

The Trustee recognises that delay and error can cause significant losses for members. They can also cause members to lose faith in schemes which may in turn reduce their propensity to save and thereby impair future outcomes.

The Trustee has delegated the administration of the Scheme to Barnett Waddingham LLP. The administrator operates measures and controls aimed at ensuring that all financial transactions (such as benefit payments) are processed promptly and accurately – these were in place throughout the period covered by this Statement. The Trustee has agreed and monitors target timescales with the administrator for the calculation and payment of benefits such as retirement benefits and transfer values. The Trustee receives quarterly administration reports from the administrator which details the performance against the agreed service levels.

The Trustee has received assurance from the Scheme's administrator and has taken steps to try and ensure that there were adequate internal controls to ensure that core financial transactions relating to the Scheme were processed promptly and accurately during the Scheme Year.

A list of the key service levels is:

Nature of Event/Activity	**Target Turnaround (working days)**
Deaths	2
Deferred benefit statement	10
Retirement Quotation	10
Retirement Payment	5
Annuity Purchase	5
Transfer Out Calculation	10
Transfer Out Payment	3
Individual data changes	5
General queries	10
Cash Handling	5

These timescales are all comfortably within statutory timescales and have been agreed with the Trustee.

Crucially, all target timescales include allowance for tests to be carried out on whether money purchase underpins 'bite' i.e. whether their value is such that a member's benefits are uplifted.

The administrator records all member transactions and benefit processing activities in a work management system which assigns the relevant timescale to the task. They must disclose regularly to the Trustee their performance against these agreed timescales. These disclosures are included within the reports provided by the Scheme Administrator and are considered by the Trustee at each meeting. During the year these have ranged between 96% and 100% of activities being achieved within the service level targets.

The processes adopted by Barnett Waddingham to help meet the SLA's include:

- All member transactions and benefit processing activities recorded in a work management system which assigns the relevant timescale to the task
- Timeliness of transactions monitored and reported
- Regular monitoring of bank accounts
- Periodic internal audits undertaken to review consistency of practice, standards and control application.
- Payments checked and approved independently by one or more individuals (depending on value).

The current Administrator was appointed in January 2017 and as part of the appointment process the Trustee reviewed in detail the AAF01/06 report which sets out the details of how the administrator manages processes and risks. The latest publication of this report covering the period 1 April 2019 to 31 March 2020 has also been reviewed by the Trustee in the period covered by the Statement. It was the Independent Reporting Accountants' opinion that, in all material aspects, the controls were suitably designed and those tested operated effectively. The Report also highlighted all the relevant accreditations held by the administrator including the Cyber Essentials certification which the Trustee considers very important in this era of cyber security attacks.

The Auditor to the Scheme checks as part of the annual audit process that contributions to the Scheme are paid in accordance with the Scheme's rules. The auditor to the Scheme is RSM UK Audit LLP. The agreement with RSM UK with regard to audit services is reviewed annually.

The Schedule of Contributions sets out timescales for the University to remit monthly contributions to the Scheme. These timescales and compliance are reviewed regularly with detailed review in the annual audit. Whilst further contributions are not a consideration in respect of the former protected rights pots it is relevant in respect of the money purchase underpin. The Trustee believes that all financial transactions for the Scheme have been undertaken promptly and accurately in line with the processes in place during the period of this Statement.

The Scheme's Risk Register outlines key Scheme risks including the risks to Scheme members and these are monitored regularly and reviewed annually.

The Trustee is satisfied that over the period covered by this statement:

- the administrator was operating appropriate procedures, checks and controls and operating within the agreed SLA;
- there have been no material administration errors in relation to processing core financial transactions; and
- all core financial transactions have been processed promptly and accurately in line with the processes in place during the Scheme year.
- Following the end of the period the Trustee has been made aware that the treatment of the notional units in the calculations relating to money purchase benefits had not reflected the change in underlying investments in 2019. This has prompted a review of the methodology adopted in calculating benefit levels by the administrator and Scheme advisers. Historic cases which are impacted by this issue, i.e. those that have settled since the 2019 change, are currently being assessed and the Trustee will work with the administrator and advisers to remedy any financial impact identified.

Trustee Knowledge and resources

In accordance with sections 247 and 248 of the Pensions Act 2004, the Trustee is required to maintain an appropriate level of knowledge and understanding which, together with professional advice which is available to them, enables them to properly exercise their functions and duties in relation to the Scheme.

