Current Issues in Pensions Financial Reporting

The key financial assumptions required for determining pension liabilities under the FRS17 Accounting Standards are the discount rate and the rate of future inflation.

There are a number of considerations for university Finance Directors to take into account when setting these assumptions and for auditors in determining whether the assumptions are appropriate. This note aimed specifically at those involved in the preparation of pension disclosures of University Self Administered Trusts (SATs) sets out some of the technical issues relevant to those involved in the preparation and the audit of pension disclosures.

Discount rate

The Accounting Standards require the discount rate to be based on yields on high quality (usually AA-rated) corporate bonds of appropriate currency, taking into account the term of the relevant pension scheme’s liabilities. Corporate bond indices are often used as a proxy to determine the discount rate.

The table below shows some of the key market indices that could be taken into account when deriving the discount rate. The yield on government bonds (gilts) is also shown for comparison:

<table>
<thead>
<tr>
<th>Index (annualised yield)</th>
<th>31/07/2014</th>
<th>31/07/2013</th>
<th>31/07/2012</th>
</tr>
</thead>
<tbody>
<tr>
<td>ML Sterling Non-Gilts AA Over 15 years</td>
<td>3.99%</td>
<td>4.19%</td>
<td>4.03%</td>
</tr>
<tr>
<td>ML Sterling Corporates AA Over 15 years</td>
<td>4.05%</td>
<td>4.31%</td>
<td>3.97%</td>
</tr>
<tr>
<td>iBoxx Sterling Corporates AA Over 15 years</td>
<td>4.08%</td>
<td>4.33%</td>
<td>3.89%</td>
</tr>
<tr>
<td>Over 15 Year Fixed Interest Gilts</td>
<td>3.26%</td>
<td>3.43%</td>
<td>2.78%</td>
</tr>
</tbody>
</table>

At the end of July 2014, the yields on bonds of all types are lower than those as at 31 July 2013. This is likely to result in lower discount rates being adopted for accounting purposes in comparison to those adopted last year which, all other things being equal, will lead to higher values being placed on pension scheme liabilities.

Figure 1 shows the individual yields on the bonds making up the iBoxx AA Sterling Corporate Bond All Stocks Index as at 31 July 2014.
Other issues that should be noted when setting the discount rate include:

- The yields on individual AA bonds vary by duration, as shown in Figure 1. Taking into account the duration of a pension scheme’s liabilities when setting the discount rate may result in a different discount rate than if a single index figure is used. Figure 1 illustrates that longer dated stocks generally had a higher yield.

  The duration of the iBoxx Sterling Corporates AA Over 15 years as at 31 July 2014 is approximately 14 years and this is generally shorter than the duration of most pension schemes’ liabilities.

  As can be seen in Figure 1, the yields vary significantly in the short to mid durations, but have flattened out at the longer durations. This represents a change from last year where the curve continued to slope upwards even at longer terms.

  In years where the yields vary significantly by term, the use of an index yield means the discount rate will not normally be appropriate for the duration of the scheme’s liabilities. It is likely, therefore, to be appropriate to use a discount rate below the index yield if the duration of the scheme’s liabilities is shorter than the index. For longer durations, yields are generally above the index. Based on Figure 1 and extrapolating beyond the yield on the longest duration AA bonds it is possible to justify discount rates in excess of the index yield for immature schemes although the scope for upwards adjustment is perhaps lower this year following the flattening of the yield curve at the longer terms. As ever, consistency with the approach adopted in previous years should be considered.

  We continue to see private companies using a discount rate above the AA Corporate Bond index yield reflecting this consideration. Our survey of assumptions adopted by university SATs as at 31 July 2013 showed that the average discount rate used was 4.6% p.a. which was materially higher than the AA Corporate Bond index yield reflecting this consideration.

- It is possible to discount different tranches of liabilities at different rates, for example by using an AA bond yield curve rather than a single rate based on an index. Care should be taken, however, as AA bond yield curves can be derived in a variety of ways. The methodology chosen can lead to variations in individual rates and subsequently also in the liability figure derived.

- The yields on AA bonds issued by financial companies continue to be higher than comparable bonds issued by non-financials. Over the past year there has been a trend of narrowing credit spreads, arguably suggesting greater confidence in the corporate bond markets.

### Inflation

**Retail Prices Index (RPI)**

The table below shows a sample of market implied long term inflation rates. As can be seen from the inflation yield curve in Figure 2, market implied inflation varies considerably depending on the term being considered. It may, therefore, be appropriate to adopt an inflation assumption appropriate to the characteristics of each specific scheme rather than merely adopting a proxy such as the Bank of England’s 20 year rate, particularly if the duration is significantly different to 20 years. Consistency with the approach adopted to derive the discount rate is important.

