



VALUATION REPORT

# Devon Pension Fund

Actuarial valuation as at 31 March 2022

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31 March 2023



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## Executive summary

Some of the key results contained within this report are set out below:

### 1. Funding position

Using the agreed assumptions, the Fund had assets sufficient to cover 98% of the accrued liabilities as at 31 March 2022, which has increased from 91% at the 2019 valuation.

### 2. Contributions

Individual employer contributions are set out in Appendix 5 in the Rates and Adjustments Certificate to cover the period from 1 April 2023 to 31 March 2026. No employer is permitted to pay their deficit over a period greater than 15 years from 1 April 2023.

### 3. Method and assumptions

The resulting method and assumptions are set out in Appendix 2 and we believe they are appropriate for the 31 March 2022 valuation. The key assumptions used are a discount rate assumption of 4.7% p.a. and a CPI inflation assumption of 2.9% p.a.

### 4. Investment performance

Investment returns have been strong since the previous valuation, but gains in the funding position have been partially offset by a reduction in future anticipated investment returns net of inflation (i.e. a reduction in the real discount rate).

### 5. Regulatory changes

There have been a number of important regulatory changes since the 2019 valuation including McCloud, Cost management and Climate risk.

Details of how we have approached each change is detailed in this report.

## Background

We have been asked by Devon County Council, the administering authority for the Devon Pension Fund (the Fund), to carry out an actuarial valuation of the Fund as at 31 March 2022. The Fund is part of the Local Government Pension Scheme (LGPS), a defined benefit statutory scheme administered in accordance with the Local Government Pension Scheme Regulations 2013 (the Regulations) as amended.

The purpose of the valuation is to review the financial position of the Fund and to set appropriate contribution rates for each employer in the Fund for the period from 1 April 2023 to 31 March 2026 as required under Regulation 62 of the Regulations.

This report summarises the results of the valuation and is addressed to the administering authority of the Fund. It is not intended to assist any user other than the administering authority in making decisions or for any other purpose and neither we nor Barnett Waddingham LLP accept liability to third parties in relation to this advice.

This report is provided further to earlier advice dated 9 September 2022 which set out the background to the valuation and explained the underlying methods and assumptions derivation.

This advice complies with Technical Actuarial Standards (TASs) issued by the Financial Reporting Council – in particular TAS 100: Principles for Technical Actuarial Work and TAS 300: Pensions.

We would be pleased to discuss any aspect of this report in more detail.

## Valuation methodology

### Setting contributions

The contribution rates consist of two elements, the primary rate and the secondary rate:

- The **primary rate** for each employer is the employer's future service contribution rate (i.e. the rate required to meet the cost of future accrual of benefits) expressed as a percentage of pay.
- The **secondary rate** is an adjustment to the primary rate to arrive at the total rate each employer is required to pay (for example, to allow for deficit recovery). The secondary rate may be expressed as a percentage of pay or a monetary amount.

Regulation 62 specifies four requirements that the actuary "must have regard" to:

1. The existing and prospective liabilities arising from circumstances common to all those bodies
2. The desirability of maintaining as nearly a constant a primary rate as possible
3. The current version of the administering authority's Funding Strategy Statement (FSS)
4. The requirement to secure the "solvency" of the pension fund and the "long-term cost efficiency" of the Scheme, so far as relating to the pension fund

The wording of the second objective is not ideal in that it appears to be aimed towards the primary rate rather than taking into account the surplus or deficit of the employer. We believe that if we achieve reasonably stable total individual employer rates (which seems like a preferable objective) then we will also meet the regulatory aim.

CIPFA's FSS guidance includes further details, summarised as follows:

- **"solvency"** means ensuring that employers are paying in contributions that cover the cost of benefit accrual and target a fully funded position over an appropriate time period using appropriate actuarial assumptions, and
- **"long-term cost efficiency"** means that employers have the financial capacity to increase contributions (or there is an alternative plan in place) should contributions need to be increased in future.

## Assumptions used

We have considered these four requirements when providing our advice and choosing the method and assumptions used.

A number of reports and discussions have taken place with the administering authority and, where required, its investment advisors before agreeing the assumptions to calculate the results and set contribution rates. In particular:

- The initial results report dated 9 September 2022 provides information and results on a whole fund basis as well as background to the method and derivation of the assumptions. Please note that the active liabilities in the initial results report were revised and discussed with the Fund to make an adjustment for the McCloud ruling.
- The climate analysis report dated 8 September 2022 which considers climate risk in the context of the Fund's 2022 actuarial valuation. It considers whether the 2022 valuation funding strategy is sufficiently robust in the context of this climate scenario analysis and any potential contribution impacts.
- The FSS which will confirm the approach in setting employer contributions.

Note that not all of these documents may be in the public domain and may be restricted to the administering authority which has no obligation to share them with any third parties.

The assumptions detailed in this report have been agreed with the administering authority. The Fund's FSS has been reviewed in collaboration with the administering authority to ensure that it is consistent with this approach. The FSS complies with the latest version of CIPFA's FSS guidance but we understand that this guidance is currently under review by the Scheme Advisory Board's Compliance and Reporting Committee. This updated guidance had not come into effect as at the date of this report.

We confirm that in our opinion the agreed assumptions are appropriate for the purpose of the valuation. Assumptions in full are set out in Appendix 2.

## Valuation of liabilities

To calculate the value of the liabilities, we estimate the future cashflows which will be made to and from the Fund throughout the future lifetime of existing active members, deferred benefit members, pensioners and their dependants. We then discount these projected cashflows using the discount rate which is essentially a calculation of the amount of money which, if invested now, would be sufficient together with the income and growth in the accumulating assets to make these payments in future, using our assumption about investment returns.

This amount is called the present value (or, more simply, the value) of members' benefits. Separate calculations are made in respect of benefits arising in relation to membership before the valuation date (past service) and for membership after the valuation date (future service).

To produce the future cashflows or liabilities and their present value we need to formulate assumptions about the factors affecting the Fund's future finances such as inflation, salary increases, investment returns, rates of mortality and staff turnover etc.

The assumptions used in projecting the future cashflows in respect of both past service and future service are summarised in Appendix 2.

## Valuation of assets

We have been provided with audited Fund accounts for the year to 31 March 2020 and unaudited Fund accounts for the years to 31 March 2021 and 31 March 2022.

The market asset valuation as at 31 March 2022 was £5.41bn. Please note that this excludes members' additional voluntary contributions (AVCs).

For the purposes of the valuation, we use a smoothed value of the assets rather than the market value. The financial assumptions that we use in valuing the liabilities are smoothed around the valuation date so that the market conditions used are the average of the daily observations over the period 1 January 2022 to 30 June 2022. Therefore, we value the assets in a consistent way and apply the same smoothing adjustment to the market value of the assets.

The smoothed asset valuation as at 31 March 2022 was £5.32bn. This was based on a smoothing adjustment of 98.2%. More detail can be found in Appendix 1.

The Fund's long-term investment strategy has been taken into consideration in the derivation of the discount rate assumption. The investment strategy is set out in the Fund's Investment Strategy Statement (ISS) that should be made publicly available on the Fund's website.

## Previous valuation results

The previous valuation was carried out as at 31 March 2019 by Barnett Waddingham. The results are summarised in the valuation report dated 31 March 2020 and reported a deficit of £399m.

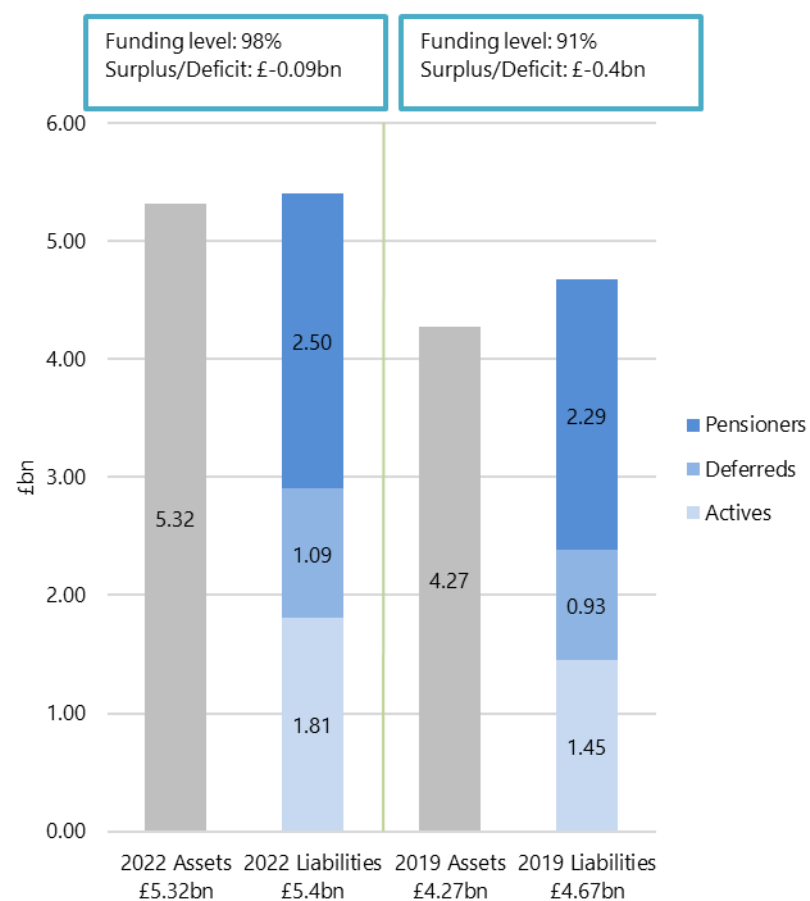
## Results

### Funding position

A comparison is made of the value of the existing assets with the value of the accrued liabilities. If there is an excess of assets over the liabilities then there is a surplus. If the converse applies there is a deficit.