During the period, the Trustee Directors undertook a number of activities that involved giving consideration to pensions and trust law, the Scheme's governing documents and the Statement of Investment Principles. This allowed them to exercise their knowledge and understanding and to further strengthen their capabilities, for example, by developing their knowledge and understanding of the relevant principles relating to the funding and investment of occupational pension schemes. Details of how the conversance and knowledge and understanding requirements have been met during the period covered by this statement are set out below.

- The Trustee, with the help of their advisers, regularly consider training requirements to identify any knowledge gaps. The Trustee's investment and actuarial advisers proactively raise any changes in governance requirements and other relevant matters as they become aware of them. The Trustee's advisers would typically deliver training on such matters at Trustee meetings if they were material. The Trustee has undertaken ongoing training, both collectively as a group and individually to keep abreast of pension legislation and regulations and relevant developments over the Scheme year as well as demonstrating conversance with the Scheme documentation. In particular:
    - The Trustee reviewed formal publications from their advisers covering current pension topics as part of each Trustee meeting with the adviser also in attendance to provide relevant detail and in particular the impact on the Scheme such as CMA objectives and reporting requirements.
    - The Statement of Investment Principles was updated in 2020 and the Trustee received appropriate advice to understand the changes to that document.
    - The Trustee has undertaken training with regard to funding in July 2020 and preparation training for the Scheme valuation in February 2021, also noting training on valuation assumptions was received in April 2021 following the end of the period covered by this Statement.
- The Trustee has regularly reviewed the training needs of the Board to ensure that any new needs that arise are identified and that a plan is put in place to address them. This is considered at the Trustee meetings where relevant topics are considered to plan any training sessions for the forthcoming meetings.
- A training log is maintained in line with best practice and the training programme is reviewed annually to ensure it is up to date.

Further, the Trustee Directors consider that they have sufficient knowledge and understanding of the law relating to pensions and trusts and of the relevant principles relating to the funding and investment of occupational pension schemes to fulfil their duties. All the Trustee Directors are required to commit to completing training, either at the relevant meetings or by personal study. New Trustee Directors complete the Pensions Regulator's Trustee Toolkit (the Trustee Toolkit is a free online learning programme from the Pensions Regulator aimed at trustees of occupational pension schemes and designed to help trustees meet the minimum level of knowledge and understanding required by law) as part of their induction requirements.

All the Trustee Directors are familiar with and have access to copies of the current Scheme governing documentation, including the Trust Deed & Rules (together with any amendments), the SIP and key policies and procedures. In particular, the Trustee refers to the Trust Deed and Rules as part of considering and deciding to make any changes to the Scheme and, where relevant, deciding individual member cases, and the SIP is formally reviewed at least every three years and as part of making any change to the Scheme's investments. The SIP was reviewed during the period with a revised SIP being adopted in September 2020.

Regular training is provided on aspects of the Trustee Knowledge and Understanding requirements. Other training relates to topical items or specific issues under consideration and during the Scheme year. A training log is maintained in line with best practice and the training programme is reviewed annually to ensure it is up to date and is referenced in the Risk Register to reflect the importance of this area. Additionally, the Scheme has in place a structured induction process for new trustees with support for new Trustee Directors to complete the Regulator's Toolkit.

Taking into account the knowledge and experience of the Trustee Directors with the specialist advice (both in writing and whilst attending meetings) received from the appointed professional advisors (e.g. investment consultants, legal advisors), the Trustee Directors believe they are well placed to exercise their functions as Trustee Directors of the Scheme properly and effectively.

I confirm that the above Statement has been produced by the Trustee to the best of their knowledge.

Signed for and on behalf of The Chair of Directors of the University of Sussex Pension and Assurance Scheme Trustee Limited

Signature:

Name: C.T. CROOK

Position: Chair of the Trustee

Date: 16th SEPTEMBER 2021

Statement of Investment Principles

1. Introduction

The Trustee of the University of Sussex Pension and Assurance Scheme (the "Scheme") has drawn up this Statement of Investment Principles (the "Statement") to comply with Section 35 of the Pensions Act 1995, Section 244 of the Pensions Act 2004, the Occupational Pension Scheme (Investment) Regulations 2005, the Pension Protection Fund (Pensionable Service) and Occupational Pension Scheme (Investment and Disclosure) (Amendment and Modification) Regulations 2018, and the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.. The Statement is intended to affirm the investment principles that govern decisions about the Scheme's investments.