There may be other considerations to take into account when choosing inflation assumptions, such as whether to adjust for a possible inflation risk premium that may be implicit in the Bank of England’s figures or for any other external factors that the Finance Director feels should be taken into account in determining this assumption. The justification for including an inflation risk premium is arguably less strong under current market conditions due to the high level of demand for fixed interest gilts.

<table>
<thead>
<tr>
<th>Index (annualised rate)</th>
<th>31/07/2014</th>
<th>31/07/2013</th>
<th>31/07/2012</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bank of England 20 year market implied inflation</td>
<td>3.49%</td>
<td>3.54%</td>
<td>2.86%</td>
</tr>
<tr>
<td>Bank of England 15 year market implied inflation</td>
<td>3.34%</td>
<td>3.37%</td>
<td>2.59%</td>
</tr>
</tbody>
</table>
Figure 2 shows implied rates of future inflation are at similar levels to those of a year ago.

**Consumer Prices Index (CPI)**

The figures above relate to inflation as measured by the Retail Prices Index (RPI). Many schemes now have benefits increasing with reference to the Consumer Prices Index (CPI) instead, and over the last 20 years CPI has been on average around 0.7% p.a. lower than RPI. Of this, 0.5% p.a. could be attributed to the ‘formula effect’ resulting from technical differences in the way the two indices are calculated, and the remaining 0.2% p.a. could be attributed to differences between the compositions of the two indices. In 2010 a change was made to the way the indices were calculated and at the time this was expected to increase the difference between CPI and RPI going forward. The ‘formula effect’ since 2010 has been observed to be between 0.8% p.a. and 1.0% p.a.

Towards the end of 2011, the Office for Budget Responsibility (OBR) published a paper on the gap between RPI and CPI which suggested that other factors mean the gap could be between 1.3% p.a. and 1.5% p.a. However, this assumes that the constituent effect will continue unchanged, and there is no guarantee that this will be the case over the long-term.

The current government CPI inflation target is 2.0% p.a.

**Mortality**

Demographic assumptions used for accounting disclosures can have a significant impact on the accounting figures. The most significant of these is the mortality assumption. Barnett Waddingham’s survey of assumptions adopted by university SATs as at 31 July 2013 showed a difference of up to four years in the life expectancy assumptions adopted. Each additional year of life expectancy can add around 3% to the value of pension scheme liabilities and hence the chosen assumption can have a significant impact on the results.

For simplicity, Finance Directors have often adopted the same mortality assumptions used by the scheme’s trustees for the funding valuation. As pension costs have increased there has been an increasing tendency to adopt different assumptions. Trustees are required to use prudent assumptions whereas the assumptions for accounting disclosures should be a best estimate. Entities should consider reviewing their mortality assumptions to ensure these are not overly prudent and that their pension liabilities are not being overstated.

Barnett Waddingham has developed a tool to help companies analyse the appropriateness of their mortality assumptions by looking at scheme-specific factors such as the socio-economic make-up of the membership. To find out more about this please contact us using the details overleaf.
Market update

Over the past year most asset classes have seen positive returns. Although these will, to some extent, have offset the increase in liabilities which will result from lower discount rates we would expect the accounting position to have deteriorated. The precise outcome will be sensitive to the maturity of the scheme and the investment strategy adopted.

Transition to FRS102

On 5 March 2013, the Financial Reporting Council Board formally approved the new UK accounting standard, FRS102. With regard to accounting for university SATs, this will replace the current FRS17 and will have implications for pensions accounting disclosures by bringing them broadly in line with the revised IAS19 standard for EU-listed entities, albeit with fewer disclosure requirements.

FRS102 will be compulsory for accounting periods beginning on or after 1 January 2015, and early adoption is permitted for periods ending on or after 31 December 2012.

The main change is that the ‘expected return on assets’ will cease to be used, and the finance cost will be replaced by a ‘net interest’ entry, calculated using the discount rate applying at the start of the period. In most cases this will result in an increase to the disclosed pension cost.

There are other changes affecting, for example, the way surpluses are restricted and how group and multi-employer plans must account for their pension arrangements.

It may also be more difficult to account for group plans (with more than one participating employer where these are under common control) as defined contribution schemes in future, and it is only possible to take this approach for multi-employer plans (with more than one participating employer where these are not under common control) if there is insufficient information to use defined benefit accounting methods.

It is likely that universities will need to make disclosures as to the impact of the changes during the transition.

Please contact your Barnett Waddingham consultant if you would like to discuss any of the above topics in more detail. Alternatively contact us via the following:

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