Using the assumptions summarised in Appendix 2, the funding position is set out in the graph below. This shows the funding position of the Fund at the current and previous valuation dates.

There was a deficit of £88.6m in the Fund at the valuation date, corresponding to a funding level of 98%.





## Contribution rates

### Primary rate

Using the assumptions summarised in Appendix 2, the resulting average primary rate across the whole Fund is set out in the table below (after allowing for member contributions). This includes a comparison to the primary rate at the previous valuation.

The primary rate for the whole Fund is the weighted average (by Pensionable Pay) of the individual employers' primary rates.

Primary rate	2022 valuation of payroll p.a.	2019 valuation of payroll p.a.
Average total future service rate	25.6%	23.2%
Less average member rate	-6.4%	-6.3%
<b>Fund primary rate</b>	<b>19.2%</b>	<b>16.9%</b>

Active members pay contributions to the Fund as a condition of membership in line with the rates required under the Regulations.

Please note that expenses are allowed for in the derivation of the discount rate and therefore we make no explicit allowance in the primary rate for expenses.

### Secondary rate

The secondary rate is an adjustment to the primary rate to arrive at the total rate each employer is required to pay (for example, to allow for deficit recovery). Where there is a deficit, contributions should be set to restore the funding positions to 100% over an agreed "recovery period".

The recovery period for individual employers varies across the Fund. The administering authority's approach to setting recovery periods is set out in the FSS. Where there is a surplus, this may also be reflected in contribution rates in line with the Fund's FSS.

The primary and secondary rate of the individual employer contributions payable are set out in the Rates and Adjustments Certificate in Appendix 5. These will differ from the primary rate set out above as well as varying from each other as they are either based on the employer's own membership and experience or they are the employer's share of the contributions payable within a pool of employers.

In Appendix 5 we also disclose the sum of the secondary rates for the whole Fund for each of the three years beginning 1 April 2023.

The secondary contributions agreed with the administering authority have been set at this valuation in order to restore the Fund to a funding position of 100% by no later than 2038.

## Projected funding position

Based on the assumptions as set out in Appendix 2 and the contributions certified and set out in Appendix 5, we estimate that the funding position of the whole fund may increase to 101% by 31 March 2025, the next valuation date. This projection is based on the assumptions made for this valuation and contributions being paid at the agreed amounts. This projection does not allow for any actual experience since 31 March 2022 nor any other risks or uncertainties. Some of these additional risks are set out later in this report and in Appendix 3.

## Standardised basis

Following the funding valuation, a "Section 13" report (prepared under Section 13 of the Public Service Pensions Act 2013) will be prepared to report on whether the following aims are achieved: compliance, consistency, solvency and long-term cost efficiency, and to identify any funds that cause concerns.

As part of our calculations we have considered the results on a standardised basis as set by the Scheme Advisory Board (SAB). We are required to provide the SAB with the results for the Fund for comparison purposes.

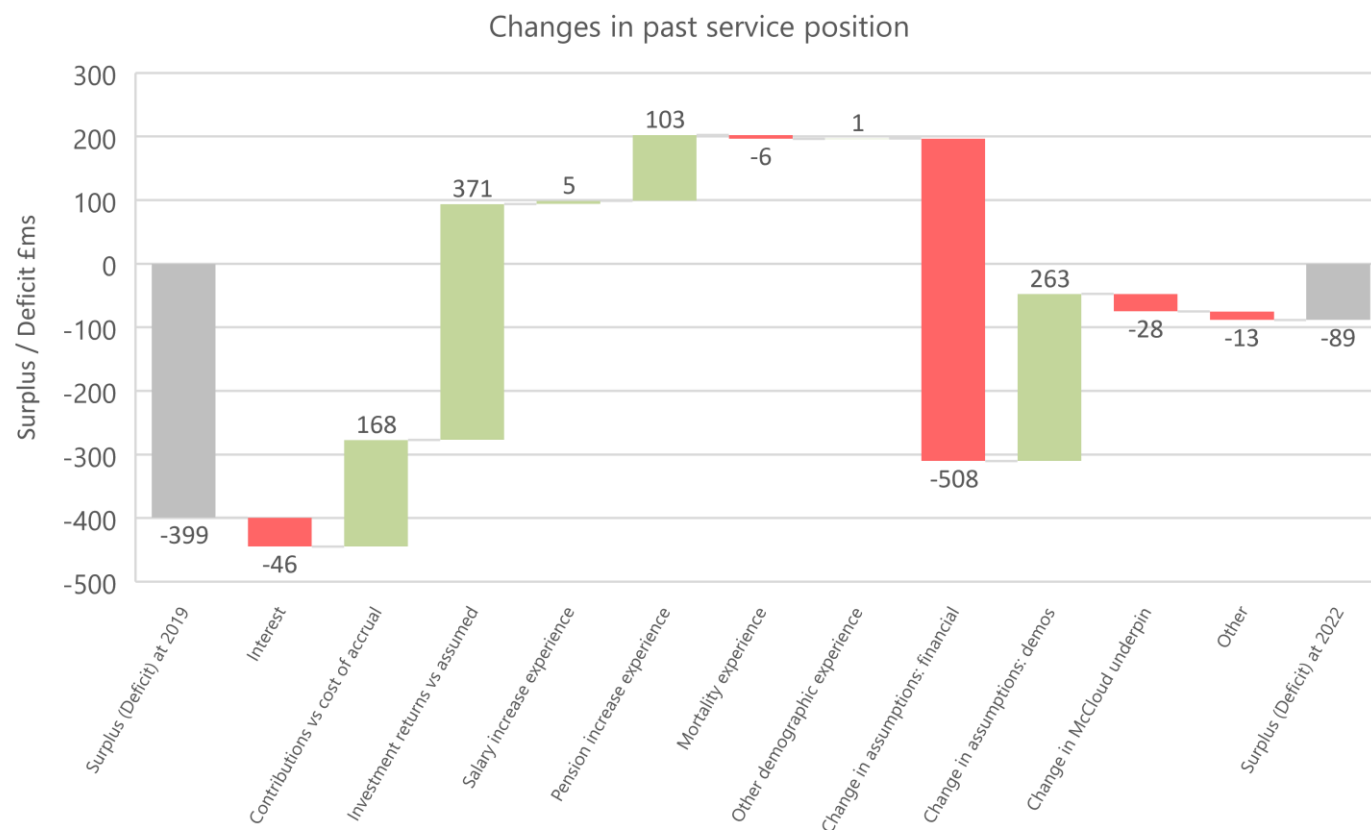
The standardised basis is set using assumptions advice from the Government Actuary's Department (GAD) with some of the assumptions used being set locally (such as mortality) and some are set at Scheme level (including all the financial assumptions). It is not used to set contributions as it does not reflect the Fund's investment strategy or the administering authority's attitude to risk; contributions are set using the funding basis.

The results on the standardised basis as at 31 March 2022 are set out in the dashboard in Appendix 4. The dashboard should assist readers in comparing LGPS valuation reports and the information will be used by GAD in their "Section 13" report.

## Reconciliation to previous valuation

### Funding position

The previous valuation revealed a deficit of £399m. The key factors that have influenced the funding level of the Fund over the period are illustrated in the chart below.