The Scheme's investment arrangements, based on the principles set out in this Statement, are detailed in the Investment Policy Implementation Document ("IPID") which is included as an Appendix to this Statement. The IPID will be reviewed promptly in response to any changes to the manager structure or strategy.

In preparing this Statement, the Trustee has consulted the University of Sussex and the Institute of Development Studies (the "Employers") to ascertain whether there are any material issues which the Trustee should be aware of in agreeing the Scheme's investment arrangements.

The Trustee seeks to maintain a good working relationship with the Employers and will discuss any proposed changes to the Statement with the Employers. However, the Trustee's fiduciary obligation is to the Scheme's members and this will take precedence over the Employers' wishes.

The Trustee will seek to adopt investment arrangements that are in keeping with best practice, including the principles underlying the (Myners) Code of Best Practice for pension fund investment published in 2001 and updated in 2008.

2. Process For Choosing Investments

The process for choosing investments follows the identification of appropriate investment objectives, including the funding objective, target expected return from the Scheme's assets and the appropriate level of risk.

In considering the appropriate investments for the Scheme, the Trustee has obtained and considered the written advice of Broadstone Corporate Benefits Limited, who the Trustee believes to be suitably qualified to provide such advice.

3. Defined Benefit Assets

3.1. Investment Objectives

The Trustee's objective is to invest the defined benefit assets in the best interest of the members and beneficiaries and, in the case of a potential conflict of interest, in the sole interest of the members and beneficiaries. Within this framework, the Trustee has agreed a number of objectives with the Employers to help guide them in their strategic management of the assets and control of the various risks to which the Scheme is exposed. The Trustee's primary objectives are as follows:

- To ensure that it can meet its obligation to the beneficiaries of the Scheme; and
- To pay due regard to the Employers' interest in the size and incidence of contribution payments.

Additional objectives are as follows:

- To achieve full funding on the Scheme's Technical Provisions funding basis; and
- To target an expected return from the total Scheme assets which supports the Scheme's Technical Provision funding assumptions and Recovery Plan.

3.2. Risk Management and Measurement

There are various risks to which any defined benefit pension scheme is exposed. The Trustee's policy on risk management is as follows:

- The primary risk upon which the Trustee focuses is that arising through a mismatch between the Scheme's assets and its liabilities.
- The Trustee recognises that whilst increasing risk may increase potential returns over a long period, it also increases the risk of a shortfall in returns relative to that required to cover the Scheme's liabilities as well as producing more short-term volatility in the Scheme's funding position. The Trustee has taken advice on the matter and (in light of the objectives noted previously) considered carefully the implications of adopting different levels of risk.

The Trustee recognises the risks that may arise from the lack of diversification of investments. Subject to managing the risk from a mismatch of assets and liabilities, the Trustee aims to ensure the asset allocation policy in place results in an adequately diversified portfolio. Due to the size of the Scheme's assets and recognising the need to diversify, investment exposure is obtained via pooled vehicles.

The Trustee also takes into account the following risks attached to the investment of the Scheme's assets:

- *Interest rate risk* exists if the projected cash flow profile of the assets held differs from that of the projected liabilities.
- *Inflation risk* exists if the projected cashflows from the assets have different linkages to inflation from the projected liabilities.
- *Credit risk* reflects the possibility that the payments due under a bond might not be made by the issuer, and similarly that the dividends expected from an equity investment might not be paid.
- *Currency risk* will arise through investment in non-Sterling assets, given that the Scheme's liabilities are denominated in Sterling, because changes in exchange rates will impact the relative value of the assets and liabilities.
- *Volatility risk* concerns the stability of the market value of assets (such as equities),

where the price achievable may be particularly affected by short term sentiment and is not certain until the point of sale.

- *Regulatory risk* arises from investing in a market environment where the regulatory regime may change. This may be compounded by political risk in those environments subject to unstable regimes.
- *Liquidity risk* arises from holding assets that are not readily marketable and realisable.
- *Concentration risk* arises, for example, when a high proportion of the Scheme's assets are invested in securities, whether debt or equity, of the same or related issuers.