## Experience

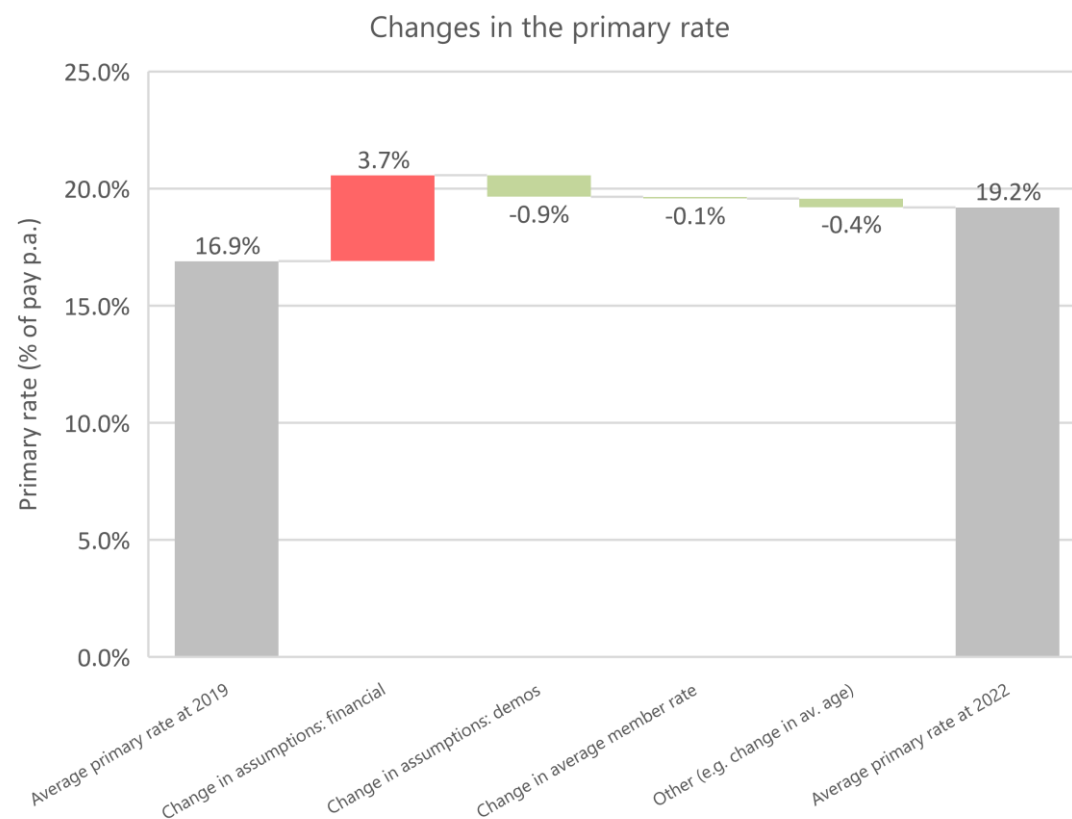
- Better than assumed investment returns has decreased the Fund deficit by approximately £371m
- Changes in financial assumptions, including a rise in expected future inflation, have increased the Fund's deficit by approximately £508m.
- Payment of secondary contributions has decreased the Fund deficit by approximately £168m
- Lower inflation than assumed has decreased the Fund deficit by approximately £103m

## Assumptions

- Lower salary increases than assumed has decreased the Fund deficit by approximately £5m
- The increase in Fund liability on the ongoing basis due to allowing for the McCloud ruling is £28m

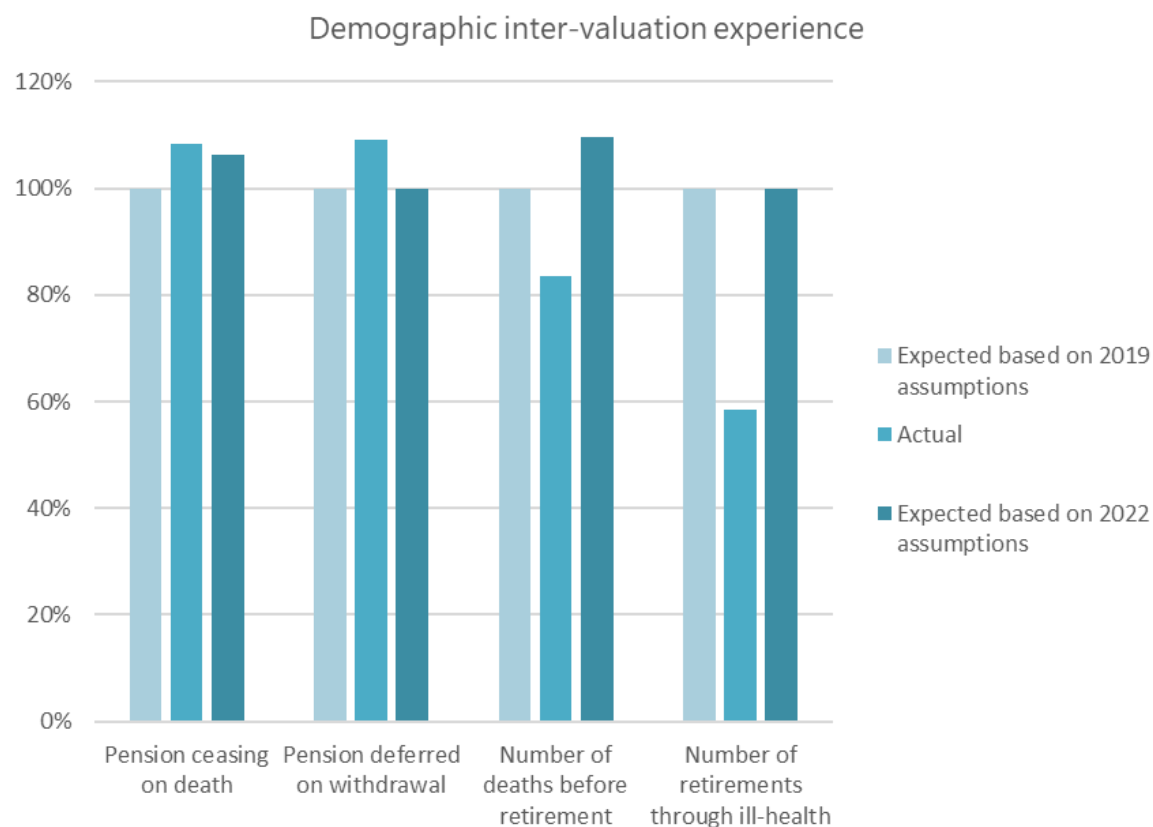
## Primary contribution rate

The previous valuation resulted in an average primary rate of 16.9% of Pensionable Pay. The reasons for the change in the cost of future benefit accrual are set out in the reconciliation chart below.



## Comparing experience with assumptions

A comparison of the actual demographic experience of members of the Fund over the intervalation period, with that assumed by the assumptions adopted at the last valuation in 2019 is shown in the graph below. The graph also shows how the assumptions adopted for this valuation would have compared with those adopted at 2019.



## Sensitivities to the liabilities

The results set out in this report are based on a particular set of assumptions. The actual cost of providing the benefits will depend on the actual experience, which could be significantly better or worse than assumed. The sensitivity of the results to some of the key assumptions is set out in the table below.

The figures in the table are shown relative to the deficit of £88.6m and funding level of 98% on the agreed funding basis.

2022 sensitivity analysis of funding position	2022 Valuation basis	Decrease discount rate by 0.1% p.a.	Increase CPI inflation by 0.1% p.a.	Increase salary assumption by 0.5% p.a.	Increase long-term rate of mortality improvement by 0.25% p.a.	Increase initial addition to mortality improvement by 0.5%	Decrease 2020/21 weighting parameter by 5%
	£bn	£bn	£bn	£bn	£bn	£bn	£bn
Smoothed asset value	5.32	5.32	5.32	5.32	5.32	5.32	5.32
Total past service liabilities	5.40	5.50	5.49	5.46	5.45	5.49	5.44
<b>Surplus / (Deficit)</b>	<b>(0.09)</b>	<b>(0.18)</b>	<b>(0.17)</b>	<b>(0.14)</b>	<b>(0.13)</b>	<b>(0.17)</b>	<b>(0.12)</b>
<b>Funding level</b>	<b>98%</b>	<b>97%</b>	<b>97%</b>	<b>97%</b>	<b>98%</b>	<b>97%</b>	<b>98%</b>

## Sensitivities to the primary contribution rate

The calculated primary contribution rate required to fund benefits as they are earned from year to year will also be affected by the particular set of assumptions chosen. The sensitivity of the primary rate to changes in some key assumptions is shown below. Please note that the primary rate set out below does not include any adjustment via the secondary rate. The total contribution rate payable by employers will be a combination of the primary rate and a secondary rate adjustment, further details can be found in Appendix 5.

The figures in the table are shown relative to the primary rate of 19.2% of Pensionable Pay on the agreed funding basis.

2022 sensitivity analysis of primary rate	2022 Valuation basis	Decrease discount rate by 0.1% p.a.	Increase CPI inflation by 0.1% p.a.	Increase long-term rate of mortality improvement by 0.25% p.a.	Increase initial addition to mortality improvement by 0.5%	Decrease 2020/21 weighting parameter by 5%
	% of payroll p.a.	% of payroll p.a.	% of payroll p.a.	% of payroll p.a.	% of payroll p.a.	% of payroll p.a.
Average total future service rate	25.6%	26.3%	26.3%	25.9%	25.9%	25.7%
Less average member rate	6.4%	6.4%	6.4%	6.4%	6.4%	6.4%
<b>Fund primary rate</b>	<b>19.2%</b>	<b>19.9%</b>	<b>19.9%</b>	<b>19.5%</b>	<b>19.5%</b>	<b>19.3%</b>



## Further comments

### Funding Strategy Statement (FSS)

The assumptions used for the valuation have been documented in a revised Funding Strategy Statement agreed between the Fund Actuary and the administering authority.

#### Risks

There are many factors that affect the Fund's funding position and could lead to the Fund's funding objectives not being met within the timescales expected. Some of the key risks that could have a material impact on the Fund are:

- Employer covenant risk
- Investment risk
- Inflation risk
- Mortality risk
- Member options risk
- Regulatory risk
- Climate risk

The sensitivity of the funding results to some of these risks was set out in the sensitivities section of this report. Please note that this is not an exhaustive list. Further information on these risks and more can be found in our initial results report and will be set out in greater detail in the FSS.

#### Post valuation events

Since the valuation date, there has been some significant market turbulence including material increases in short-term inflation and gilt yields. There is an ongoing cost of living crisis, as well as political turmoil.