The Trustee also considers the balance between active and passive management, in asset classes where passive management is a practicable option. In determining this balance, the Trustee considers whether active management offers sufficient potential to outperform to justify the additional risks and fees compared with passive management. The risks taken into account include:

- *Active risk* in that the combination of assets held by an active manager will differ from the benchmark and may give rise to underperformance relative to passive management.
- *Tracking error risk* in that a passive manager may not have the skills to track the benchmark index within an appropriate degree of accuracy.
- *Manager selection risk* due to the potential for selecting (or failing to de-select in a timely manner) an active manager that fails to generate sufficient return in excess of the benchmark to justify the active risk taken and the higher fees charged than for passive management.

The documents governing the manager appointment include a number of guidelines which, among other things, are designed to ensure that only suitable investments are held by the Scheme. The manager is prevented from investing in asset classes outside of their mandate without the Trustee 's prior consent.

Arrangements are in place to monitor the Scheme's investments to help the Trustee check that nothing has occurred that would bring into question the continuing suitability of the current investments. To facilitate this, the Trustee receives regular reports from the investment manager.

The Trustee is a long-term investor and has not set an explicit target to review the duration of its arrangements with the investment manager. However, the duration will be reviewed in conjunction with any review of investment strategy.

3.3. Portfolio Construction

The Trustee has adopted the following control framework in structuring the Scheme's investments subject to the overriding constraint that at the total Scheme level the expected level of risk is consistent with that detailed in Section 3.2:

- All other things being equal there is a preference to invest via pooled funds.
- At the total Scheme level, and within the pooled funds, investments should be

broadly diversified to ensure there is not a concentration of investment with any one issuer.

- Investment in illiquid investments, such as property or pooled property funds, may be held.
- Borrowing is not permitted except as to cover short term liquidity requirements.

3.4. Strategic Benchmark and Rebalancing

The Trustee has established a strategic benchmark asset allocation as set out below. Full details of the Scheme's current objective and investment benchmark are set out in the Appendix.

Asset Class	**Target Benchmark Allocation %**
Equities	50.0
UK Equity	*17.0*
Overseas Equity	*33.0*
Bonds	50.0
Index-Linked Gilts	*30.0*
Corporate Bonds	*20.0*
Total	**100.0**

The Appendix also sets out the Scheme's rebalancing arrangements. It is acknowledged that the actual asset allocation may drift away from the target benchmark allocation set out above. The Trustee will review the Scheme's asset allocation and rebalancing arrangements periodically and can use either an automated process or its discretion (or a combination of these) in rebalancing the Scheme's assets, in conjunction with advice from its Investment Consultant.

4. Expected Return

The expected return on the Scheme's total assets will be determined by the strategic asset allocation, which has been constructed to be consistent with the return objective as set out in Section 3.1. The Trustee expects the assets to produce a net of fees return in excess of gilts + 2.2% per annum over the longer term (based on market conditions as at 31 August 2020, this is broadly equivalent to an expected net of fees return in excess of the Consumer Prices Index (CPI) + 1.1% per annum).

As at 31 August 2020, the actual expected return on the Scheme's assets, based on the target allocation set out in Section 3.4 and prevailing market conditions, was gilts + 2.3% per annum, which is calculated using the weighted average expected return on equities (gilts + 4% per annum) and corporate bonds (gilts + 1.4% per annum).

5. Additional Voluntary Contributions (AVCs)

Under the terms of the Trust Deed, the Trustee is responsible for the investment of AVCs paid by members. The AVCs are held within the main Scheme assets, as members pay a specified contribution in return for a defined benefit payable from the Scheme. These AVCs are not separately ring-fenced.

6. Realisation of Investments and Portfolio Turnover

The investment managers have discretion in the timing of realisation of investments and in considerations relating to the liquidity of those investments within parameters stipulated in the relevant appointment documentation and pooled fund prospectuses.

The Trustee expects the investment manager to change underlying holdings only to an extent required to meet its investment objectives. The reasonableness of such turnover will vary by fund and change according to market conditions. The Trustee therefore does not set a specific portfolio turnover target for their strategy or the underlying funds. The investment manager provides information on portfolio turnover and associated costs to the Trustee so that this can be monitored, as appropriate.

7. Environmental, Social, Governance (ESG) risks

The Trustee believes that environmental, social and corporate governance issues including the impact of, and potential policy response to, climate change can be financially material to long-term investment portfolios and should therefore be considered as part of the Scheme's investment process. Having also considered non-financial matters, and acknowledging that these are potentially important, given the pooled fund nature of the Scheme's investment arrangements the Trustee acknowledges that it cannot directly influence the selection, retention and realisation of investments. It is recognised that pooled funds represent the most practical approach, given the size of the Scheme's assets, and that these will be governed by the individual policies of the investment manager.

The Scheme's equity investments are managed on a passive index-tracking basis via pooled funds, i.e. the funds aim to track the relevant regional equity market index, which is in contrast to an actively managed approach where an investment manager can be more selective about the individual companies that it chooses to invest in. Therefore, for passive index-tracking funds, the investment manager has little flexibility other than to invest in the equity of the businesses in the proportion that they make up the appropriate underlying index. The Trustee believes that the passive index-tracking approach is appropriate and reflects its preference for a relatively low cost, low governance and simple approach to investing in equities.

However, the investment manager is recognised as a market leader in the areas of ESG and engaging with businesses, and through its engagement activities, including voting, the investment manager encourages all of its investee companies to incorporate appropriate sustainability and ESG (including climate change risk) policies into their corporate strategies. The investment manager has a separate dedicated ESG and engagement team which ensures that their approach to ESG is consistently applied throughout the firm and across all of the businesses in which it invests.

The Scheme's investment in pooled corporate bond funds is managed on a semi-active basis, and the investment manager takes into account ESG factors, and the potential financial impact of these, within its investment process for the selection, retention and realisation of investments. The Trustee acknowledges that as bond holders the investment manager will not typically have as much influence on a business as an equity holder, for example, bond holders are unlikely to have voting rights.

The investment manager produces regular reports on its activities in the area of ESG, including the initiatives it takes to influence companies and market participants (including governments and regulators).

Responsibility for monitoring the make-up and development of the capital structure of investee companies is delegated to the investment manager. The Trustee expects the extent to which the investment manager monitors capital structure to be appropriate to the nature of the mandate.

The Scheme is comprised of a diverse membership, expected to hold a broad range of views on ethical, political, social, environmental, and quality of life issues. The Trustee therefore does not explicitly seek to reflect any specific views through the implementation of the investment strategy.

8. Stewardship: Exercise of voting rights and engagement activities

The Trustee believes that good stewardship can enhance long-term portfolio performance and is therefore in the best interests of the Scheme's beneficiaries and aligned with fiduciary duty.

Given that the Scheme's investments are in pooled funds, the investment manager is responsible for the exercising of rights (including voting rights) and stewardship obligations related to the Scheme's investments, and the Trustee encourages the manager to exercise those rights.

The Trustee expects its investment manager to monitor investee companies and engage with management on all relevant stewardship matters.

In the Trustee's view, the investment manager takes its engagement responsibilities seriously, and encourages best practice in this area. The investment manager's dedicated engagement team ensures that their engagement policy is consistently applied across all of its investee companies. The manager engages in a broad number of areas, including ESG, diversity, remuneration, sustainability, Board composition, etc, and exercises its voting policy accordingly. The manager publishes regular reports detailing its engagement activities and voting records. The manager regularly votes against companies where it believes this is in its clients' best interests.

The Trustee expects the Scheme's investment manager to discharge its responsibilities in accordance with the principles of the Financial Reporting Council's 2012 UK Stewardship Code ("the Code") as updated, as far as it is able. The manager reports on the extent of their adherence to the Code, alongside their broader stewardship activities on at least an annual basis.

9. Incentivisation of Investment Managers

The investment manager is primarily remunerated based on an agreed fixed annual percentage of the asset value for each underlying fund. The Trustee does not directly incentivise the investment manager to align the approach it adopts for a particular fund with the Trustee's policies and objectives. Instead, the investment manager and the funds are selected so that, in aggregate, the characteristics and returns produced are expected to meet the Trustee's objectives.

Neither does the Trustee directly incentivise the investment manager to make decisions about the medium to long-term performance of an issuer of debt or equity, or to engage with those issues to improve their performance. The Trustee expects such assessment of performance and engagement to be undertaken as appropriate and necessary to meet the investment objectives of the funds used by the Scheme.