However, our funding model is designed to help withstand short-term volatility in markets as it is a longer-term model. We use smoothed assumptions over a six-month period with the ultimate aim of setting stable contributions for employers. The valuation approach and assumptions are not based on gilt yields and

the discount rate is derived from the long-term future expected returns on each asset class with a deduction for uncertainty and risk (our prudence adjustment). Therefore, at this stage, the anticipated effect on the long-term funding position is not significant enough to revise our approach.

Nevertheless, due to the ongoing uncertainty around the shorter-term impact of these issues, we have considered these issues in setting the employer contribution rates to ensure that contributions in to the Fund remain appropriate. Most notably, high inflation will have a significant impact in the short term as higher levels of pensions in payment will need to be paid out of the Fund as a result of the anticipated increase of 10.1% in April 2023.

We will continue to monitor the Fund's funding position and raise any individual employer cases with the Fund that we consider need any special attention. The impact of these events will be fully considered as part of the 2025 valuation when we revisit employer contributions.

The next formal valuation is due to be carried out as at 31 March 2025 however we would recommend that the financial position of the Fund is monitored regularly during the period leading up to the next formal valuation.

## Rates and Adjustments Certificate

The contributions payable in respect of benefit accrual and any deficit contributions under each employer's recovery period have been set out in Appendix 5 in the Rates and Adjustments Certificate in accordance with Regulation 62 of the Regulations and cover the period from 1 April 2023 to 31 March 2026. In this certificate no allowance will be made for additional costs arising which need to be met by additional contributions by the employer such as non-ill health early retirements.

The contributions in the Rates and Adjustments Certificate are set so that each employer's assets (including future contributions) are projected to be sufficient to cover the benefit payments for their members, on the assumptions set out in this report. Where there is currently a deficit for an individual employer, recovery of this deficit is targeted in line with the Fund's FSS and all employers are projected to be fully funded after a recovery period length of no more than 15 years from 1 April 2023.

This document has been agreed between the administering authority and the Fund Actuary. Contributions have been set which in our opinion meet the regulatory requirements and the funding objectives set out in the Fund's FSS.

This report must be made available to members on request.



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## Appendix 1 Summary of data and benefits

### Membership data

The membership data has been provided to us by the administrators of the Fund. We have relied on information supplied by the administrator and the administering authority being accurate. The membership data has been checked for reasonableness and we have compared the membership data with information in the Fund's accounts. The numbers in the tables below relate to the number of records and so will include members in receipt of, or potentially in receipt of, more than one benefit.

Any missing or inconsistent data has been queried with the Fund and estimated where necessary. Whilst this should not be seen as a full audit of the data, we are happy that the data is sufficiently accurate for the purposes of the valuation.

### Benefits

Full details of the benefits being valued are set out in the Regulations as amended and summarised on the [LGPS website \(https://www.lgpsmember.org/\)](https://www.lgpsmember.org/). We have made no allowance for discretionary benefits.

## Membership summary

A summary of the membership data used in the valuation is as follows. The membership data from the previous valuation is also shown for comparison. Please note that the average ages at 31 March 2022 are weighted by salary for active members and by pension for deferred and pensioner/dependant members, the average ages at 2019 are weighted by liability.

Data used	Data at 31 March 2022			Data at 31 March 2019		
Active members	Number	Pensionable pay £m	Average age	Number	Pensionable pay £m	Average age
Males	9,367	239	53	9,144	213	53
Females	30,093	468	52	28,380	391	52
Total	39,460	707	53	37,524	604	52
Deferred members (including undecided)	Number	Pension £m	Average age	Number	Pension £m	Average age
Males	13,735	24	52	13,183	22	52
Females	42,663	45	52	40,255	39	51
Total	56,398	69	52	53,438	61	51
Pensioner and dependant members	Number	Pension £m	Average age	Number	Pension £m	Average age
Males	13,687	91	70	12,997	85	69
Females	24,945	83	68	21,728	70	68
Total	38,632	174	69	34,725	155	69

## Projected retirements

In the table below we have set out the number of members who are assumed to reach retirement age over the period from 1 April 2022 to 31 March 2026 as required under the Regulations.

Members may retire for a number of reasons including reaching normal retirement age, retiring through ill-health or redundancy. The amounts set out in the table below are the new retirement benefit amounts, as at the current valuation date that are assumed to come into payment in each of the intervaluation years.

Projected new benefits		
Year to	Number of members	Retirement benefits £m
31 March 2023	2,309	15
31 March 2024	2,487	17
31 March 2025	2,719	20
31 March 2026	2,380	17

## Guaranteed Minimum Pension (GMP) equalisation and indexation

On 23 March 2021, the Government published the outcome to its GMP Indexation consultation, concluding that all public service pension schemes, including the LGPS, will be directed to provide full indexation to members with a GMP reaching State Pension Age (SPA) beyond 5 April 2021. This is a permanent extension of the 'interim solution' that has applied to members with a GMP reaching SPA on or after 6 April 2016. Details of the consultation outcome can be found [here](#).

As with the previous valuation, we have assumed that the Fund will pay limited increases for members that have reached SPA by 6 April 2016, with the Government providing the remainder of the inflationary increase. For members that reach SPA after this date, we have assumed that the Fund will be required to pay the entire inflationary increase. We are comfortable that our approach is consistent with the consultation outcome.

## Appendix 2 Summary of assumptions

A summary of the assumptions adopted for the valuation at 31 March 2022 and as at 31 March 2019 is set out below.

Assumptions	2022 valuation	2019 valuation
<b>Financial assumptions (p.a.)</b>		
CPI inflation	2.9%	2.6%
Salary increases	3.9%	3.6%
Discount rate	4.7%	5.1%
Pension increases on GMP	Funds will pay limited increases for members reaching SPA by 6 April 2016, and full increases for others	
<b>Demographic assumptions</b>		
Post-retirement mortality		
Base table pensioners (male/female)	100%/120% of S3PA tables	95%/110% of S3PA tables
Base table dependants (male/female)	100%/105% of S3DA tables	95%/80% of S3DA tables
CMI Model	CMI 2021	CMI 2018
Long-term rate of improvement	1.25% p.a.	1.25% p.a.
Smoothing parameter	7	7
Initial addition to improvement	0.0% p.a.	0.5% p.a.
2020/21 weighting parameter	5%	n/a
Retirement assumption	Weighted average	Weighted average
Pre-retirement decrements	GAD 2016 scheme val: no salary scale, 50% multiplier to ill-health rates and 115% multiplier to pre-retirement mortality rates	GAD 2016 scheme val: no salary scale, 50% multiplier to ill-health rates and 105% multiplier to pre-retirement mortality rates
50:50 assumption	Member data	Member data
Commutation	50% of max	50% of max
Family statistics		
% with qualifying dependant	75% (M) / 70% (F)	75% (M) / 70% (F)
Age difference	Males 3 years older	Males 3 years older

## Demographic assumptions – sample rates

The following tables set out some sample rates of the demographic assumptions used in the calculations. These sample rates are based on those set by the Government Actuary's Department (GAD) based on analysis of the Local Government Pension Scheme (LGPS) in England and Wales.

### Allowance for ill-health early retirements

A small proportion of members are assumed to retire early due to ill health. In the table below we set out an extract of some sample rates from the GAD tables used:

Age	Males	Females
25	0.01%	0.00%
30	0.01%	0.01%
35	0.02%	0.01%
40	0.04%	0.03%
45	0.09%	0.06%
50	0.18%	0.13%
55	0.36%	0.28%
60	0.74%	0.62%
65	1.51%	1.34%

Please note the above rates are the raw decrements as set by GAD. Our assumption is that there will be 50% of the number of ill-health retirements assumed by GAD.

The proportion of ill-health early retirements falling into each tier category has been assumed to be as follows for both males and females:

Tier 1	Tier 2	Tier 3
75%	15%	10%



## Death before retirement

A small number of members are assumed to die before reaching retirement age. In the table below we set out an extract of some sample rates from the GAD tables used:

Age	Males	Females
25	0.02%	0.01%
30	0.03%	0.01%
35	0.05%	0.02%
40	0.06%	0.03%
45	0.09%	0.05%
50	0.13%	0.08%
55	0.21%	0.12%
60	0.32%	0.19%
65	0.50%	0.29%

Please note the above rates are the raw decrements as set by GAD. We have applied a 115% multiplier to the rates assumed by GAD.

## Allowance for withdrawals

This assumption is regarding active members who leave service to move to deferred member status. Active members are assumed to leave service at the following sample rates:

Age	Males	Females
25	9.21%	10.17%
30	7.25%	8.07%
35	5.70%	6.40%
40	4.48%	5.07%
45	3.53%	4.03%
50	2.78%	3.19%
55	2.18%	2.53%
60	1.72%	2.01%
65	1.35%	1.59%

## Appendix 3 Regulatory uncertainties

There are currently a few important regulatory uncertainties surrounding the 2022 valuation as follows:

- Effect of the McCloud and Sargeant cases;
- Cost management reviews which could affect future and historic LGPS benefits;
- Change in timing of future actuarial valuations from a triennial cycle; and
- Climate change risks and opportunities.

Although it is unclear what impact these uncertainties will have on the future benefits of individual members, we have considered these issues in the assumptions used to set the contribution rates for employers.

### McCloud

When the Government reformed public service pension schemes in 2014 and 2015 they introduced protections for older members. In December 2018, the Court of Appeal ruled that younger members of the Judges' and Firefighters' Pension schemes have been discriminated against because the protections do not apply to them. The Government has confirmed that there will be changes to all main public sector schemes, including the LGPS, to remove this age discrimination. A consultation has been run in relation to the changes proposed for the LGPS and legislation is now being drafted to bring forward these changes. We understand the updated Regulations are to be consulted on in 2023 with the earliest effective date expected to be October 2023.

For the 2022 valuation, as instructed by the Department of Levelling Up, Housing and Communities (DLUHC), we have assumed that the legislation will bring forward the changes as currently proposed, and we have valued the benefits in line with this. The data extracts received for valuation purposes did not include the full pay or service history we require to value the cost of the anticipated benefit changes. We therefore made estimates (for active members only) based on the information that is held in data extract provided. Our estimates involve projecting members CARE benefits against the equivalent final salary benefit to determine, for each active member, whether the underpin may bite and the liability value if it does. There still remains uncertainty over the long-term effects of the McCloud judgment but where data has been available, we have been able to estimate the impact of McCloud on individual employers and funding positions and contributions have been set accordingly.

## Change in timing of future actuarial valuations from a triennial cycle

In 2019, the Ministry of Housing, Communities & Local Government (as it was then known, now known as DLUHC) issued a consultation which included moving from a triennial to quadrennial valuation cycle from 2024. The issue remains outstanding and we have produced this report on the basis of a triennial valuation cycle.

### Cost management reviews

There remain uncertainties around the 2016 and 2020 cost management exercises. Although we understand that the Scheme Advisory Board (SAB) will not be recommending any Scheme changes, this is still to be announced. However, we anticipate the impact of any changes to be small and therefore we have not made an explicit allowance for these.

Further cost management reviews will be carried out and may lead to future benefit changes. However, as the aim of this monitoring is to keep the cost of benefits within an affordable range, we can be relatively comfortable that future reviews will not have a significant impact on the value we currently place on the liabilities, therefore we have not made an explicit allowance for these.

## Climate change risks and opportunities

Climate risk is an important consideration for the 2022 valuation. As part of the 2022 valuation process we have used scenario analysis to identify the impact of shorter term climate risk (transition risk) and longer term climate risk (physical risk) on the Fund's potential funding outcomes. This analysis was developed for LGPS funds based on the Department for Work and Pensions regulations, as we await final regulations which apply directly to the LGPS. The analysis was discussed with GAD, who agreed a set of four key principles for how LGPS funds would undertake climate change scenario analysis as part of the 2022 valuation.

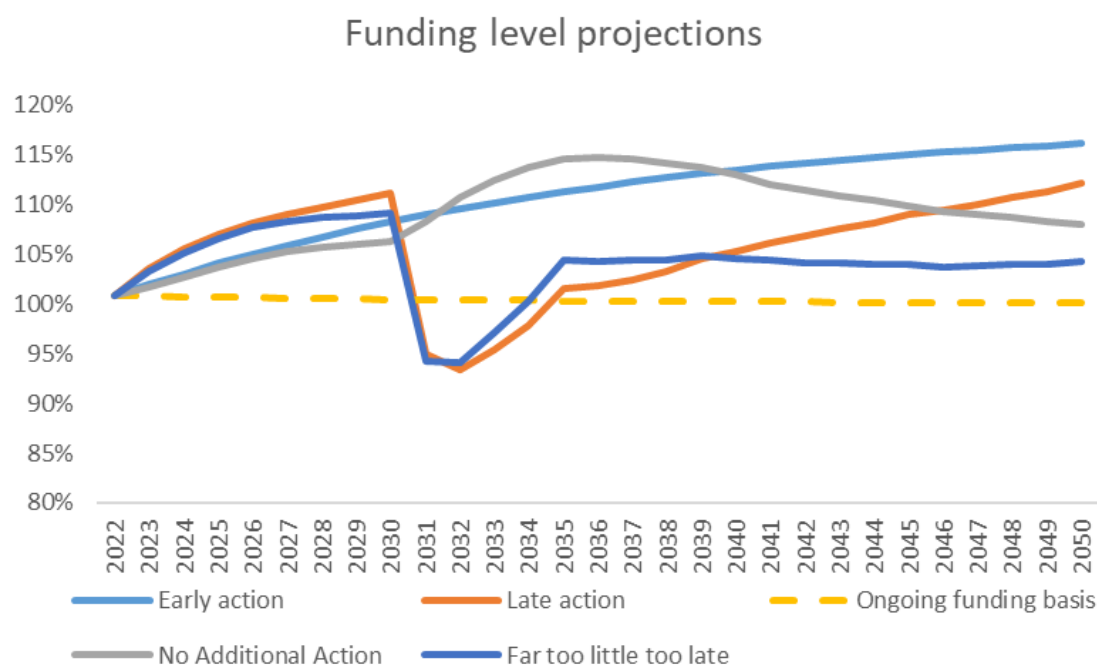
Our analysis considered the potential impact on the future investment return outlook (and therefore discount rate) and inflation (and therefore inflation-linked assumptions), for the purpose of projecting asset and liability values and primary rates. We have also considered additional elements such as the potential impact on life expectancy changes and employer covenant. The analysis supports the level of prudence in the funding strategy.

Under the Key principles, it was agreed that each fund should select two scenarios to consider as a minimum including: "Paris-aligned" and higher temperature outcome, and compare these to the funding basis.

- "Paris-aligned" is an optimistic basis which assumes that good progress is made towards the ambitions made in the 2015 Paris Agreement.

- A higher temperature outcome assumes that no new climate policies are introduced beyond those already agreed, resulting in a growing concentration of greenhouse gas emissions and a larger increase in global temperatures.

Our analysis considers four scenarios which are detailed in our climate scenario analysis report. The impact of the on the funding position of each scenario is considered in Projected funding level graph below.



Our “early action” scenario aims to represent a “Paris-aligned” scenario, and our “no additional action” scenario represents a higher temperature outcome.

One of the other key principles agreed with GAD was for results to be considered over a period of at least 20 years. The funding level is projected over a period of 30 years as can be seen in the graph above.

Detail on the Fund’s approach will also be included in the FSS.

## COVID-19 crisis

The 2019 valuation report and Rates and Adjustments Certificate were finalised during the early stages of the COVID-19 crisis. Due to the timing of events, no adjustment was made to the 2019 results. There still remains uncertainty over the long-term effects of COVID-19 but where data has been available, we have been able to consider the impact of COVID-19 on individual funds through the longevity analysis and in setting the mortality assumptions for the Fund. On balance, we would expect the pandemic to lead to a modest reduction in future improvements in life expectancy.

Therefore, we are comfortable that contributions have been set appropriately to allow for COVID-19, based on the data available. More data will be available at the next formal valuation in 2025 where we will update our analysis. We will also continue to monitor the situation during the intervalation period.

## Appendix 4 Dashboard

### GAD Dashboard

#### 2022 funding position - local funding basis

Funding level (assets/liabilities)	%	98.4%
Funding level (change since previous valuation)	%	6.9%
Asset value used at the valuation	£m	5,316
Value of liabilities (including McCloud liability)	£m	5,405
Surplus (deficit)	£m	-89
Discount rate – past service	% pa	4.7%
Discount rate – future service	% pa	4.7%
Assumed pension increases (CPI)	% pa	2.9%
Method of derivation of discount rate, plus any changes since previous valuation		In line with the Funding Strategy Statement

#### Assumed Life expectancies at age 65

Life expectancy for current pensioners – men age 65	years	21.7
Life expectancy for current pensioners – women age 65	years	22.9
Life expectancy for future pensioners – men age 45	years	23.0
Life expectancy for future pensioners – women age 45	years	24.3

#### Past service funding position - SAB basis (for comparison purposes only)

Market value of assets	£m	5,412
Value of liabilities	£m	5,320
Funding level on SAB basis (assets/liabilities)	%	101.7%
Funding level on SAB basis (change since last valuation)	%	+7.3%

### Contribution rates payable

		2019 Valuation	2022 Valuation
Primary contribution rate	% of pay	16.9%	19.2%
<i>Secondary contribution rate (cash amounts in each year in line with CIPFA guidance)</i>	£m		
Secondary contribution rate - 1st year of rates and adjustment certificate	£m	21.47	16.54
Secondary contribution rate - 2nd year of rates and adjustment certificate	£m	22.24	18.81
Secondary contribution rate - 3rd year of rates and adjustment certificate	£m	23.05	19.69
<i>Giving total expected contributions</i>			
Total expected contributions - 1st year of rates and adjustment certificate (£ figure based on assumed payroll)	£m	127.36	157.49
Total expected contributions - 2nd year of rates and adjustment certificate (£ figure based on assumed payroll)	£m	132.00	165.23
Total expected contributions - 3rd year of rates and adjustment certificate (£ figure based on assumed payroll)	£m	136.81	171.79
<i>Assumed payroll (cash amounts in each year)</i>			
Total assumed payroll - 1st year of rates and adjustment certificate (£m)	£m	626.61	733.92
Total assumed payroll - 2nd year of rates and adjustment certificate (£m)	£m	649.45	762.38
Total assumed payroll - 3rd year of rates and adjustment certificate (£m)	£m	673.13	791.95
3-year average total employer contribution rate	% of pay	20.3%	21.6%
Average employee contribution rate (% of pay)	% of pay	6.3%	6.4%
Employee contribution rate (£ figure based on assumed payroll of £m)	£m pa	39.48	46.79