10. Conflicts of Interest

The Trustee maintains a separate conflicts of interest policy and register. Subject to reasonable levels of materiality, these documents record any actual or potential conflicts of interest in relation to investee companies or the investment manager, while also setting out a process for their management.

11. Actuary

The Scheme Actuary performs a valuation of the Scheme at least every three years, in accordance with regulatory requirements. The main purpose of the actuarial valuation is to assess the extent to which the assets cover the accrued liabilities and agree the Employer's contribution rate.

12. Investment Consultant

Whilst the day-to-day management of the Scheme's assets is delegated to an investment manager, all other investment decisions including strategic asset allocation and selection and monitoring of investment managers are taken after receiving written advice from the Investment Consultant. Broadstone Corporate Benefits Limited has been appointed for this purpose.

13. Fee Structures

The investment managers levy fees based on a percentage of the value of the assets under management. Details of the annual fees charged by the investment managers are given in the Appendix. The Scheme Actuary and the Investment Consultant typically work on the basis of time cost; however, in certain circumstances a fixed fee will be agreed.

The appropriateness of the investment manager's remuneration will be assessed relative to market costs for similar strategies, the skill and resources required to manage the strategy, and the success or otherwise a manager has had in meeting its objectives, both financial and non-financial.

14. Review of this Statement

The Trustee will review this Statement at least once every three years and without delay after any significant change in investment policy. Any change to this Statement will only be made after having obtained and considered the written advice of someone whom the Trustee reasonably believes to be qualified by their ability in and practical experience of financial matters and to have the appropriate knowledge and experience of the management of pension scheme investments.

On behalf of the Trustee of the University of Sussex Pension and Assurance Scheme

CHRISTOPHER CROOK – CHAIR.

Date 28TH SEPTEMBER 2020.

Appendix - Investment Policy Implementation Document

Introduction

This Appendix is supplemental to the Statement of Investment Principles (the "Statement") and contains the investment policy of University of Sussex Pension and Assurance Scheme (the "Scheme").

Defined Benefit Assets

Investment Strategy

Given the investment objectives in the Statement, the Trustee has implemented the investment strategy detailed in the tables below. The Trustee believes that the investment risk arising from the investment strategy combined with the risks arising from active management are consistent with the overall level of risk being targeted.

The Scheme's assets are notionally split between the "Equity Portfolio" and the "Bond Portfolio".

Overall Scheme Benchmark

The Scheme's overall strategic allocation and control ranges are set out below. The Scheme's equities are held in an equity sub-portfolio, and the control ranges in respect of the regional equity funds set out below will be scaled appropriately and applied within the equity sub-portfolio.

Fund	Central Benchmark %	Control Ranges +/-%
Equities	**50.0**	**0-50.5%**
UK Equity Index	*17.0*	*+/- 1.25*
North America Equity Index	*8.0*	*+/- 0.75*
North America Equity Index – GBP Currency Hedged	*8.0*	*+/- 0.75*
Europe (ex UK) Equity Index	*3.0*	*+/- 0.50*
Europe (ex UK) Equity Index – GBP Currency Hedged	*3.0*	*+/- 0.50*
Japan Equity Index	*2.5*	*+/- 0.50*
Asia Pacific (ex Japan) Equity Index	*2.5*	*+/- 0.50*
World Emerging Markets Equity Index	*6.0*	*+/- 0.50*
Bonds	**50.0**	
Maturing Buy & Maintain Credit	20.0	
All Stocks Index-Linked Gilts Index	30.0	
Total	**100.0**	

Rebalancing Policy

The investment manager is currently responsible for monitoring the Scheme's asset allocation relative to the benchmark allocation and control ranges on a quarterly basis. If necessary, the investment manager will take action to rebalance the Scheme's assets where one, or more, of the control ranges are breached, such that the resulting distribution is as close as practicable to the central benchmark.

The overall allocation to equities is subject a control range such that any rebalancing will involve a switch from equities to bonds. The Trustee will determine the appropriate bond fund(s) to receive the proceeds from any rebalancing, which will be implemented on an automated basis by the investment manager.

Where appropriate, the investment manager will apply cash flows so as to manage the actual asset allocation in line with the Scheme's benchmark allocation.

Day-to-Day Management of the Assets

The assets of the Scheme consist of an insurance policy issued by Legal & General Assurance (Pensions Management) Limited. The underlying management is delegated to Legal & General Investment Management, who were appointed by the Scheme on 20 November 2003.

The Trustee has taken steps to satisfy itself that the manager has the appropriate knowledge and experience for managing the Scheme's investments and that they are carrying out their work competently. The Trustee has determined, based on expert advice, a benchmark mix of asset types and ranges within which the appointed investment manager may operate.

The Trustee regularly reviews the suitability of the Scheme's investments, including the appointed manager and the use of active management. Any such adjustments would be done with the aim of ensuring that the objectives and overall level of risk is consistent with that being targeted as set out in the Statement.

Investment Structure

The table below illustrates the Scheme's investment structure.

Fund	Benchmark Performance Index	Performance Target
UK Equity Index Fund	FTSE All-Share	Track benchmark
North America Equity Index Fund	FTSE AW – Developed North America Index	Track benchmark
North America Equity Index Fund – GBP Currency Hedged	FTSE AW – Developed North America Index – GBP Hedged	Track benchmark
Europe (ex UK) Equity Index Fund	FTSE AW – Developed Europe (ex UK) Index	Track benchmark
Europe (ex UK) Equity Index Fund – GBP Currency Hedged	FTSE AW – Developed Europe (ex UK) Index – GBP Hedged	Track benchmark
Japan Equity Index Fund	FTSE AW – Japan Index	Track benchmark
Asia Pacific (ex Japan) Equity Index Fund	FTSE AW – Developed Asia Pacific (ex Japan) Index	Track benchmark

World Emerging Markets Equity Index Fund	FTSE AW – All Emerging Markets Index	Track benchmark
All Stocks Index-Linked Gilts Index Fund	FTSE A Index-Linked (All Stocks)	Track benchmark
Maturing Buy & Maintain Credit	These funds aim to invest in a diversified range of high credit quality bonds, with the intention that these will be held to maturity.	

Annual Management Charges

The following table sets out the annual investment management charges agreed between the Trustee and the Scheme's investment manager.

Fund	Annual Management Charge
UK Equity Index Fund	0.10% p.a. on the first £10m 0.075% p.a. on the next £10m 0.06% p.a. on the next £30m 0.05% p.a. on the balance above £50m
North America Equity Index Fund	0.20% p.a. on the first £1m 0.175% p.a. on the next £1.5m 0.15% p.a. on the next £7.5m 0.125% p.a. on the next £20m 0.10% p.a. on the next £20m 0.08% p.a. on the balance above £50m
North America Equity Index Fund – GBP Currency Hedged	0.225% p.a. on the first £1m 0.20% p.a. on the next £1.5m 0.175% p.a. on the next £7.5m 0.15% p.a. on the next £20m 0.125% p.a. on the next £20m 0.105% p.a. on the balance above £50m
Europe (ex UK) Equity Index Fund	0.25% p.a. on the first £1m 0.225% p.a. on the next £1.5m 0.20% p.a. on the next £7.5m 0.175% p.a. on the next £20m 0.15% p.a. on the next £20m 0.125% p.a. on the balance above £50m
Europe (ex UK) Equity Index Fund – GBP Currency Hedged	0.275% p.a. on the first £1m 0.25% p.a. on the next £1.5m 0.225% p.a. on the next £7.5m 0.20% p.a. on the next £20m 0.175% p.a. on the next £20m 0.15% p.a. on the balance above £50m
Japan Equity Index Fund	0.225% p.a. on the first £1m 0.20% p.a. on the next £1.5m 0.175% p.a. on the next £7.5m 0.15% p.a. on the next £20m 0.125% p.a. on the next £20m 0.10% p.a. on the balance above £50m
Asia Pacific (ex Japan) Equity Index Fund	0.275% p.a. on the first £1m 0.25% p.a. on the next £1.5m 0.225% p.a. on the next £7.5m 0.20% p.a. on the next £20m 0.175% p.a. on the next £20m 0.15% p.a. on the balance above £50m
World Emerging Markets Equity Index Fund	0.45% p.a. on the first £5m 0.35% p.a. on the next £5m 0.30% p.a. on the balance above £10m
All Stocks Index-Linked Gilts Index Fund	0.10% p.a. on the first £5m 0.075% p.a. on the next £5m 0.05% p.a. on the next £20m 0.03% p.a. on the balance above £30m
Maturing Buy and Maintain Credit Funds	0.1% on all assets