### Deficit recovery plan and surplus spreading plan

		2019 Valuation	2022 Valuation
Latest deficit recovery period end date, where this methodology is used by the fund's actuarial advisor	Year	2041	2038
Earliest surplus spreading period end date, where this methodology is used by the fund's actuarial advisor	Year	2023	2026
The time horizon end date, where this methodology is used by the fund's actuarial advisor	Year	n/a	n/a
The funding plan's likelihood of success, where this methodology is used by the fund's actuarial advisor	%	n/a	n/a
Percentage of liabilities relating to employers with deficit recovery periods of longer than 20 years	%	45%	0%



### Additional information

Percentage of total liabilities that are in respect of Tier 3 employers	%	11.5%
Included climate change analysis/comments in the 2022 valuation report	Yes/No	Yes
Value of McCloud liability in the 2022 valuation report (on local funding basis)	£m	28

## Appendix 5 Rates and Adjustments Certificate

### Regulatory background

In accordance with Regulation 62 of the Local Government Pension Scheme Regulations we have made an assessment of the contributions that should be paid into the Fund by participating employers for the period 1 April 2023 to 31 March 2026.

The method and assumptions used to calculate the contributions set out in the Rates and Adjustments Certificate are detailed in the Funding Strategy Statement and our report on the actuarial valuation dated 31 March 2023.

The primary rate of contribution as defined by Regulation 62(5) for each employer for the period 1 April 2023 to 31 March 2026 is set out in the table overleaf. The primary rate is the employer's contribution towards the cost of benefits accruing in each of the three years beginning 1 April 2023. In addition each employer pays a secondary contribution as required under Regulation 62(7) that when combined with the primary rate results in the minimum total contributions as set out below. This secondary rate is based on their particular circumstances and so individual adjustments are made for each employer.

### Primary and secondary rate summary

The primary rate for the Fund is the weighted average (by payroll) of the individual employers' primary rates and is 19.2% p.a. of payroll.

The secondary rates across the entire Fund (as a percentage of projected Pensionable Pay and as a monetary amount) in each of the three years in the period 1 April 2023 to 31 March 2026 is set out in the table below.

Secondary contributions	2023/24	2024/25	2025/26
Total as a % of payroll	2.3%	2.5%	2.5%
Equivalent to total monetary amounts of	£16,540,964	£18,806,816	£19,684,137

These amounts reflect the individual employers' deficit recovery plans.

## General notes

Employers may pay further amounts at any time and future periodic contributions, or the timing of contributions, may be adjusted on a basis approved by us as the Fund Actuary. The administering authority, with the advice from us as the Fund Actuary may allow some or all of these contributions to be treated as a prepayment and offset against future certified contributions.

The certified contributions include an allowance for expenses and the expected cost of lump sum death benefits but exclude early retirement strain and augmentation costs which are payable by participating employers in addition.

The monetary amounts are payable in 12 monthly instalments throughout the relevant year unless agreed by the administering authority and an individual employer.

## Specific notes

The notes below detail what the specific notes refer to in the table below:

- i. The amounts shown in brackets are the secondary amounts payable where the secondary rate payments are to be made in advance in April 2023 (the amounts in brackets are discounted to reflect early payment). The total secondary rates due for the period 1 April 2023 to 31 March 2026 will be paid in full in April 2023 and will be the total of the amounts shown in the brackets. Please note that if the bracketed amounts are not paid in April 2023 then the full lump sum amount (shown before the bracketed amount) should be paid in monthly instalments in the respective years shown.
- ii. The amount shown in brackets for 2023/24 is the secondary amount payable where the secondary rate payment is made in advance (the amount in brackets is discounted to reflect early payment). The amount shown in the brackets will be paid in full in April 2023. A further discounted amount may be agreed for advance payments on the secondary contributions due for 2024/25 and 2025/26 subject to agreement of the administering authority. Please note that if the bracketed amount is not paid in April 2023 then the full lump sum amount (shown before the bracketed amount) should be paid in monthly instalments over 2023/24.

Employer code	Employer name	Primary rate	Secondary rate (% pay plus monetary adjustment)			Total contributions i.e. primary (% of pay) plus secondary			Specific notes
		(% pay)	2023/24	2024/25	2025/26	2023/24	2024/25	2025/26	
Government bodies									
Funding Pool	Devon County Council								
11	Devon County Council	19.2%	£5.42m	£5.63m	£5.85m	19.2% plus £5.42m	19.2% plus £5.63m	19.2% plus £5.85m	
275	South West Norse (Cleaning)	26.1%	-2.8%	-2.8%	-2.8%	23.3%	23.3%	23.3%	
286	South West Norse (Catering)	24.1%	-1.1%	-1.1%	-1.1%	23.0%	23.0%	23.0%	
392	Devon Norse FM	22.0%	1.1%	1.1%	1.1%	23.1%	23.1%	23.1%	
486	Libraries Unlimited	23.1%	-11.1%	-11.1%	-11.1%	12.0%	12.0%	12.0%	
Funding Pool	Plymouth City Council								
8	Plymouth City Council	19.0%	3.4%	3.4%	3.4%	22.4%	22.4%	22.4%	
403	Delt Shared Services Ltd	19.1%	0.9%	0.9%	0.9%	20.0%	20.0%	20.0%	
454	CaterEd	20.4%	-1.4%	-1.4%	-1.4%	19.0%	19.0%	19.0%	
559	Delt Shared Services (Plymouth City) Ltd	22.5%	-2.5%	-2.5%	-2.5%	20.0%	20.0%	20.0%	
560	Delt Shared Services (Print & Doc Services) Ltd	28.8%	-8.8%	-8.8%	-8.8%	20.0%	20.0%	20.0%	
Funding Pool	Torbay Council								
10	Torbay Council	18.4%	-	-	-	18.4%	18.4%	18.4%	
272	Torbay Economic Development Company	24.6%	2.4%	2.4%	2.4%	27.0%	27.0%	27.0%	
604	Torbay Education Limited	21.8%	-3.4%	-3.4%	-3.4%	18.4%	18.4%	18.4%	
Funding Pool	North Devon District Council								
2	North Devon District Council	20.2%	£475k	£493k	£512k	20.2% plus £475k	20.2% plus £493k	20.2% plus £512k	
118	North Devon Joint Crematorium	20.2%	£11,000	£11,000	£12,000	20.2% plus £11,000	20.2% plus £11,000	20.2% plus £12,000	
Individual Employers									
1	Torridge District Council	19.5%	£528k	£548k	£570k	19.5% plus £528k	19.5% plus £548k	19.5% plus £570k	
3	West Devon Borough Council	17.8%	£244k	£254k	£264k	17.8% plus £244k	17.8% plus £254k	17.8% plus £264k	
4	Mid Devon District Council	19.0%	£723k	£751k	£780k	19.0% plus £723k	19.0% plus £751k	19.0% plus £780k	

Employer code	Employer name	Primary rate	Secondary rate (% pay plus monetary adjustment)			Total contributions i.e. primary (% of pay) plus secondary			Specific notes
		(% pay)	2023/24	2024/25	2025/26	2023/24	2024/25	2025/26	
5	Teignbridge District Council	19.6%	£1.09m	£1.14m	£1.18m	19.6% plus £1.09m	19.6% plus £1.14m	19.6% plus £1.18m	
6	Exeter City Council	19.6%	£1.12m	£1.16m	£1.20m	19.6% plus £1.12m	19.6% plus £1.16m	19.6% plus £1.20m	
7	East Devon District Council	20.0%	£246k	£256k	£266k	20.0% plus £246k	20.0% plus £256k	20.0% plus £266k	
9	South Hams District Council	19.6%	-1.8%	-0.3%	1.2%	17.8%	19.3%	20.8%	
90	Devon & Somerset Fire Authority	18.5%	-	-	-	18.5%	18.5%	18.5%	
324	Police Crime Commissioner Devon and Cornwall	18.9%	£652k	£677k	£703k	18.9% plus £652k	18.9% plus £677k	18.9% plus £703k	
<b>Colleges and universities</b>									
<i>Individual Employers</i>									
21	University Of Plymouth	17.8%	-	-	-	17.8%	17.8%	17.8%	
23	Cornwall College	22.2%	-	-	-	22.2%	22.2%	22.2%	
25	Exeter College	17.3%	-	-	-	17.3%	17.3%	17.3%	
27	Arts University Plymouth	17.5%	£77,100	£80,100	£83,200	17.5% plus £77,100 (£76,098)	17.5% plus £80,100	17.5% plus £83,200	(ii)
29	South Devon College	18.0%	£75,900	£78,800	£81,900	18.0% plus £75,900	18.0% plus £78,800	18.0% plus £81,900	
210	City College Plymouth	18.8%	-	-	-	18.8%	18.8%	18.8%	
227	Petroc	18.8%	£223k	£232k	£241k	18.8% plus £223k	18.8% plus £232k	18.8% plus £241k	
<b>Small scheduled bodies</b>									
<i>Funding Pool</i>		<i>Small Scheduled Bodies</i>							
102	Ashburton Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
103	Axminster Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
104	Barnstaple Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
107	Dartmouth Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
113	Ilfracombe Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
114	Kingswear Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
116	Lynton & Lynmouth Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	

Employer code	Employer name	Primary rate	Secondary rate (% pay plus monetary adjustment)			Total contributions i.e. primary (% of pay) plus secondary			Specific notes
		(% pay)	2023/24	2024/25	2025/26	2023/24	2024/25	2025/26	
120	Okehampton Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
128	South Molton Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
132	Tavistock Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
133	Totnes Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
136	Ivybridge Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
137	Sidmouth Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
138	Newton Abbot Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
140	Cullompton Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
143	Bideford Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
147	Combe Martin Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
149	Kingsteignton Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
150	Exmouth Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
153	Dawlish Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
157	Ugborough Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
158	Crediton Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
165	Fremington Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
170	Exminster Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
171	Kingsbridge Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
175	Tedburn St Mary Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
176	South Brent Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
177	Great Torrington Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
178	Braunton Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
179	Buckland Monachorum Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
181	Bovey Tracey Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
192	Brixham Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
243	Chudleigh Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	

Employer code	Employer name	Primary rate	Secondary rate (% pay plus monetary adjustment)			Total contributions i.e. primary (% of pay) plus secondary			Specific notes
		(% pay)	2023/24	2024/25	2025/26	2023/24	2024/25	2025/26	
295	Honiton Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
383	Seaton Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
384	Bishopsteignton Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
420	Moretonhampstead Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
430	Witheridge Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
452	Teignmouth Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
459	Stokenham Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
476	Cranbrook Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
478	Bradninch Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
481	Budleigh Salterton Town Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
488	Broadclyst Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
551	Holcombe Burnell Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
562	Clyst Honiton Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
568	Axmouth Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
587	Aylesbeare Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
607	Bishops Clyst Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
612	Staverton Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
616	Bishops Tawton Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
630	Uplyme Parish Council	21.3%	0.6%	0.6%	0.6%	21.9%	21.9%	21.9%	
<b>Academies</b>									
<i>Funding Pool</i>		<i>Academies</i>							
233	Cornerstone Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
234	Ivybridge Community College	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
235	Dartmouth Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
236	Uffculme Academy incl Uffculme Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
239	Marine Academy Plymouth	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	

Employer code	Employer name	Primary rate	Secondary rate (% pay plus monetary adjustment)			Total contributions i.e. primary (% of pay) plus secondary			Specific notes
		(% pay)	2023/24	2024/25	2025/26	2023/24	2024/25	2025/26	
240	All Saints Academy Plymouth	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
246	Torquay Boys Grammar School	19.6%	2.2%	3.2%	3.2%	21.8%	22.8%	22.8%	
247	Churston Ferrers Grammar School Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
248	Teign School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
249	Ivy Education Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
250	Bradworthy Primary Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
253	The King's School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
254	Queen Elizabeth's Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
255	Exmouth Community College	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
258	Devonport High School for Girls	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
260	Plympton Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
262	St Margaret's Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
263	Stoke Damerel College	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
264	Kingsbridge Community College	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
265	Clyst Vale Community College	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
266	Lipson Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
267	Torquay Girls Grammar School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
268	Tor Bridge High	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
269	Hayes Road Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
270	Newport Community School Primary Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
274	Honiton Community College	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
278	Chulmleigh Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
279	Great Torrington Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
280	Stockland CofE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
282	Colyton Grammar School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
283	Bickleigh-on-Exe CE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	



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		(% pay)	2023/24	2024/25	2025/26	2023/24	2024/25	2025/26	
284	Devonport High School for Boys	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
285	Littletown Primary Academy and Nursery	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
289	Brixham College	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
291	Old Priory Junior Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
292	Braunton Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
304	Aveton Gifford Primary/Bere Alston Primary	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
309	Barton Hill Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
344	Tidcombe Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
359	Ilfracombe Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
360	Combe Pafford Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
362	Plymouth CAST (Devon)	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
363	St Christopher's MAT (Central staff)	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
367	Ted Wragg HQ Staff	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
371	St George's CofE Primary Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
372	St Michael's CofE Primary Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
380	Sparkwell Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
382	Exeter Mathematics School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
386	St Marychurch CofE Primary and Nursery School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
387	All Saints Babbacombe CofE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
391	Kingswear Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
394	Atlantic Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
395	Ilsham CofE Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
396	East Allington Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
397	Blackawton Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
398	Stoke Fleming Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	

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		(% pay)	2023/24	2024/25	2025/26	2023/24	2024/25	2025/26	
402	Coast Academies	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
410	Acorn Multi Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
453	Pilton Bluecoat School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
458	South Devon UTC	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
460	Plymouth CAST (Plymouth)	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
461	Plymouth CAST (Torbay)	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
462	St Peter's CoFE Junior School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
463	St Rumons CoFE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
465	St Matthew's CoFE Primary and Nursery Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
472	Oldway Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
473	St Edwards CoFE Primary Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
484	Ernesettle Community School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
485	Upton St James CoFE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
493	Bideford College	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
494	Link Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
495	Plymouth Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
498	Transforming Futures Multi Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
499	Kingsteignton School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
500	Academy for Character and Excellence	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
503	Connect Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
504	Discovery Multi Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
505	Horizon Multi Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
506	Learning Academies Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
508	All Saints Axminster CoE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
509	Beer CoFE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	

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		(% pay)	2023/24	2024/25	2025/26	2023/24	2024/25	2025/26	
510	Lady Modiford's CofE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
511	Meavy CofE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
515	Montpelier Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
517	Alphington Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
518	Bowhill Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
519	Ide Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
520	St Thomas Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
522	Catch 22 Multi Academies Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
527	Bay Educational Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
528	Alphington Primary Pre-School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
533	Axe Valley Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
534	Lew Trenchard Church of England Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
536	Reach South Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
542	Dartmoor Multi Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
547	Scott Medical and Healthcare College	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
554	Alumnis Multi Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
555	St Leonard's CofE Primary	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
564	St James CofE Primary	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
565	Wave Multi Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
575	Plympton St Mary Infants	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
581	Avanti Hall School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
586	St Lukes Science and Sports College	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
588	Colyton Primary Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
589	Fremington Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
590	North Molton Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	

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		(% pay)	2023/24	2024/25	2025/26	2023/24	2024/25	2025/26	
594	Roundswell Community Primary Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
595	Widecombe-in-the-Moor Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
596	Moretonhampstead Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
597	Islington CofE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
606	Glendinning Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
617	Plymouth High School for Girls	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
618	The Thinking Schools Academy Trust	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
619	St Peter's CofE Primary School, Plymouth	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
620	Orchard Manor School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
621	Dartington CofE Academy	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
632	Morchard Bishop CofE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%	
<b>Other</b>									
<i>Funding Pool</i>		<i>First Federation MAT</i>							
583	Fishkids (Brixington Primary)	21.1%	-1.5%	-1.5%	-1.5%	19.6%	19.6%	19.6%	
592	Fishkids (Blackpool Primary)	27.2%	-7.6%	-7.6%	-7.6%	19.6%	19.6%	19.6%	
<i>Funding Pool</i>		<i>Colyton Academy</i>							
609	Innovate (Colyton Grammar)	23.4%	0.7%	0.7%	0.7%	24.1%	24.1%	24.1%	
<i>Funding Pool</i>		<i>Transforming Futures MAT</i>							
625	Delt Shared Services (Transforming Futures Multi Academy Trust)	20.5%	-0.7%	-0.7%	-0.7%	19.8%	19.8%	19.8%	
<i>Individual Employers</i>									
37	Dartmoor National Park Authority	19.7%	-	-	-	19.7%	19.7%	19.7%	
109	Devon & Severn IFCA	17.3%	£27,700	£28,800	£29,900	17.3% plus £27,700	17.3% plus £28,800	17.3% plus £29,900	
160	Plymouth Citizens Advice Bureaux	21.9%	£3,770	£3,910	£4,060	21.9% plus £3,770 (£3,619)	21.9% plus £3,910 (£3,754)	21.9% plus £4,060 (£3,898)	(i)
162	Wolseley Community Economic Development Trust	20.7%	£16,000	£16,600	£17,250	20.7% plus £16,000	20.7% plus £16,600	20.7% plus £17,250	

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		(% pay)	2023/24	2024/25	2025/26	2023/24	2024/25	2025/26	
164	Access Plymouth	25.7%	£8,780	£9,120	£9,470	25.7% plus £8,780	25.7% plus £9,120	25.7% plus £9,470	
168	Torbay Coast & Countryside Trust	19.9%	£7,900	£8,200	£8,520	19.9% plus £7,900	19.9% plus £8,200	19.9% plus £8,520	
172	Millfields Community Economic Development Trust	25.3%	£9,070	£9,420	£9,790	25.3% plus £9,070	25.3% plus £9,420	25.3% plus £9,790	
188	LED Community Leisure	21.1%	-9.1%	-9.1%	-9.1%	12.0%	12.0%	12.0%	
211	Interserve Projects Ltd	25.5%	-	-	-	25.5%	25.5%	25.5%	
225	Interserve Plymouth Catering Services	25.5%	-13.5%	-13.5%	-13.5%	12.0%	12.0%	12.0%	
296	Bournemouth Churches Housing Association	27.5%	-15.5%	-15.5%	-15.5%	12.0%	12.0%	12.0%	
297	Idverde Limited	24.6%	-9.7%	-9.7%	-9.7%	14.9%	14.9%	14.9%	
299	Plymouth Active Life	22.5%	-10.5%	-10.5%	-10.5%	12.0%	12.0%	12.0%	
308	Action for Children (Torbay)	18.5%	-	-	-	18.5%	18.5%	18.5%	
323	Mama Bears Day Nursery	14.7%	-	-	-	14.7%	14.7%	14.7%	
368	University Commercial Services	23.5%	-	-	-	23.5%	23.5%	23.5%	
389	Healthwatch Torbay	25.3%	-	-	-	25.3%	25.3%	25.3%	
399	Strata Service Solutions Ltd	19.3%	£14,450	£15,050	£15,600	19.3% plus £14,450	19.3% plus £15,050	19.3% plus £15,600	
401	Churchill Cleaning Services Limited - West (Sherwell)	34.6%	-	-	-	34.6%	34.6%	34.6%	
405	Barnardo's (Plymouth Cluster 6)	19.9%	-7.9%	-7.9%	-7.9%	12.0%	12.0%	12.0%	
408	Torbay Community Development Trust	24.1%	£1,760	£1,830	£1,900	24.1% plus £1,760	24.1% plus £1,830	24.1% plus £1,900	
412	South West Heritage Trust	25.5%	-	-	-	25.5%	25.5%	25.5%	
455	Plymouth Learning Partnership (PAPH)	20.7%	-	-	-	20.7%	20.7%	20.7%	
457	Livewell South West	19.3%	£20,900	£21,750	£22,600	19.3% plus £20,900	19.3% plus £21,750	19.3% plus £22,600	
479	Compass (Great Torrington Academy)	28.2%	-13.1%	-13.1%	-13.1%	15.1%	15.1%	15.1%	
483	MITIE (South Devon College)	13.1%	£1,350	£1,400	£1,460	13.1% plus £1,350	13.1% plus £1,400	13.1% plus £1,460	
496	Burton Art Gallery	20.3%	-	-	-	20.3%	20.3%	20.3%	

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514	Fusion Lifestyle	16.1%	-	-	-	16.1%	16.1%	16.1%	
516	Barnardos (Plymouth - Adult Care Cluster 4)	26.0%	-	-	-	26.0%	26.0%	26.0%	
521	DYS Space Ltd	18.5%	£2,220	£2,310	£2,400	18.5% plus £2,220	18.5% plus £2,310	18.5% plus £2,400	
535	Aspens Services (Queen Elizabeth Academy Trust)	21.6%	£2,390	£2,480	£2,570	21.6% plus £2,390	21.6% plus £2,480	21.6% plus £2,570	
537	South West Highways	23.3%	-11.3%	-11.3%	-11.3%	12.0%	12.0%	12.0%	
545	Chartwells (Our Lady's Catholic School)	30.0%	-14.3%	-14.3%	-14.3%	15.7%	15.7%	15.7%	
553	Churchills (King Edwards VI Cleaning)	35.7%	1.1%	1.1%	1.1%	36.8%	36.8%	36.8%	
556	Caterlink Ltd	30.9%	-18.5%	-18.5%	-18.5%	12.4%	12.4%	12.4%	
558	Compass	27.4%	£250	£260	£270	27.4% plus £250	27.4% plus £260	27.4% plus £270	
566	Devon Wildlife Trust	25.3%	-	-	-	25.3%	25.3%	25.3%	
570	ServiceMaster Clean Contract Services	23.1%	-	-	-	23.1%	23.1%	23.1%	
571	Action for Children (West Exeter Children's Centre)	19.1%	-4.0%	-4.0%	-4.0%	15.1%	15.1%	15.1%	
573	Churchill Cleaning Services Limited - West (Honiton Community College)	28.8%	-	-	-	28.8%	28.8%	28.8%	
576	The Exwick Ark	31.3%	£1,830	£1,900	£1,980	31.3% plus £1,830	31.3% plus £1,900	31.3% plus £1,980	
577	NHS CARE (Torbay & South Devon NHS Foundation)	23.8%	£3,160	£3,280	£3,410	23.8% plus £3,160	23.8% plus £3,280	23.8% plus £3,410	
584	Torbay Youth Trust	21.0%	0.5%	0.5%	0.5%	21.5%	21.5%	21.5%	
591	SWISCo	21.3%	-	-	-	21.3%	21.3%	21.3%	
593	Fresha (Riviera Education Trust)	23.0%	-	-	-	23.0%	23.0%	23.0%	
602	Fresha (Furzeham Primary School)	24.5%	-	-	-	24.5%	24.5%	24.5%	
603	Fresha (St Christophers Multi Academy Trust)	29.0%	-	-	-	29.0%	29.0%	29.0%	
613	Direct Cleaning Services	TBC	TBC	TBC	TBC	TBC	TBC	TBC	
614	Churchill Cleaning Services Limited - West (Oreston Academy)	21.8%	-9.8%	-9.8%	-9.8%	12.0%	12.0%	12.0%	
615	Churchill Cleaning Services Limited - West (SD Community College)	19.5%	-3.5%	-3.5%	-3.5%	16.0%	16.0%	16.0%	

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623	3 Rivers Developments Limited	24.6%	-	-	-	24.6%	24.6%	24.6%	
624	Expedite Complete Business Solutions Ltd	21.4%	-	-	-	21.4%	21.4%	21.4%	
626	Devon Schools Leadership Services	26.4%	-3.3%	-3.3%	-3.3%	23.1%	23.1%	23.1%	
627	Specialist Fleet Services	16.2%	-4.2%	-4.2%	-4.2%	12.0%	12.0%	12.0%	
628	Aspens (Barton Hill Academy)	17.4%	-4.6%	-4.6%	-4.6%	12.8%	12.8%	12.8%	
629	Churchill Cleaning Services Limited - West (Plymstock School)	20.0%	-8.0%	-8.0%	-8.0%	12.0%	12.0%	12.0%	
631	BIFFA Waste Services Ltd	20.6%	-	-	-	20.6%	20.6%	20.6%	
634	Churchill Cleaning Services Limited - West (Plymouth High School for Girls)	19.5%	-7.5%	-7.5%	-7.5%	12.0%	12.0%	12.0%	
636	Fresha (Bradley Barton School)	21.6%	-8.4%	-8.4%	-8.4%	13.2%	13.2%	13.2%	
639	Fresha (Haywoods School)	24.3%	-	-	-	24.3%	24.3%	24.3%	
643	Pinnacle FM Limited	29.0%	-	-	-	29.0%	29.0%	29.0%	
800	Plymouth CityBus	23.9%	-11.9%	-11.9%	-11.9%	12.0%	12.0%	12.0%	
<b>Other (no guarantor)</b>									
<i>Individual Employers</i>									
106	Dame Hannah Rogers School	18.8%	£42,350	£44,000	£45,700	18.8% plus £42,350	18.8% plus £44,000	18.8% plus £45,700	
123	The Deaf Academy	22.3%	£43,000	£44,650	£46,400	22.3% plus £43,000	22.3% plus £44,650	22.3% plus £46,400	
166	LiveWest	12.0%	-12.0% plus £77,000	-12.0% plus £79,950	-12.0% plus £83,100	£77,000 (£75,999)	£79,950	£83,100	(ii)
169	North Devon Homes	21.6%	£64,350	£66,850	£69,450	21.6% plus £64,350	21.6% plus £66,850	21.6% plus £69,450	
196	Westward Housing	23.3%	£38,450	£39,950	£41,500	23.3% plus £38,450 (£38,000)	23.3% plus £39,950	23.3% plus £41,500	(ii)
221	Plymouth Community Homes	21.3%	-	-	-	21.3%	21.3%	21.3%	
377	Peninsula Dental Social Enterprise CIC	23.0%	£1,110	£1,150	£1,200	23.0% plus £1,110	23.0% plus £1,150	23.0% plus £1,200	

## Post valuation employers

Employer code	Employer name	Primary rate (% pay)	Secondary rate (% pay plus monetary adjustment)			Total contributions i.e. primary (% of pay) plus secondary		
			2023/24	2024/25	2025/26	2023/24	2024/25	2025/26
Academies								
Funding Pool	Academies							
646	Lifton Community School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
648	Beaford Primary & Nursery School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
283	Bolham Community Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
506	High View School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
652	Whitchurch Primary	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
651	St Budeaux Primary	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
658	Burlescombe CofE Primary	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
655	King Edward VI Community College	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
657	Webber's CofE Primary	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
633	Berry Pomeroy Parochial CE Primary School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
659	St Sidwells Church of England Primary School and Nursery	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
660	Furzham Primary and Nursery School	19.6%	2.3%	3.3%	3.3%	21.9%	22.9%	22.9%
Other								
Individual Employer								
649	Plymouth Active Life	19.8%	-	-	-	19.8%	19.8%	19.8%
653	Innovate Services	28.6%	-	-	-	28.6%	28.6%	28.6%